WIOA State Plan for the State of Tennessee FY-2018

Contents

WIOA State Plan for the State of Tennessee FY-2018 1
Overview 16
Options for Submitting a State Plan 16
How State Plan Requirements Are Organized 17
I. WIOA State Plan Type 19
Combined Plan partner program(s) 19
II. Strategic Elements 20
a. Economic, Workforce, and Workforce Development Activities Analysis 20
b. State Strategic Vision and Goals 56
c. State Strategy 70
III. Operational Planning Elements 82
A. State Strategy Implementation 82
b. State Operating Systems and Policies 111
IV. Coordination with State Plan Programs 150
V. Common Assurances (for all core programs) 151
VI. Program-Specific Requirements for Core Programs 153
Program-Specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B 153
Program-Specific Requirements for Wagner-Peyser Program (Employment Services) 175
Program-Specific Requirements for Adult Education and Family Literacy Act Programs 190
Program-Specific Requirements for Vocational Rehabilitation 204
VII. Program-Specific Requirements For Combined State Plan Partner Programs 274

Temporary Assistance for Needy Families (TANF) 274
TANF Certifications 288
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))) 289
Jobs for Veterans' State Grants 309
Unemployment Insurance (UI) 324
Senior Community Service Employment Program (SCSEP) 366
Appendix 1. Performance Goals for the Core Programs 392
Table 1. Employment (Second Quarter after Exit) 393
Table 2. Employment (Fourth Quarter after Exit) 394
Table 3. Median Earnings (Second Quarter after Exit) 394
Table 4. Credential Attainment Rate 395
Table 5. Measureable Skill Gains 396
Table 6. Effectiveness in Serving Employers 397
Table 7. Additional Indicators of Performance 398
Appendix 2. Other State Attachments (Optional) 399
- You should maintain a record of the public hearings that includes copies of the notices for the hearings, what media were used to publicize the hearings, mailing lists used for notification, where the hearings were held, and attendance levels. See section 122(a)(3). . 402
- You should develop and implement policies and procedures for the framework of consultations required by section 122(b)(1)(A-B) and section 122(b)(2) of the Act; moreover, you should maintain appropriate records for these mandated consultations. 402
- Postsecondary career and technical education programs assisted under Perkins IV are mandatory partners in the one-stop career center delivery system established by WIA. You are encouraged to

collaborate with your State Workforce Investment Board and other one-stop partners as you plan for the participation of postsecondary career and technical programs in your State's one-stop career center delivery system. 402

- Public hearings and other consultation activities should address all aspects of the State plan, including the reservation of funds under section 112(c) of the Act, if any, and the amount and uses of funds reserved for services that prepare individuals for non-traditional training and employment under section 112(a)(2)(B) of the Act. 402

- Eliminate redundancy and misalignment of Programs of Study that DOE offers to local education agencies (LEAs). 404

- Provide more flexibility for LEAs in the sequencing of courses, particularly for smaller, more rural LEAs. 404

- Simplify the annual programs of study selection process for LEAs. 404

- Align remaining programs of study and accompanying courses with the state's various postsecondary opportunities and its economic and labor market needs and trends, extending the student's academic/career pathway, allowing a higher likelihood of long-term success and stability. 404

- The evaluative process led to the identification of 139 duplicative programs of study across 16 career clusters. These duplicative programs of study lead to confusion and frustration on the part of the LEAs over the years. 405

- For the 2016-17 school year, LEAs chose from 59 programs of study. 405

- Common themes include (a) drastically reduced number of promoted programs of study, (b) flexibility in course choices, (c) the removal of non-academic "foundational" courses, and (d) the insertion of cross-cluster and general education courses into certain program of study choices. 405

o Retirement of courses identified as lacking rigor or not aligned to economic needs of the state. 405

o Adoption of new courses to fill gap areas identified through review process to ensure adequate pathways are available to students to high-wage, high-demand careers. 405

o Revision of courses to increase rigor, embed general education content—especially literacy—and ensure alignment to postsecondary and industry knowledge and skills. 405

o Addition of "course equivalencies" between general education courses and career and technical education courses for credits such as laboratory science, fine arts, personal finance, and wellness. 405

o The growth rate for the occupational cluster in the Local Workforce Investment Area (LWIA) region is positive; the individual occupations have positive growth rates. 410

o For all occupations in the TDLWD occupational cluster, the ratio of program completers (supply) to the number of annual average openings for the occupations (demand) is no more than 1.5. Exception: If the available placement rates for program completers are 95% or above (program completers placed in jobs related to their training), then the occupations in the TDLWD occupational cluster are considered "in demand." 410

o The average annual number of openings in the TDLWD occupational cluster is equal to or greater than 10. 410

B. Other Department Requirements 418

o program enrollment has approximately the same make-up as enrollment of the total student body; 421

o entry requirements do not adversely affect access for members of special populations to the programs; and 421

o special population students are enrolled in all types of education programs including CTE-specific courses, work-based learning, internships and apprenticeships. 421

o individuals with disabilities; 422

o individuals from economically disadvantaged families, including foster children; 422

o individuals preparing for non-traditional fields; 422

o single parents, including single pregnant women; 422

o displaced homemakers; and 422

o individuals with limited English proficiency. 422

o promoting outreach and recruitment information regarding career opportunities with an emphasis on non-traditional opportunities; 423

o identification of special population students; 423

o utilizing assessment tools/individualized education plans for special population students enrolled in CTE programs to determine their special needs; 423

o planning and coordinating supplemental services for special population students enrolled in CTE programs; 423

o facilitating the identification of appropriate adaptive equipment, assistive devices and new technology for students with disabilities, as funding is available; 423

o providing professional development activities for CTE teachers, counselors and administrators; and 423

o identifying or developing special instructional materials or adapting existing instructional materials for CTE programs. 423

o exploration of career areas that focus on expanding career options, educational planning, and CTE training that is free of gender bias; 423

o comprehensive career counseling and guidance including labor market information on a broad range of occupations, career testing, placement services for part-time and summer employment, internships, and cooperative programs; 423

o access to options for specialization in a variety of areas with access to work-based learning opportunities; 423

o career development activities which lead to mastery of workplace readiness skills; 423

o high quality, paid work-based learning experiences to provide career exploration, enhancement of personal and interpersonal skills, and development of occupational skills; 423

o access to programs which encourage learning all aspects of the industry including planning, management, finances, technical production, and principles of technology; and 423

o provide information on non-traditional jobs that are in high-demand, require high-skill or offer high-wages with opportunities for advancement and benefits. 423

o Be sure that your local applications or forms seek complete information from eligible recipients on their proposed programs, services, and activities for special populations. See section 134(b)(8)(A)-(C), and 134(b)(9)-(10). 426

o The Act eliminated “individuals with other barriers to educational achievement” from the definition of special populations. See section 3(29). 426

o You may wish to refer to Program Memorandum OVAE/DVTE 99-13 for additional background information concerning the reservation and use of state leadership funds for activities related to non-traditional training and employment. 426

o Your accountability system must be able to disaggregate data for each of the core indicators of performance under section 113(b)(2)

of the Act for the categories of students described in section 1111(h)(1)(C)(i) of the Elementary and Secondary Education Act of 1965, as amended, and section 3(29) of the Act that are served under the Act. See section 113(c)(2)(A). 426

- Example: System X has an actual performance level of 91.00% for graduation rate, which is above the state level of 79.50%. 438

- 91.00% + 79.50% = 170.50% 438
- 170.50% divided by 2 = 85.25% 438
- System X's baseline will be 85.25% or System X can negotiate for a higher level, but not lower than the average baseline. 438

I. TITLE I: CAREER AND TECHNICAL EDUCATION ASSISTANCE TO STATES 447

PERKINS IV BUDGET TABLE - PROGRAM YEAR 1 448

..... 482

- Comprehensive vocational evaluation and mobile evaluation services 497
- Employment Readiness Program (ERP) a pre-employment and life skills training program to encourage positive work behaviors and independence. 497
- Occupational skills training in automotive maintenance/detailing, manufacturing, garden center services, retail, business education, food service, warehouse training, power equipment operations, and pharmacy technician. 497
- Physical Rehabilitation Services to include: Work Conditioning and Work Hardening, Occupational and Physical Rehabilitation, Spinal Cord Injury Program, Personal Care Attendant training, Vision Rehabilitation, Independent Living Skills, Equipment Operation Screens and Adaptive Equipment Assessments. 497

- Traumatic brain injury services to include: Case Management, Occupational, Physical, and Speech/Language Pathology to include cognitive therapy; Vision Rehabilitation, Therapeutic Golf Rehabilitation, Vocational Evaluation and Assessments; Behavioral instruction, Job Skills/Readiness training and Community Re-entry training. 497
- Vision impairment services to include: pre-vocational assessment, training for independent living to include adaptive kitchen skills and home management skills; braille, Orientation & Mobility training, Adaptive communication skills, assistive technology assessments and training; computer training; and prerequisite evaluation and training for entry into Tennessee Business Enterprises. 497
- Campus Life Services (Residential Living) 497
- Student Health Services to include Medical Dormitory 497
- Case management services 497
- Psychiatric and physician services 497
- Recreation therapy and leisure-time skills 498
- Remedial education 498
- Job seeking skills training 498
- Psychological services 498
- Independent living skills training 498
- Autism Support Services 498
- Deaf Service 498
- Behavioral Education 498
- Comprehensive vocational evaluation services provide an individualized, timely and systematic process for identifying viable vocational options and developing employment goals and objectives. 498

- Employee Development Services 499
- Clovernook 499
- Department of Education 499
- National Federation for the Blind 499
- Southeast TN Human Resource Agency 499
- Technology Centers: East Tennessee Technology Access in Knoxville; Signal Centers; Technology Access Center of Middle Tennessee in Nashville; West Tennessee Special Technology Access Resource (STAR) Center in Jackson; and Mid-South ACT in Memphis 499
- Tennessee Disability Coalition Benefits to Work 499
- University of Tennessee, Center for Literacy Education and Employment 499
- Cincinnati Children's Hospital Medical Center 499
- Statewide Independent Living Council 499
- STAR Center 499
- Department of Education 499
- Department of Labor and Workforce Development 500
- Department of Mental Health and Substance Abuse 500
- Department of Intellectual and Developmental Disabilities 500
- Concentrated focus on outcomes rather than services 500
- Different payment schedule based on Priority Category assignment of the client 500
- Bonus for exceptional wages 500
- Streamlined application and approval process 500
- 84 LOAs for Vocational Assessment 500
- 32 LOAs for Vocational Adjustment Services 500

- 83 LOAs for Trial Work Experiences 501
- 115 LOAs for Job Placement Services 501
- 92 LOAs for supported employment services 501
- 12 LOAs for Pre-Employment Transition Services 501
- Vocational evaluation 501
- Personal and vocational adjustment training 501
- Transportation and daily meals 501
- Vocational training 501
- Job readiness training 501
- Job development and job placement 501
- Supported employment 501
- Rehabilitation technology 501
- Orientation and mobility 501
- Activities of daily living 501
- Trial work experiences 501
- Follow-up 501
- Pre-Employment Transition Services 501
- Role of the State Business Employment Consultant and Business Employment Consultants (BECs): Facilitate employment opportunities for persons with disabilities by providing services and resources to assist Tennessee businesses in recruiting, hiring, returning to work, and retaining employees with disabilities. 502
- Number and location of the BECs: Currently, there are a total of 11 BEC's positons statewide and the positions are located in the following regions: region 1, region 2, region 3, region 4, region 5, region 6, region 7, and region 8. There is also a Statewide Business Employment Consultant located in state office, which assists with

statewide participation in the Talent Acquisition Portal (TAP) that is managed by the Consortium of State Agencies of Vocational Rehabilitation (CSAVR). 502

- Business Initiatives: The Division conducts several business initiatives across the state such as Walgreens' REDI programs, Project Search East TN Children's Hospital and UT Medical Center, Kroger/Peyton's distribution centers, AutoZone distribution centers, Vanderbilt University Cummins, Auto Zone, Cracker Barrel, Food City, Allegro, Phoenix Boats, and Veteran's Administration- Johnson City. 503
- Additional business initiatives for the agency are: The TN Rehabilitation Center at Smyrna has developed customized training partnerships with Schwan Cosmetics, Walgreens, and CVS Caremark to develop curriculums specific to their hiring requirements which build capacities for diversity within companies. 503
- Vocational Rehabilitation 505
- Department of Education 505
- Department of Intellectual and Developmental Disabilities 505
- Department of Labor and Workforce Development 505
- Department of Mental Health and Substance Abuse Services 505
- Council on Developmental Disabilities (Oversees the Implementation of the MOU 505
- Department of Education 516
- Vocational Rehabilitation 516
- Department of Labor and Workforce Development 516
- Department of Intellectual and Developmental Disabilities 516
- Department of Mental Health and Substance Abuse Services 516
- Council on Developmental Disabilities (this agency oversees the implementation of the MOU. 516

- Priority Category 1 - 8,928 (Includes Title VI, Part B) 526
- Priority Category 2 - 3,826 526
- Priority Category 1 - $17,605,128 (Includes Title VI, Part B) 526
- Priority Category 2 - $7,544,872 526
- Priority Category 3 as of Sept 30, 2017 - 82 527
- Priority Category 4 as of Sept 30, 2017 - 138 527
- All agencies as required in the Combined State Plan 528
- Tennessee's Department of Labor and Workforce Development 528
- Department of Economic and Community Development 528
- Department of Intellectual and Developmental Disabilities 528
- Department of Children's Services and Department of Mental Health and Substance Abuse Services 528
- Chambers of Commerce 528
- Tennessee Works Partnership 528
- TennCare 528
- Develop/disseminate surveys to determine adequate training needs of service providers (new and seasoned staff) 528
- Maintain the monitoring and expansion of contracts related to Business Initiatives (ex. CLEE) 528
- Throughout the SFY, Vocational Rehabilitation will achieve a monthly timeliness rating of 92% for the determination of eligibility with the inclusion of extension agreements per policy. Determination of eligibility within 60 days. 529
- Throughout the SFY, Vocational Rehabilitation will develop the Individualized Plan for Employment within 90 days unless there is an agreed upon extension between the client and counselor. A timeliness rating of 90%. 529

- Meet with core partners to develop goals around the new federal standards and indicators regarding wages..... 529
- Research prevailing wages for various industries 529
- Research, develop, and implement strategies to increase the awareness and accessibility of client satisfaction surveys 529
- Achieving an 80%or higher satisfaction rating for the vocational rehabilitation program as reported by the consumer satisfaction survey program for successful outcome closures 529
- Continue to increase staff knowledge in rehabilitation practices through on-going training. 529
- Department of Education..... 535
- Vocational Rehabilitation 535
- Department of Labor and Workforce Development 535
- Department of Intellectual and Developmental Disabilities..... 535
- Department of Mental Health and Substance Abuse Services..... 535
- Council on Developmental Disabilities (this agency oversees the implementation of the MOU. 535
- The agreement between the Division and the DMHSAS solidified the use of evidence based supported employment model, Individual Placement & Support (IPS), in assisting individuals with behavioral health and co-occurring diagnoses in their pursuit of competitive integrated employment. The Division has 8 CRPs that have specific IPS LOA with the agency..... 544
- The agreement between the Division and the Department of Intellectual and Development Disabilities created a pilot program for individuals who are in DIDD's Harold Jordan Center. It is a state owned facility for individuals with intensive behavioral issues and will utilize employment as part of the wrap around services. 544

- The agreement between the Division and the Division of TennCare created provision of employment services for persons enrolled in the Employment and Community First (ECF) CHOICES program. Federal guidance for Medicaid LTSS stipulates employment should be an ongoing part of the delivery of services. Regulations for home and community-based programs requiring provision of opportunities to work in competitive integrated setting. The target populations are individuals with intellectual and/or developmental disabilities. The agreement intends to ensure that services are coordinated, seamless, and efficient. The Division and TennCare coordinated training efforts to implement the agreement requirements. 544

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),
- the Wagner-Peyser Act program (Wagner-Peyser Act, as amended by title III), and
- the Vocational Rehabilitation program (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 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 and III 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 (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 Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))*
- Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

---

* 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 and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 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, and
- 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 and Innovation 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.* States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

---

* 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

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 Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and Vocational Rehabilitation Program. No

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. Yes

Combined Plan partner program(s)

Indicate which Combined State 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 (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 Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) No

Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))] No

II. Strategic Elements

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

a. Economic, Workforce, and Workforce Development Activities Analysis

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

1. Economic and Workforce Analysis

A. Economic Analysis

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

i. Existing Demand Industry Sectors and Occupations

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

ii. Emerging Demand Industry Sectors and Occupation

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 1 and 2 above, provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

Executive Summary

The Tennessee economy continued its growth in 2017, with nonagricultural employment increasing from 2,965,500 to 3,010,000. The average number of employing establishments grew, the state labor force expanded, and state unemployment rates continued their decline. Per capita income advanced at a greater rate than the U.S. in 2015-2016 as average wages rose and poverty rates declined somewhat. The short-term job outlook is for annual average employment growth of at least 1.8 percent through the third quarter of 2019, with expected total openings of 840,820 over the two year period. From 2015 to 2016, non-fatal injuries and illnesses on the job were also reduced.

Employment

Nonagricultural employment increased by nearly 1.5 percent from 2016 to 2017, at a pace somewhat slower than from 2015 to 2016. The result was 44,500 new jobs created in the state from 2016 to 2017. All metropolitan statistical areas increased in employment except Cleveland.

Employers

The average number of establishments increased by 2.4 percent over the year. Total payroll increased to $139 billion in 2017, one and a half times higher than in 2016. Seventy counties had a net increase in employing establishments in 2017.

Labor Force and Demographics

Total population increased 1 percent over the year. Even as the labor force increased to 3,198,800 in 2017, the number of unemployed decreased by 29,100 to an annual average of 118,600. The average unemployment rate dropped from 4.7 percent in 2016 to 3.7 percent in 2017.

Wages and Income (and Poverty)

The Tennessee average annual wage increased nearly 1.7 percent in 2016-2017. The median wage, with half of the employees earning more and half less, improved over the year by 3.3 percent, bringing the state median wage to $33,870. Production wages increased from $18.58/hour in 2016 to $19.40/hour in 2017. Per capita, personal income was $43,326, while the rate of poverty was 17.2 percent.

Job Outlook

One measure of the job outlook is the number of unemployed individuals compared to the number of jobs posted monthly on the job seeker website jobs4tn.gov. From June 2016 to June 2017, the number of unemployed remained less than the number of job postings, as the state remained a jobseekers' market. Job growth through 2019 was expected to be at least 1.8 percent annually.

Safety on the Job

Safety on the job increased from 2015 to 2016 with a reduction in nonfatal injuries and illnesses to 3.0 per 100 full-time equivalent workers.

Detailed Industry Analysis

Twenty industries comprise more than two of every three jobs in Tennessee. The top five industries include food services and drinking places, educational services, administrative and support services, ambulatory health services (outpatient), and hospitals. More people are now employed in outpatient healthcare settings (148,424) than in hospitals (142,369). These industries are also the top five in terms of employment in the East Region and West Region; however, in the Middle Region professional, scientific, and technical services rank fourth in employment. Transportation equipment manufacturing is the only manufacturing industry among the top 10 industries in the East and Middle regions, with none in the top 10 in employment in the West; however, paper, petroleum and coal, and miscellaneous manufacturing are among the ten 10 industries in the West paying the highest annual average wages.

Detailed Occupational Analysis

The industries expected to grow most rapidly through 2019 are identified in the Job Outlooks section. Although the service-providing sector is expected to grow almost three times as fast as the goods-producing sector, manufacturing and construction are still expected to experience positive growth, with construction expected to create more than 4,000 jobs during the 2017-2019 projection period. More rapid growth in the professional and business services, financial activities, and leisure and hospitality industries will boost employment in the computer and mathematical and business and financial occupations, as well as for office and administrative occupations such as customer service representatives. Healthcare support is expected to be the third fastest-growing group. The top three critical skills in terms of growth are speaking, active listening, and reading comprehension.

Information is included on Middle-Skill occupations (those requiring less than a four-year degree) that are in demand, their 2017 annual average wages, and their current supply/demand outlook on jobs4tn.gov. If listed occupations have certifications aligned with Tennessee high school career and technical education programs, an indicator is displayed in the last column in the table.

Workforce Issues in the East, Middle, and West Regions

Population in 2017 for the state was estimated at 6,715,984, increasing by one percent over 2016. All three regions increased in population, with the Middle Region adding an additional 46,333 people. Average unemployment rates declined in all areas. The West continues to have the highest unemployment rates, including among youth. College educational attainment in the East was slightly below the state average. The state poverty rate (2016) has declined somewhat to 17.2 percent, with the West Region higher at 20.6 percent. The East Region has the highest rate of those unemployed with a disability (15.4 percent).

Sustainable Barriers to Employment

Two tables contain numbers of individuals in each of the nine local workforce development areas with substantial barriers to employment. Collection of these data is ongoing and will be provided to workforce services partners as it becomes available. In the fiscal year ending June 2018, almost 2,000 individuals were involved in recovery courts in Tennessee.

Conclusion

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

Statewide Employment

Tennessee’s average annual nonfarm employment increased 1.5 percent from 2016 to 2017, adding 44,500 jobs. Goods-producing jobs grew at a rate of 2.1 percent compared to 1.6 percent for private service-providing jobs. Jobs in the government sector grew at 0.5 percent. In the goods-producing sector, manufacturing and mining, logging, and construction each grew by 4,900 jobs.

Among the private service-providing industries, those with the largest job increases were leisure and hospitality which added 10,200 jobs, and education and health services which added 8,000 jobs. Within the leisure and hospitality sector, accommodation and food services accounted for 8,300 of the added jobs while healthcare and social assistance accounted for 7,100 of the 8,000 jobs added in education and health services.

Since 2012, Tennessee has added 295,000 jobs, a 10.9 percent increase. Professional and business services led the way adding 67,500 jobs. Of those jobs, 31,700 were added in administrative support, waste management and remediation services, and 25,200 were added in professional, scientific and technical services. Other sectors gaining over 25,000 jobs included durable goods manufacturing; trade, transportation and utilities; healthcare and social assistance; and accommodation and food services. Only federal government has experienced a decline since 2012.

Table 1: Tennessee Industry Employment, 2012-2017

Industry Employment (in thousands)	2012	2016	2017	16-17	16-17%	12-17	12-17%
Total Nonfarm	2715.0	2965.5	3010.0	44.5	1.5%	295	10.9%
Goods Producing	422.2	463.0	472.9	9.9	2.1%	50.7	12.0%
Mining, Logging, & Construction	108.9	119.1	124.0	4.9	4.1%	15.1	13.9%
Manufacturing	313.4	343.9	348.8	4.9	1.4%	35.4	11.3%
Durable Goods Manuf.	193.9	219.2	222.0	2.8	1.3%	28.1	14.5%
Non Durable Goods Manufacturing	119.5	124.7	126.8	2.1	1.7%	7.3	6.1%
Private Service-Providing	1871.1	2074.5	2107.0	32.5	1.6%	235.9	12.6%
Trade, Transportation, & Utilities	575.0	617.3	621.0	3.7	0.6%	46	8.0%
Wholesale Trade	120.4	119.5	121.1	1.6	1.3%	0.7	0.6%
Retail Trade	312.8	333.8	334.8	1	0.3%	22	7.0%
Transportation & Utilities	141.8	164.0	165.1	1.1	0.8%	23.3	16.4%
Information	43.2	45.3	45.6	0.3	0.7%	2.4	5.6%
Financial Activities	137.1	153.1	158.1	5	3.3%	21	15.3%
Finance & Insurance	105.3	115.0	118.4	3.4	3.0%	13.1	12.4%
Real Estate, Rental & Leasing	31.8	38.1	39.8	1.7	4.5%	8	25.2%
Professional & Business Services	339.1	404.3	406.6	2.3	0.6%	67.5	19.9%
Professional, Scientific & Technical Services	110.9	132.1	136.1	4	3.0%	25.2	22.7%
Management of Companies & Enterprises	35.1	44.9	45.7	0.8	1.8%	10.6	30.2%

Industry Employment (in thousands)	2012	2016	2017	16-17	16-17%	12-17	12-17%
Admin,Support,Waste Mgt & RemediationServices	193.1	227.4	224.8	-2.6	-1.1%	31.7	16.4%
Education & Health Services	395.6	423.9	431.9	8	1.9%	36.3	9.2%
Educational Services	51.9	59.3	60.2	0.9	1.5%	8.3	16.0%
Health Care & Social Assistance	343.7	364.6	371.7	7.1	1.9%	28	8.1%
Leisure & Hospitality	276.8	319.6	329.8	10.2	3.2%	53	19.1%
Arts, Entertainment & Recreation	30.2	35.6	37.5	1.9	5.3%	7.3	24.2%
Accommodation & Food Services	246.7	284.0	292.3	8.3	2.9%	45.6	18.5%
Other Services	104.2	111.0	113.9	2.9	2.6%	9.7	9.3%
Government	421.7	428.0	430.1	2.1	0.5%	8.4	2.0%
Federal Government	50.1	49.2	49.1	-0.1	-0.2%	-1	-2.0%
State Government	94.8	96.5	97.9	1.4	1.5%	3.1	3.3%
Local Government	276.8	282.3	283.2	0.9	0.3%	6.4	2.3%

Table 1 shows that total Tennessee nonfarm employment was 3 million, 10 thousand in 2017. The most rapidly growing industries during 2012-2017 were management of companies and enterprises, real estate rental and leasing, and arts and entertainment and recreation.

Tennessee Industry and Occupational Employment Projections, 2017-2019

From a base of 3.2 million jobs in 2017, total employment for Tennessee, including agricultural, self-employed, and private household workers, is expected to grow to 3.3 million by 2019. Expected to increase by 1.8 percent annually, Tennessee's expanding economy is continuing steady growth across all industry sectors. Most of the employment growth will be in the service-providing industries with an annual growth rate of 2 percent and the addition of 103,940 jobs.

The service-providing sector is expected to grow more than two and a half times as rapidly as the goods-producing sector over this period, with all sectors showing positive growth. Specifically, the professional and business services and the financial activities sectors are expected to grow the most rapidly, with 3.6 and 3.2 percent annual growth rates, respectively. Professional and business services and education and health services together are expected to create the most new jobs (56,820), nearly 50 percent of the total. In the goods-producing sector healthy growth within construction (1.6 percent) and the creation of 3, 970 new jobs through 2019 can only be considered positive indicators.

Tennessee Major Industry Sector Employment, 2017-2019

Industry Sector Code	Title	2017 Employment(Thousands)	22019 Projected Employment (Thousands)	New Jobs Created (Thousands)	Annual Average Growth Rate(%)
000000	**Total All Industries**	3207.7	3326.3	118.6	1.8%
101000	**Goods Producing**	498.6	506.4	7.8	0.8%
101100	Natural Resources and Mining	29.3	29.4	0.2	0.3%
101200	Construction	120.4	124.4	4.0	1.6%
101300	Manufacturing	349.0	352.6	3.7	0.5%
102000	**Service-Providing**	2532.1	2636.0	103.9	2.1%
102100	Trade, Transportation, and Utilities	630.1	644.2	14.0	1.1%
102200	Information	46.2	46.6	0.4	0.5%
102300	Financial Activities	148.4	158.3	9.8	3.3%
102400	Professional and Business Services	404.3	433.5	29.2	3.6%
102500	Education and Health Services	648.6	676.2	27.6	2.1%
102600	Leisure and Hospitality	335.0	349.7	14.8	2.2%
102700	Other Services (except Government)	133.6	137.4	3.8	1.4%
102800	Government	185.8	190.2	4.3	1.2%
102900	**Self Employed and UnpaidFamily**	177.0	183.9	6.9	1.9%

Fastest Growing Industries

The average annual growth rate for all industries for 2017-2019 is expected to be 1.8 percent, with service-providing industries growing almost three times as fast as the goods-producing industries.

The fewest number of new jobs expected over this two year period will be in natural resources and mining (180) and information (430). With just one in eight new jobs being created in the goods-producing versus the service-providing sector, the long term shift from the goods-producing to the service sectors is clear.

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

Professional and Business Services: Part of the reason for the rapid growth of this industry sector is the fast growth of several of its detailed industries, including the business services industries of accounting, tax preparation, bookkeeping, and payroll services (6.1 percent) and management, scientific, and technical consulting services (9.6 percent).

With the passage of the new federal tax law, it is likely that accounting and tax preparation services will continue robust growth. The most rapidly growing industry is facilities support services (12.9 percent), as a result of the booming construction industry and the outsourcing of building maintenance and management. Waste collection and waste treatment have also seen rapid growth, as recycling is sustained and population and industry growth advance the production of hazardous and nonhazardous waste.

Financial Activities: Key industries in this fast-growing sector include insurance carriers, expected to add more than 2,000 jobs; automotive equipment rental and leasing, and securities and commodities brokers. The demand for financial services is likely to grow due to the aging population seeking retirement services as well as companies seeking investment banking services.

Insurance carriers' growth is happening through mergers and acquisitions as well as investments in technology as they expand their reach through digital services. Tennessee's population increased by 0.8 percent from 2015 to 2016. As tourism and population growth increase, particularly in Tennessee's urban areas, car and truck rental should advance as well.

Leisure and Hospitality: This is the third most rapidly-growing industry sector in Tennessee with a projected annual growth rate of 2.2 percent. One of the fastest-growing sectors is special food services, expected to create more than 1,000 new jobs over the two year period. This industry includes food service contractors, caterers, and mobile food services such as food trucks and custom home food delivery.

Education and Health Care Services: This industry sector expected to be the largest in 2019 contains two of the most rapidly-growing industries 6233, Continuing Care Retirement Communities and Assisted Living Facilities, and 6241, Individual and Family Services. Assisted living facilities could create more than 1500 new jobs during this period, as the population ages during a time of smaller families and somewhat increased the availability of long term care insurance.

The individual and family services industry could see more than 2800 new jobs created, with additional funding for youth services, drug treatment, and counseling, social assistance for the developmentally disabled, foster care and related services and a need for more support for families as the population increases. In 2012, Tennessee had the second highest opioid prescription rate in the nation after Alabama. Recent research reported in the 2018 Economic Report to the Governor demonstrated that prescription opioid use in Tennessee has had a significant effect in lowering the labor force participation rate, and policies to combat this will likely involve some expansion in the family services industry.

Fastest Growing Industries with More Than 1,000 Employment in 2017

Industry Title	2017Employment	2019 Employment	New JobsCreated	Annual Average Growth Rate (%)
Facilities Support Services	4,770	6,080	1,310	12.9
Automotive Equipment Rental and Leasing	6,820	8,190	1,380	9.6
Management, Scientific, and Technical Consulting Services	29,150	34,990	5,850	9.6
Software Publishers	2,930	3,400	470	7.7
Waste Collection	2,680	3,040	360	6.4
Accounting, Tax Preparation, Bookkeeping, and Payroll Services	22,390	25,180	2,790	6.1
Insurance Carriers	19,770	22,150	2,380	5.8
Electronic Shopping and MailOrder Houses	5,580	6,240	660	5.8
Warehousing and Storage	34,010	37,990	3,980	5.7
Data Processing, Hosting, and Related Services	5,570	6,210	640	5.6
Waste Treatment and Disposal	2,080	2,320	240	5.5
Agents and Managers for Artists, Athletes, Entertainers, and Other Public Figures	1,020	1,130	110	5.4
Continuing Care Retirement Communities and Assisted Living Facilities	14,470	16,040	1,570	5.3
Commercial and Industrial Machinery and Equipment Rental and Leasing	2,710	3,000	290	5.1
Special Food Services	10,360	11,450	1,090	5.1
Individual and Family Services	26,640	29,440	2,800	5.1
Securities and Commodity Contracts Intermediation and Brokerage	5,590-	6,180	590	5.1
Other Support Services	10,030	11,080	1,050	5.1
Other Financial Investment Activities	4,300	4,750	450	5.1
Other Professional, Scientific, and Technical Services	12,740	14,070	1,330	5.1

The fastest growing industries included facilities support, automotive rental and leasing, management consulting services, software publishers, and waste collection.

Other Rapidly Growing Industries: Two industries in the information sector are expected to be in the top 20 in terms of industry growth: data processing, hosting, and related services (5.6 percent) and software publishers (7.7 percent), creating more than a thousand new jobs. Slow overall employment growth in the information sector is due to industries such as the publishing of books, newspapers, and related items and broadcasting, which are expected to decline during this period.

Two industries growing three times faster than average include electronic shopping and mail-order houses (5.8 percent) and warehousing and storage (5.7 percent). Warehousing and storage are expected to create the second-highest number of new jobs by 2019 (nearly 4,000). The rapid development of this industry contrasts with the slower projected growth of retail trade in general (0.8 percent).

Goods Producing Sectors:

Among the goods-producing sectors, the **Construction** sector is expected to be the most rapidly growing at 1.6 percent. Buoyed by low interest rates, the fastest growing detailed industries will be in residential building construction (2361), including single and multifamily and home remodelers. Other fast-growing sectors include building equipment contractors (2382) including electricians, plumbing and air conditioning, and site preparation and other construction installers (2389). Related industries such as lumber and construction wholesalers (NAICS 4233) and activities related to real estate (NAICS 5313) are expanding as well.

Manufacturing is expected to be the fourth largest employment sector in Tennessee, comprising 352,610 jobs in 2019 and with average weekly wages of $1,084 in the third quarter of 2017.

Despite national trends showing manufacturing declining, a least five manufacturing- related industries, including dairy products (NAICS 3115), other nonmetallic mineral products (NAICS 3279), motor vehicle parts (NAICS 3363), and motor vehicle manufacturing (NAICS 3361) are expected to grow faster than two percent and cause total manufacturing employment to move in a positive direction. Other rapidly-growing industries include metal manufacturing (3324), electro-medical and measuring instruments (3345) and cement and concrete manufacturing (3273).

Occupational and Wage Growth

Computer and Mathematical occupations with an annual growth rate of 3.3 percent are the fastest growing occupational group. Employment is expected to top 57,610 in the state by 2019, creating annual total openings of more than 5,400 and paying the third highest median wages ($70, 140) of the 22 occupational groups.

The largest occupation is computer user support specialists (10,050 employment in 2017), followed by computer systems analysts. The fastest growing mathematical occupations with more than 30 employment in 2017 are statisticians (8.3 percent annually), actuaries (5.2) and operations research analysts (5.0). Among the computer occupations, the fastest growing is software developers, applications (5.0) and information security analysts (4.8).

Business and Financial Operation occupations, with the fifth highest median wage ($58,050) are expected to increase employment by 2.9 percent annually. Among the fastest-growing occupations are tax preparers (6.2 percent annually); insurance appraisers, auto damage (5.8 percent), and personal financial advisors (4.8). Among those with the largest number of openings

are accountants and auditors, with more than 2,420 openings per year, and human resource specialists, with more than 1,270 openings; both of these require bachelor's degrees.

In support of these occupations is **Office and Administrative** occupations, having the largest number of annual openings expected (63,080). Two prominent occupations in this group are customer service representatives (9,210 annual openings) and stock clerks and order fillers (7,660 annual openings), usually requiring a high school diploma or the equivalent.

Healthcare Support occupations, the third most rapidly growing group (2.5 percent annually) has projected annual openings of 11, 220. The median wage of $26,430 is the sixth lowest among the occupational groups. The largest occupations in this group are nursing assistants, with projected employment of 32,870 in 2019 and 4,160 openings, and medical assistants, with projected employment of 15,690 and expected 2,030 openings. The most rapidly growing occupations are veterinary assistants and laboratory animal caretakers (6.1 percent annually) and home health aides (4.9 percent).

Management occupations' employment is projected to increase by 2.4 percent annually. Not surprisingly, this occupational category has the highest annual wage ($81,140) of the 22 occupational groups. The fastest growing occupations include financial managers (3.6 percent annually), training and development managers (3.5 percent) and emergency management directors (3.1 percent), important in planning for natural disaster and crisis management. Other large management occupations include general and operations managers; farmers, ranchers, and other agricultural managers, and food service managers (2,010 openings per year).

Community and Social Service occupations are also expected to increase by 2.4 percent annually and expected to have more than 6600 openings each year. However, median wages are in the middle range, at $39,580, but still above the state median of $33,860. Fast-growing occupations include marriage and family therapists (4.4 percent annually), community health workers (3.8 percent), and substance abuse and behavioral disorder counselors (3.6 percent). Reducing the opioid crisis will likely cause growth in these areas to continue. Some of the largest occupations include clergy, directors of religious activities; and child, family, and school social workers (660 openings expected annually).

Other Major Occupational Groups with large numbers of annual openings include **food preparation and serving related** occupations (54, 440 annual openings), **sales and related occupations** (46,760), **transportation and material** moving occupations (41,070), and **production** occupations (34,200 openings, the fifth largest group). In production, among the fastest growing occupations are medical appliance technicians (5.3 percent), computer numerically controlled machine tool programmers (2.4 percent), and painters, transportation equipment (3.2 percent). The largest occupational categories are assemblers and fabricators (80,610 projected employment) and metal and plastic workers (50,430 projected).

Healthcare practitioners have the tenth largest number of openings (14,830) and the seventh highest per capita average wage ($55,020). The occupations in this group with the most openings include registered nurses, licensed practical nurses, pharmacy technicians, medical and laboratory technicians, and nurse practitioners. Among the higher paying occupational groups are **legal occupations** with a median annual wage of $70,870 (second highest) and **architecture and engineering** occupations paying on average $68,380.

Emerging Growth Sectors

The Solar Jobs Census of 2017 named Tennessee 14th in the U.S. for solar jobs, with an estimated 4411 jobs in 2017. They reported an estimated 2100 jobs in installation; 1500 in manufacturing; 270 in sales and distribution; 380 in project development; and 110 in other areas. The industries in which solar workers are employed are not easily identified in the current North American Industry Classification System (NAICS), so it is difficult to review these results. As the NAICS is updated in future years to better identify solar industries, more information should be available.

A recent study by the Tennessee Department of Economic and Community Development (January 2018) on the cluster of Healthcare and Medical Devices industries in Tennessee reported employment of more than 26,600 Tennesseans and projected employment of 28,000 by 2022[iv]. These industries alone are estimated to employ more than 1500 team assemblers and 700 medical appliance technicians, as well as more than 1200 engineers and industrial engineering technicians. The medical apparatus manufacturing industry is included in NAICS code

3345, expected to increase by 4.3 percent from 2017 to 2019; also faster growing are scientific research and development services (5417) at 1.2 percent and architectural, engineering, and related services, which include testing laboratories, at 1.5 percent.

B. Workforce Analysis

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA.* This population must include individuals with disabilities among other groups** in the State and across regions identified by the State. This includes: Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. ** Veterans, unemployed workers, and youth, and others that the State may identify.

i. Employment and Unemployment

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

ii. Labor Market Trends

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

iii. Education and Skill Levels of the Workforce

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

iv. Skill Gaps

Describe apparent ‘skill gaps’.

I. EMPLOYMENT AND UNEMPLOYMENT

All regions had significant reductions in their unemployment rates over the year. In 2016, the Middle Region had the largest labor force, at 1.3 million, an average of just over 55,000 unemployed for the year, and an unemployment rate of 4.2 percent. The unemployment rate decreased from 4.9 percent in 2015. The East, although having a smaller labor force of 1.1 million, had a higher annual average unemployment rate of 5.0 percent, so the number of unemployed was just over 55,000 as well. In 2015, the unemployment rate had been higher at 5.7 percent. The West Region had the highest annual average unemployment rate, 5.7 percent, but with a smaller labor force of 0.7 million, the average number of unemployed was just over 40,000. The rate declined from 6.7 percent in 2015.

Along with the highest average unemployment rate, in 2015 the West also had the highest poverty rate of the region, at 20.7 percent (decreasing from 2014). The East had a rate of 18.0 percent (slightly increased from 2014). The Middle had the lowest rate at 15.4 percent, decreasing from 2014.

Educational Attainment

Comparing census data on the educational attainment of the population within the East, Middle, and West Regions to the average for Tennessee: For the population, 25 years and older, in 2015 percent of state residents were high school graduates or had higher degrees. The rates for all regions were fairly similar, with the Middle Region about a percentage point higher at 86.7, having increased over the year. The East Region had the lowest percentage of individuals with bachelor’s degrees or greater, at 22.4 percent, followed by the West at 24.6 percent and the Middle at 27.6 percent, all regions have increased over the year.

Poverty Rates by County and Region

Poverty rates vary by region, within regions, and within counties. The latest data on poverty rates are for 2015. All regions had poverty rates of 15 percent or greater, with the West Region having the highest rate at 20.7 percent; the East at 18.0 percent; and the Middle at 15.4 percent. The poverty rates for both West and Middle decreased, with that of the East increasing slightly. Poverty rates tend to be greater in the core urban counties and rural areas in Middle Tennessee as well as in the other regions.

Disability Status

For the state in 2015, 193,990 individuals were identified with a disability in a labor force of 2,962,822. This is 6.5 percent. Those with a disability made up 13.8 percent of the unemployed. Of those not in the labor force, approximately 34 percent of individuals had a disability, demonstrating it can be a significant barrier to employment. The highest regional percentage of those not in the labor force and having a disability was in East Tennessee with 38.7 percent.

Youth Unemployment

High youth unemployment (ages 16 to 24) continues to be the challenge across the regions. The latest data is available for 2015. With an average state unemployment rate in 2015 of 5.6 percent, youth unemployment was from three to four times greater, with the highest rates in West, East,

and Middle Tennessee, respectively. In West Tennessee, nearly one in four youth in the Region in the labor force was unemployed.

Challenges: Substantial Barriers to Employment

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

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

Several of these departments have different service areas than the LWDAs, so population-based estimates were created by the Department of Labor and Workforce Development, LMI Section. These estimates are displayed below. Individuals with barriers to employment by LWDA in the following categories are included:

- Column B: Low-income individuals - number of people in poverty
- Column C: Low-income individuals- persons earning less than 70% of Lower Living Standard Income Level (LLSIL), ages 16 to 64
- Column D: Native Americans
- Column E: Individuals with disabilities- ages 18 to 64
- Column F: Older individuals- more than 55 years old
- Column G: Those in households where English is not spoken well, or not at all
- Column H: Justice-involved individuals (on parole, 6-30-2016)
- Column I: Justice-involved individuals (on probation, 6-30-2016)
- Column J: Justice-involved individuals (delinquent youth in care, 5-3-2017)
- Column K: Foster care services (dependent, neglected youth, 5-3-2017)
- Column L: Foster care services-youth aged out
- Column M: Single parents
- Column N: Temporary Assistance for Needy Families (TANF) case closures in FFY 2016
- Column O: Estimated numbers of homeless persons

Some measures are more reliable than others. Homeless censuses are done infrequently, and may not capture many who are not living on the streets but nonetheless do not have permanent

housing. The largest groups include low-income, older individuals, and those with disabilities. As integrated databases are developed, determining individuals who have two or more barriers would assist in prioritizing services.

Substantial Barriers to Employment

LWDA	B	C	D	E	F	G	H	I	J	K	L	M	N	O
1	67,078	42,205	1,107	39,384	126,536	1,163	543	3082	37	63	37	12,026	1,271	332
2	84,551	47,110	1,023	51,183	150,553	5,081	716	3596	80	142	83	14,817	1,413	423
3	68,679	44,625	1,373	30,664	123,631	5,434	757	3499	32	100	50	13,713	1,539	748
4	84,920	45,050	1,948	49,372	175,602	3,801	620	3671	45	140	70	14,281	1,460	392
5	106,358	61,505	1,426	57,308	192,468	7,351	885	5531	85	110	78	21,352	2,302	484
6	40,304	23,575	1,130	24,017	73,289	3,584	366	1725	54	47	25	8,898	1,023	97
7	47,488	30,995	581	24,693	78,349	2,497	433	1985	42	80	47	7,404	874	108
8	80,782	41,395	3,755	50,327	194,224	5,571	1030	5281	75	95	58	24,130	2,200	282
9	156,240	99,360	3,990	67,917	253,975	32,555	3124	9725	89	210	98	39,192	4,115	2,728
10	40,349	22,590	585	22,965	77,446	2,137	322	1574	51	70	38	8,162	889	66
11	46,947	29,860	488	23,466	77,712	1,145	561	1860	38	55	23	9,494	1,560	578
12	62,641	40,205	1,520	33,316	104,030	1,896	787	2398	45	56	36	13,518	1,774	783
13	191,530	109,650	2,199	69,650	243,920	17,626	2268	7919	161	131	109	48,289	8,036	1,759

Sources:

Low-income individuals (Number of people in poverty)	**https://www.census.gov/did/www/saipe/**
Low-income individuals (Persons Earning Less Than 70% of Lower Living Standard Income Level (LLSIL)	https://www.doleta.gov/budget/disadvantagedYouthAdults.cfm
Native Americans	U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_5YR_B02001&proc

Low-income individuals (Number of people in poverty)	**https://www.census.gov/did/www/saipe/**
Individuals with disabilities	U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_5YR_S1810&prodT
Older Individuals	U.S Census Bureau Population Estimates Program https://www.census.gov/programs-surveys/ popest.html
English Language Learners	U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates
Justice-Involved Individuals (Parole)	TN Department of Correction, Statistical Abstract 2016 Parole and Probation Population by District - June 30, 2 http://www.tn.gov/assets/entities/correction/attachments/StatisticalAbstract2016.pdf
Justice-Involved Individuals (Probation)	TN Department of Correction, Statistical Abstract 2016 Parole and Probation Population by District - June 30, 2 http://www.tn.gov/assets/entities/correction/attachments/StatisticalAbstract2016.pdf
Justice-Involved Individuals (Delinquent Youth in Care)	Brian Stephens, Dir. of Independent Living, TN Dept. of Children's Services (brian.stephens@tn.gov)
Foster Care Services (Dependent and Neglected Youth)	Brian Stephens, Dir. of Independent Living, TN Dept. of Children's Services (brian.stephens@tn.gov)
Foster Care Services - Aged Out	Brian Stephens, Dir. of Independent Living, TN Dept. of Children’s Services (Brian.stephens@tn.gov)
Single Parents	U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_5YR_B19131&prod
Temporary Assistance for Needy Families - Case Closures - FFY 2016	Keisha Malone, keisha.malone@tn.gov. TN Dept. of Human Services 6/1/2017
Estimated Homeless Data for Tennessee areas	Bob Currie, Division of Mental Health Services, (Bob.Currie@tn.gov) Jenna Robl, Office of Housing and Home (Jenifer.Robl@tn.gov)

Workforce Challenges and Strategies 2018

The Workforce Innovation and Opportunity Act (WIOA) was in full implementation stage after July 1, 2017. The integration of workforce services with collaborative partners and shared goals continues to evolve.

An additional challenge in August 2018 was the restructuring of the local workforce development areas from 13 to 9, with full implementation in the fall and winter of 2018. To facilitate this implementation, data on the potential population to serve was needed for each of the nine areas

Challenges: Substantial Barriers to Employment

WIOA included a renewed focus on those with substantial barriers to employment (SBEs), with categories specifically defined in the WIOA guidelines.

WIOA Individuals with Barriers to Employment, 2018 Categories

1. a. Displaced homemakers
2. b. Low-income individuals
3. c. Native Americans
4. d. Individuals with disabilities, including recipients of Social Security
5. e. Older individuals
6. f. Justice-involved individuals
7. g. People experiencing homelessness
8. h. Youth who are in or have aged out of the foster care system
9. i. Individuals who:

- Are English language learners
- Have low levels of literacy
- Face substantial cultural barriers

1. j. Eligible migrant and seasonable farmworkers
2. k. Individuals within two years of exhausting lifetime Temporary Assistance for Needy Families (TANF) eligibility
3. l. Single parents, including pregnant women
4. m. Those unemployed for 27 or more consecutive weeks
5. n. Such other groups as determined by Governor Lee

Collection of data on current populations in these categories is ongoing for Workforce Services and WIR²ED. Estimates of the number of these individuals by the revised Local Workforce Development Areas (LWDAs) in Tennessee were produced from a number of sources, including the following:

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

Several of these departments have different service areas than the LWDAs, so population-based estimates were created by the Department of Labor and Workforce Development, WIR2ED Division. Available in this report are data by LWDA for the following categories:

- Low-income individuals
- Native Americans
- Individuals with disabilities
- Older individuals

- Justice-involved individuals, including those on probation or parole and in mental health and recovery courts
- Youth aged out of foster care
- Individuals with limited English-speaking ability
- Single parents
- In-School youth experiencing homelessness
- Individuals within 18 months of exhausting lifetime TANF eligibility

These estimates are displayed in Table 30-32. Additional diversion programs and processes are being developed, including the Davidson County District Attorney's statement on September 5, 2018, that he would stop immediately prosecuting many drivers' license violations, which is expected to divert 12,000 charges out of Nashville courtrooms during the next year. The largest groups with substantial barriers to employment include older individuals, those below the poverty threshold, and those with disabilities. As integrated databases are developed, determining individuals who have two or more barriers would assist in prioritizing services.

Substantial Barriers to Employment

New LWDA Area	Number Of American Indians or Alaskan Natives alone	Population Ages 14-17	Population Ages 18-24	Population Ages 55+	Number Below Poverty	Number With Dis-ability	Number of Single Parent Families
East							
East Tennessee	2,554	60,418	115,555	370,968	117,665	108,067	36,565
Northeast Tennessee	927	24,111	45,554	169,237	53,514	56,240	16,332
Southeast Tennessee	940	31,855	59,040	193,051	59,124	57,298	20,889
Middle							
Northern Middle Tennessee	4,217	100,176	184,639	431,975	136,440	123,061	64,777
Southern Middle Tennessee	1,021	23,669	35,753	130,826	38,318	41,303	15,256
Upper Cumberland	578	17,232	31,558	114,366	38,518	34,757	11,213
West							
Greater Memphis	1,741	59,408	105,887	260,918	109,880	77,019	52,358
Northwest Tennessee	553	13,076	23,496	79,908	26,210	25,172	9,370
Southwest Tennessee	254	13,041	24,262	76,476	27,103	22,656	9,498
Total	12,785	342,986	625,744	1,827,725	606,772	545,573	236,258

Source: U.S. Census, American Community Survey, 2016.

Substantial Barriers to Employment

INSERT THE UPDATED INFORMATION HERE

Those Unemployed for 27 or More Consecutive Weeks

Group Identified	Number of Workers Reported
All Races	21,325
White	16,400
Black	4,200
Hispanic	1,100
Age 16-19	1,433
Age 20+	20,275
Male, 16+	11,100
Female, 16+	10,250

Sources: Probationers and parolees: Adam Dawson, Community Supervision Division, TN Department of Correction.

Mental Health Court and Recovery Court Statistics: Liz Ledbetter, Recovery Court Administrator,

TN Department of Mental Health and Substance

Abuse Services. Limited English Speaking: U.S. Census Bureau, American Community Survey, 2016. Foster Care Services: Dave Aguzzi, Office

of Independent Living, TN Department of Children's Services, In School Youth Experiencing Homelessness: Hebeh Hindieh, Data Management

Division, TN Department of Education TANF 18 Months from Ending Eligibility: Lakecia Peterson, Division of Family Assistance and Child Support,

TN Department of Human Services.

iv. Skills Gaps

Critical Skills

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

The five most critical skills required across all occupations based on the estimated employment increases through 2019 include speaking, active listening, reading comprehension, social perceptiveness, and critical thinking. With the growth in the service industry, especially in leisure and hospitality, food service, and customer service occupations, service orientation has grown in importance.

Middle Skill Occupations in Demand

The following table lists a variety of middle skill occupations in demand in Tennessee. Using the Tennessee Department of Labor and Workforce's newly completed statewide occupational projections for 2016-2026, an initial list was developed by identifying occupations within16 broad educational clusters and nearly 200 detailed programs of study within those clusters that were expected to be growing through the year 2026 at least as fast as the average for all occupations. Middle skill includes occupations with the usual job entry requirement of a high school diploma but less than a bachelor's degree. To be included in the list, the jobs had to have a median annual wage in 2017 of at least $29,393, which is the equivalent of $14.13 an hour for a 40 hour week year-round.

Each of the occupations was in programs of study that had more job market openings expected in the long run each year than the number of newly trained individuals entering the job market1. One addition- a measure is included to describe the short term labor market conditions for these occupations. On or around September 13-14, 2018, the state's jobs4tn.gov website was queried as to the current number of job openings for these jobs compared to the number of candidates with active resumes registered on the system. That ratio of candidates to job openings appears in column B in the following table. For example, for transportation inspectors, in the short term, there were currently more than five candidates seeking jobs on the system than jobs posted.

If more candidates were needed to fill job openings, then the number will be less than one. For example, at present, the ratio for physical therapist assistants is 0.70; this means there will only .7, or less than one candidate on the system to fill each of the currently advertised jobs.

The largest categories of jobs include 17 in health science, seven in architecture and construction, and five each in agriculture, food, and natural resources; manufacturing; science, technology, engineering, and math (STEM), and transportation.

Further information on job requirements can be found on jobs4tn.gov in the Occupational Profile section. Jobs excluded from the list included those which required a bachelor's degree or more, had no current openings on jobs4tn.gov, had annual wages less than $29,393 or were not expected to be in demand in the long term.

The number of average annual openings by occupation projected from 2016 to 2026 is in most cases considerably larger than previous estimates of annual average openings for these occupations. This is due to the newly-developed separations methodology by the U.S. Department of Labor, Bureau of Labor Statistics. It includes greater numbers of annual job openings due to individuals transferring out of occupations earlier in their careers.

Middle Skill Occupations

Selected Occupations	2017 Average Annual Openings	Occupation Candidate/ Jobs Ratio (9-14-018)	2017 Median Annual Wage	TN DOE Industry Certifications
Agriculture, Food, and Natural Resources				
Biological Technicians	195	2.70	$39,080	
First Line Supervisors of Lawn and Garden Workers	2,645	1.27	$41,420	
Pesticide Handlers	2,615	0.07	$32,160	C
Pump Operators, Except Wellhead	180	0.33	$39,280	
Veterinary Technologists and Technicians	1,640	0.48	$31,130	C
Architecture and Construction				
Cement Masons and Concrete Finishers	750	1.71	$36,360	
Civil Engineering Technicians	1,070	2.63	$30,830	
Construction Carpenters	1,040	2.82	$30,600	C
Electricians	2,890	0.72	$46,500	C
Heating and Air Conditioning Mechanics	1,080	0.38	$42,160	C
Operating Engineers and Other Construction Equipment Operators	4,745	0.85	$37,920	
Plumbers and Pipefitters	1,215	0.12	$46,920	C
Arts and Communications				
Printing Press Operators	1,140	1.33	$34,770	
Business Management and Administration				
Customer Service Representatives	23,310	1.63	$30,720	
First Line Supervisors of Office and Administrative Support Workers	3,960	0.48	$50,600	C
Payroll and Timekeeping Clerks	690	1.00	$41,640	
Government and Public Administration				
Eligibility Interviewers, Government Programs	295	6.70	$36,740	
Transportation Inspectors	580	5.50	$74,580	
Health Science				
Cardiovascular Technologists and Technicians	75	0.06	$41,950	C
Chiropractors	25	0.80	$89,630	
Dental Assistants	820	0.78	$36,380	

Selected Occupations	2017 Average Annual Openings	Occupation Candidate/ Jobs Ratio (9-14-018)	2017 Median Annual Wage	TN DOE Industry Certifications
Diagnostic Medical Sonographers	155	0.09	$62,210	
Massage Therapists	190	0.16	$41,080	
Medical and Clinical Lab Technicians	620	1.04	n/a	
Medical Assistants	2,720	1.17	$30,340	C
Medical Records Technologists	480	1.51	$38,610	
Nuclear Medicine Technologists	45	0.06	$65,530	
Occupational Safety and Health Technicians	190	1.88	$48,290	
Occupational Therapist Assistants	160	0.12	$61,190	
Opticians, Dispensing	160	2.14	$36,920	

Middle Skill Occupations Continued

Pharmacy Technicians	1,275	0.48	$29,880	C
Physical Therapist Assistants	475	0.70	$58,080	
Practical Nurse	2,245	0.23	$38,060	
Radiologic Technologists	430	0.17	$50,020	
Respiratory Therapists	295	0.45	$50,010	
Hospitality and Tourism				
Fitness Trainers and Aerobics Instructors	2,915	0.24	$39,190	C
Lodging Managers	1,870	0.44	$42,830	
Human Services				
Morticians, Undertakers, Funeral Directors	405	0.75	$46,200	
Social and Human Services Assistants	3,795	1.78	$32,140	C
Information Technology				
Computer Network Support Specialists	1,220	7.17	$55,280	C
Public Safety, Corrections, and Security				
Correctional Officers	855	4.10	$31,970	

Pharmacy Technicians	1,275	0.48	$29,880	C
Firefighters (Municipal)	585	8.00	$38,460	
Paralegals and Legal Assistants	625	1.71	$46,730	
Manufacturing				
Cost Estimators	200	0.48	$59,010	
Dental Laboratory Technicians	65	4.50	$33,020	
Machinist	860	0.89	$40,460	C
Maintenance and Repair Workers, General	9,125	2.17	$36,460	
Team Assemblers	14,325	7.14	n/a	
Telecommunications Installers and Repairers	1,220	3.05	$46,460	
Sales				
Production, Planning, Expediting Clerks	2,265	0.63	$44,350	
Sales Representatives, Wholesale and Manufacturing, Except Technical	14,025	3.32	$50,630	
Science, Technology, Engineering, and Math				
Chemical Technicians	160	5.00	$46,290	
Environmental Science and Protection Technicians	275	1.82	$45,300	
Mechanical Engineering Technicians	130	1.05	$52,100	C
Nuclear Technicians	30	5.50	$76,970	
Surveying and Mapping Technicians	285	0.60	$42,660	
Transportation				
Automotive Service Technicians	2,160	2.55	$38,180	C
Commercial Pilots	205	0.24	$70,080	
Heavy and Tractor-Trailer Truck Drivers	8,810	0.25	$39,640	
Mobile Heavy Equipment Mechanics	380	0.21	$44,420	
Outdoor Power Equipment Mechanics	235	0.50	$30,040	

Sources: TN Dept. of Labor and Workforce Development, LMI Section, 2016-26 Employment Projections and 2017 OES Wages; Jobs4tn.gov Candidate/Supply Ratios; TN Dept. of Education, Career and Technical Education Div.

Tennessee Skills Gaps Due to Lack of High School Graduation and Employer Demand

The table below shows the number of individuals in Tennessee considered by the Adult Education Division with the potential to be served. This information is based on the American Community Survey 2016 5 year estimate of Census data; it includes all individuals aged 18 to 64

in Tennessee without a high school diploma. A total of 473,700 individuals in this age range without a high school diploma, with at least 19,000 in each LWDA, shows a considerable literacy skill gap in Tennessee. With a total population of 6,651,194, the total potentially to be served was 7.1 percent of Tennessee's population in 2016.

LWDA	Sum of 18-64 Potential to Serve
LWDA 1	25,819
LWDA 2	39,299
LWDA 3	23,224
LWDA 4	38,472
LWDA 5	50,023
LWDA 6	20,852
LWDA 7	20,229
LWDA 8	39,034
LWDA 9	74,576
LWDA10	20,616
LWDA11	19,940
LWDA12	28,117
LWDA13	73,499
Total	**473,700**

Skill Gaps- Middle Skill Occupations in Demand by LWDA

The table below lists ***middleskill occupations in demand*** according to the definition used by Garrett Harper in the publication "Strengthening the Middle Tennessee Region 2020." Middle skill includes occupations with the usual entry-level education of a high school diploma and requiring more than short-term on-the-job training but less than a bachelor's degree, and with median hourly wages greater than $13.68. For all the occupations listed, there are skill shortages in LWDAs.

The statewide data were developed from the 2014 to 2024 Tennessee statewide occupational employment projections, and includes those middle skill occupations with a supply-demand ratio in their program of study of less than 1.55, a positive growth rate during the projection period, and annual average openings of 25 or more. For these occupations, there are not enough skilled workers to meet employer demands.

For each of the statewide occupations in demand, information on the number of annual average openings expected in each LWDA was compiled from the Department's 2014-2024 occupational projections. If less than 11 openings were expected annually in an LWDA, the cell in the

occupational row is blank. For this reason and due to confidentiality concerns, the annual average total openings do not necessarily add up to statewide annual total openings.

This table displays expected openings at the LWDA level for the major occupational groups and detailed occupations. The educational levels include high school (HS), associates degrees (AA/AS), postsecondary non-degree award (PS) and some college, no degree (SC).Eleven of the 22 occupational groups have middle skill jobs in demand. Some of the larger number of openings are in the business and financial, computer and mathematical, health practitioners and technical, construction and production, and maintenance and repair categories. As the economy continues to improve, demand is still there for tractor-trailer truck drivers in every LWDA.

To verify current demand, job postings for the fourth quarter of 2017 for these same occupations were obtained from jobs4tn.gov and displayed in column 4. While a few occupations had lower average wages and fewer job openings, most still displayed significant demand. Job postings by LWDA and their wages by current month or quarter can be obtained from jobs4tn.gov on the LMI home page in the section on advertised job postings. Job postings will usually be greater than the net annual job openings shown in the table.

Occupation Title	Educ Level	TN	TN Jobs Posted Q4 2017	LWDA 1	LWDA 2	LWDA 3	LWDA 4	LWDA 5	LWDA 6	LWDA 7	LWDA 8	LWDA 9	LWDA 10	LWDA 11	LWDA 12	LWDA 13
Business and Financial Operations Occupations	--	--	--	170	120	385	225	345	95	70	970	1,555	65	70	70	845
Wholesale and Retail Buyers, Except Farm Products	HS	95	350	--	--	15	--	--	--	--	30	55	--	--	--	35
Purchasing Agents, Except Wholesale, Retail, and Farm Products	HS	130	88	--	--	--	--	15	--	--	--	35	--	--	--	30

Occupation Title	Educ Level	TN	TN Jobs Posted Q4 2017	LWDA 1	LWDA 2	LWDA 3	LWDA 4	LWDA 5	LWDA 6	LWDA 7	LWDA 8	LWDA 9	LWDA 10	LWDA 11	LWDA 12	LWDA 13
Claims Adjusters, Examiners, and investigators	HS	140	55	--	--	--	--	--	--	--	65	55	--	--	--	--
Computer and Mathematical Occupations	--	--	--	70	30	205	90	130	30	15	380	805	20	15	--	460
Computer Support Specialists	SC	310	1,188	--	--	40	35	20	--	--	55	165	--	--	--	50
Arts, Design, Entertainment, Sports, and Media Occupations	--	--	--	85	70	150	45	145	20	25	215	725	20	25	20	235
Merchandise Displayers and Window Trimmers	HS	60	1,132*	40	--	--	--	--	--	--	--	25	--	--	--	20
Healthcare Practitioners and Technical Occupations	--	--	624	720	345	880	440	955	200	250	740	2,275	195	365	255	1,760
Pharmacy Technicians	HS	420	669	25	25	25	--	--	--	--	40	105	--	--	--	--
Licensed Practical and Licensed Vocational Nurses	PS	1,205	2,454	--	70	85	--	115	--	--	--	260	--	--	--	145

Occupation Title	Educ Level	TN	TN Jobs Posted Q4 2017	LWDA 1	LWDA 2	LWDA 3	LWDA 4	LWDA 5	LWDA 6	LWDA 7	LWDA 8	LWDA 9	LWDA 10	LWDA 11	LWDA 12	LWDA 13
Medical Records and Health Information Technicians	PS	225	481	25	--	50	--	25	--	--	20	100	--	15	--	45
Opticians, Dispensing	HS	50	13	--	--	--	--	--	--	--	--	25	--	--	--	--
Occupation Title	Educ Level	TN	TN Jobs Posted Q4 2017	LWDA 1	LWDA 2	LWDA 3	LWDA 4	LWDA 5	LWDA 6	LWDA 7	LWDA 8	LWDA 9	LWDA 10	LWDA 11	LWDA 12	LWDA 13
Business and Financial Operations Occupations	--	--	--	170	120	385	225	345	95	70	970	1,555	65	70	70	845
Wholesale and Retail Buyers, Except Farm Products	HS	95	350	--	--	15	--	--	--	--	30	55	--	--	--	35
Purchasing Agents, Except Wholesale, Retail, and Farm Products	HS	130	88	--	--	--	--	15	--	--	--	35	--	--	--	30
Claims Adjusters, Examiners, and investigators	HS	140	55	--	--	--	--	--	--	--	65	55	--	--	--	--

Occupation Title	Educ Level	TN	TN Jobs Posted Q4 2017	LWDA 1	LWDA 2	LWDA 3	LWDA 4	LWDA 5	LWDA 6	LWDA 7	LWDA 8	LWDA 9	LWDA 10	LWDA 11	LWDA 12	LWDA 13
Computer and Mathematical Occupations	--	--	--	70	30	205	90	130	30	15	380	805	20	15	--	460
Computer Support Specialists	SC	310	1,188	--	--	40	35	20	--	--	55	165	--	--	--	50
Arts, Design, Entertainment, Sports, and Media Occupations	--	--	--	85	70	150	45	145	20	25	215	725	20	25	20	235
Merchandise Displayers and Window Trimmers	HS	60	1,132*	40	--	--	--	--	--	--	--	25	--	--	--	20
Healthcare Practitioners and Technical Occupations	--	--	624	720	345	880	440	955	200	250	740	2,275	195	365	255	1,760
Pharmacy Technicians	HS	420	669	25	25	25	--	--	--	--	40	105	--	--	--	--
Licensed Practical and Licensed Vocational Nurses	PS	1,205	2,454	--	70	85	--	115	--	--	--	260	--	--	--	145
Medical Records and Health Information Technicians	PS	225	481	25	--	50	--	25	--	--	20	100	--	15	--	45

Occupation Title	Educ Level	TN	TN Jobs Posted Q4 2017	LWDA 1	LWDA 2	LWDA 3	LWDA 4	LWDA 5	LWDA 6	LWDA 7	LWDA 8	LWDA 9	LWDA 10	LWDA 11	LWDA 12	LWDA 13
Opticians, Dispensing	HS	50	13	--	--	--	--	--	--	--	--	25	--	--	--	--

Protective Service Occupations------1301001651101605540180610757085590

First-Line Supervisors of Fire Fighting and Prevention WorkersPS7542--------15----1515------25

FirefightersPS18512----20--15----2030------40

Sales and Related Occupations------6607601,0857751,1102802851,6503,0203453453751,945

Advertising Sales AgentsHS60191----------55------25

Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific ProductsHS3052123530654060--15110240152025160

Real Estate Sales AgentsHS5070*----------35------25

Office and Administrative Support Occupations------8856801,5408551,5553603552,0104,1053754153752,745

Bookkeeping, Accounting, and Auditing ClerksHS9101,5074025603050101070150101010 60

Payroll and Timekeeping ClerksHS195269----------2030------25

Production, Planning, and Expediting ClerksHS28539915--203025----3585------95

Medical SecretariesHS315314*15--15--35------40------75

Construction and Extraction Occupations------2151552152402657595455660651157545 0

Paving, Surfacing, and Tamping EquipmentHS4014----------15----------

Operating Engineers and Other Construction Equipment OperatorsHS150245--------15----2515------15

ElectriciansHS40033025--453030----2585------50

Plumbers, Pipefitters, and SteamfittersHS17537515------15----2055------30

Sheet Metal WorkersHS9557--------20------25------15

Construction and Building InspectorsHS55106----------20------15

Installation, Maintenance, and Repair Occupations----6924027039531543514511046 01,105125150175705

Telecommunications Equipment Installers and RepairersPS15583----------3025------15

Security and Fire Alarm Systems InstallersHS55106----------1520------15

Home Appliance RepairersHS35100*----------25----------

Industrial Machinery MechanicsHS32097--15152050------100------60

Maintenance Workers, MachineryHS85295------3015------20------15

MillwrightsHS3028----------15

Electrical Power-Line Installers and RepairersHS15563----151520----2050--------

Telecommunications Line Installers and RepairersHS6048----------

Medical Equipment RepairersAA/AS6561----------20------15

Maintenance and Repair Workers, GeneralHS92598460858580125--35120235--4035185

Locksmiths and Safe RepairersHS253--20----------

Production Occupations----1,470*39563533079510304902858451,7904354854901,035

First-Line Supervisors of Production PS3251,38215201530502015458015151545

Structural Metal Fabricators and FittersHS9526----------1515--------

Team AssemblersHS1,845206*85140203103152309526561080105125140

Computer-Controlled Machine Tool Operators, Metal andHS170110--15----------3015------20

MachinistsHS345227--40--55352515152015251555

Inspectors, Testers, Sorters, Samplers, and WeighersHS405631*2030203045--2550110--202595

Transportation and Material Moving Occupations------3754057904351230330210815 2,9952102952653,090

Heavy and Tractor- Trailer Truck DriversPS1,6606,641709516011517550408546545504529 0

Middle Skill Occupations in Demand Table Legend: Educ Level: Usual required education level. HS=High school diploma or equivalent; AA/AS = Associate's degree; PS=Postsecondary non-degree award; SC=Some college, no degree.

*Reported wage data below $28,454 or no wage data reported. Source: Tennessee Department of Labor and Workforce Development, LMI Section, LWDA Employment Projections.

Some of the industry credentials associated with middle-skill demand occupations include:

- **Computer Support Specialists**: CCNA Cisco Certified Network Associate, CompTIA+, CompTIA IT Fundamentals, Microsoft Office Expert (Excel and Word), Microsoft Office Specialist (Word), Microsoft Technology Associate Software Development Fundamental

- **Pharmacy Technicians:** Certified Pharmacy Technician
- **Fire Fighters and Fire Fighter Supervisors:** Emergency Medical Responder (First Responder)
- **Bookkeeping and Auditing Clerks and Payroll and Timekeeping Clerks:** Microsoft Office Expert (Excel)
- **Electricians:** NCCER Electrical Level One, OSHA 30
- **Plumbers:** NCCER Plumbing Level One, OSHA 10
- **Construction and Building Inspectors:** NCCER Construction Technology, NCCER Core Curriculum, OSHA 10 and 30
- **Machinists:** Machining Level I- Measurement, Materials, and SafetyCertification (NIMS), Certified Production Technician (CPT)
- **Industrial Machinery Mechanics:** FANUC

Other related certifications include the **Commercial Driver License (CDL)** for tractor-trailer truck drivers and certificates and associate degrees for **Health Information Technicians**. Detailed information on licensing requirements is available on jobs4tn.gov. The state can reduce skill gaps by training more individuals in these demand areas and working to increase the number of individuals who obtain these certifications.

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 *Education and Skill Levels of the Workforce* above, and the employment needs of employers, as identified in *Employers' Employment Needs* 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 and optional one-stop delivery system partners.*

---

* 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.

In achieving the Governor's Drive to 55 goal, all training activities and education practices are working to prioritize efficiency in creating connections across a wide spectrum. From Read to be Ready, to Tennessee Promise, Tennessee LEAP, and Tennessee ReConnect, the core programs and partners are actively identifying numerous ways of leveraging their assets and building

capacity in a more integrated manner. The work being done by the local boards to navigate and connect the numerous citizens accessing our systems each day further provides thousands of opportunities to engage at numerous levels. Tennessee Workforce System is collaborating with Tennessee Higher Education Commission to provide ambassadors throughout the state that advocate for participants reconnecting to post-secondary educational programs. The assistance they provide guides Participants needing direction with FASFA, student loan information, and more to ease the process of returning to school.

While Tennessee has a record of high achievement in so many areas, the role the core programs and agencies play will drive a business model that will increase skill development and educational attainment. The encouraging business climate continues to put pressure on skill demand and the connectivity of the core programs is key to ensuring efficient connections. Tennessee has been diligently engaged to build on the Governor's launch of Jobs4TN.gov to add modules and components and move to a real-time system of data collection that identifies trends and quickly respond to the customers being served. The Tennessee Workforce System is well served to encourage both job seekers and business to utilize this system and tools. This trend has been strong over the last several years as more and more customers use technology and Tennessee is well positioned through its platform to quickly identify, respond and enhance the customer's experience using technology. The many that benefit through this medium are demonstrating an increased and enhanced value for the Tennessee Workforce System as many benefits through these connections.

The realization that bricks and mortar locations are largely unsustainable and costly, core programs and partners have to think digitally to build capacity and this model is strongly evident and a foundation is there. Additional work around the longitudinal P-20 system further connects and builds a foundation that will inform users on where investments and process improvements should be focused further contributing to efficient connections and outcomes.

Through the process of preparing for this plan, the core programs and partners further developed existing relationships and formed new ones at various levels including, state, local and community level. The work done by the Governor's Workforce Sub-Cabinet related to Drive to 55 and other areas around data sharing and alignment further enhances a strong foundation for successful workforce development activity in Tennessee.

A new initiative being introduced through further policy works to address access points and their relationship to the American Job Center. Through planning and an asset mapping process many new non-traditional partners were identified and expressed interest in becoming access points by referring and assisting clients to connect to the public Workforce System. This structure will be evaluated by working through our partner network of training providers, libraries, community and faith-based organizations and others to provide training and limited support to expand our network by not expanding infrastructure costs. The labor force participation rate must be challenged to ensure all participants looking can make job seeker connections in their community. The role the local boards play in driving this model will be key to building an affordable and highly efficient Workforce System.

These pieces: education and workforce priority, state leadership, technology, relationship, and network create a framework and foundation that will ensure continued economic and quality of life in Tennessee.

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) above.

In preparation for WIOA implementation, Tennessee's workforce development activities were analyzed by its core and partner program staff. Initial exploration showed the significant growth of new industry and new jobs required increased partnership and coordinated communication. In addition, the team was able to identify a great strength in customer-centered customer service, the support of local government and system flexibility to be pillars in the Workforce System. In addition, the availability of program data has provided much needed support for the development of service strategies and goal attainment across all programs.

Tennessee's Workforce System has received strong support from its State Workforce Board, Local Boards' and business leaders across the system. Local business leaders are highly engaged in their efforts to assist individuals by providing work-based opportunities. Community Colleges are developing training programs to meet the needs of employers. The coordination and alignment of core programs allow customers to access timely relevant services from all core partners through wrap-around customer services. The Department of Economic & Community Development assists in analyzing the needs of businesses moving to Tennessee and working with Tennessee's Workforce System to recruiting trainees adding value to the workforce system. The exceptional cooperation and alignment of core program partners to deliver resources for customers needing long-term assistance to develop talent are continuously giving credit to the workforce system. The States guidelines, policy formation, monitoring and the use of the Virtual One Stop data collection system (VOS) has allowed the state to monitor the progress made by participants and the referral process across core programs to identify gaps and weakness in the delivery system.

Tennessee has transformed the way we operate to continuously improve our ability to help Tennesseans obtain high-quality jobs and careers, while also helping employers hire, train and retain skilled workers. We are very proud of where we are today and excited about where we are headed. Through the collaboration across state agencies like Tennessee Department of Human Services, Economic & Community Development, Education, and additional partner our technological advances, and mobility we continue to make what we do more accessible to our customers, this also means that comprehensive knowledge of resources and allocation of scarce funding is maximized.

General Strengths:

• Tennessee Workforce System is equipped to provide the necessary components of an emerging and growing workforce. This includes but is not limited to job placement services, support services, education and training services, and use of labor market information.

• Identified the shared responsibility in coordination and involvement of workforce and education partners in conjunction with public and privately-run programs that promote high-quality job skills training, certifications and attainment of in-demand occupations.

• Connecting job seekers and trainees to employment and training services through innovative technology (Jobs4TN) and integrated services (eligibility verification, agency referral, and leverage funding)

• Increased awareness and expansion of partnership services and goals

Specific Program Area Strengths:

• **Governance and Leadership:** On the local level, numerous staff members have several years of experience and institutional knowledge regarding program standards, local priorities and community changes, emerging economies and changes participant pools. These staff members serve as subject matter experts for several programs and operations in the American Job Centers and have valuable relationships local stakeholders (this includes but is not limited to local elected officials, community-based organizations, board district, and school board leaders, county sheriff, etc.)

• **One-Stop Design and Delivery:** The increased use of technology allows the Tennessee Workforce System to seamlessly integrate services, system and program changes in accordance with WIOA. The connection in Jobs4TN and VOS leverage the case management processes for all participants and programs that are involved in WIOA implementation across the state. The efficiencies realized with the common intake process and reporting will enable all programs and partners included in this Combined State Plan to mutually benefit from electronic referrals and reporting and coordinate services and tracking of co-enrolled participants, to name a few. Additionally, the centralized and coordinated efforts from all program partners ease the communication and engagement of job seekers, employers, local government support, community partners, and additional external clients.

• As it pertains to individuals with disabilities, Tennessee serves as an Employment First state, allowing seamless integration and support for this hard to serve population.

• **Youth Program:** While the most significant program changes under WIOA impacted the services to youth, this shift-aligned with several modifications Tennessee was already making. The existing work of Pathways Tennessee (career pathways) and the Work Based Learning Champions initiative (Career and Technical Education) both led by the Tennessee Department of Education strongly support the increased need for funding services for in-school youth as well as increasing opportunities for work experiences. Regarding out-of-school youth, the Governor's Drive to 55 Alliance provides excellent support and resources to get 55 percent of Tennesseans equipped with a college degree or certificate by the year 2025. The Alliance's three initiatives - Tennessee Promise, Tennessee Reconnect and Tennessee LEAP (Labor Education Alignment Program), all serve as conduits to identify and close skills gaps to better prepare our workforce and our state for the future, most of which involves better serves to youth.

Some areas for growth and improvement have been identified in asset mapping of local and state level resources, common strategy development, and meeting the growing employer demand for skilled and qualified employees. Efforts to improve these challenges have been made through hosting regional meetings with local partners to identify services provided and opportunities for increased alignment. In addition, coordinated data sharing and communication will remain areas of focus for improvement and innovation. The use of data along with integration, agility, and ability to serve those with significant barriers has always been a focus in the Workforce System; this common thread has helped shape the focus and continuation of workforce development activities statewide.

General Weaknesses:

The data integration among all core partners has not been fully implemented. One core partner maintains a separate data management system for tracking and case management functions. TDLWD is aware of this weakness and will be working with its core partners to develop a universal intake and assessment process for program participants. Despite the efforts of Workforce Development to inform the public about the opportunities for training and jobs, there is still lack of awareness of what this department offers. Financial and administrative integration across core partners is weak and is not where it needs to be but in time the use of Grants4TN will be used by core partners to create an effective way of using resources.

• Partnerships exist, yet competing visions and interest across programs, agencies and sectors create system inefficiencies

• Ineffective communication across programs, agencies, and sectors

• Ineffective identification of opportunities for effective co-enrollment or referral of services

• Lack of consistent definitions, terms and/or initiatives

Specific Program Area Weaknesses:

- **Governance and Leadership:** As new partners come together so do their individualized rules, regulations, and perceived perceptions of varying systems. The lack of clarity and guidance one new program and system standards has led to from varying local and regional structures competing for resources or involvement. In the same regard, strong business leaders are unsure of the level of involvement or support these leaders can offer and as a result, have chosen to remove themselves from important systems changes.
- **One-Stop Design and Delivery:** The use of Jobs4TN for Title I and Title III programs allows for referring individuals between programs and service providers, however, there is currently no automated way to ensure that participants in other partner programs are able to easily transition between programs. This limitation, while a work in progress, may result in a participant not receiving the maximum benefit of all programs available and/or inefficient case management as a result of varying case management processes and systems. Further, while certain Title I programs require an individual to have an employment plan, such a plan is not currently held in common with other partner programs, limiting the capacity of the entire workforce system to serve participants comprehensively with their overall career goals in mind. In the same regards, funding sources that support each program are not easily accessible or adequately used to support the needs of the participants served. These two issues can result in poor program performance, inequality in resource sharing and incorrect reporting.
- **Youth Program:** As program and funding standards evolve so do the participant populations. Specifically, regarding out-of-school youth funding, the lack of asset mapping has limited local or regional leaders' knowledge of other agencies' resources and community-based programs who can serve as partners to reach the changing youth population. In the same regard, the lack of information sharing on potential participants (i.e.: recent dropouts or juvenile offenders) complicates the outreach efforts for engaging and enrolling the hardest to serve participants.

Opportunities:

- Expand technology and data systems to meet the WIOA integrated technology requirements and other federal initiatives
- Build responsive and proactive workforce systems grounded in collaboration with state, regional, and local leaders
- Support and encourage strategic thinking and planning of regional and local efforts in regard to business growth, retention, and recruitment
- Adapt education and training programs to meet current employment needs and growing opportunities
- Develop cross-program performance metrics and monitoring to measure progress towards reaching performance benchmarks

Threats:

- Too complex and hard to navigate
- Insufficient feedback mechanism to inform workforce system partners so that they can adapt to the changing federal regulations and in the workforce
- Inconsistent data matching and sharing across partners and programs

C. State Workforce Development Capacity

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

Tennessee has implemented a workforce system designed to increase capacity and leverage resources to prevent duplication of services resulting in the ability to serve customers effectively. The functional design of the Tennessee Workforce System started with the co-location of the four core program partners, (Title I, Title II and Title III and Title IV) allowing for optimal coordination in both strategic planning and operational execution. Besides the four core programs, Tennessee has several other program services that expand capacity and enhance the delivery of services for those customers who need long-term intervention. This includes broadening services to a more diverse population of job seekers across the state. A streamlined customer experience through referrals and to services from one partner to another increase the efficiency of all partners, allowing specialized services to function optimally and assists in eliminating the duplication of services. Furthermore, in an effort to assist customers with needed services, more partnerships with community service providers are sought to increase capacity, especially in rural areas across the State. Beyond bricks-and-mortar facilities, Tennessee utilizes technology to increase access to its services through mobile American Job Center services that provide for rural and urban communities who lack access or would have difficulty accessing services at the traditional AJC.

The Tennessee American Job Centers (AJCs) are at the forefront of the workforce activities and represent the vision of the workforce services delivery system. Currently, there are 23 American Job centers spread across the state providing comprehensive access. In addition to these centers, Tennessee has 62 affiliate sites and access points with six mobile units that travel the state and provide service to customers in a mobile capacity. The American Job Centers are overseen at the state level by the Division of Workforce Services and managed locally by each of the Local

Workforce Development Boards. Local boards are comprised of local representatives from businesses, labor, partner agencies, and other key stakeholders, creating a diverse and functional group. The local boards, in alignment with the State's vision, provide a front-line strategic implementation for state-wide initiatives in addition to their locally-determined priorities. The Tennessee State Workforce Board is the governing body charged with the continuous improvement of the workforce system and oversight of Workforce Innovation and Opportunity Act (WIOA) funds and programs. The State Board ensures that state workforce activities are aligned with the efforts of economic development, education, workforce development, and business stakeholders at the local, regional, and state levels. This multifaceted alignment of public and private stakeholders creates a workforce system that is demand-driven, flexible, and responsive to the needs of Tennesseans.

State initiatives include sector strategies, career pathway development, and delivery of standardized business services. Local priorities include serving priority populations, youth program services, targeted sector partnerships, and work-based learning services. Local boards are tasked with procuring a one-stop operator for the daily operation of their respective center(s) in accordance with WIOA 121(d). These boards oversee workforce activities by partnering and using Memorandums of Understanding (MOU) to implement core, non-core, and other partner programs. The technical and community colleges in the state are another vehicle the state uses to expand training and educational opportunities to those needing skills upgrades and educational backgrounds to enter better-paying jobs.

State merit-staff employees, along with other core partner staff provide career services. These services are provided for job seekers to include adults, older youth, younger youth and dislocated workers, and employers. Other services provided are labor exchange services including Reemployment Services and Eligibility Assessment participants (Unemployment Insurance (UI) claimants), veterans, migrant and seasonal farmworkers, older workers, SNAP program recipients, Adult Education and Vocational Rehabilitation services, and others. These services are provided in a seamless manner ensuring that the customer is not aware which program partner services are provided. The core partner services and optional partners share space through collocation and services throughout the Tennessee AJC System.

The Tennessee workforce system's capacity rests in the supportive nature of its core and partner programs and the agencies that provide the applicable activities and services. Included within each of these agencies is the collaborative provision of funding and service strategies that best serve the target participant populations and the emerging workforce.

Workforce System Capacity - Technology Development and Integration

The development and implementation of a technology-based data and case management system, Jobs4TN, has transformed the way information is collected and shared across programs. The system fully integrates Adults, Dislocated Workers, Youth, Veterans, Work Opportunity Tax Credit, SNAP E&T, TAA, RESEA, and Unemployment Insurance programs under one system. The addition of Adult Education program (January 2017) and interfacing of Vocational Rehabilitation services (TBD) in the near future will establish a more integrated and seamless system for data and program information management.

Workforce System Capacity - Physical Infrastructure

Much like the integration of technology, the workforce system relies heavily on its physical infrastructure and presence across the state. This consists of multiple on and off ramps to access services provided by WIOA Combined State Plan Partners. This includes but is not limited to the inclusion of existing and new partner programs' physical presence and/or directed referral of services within a Comprehensive, Affiliate or Access Point location of a Tennessee American Job Center. The 85AJCs and access points across the state, plus the six mobile career coaches, provide easy access to employment services, such as education and training for job seekers, recruitment and human resource assistance for businesses, and information for local and regional economic developers. In support of Tennessee current and future businesses, each American Job Center offers a cast array of services, including hosting job fairs, job postings, and screening potential employees, sharing important Labor Market Information about Tennessee's labor market, and providing training services. All of these services and more are made available to businesses and job seekers at no cost. The identification of business needs and employee skills levels are vital to the growth of Tennessee business and are a key piece of the workforce system's success in years to come.

In addition to the services provided by any Tennessee American Job Center, additional partner services, and activities are made available through the following:

- Adult Education Regional Districts
- Rehabilitation Services Local offices and Tennessee Rehabilitation Centers
- Human Services County Offices
- Department of Education local school districts

Workforce System Capacity - Serving Disadvantaged Populations

While there are tremendous growth and expansion of employment opportunities for Tennessee jobseekers, there are numerous individuals who require additional support to overcome their barriers to employment. In cooperation with the Department of Human Services, all partner programs will be able to refer participants with the greatest barriers to employment, especially those with disability, to Vocational Rehabilitation Services and/or TANF or SNAP E&T services. Using VOS and additional case management systems, all partners will collect basic information from the WIOA participant allowing for an assessment of the participant's needs. The "no wrong door" approach, will assure all participants navigate through the workforce system with the support of well-trained staff to identify the most beneficial workforce or supportive service and/or training program. The warm handoff between partners and programs, along with the necessary participant information, will assure that those participants with the greatest barriers to employment have the best possible opportunity to succeed in training or entering in-demand occupations.

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.

On April 20, 2011, Tennessee Gov. Bill Haslam announced the Jobs4TN plan, which lays out the administration's economic development strategy resulting from a top-to-bottom review of all state agencies. The governor's Jobs4TN plan focused on:

• Prioritizing the strategic recruitment of target industries;

• Assisting existing Tennessee businesses in expansions and remaining competitive;

• Supporting regional and rural economic development strategies;

• Investing in innovation and reducing business regulation.

"My top priority is for Tennessee to be the No. 1 location in the Southeast for high-quality jobs," Haslam said. "Our Jobs4TN plan is a blueprint for doing just that. By leveraging our existing assets in each region, we will be able to attract new businesses to the state while helping our existing businesses expand and remain competitive. We will also be making significant investments in innovation to position Tennessee as a national leader well into the future."

The Governor's Jobs4TN plan was developed over a 45-day period and involved interviews with more than 300 stakeholders, community leaders, and national experts as well as through seven roundtables across the state. Many of these goals and objectives were included in a pro-active modification of our State Workforce Investment Act plan which also re-engineered our Rapid Response and dislocated worker efforts within the regional "Jobs Base Camps" structure set in motion by the Governor. Establishing regional "jobs base camps" across the state, Economic and Community Development fundamentally restructured its field staff to establish a "jobs base camp" in nine economic regions across the state. Each base camp worked with local partners to develop and/or revise a regional economic develop a plan and align existing federal and state resources around that plan. This included the local workforce boards as a strategic partner in this initiative.

A key function of these jobs base camps was reaching out to rural counties to incorporate them into broader regional economic development strategies that leverage existing resources and maximize the assets of rural communities.

The Workforce System is another component of the Governor's comprehensive jobs plan to support and encourage investment in new business and existing business in Tennessee. His jobs plan also includes education reform initiatives that focus on children in the classroom and a well-educated, quality workforce in Tennessee, which is the most important long-term strategy for successful economic development.

Workforce System Vision

To increase the competitive position of Tennessee business through the development of a highly skilled Workforce.

GOAL 1: Ensure Tennessee employers have access to a skilled, high-quality workforce in today's changing economy.

To accomplish this goal the Tennessee workforce system is engaging the business community and further aligning education and workforce training opportunities with the needs of Tennessee

employers; ensuring training is predicated upon a labor market need, labor market information, and sector strategy input and expanding efforts to recruit and retain workers.

Strategies:

The Tennessee Workforce Development shall focus on the state's most significant short-and long-term training opportunities received by individuals that are aligned with the needs of businesses and are producing successful outcomes for individuals. The strategy will also focus on creating, fostering, and expanding sector strategies based upon input provided by employers and data provided by the state's labor market information. Efforts will continue to cultivate partnerships between sector strategies and apprenticeship programs. In addition, we will continue to strengthen the relationship and work with economic development entities to develop practices aimed at retaining workers and to meet the needs of incoming and existing industries and businesses.

GOAL 2: Ensure all Tennesseans who want to work have access to an open, streamlined, and effective workforce development system.

This goal will be accomplished by maximizing core program coordination and utilizing career pathways as an umbrella model in AJCs. In addition, evaluating to ensure that training and education requirements match the state's labor market needs as well as reducing barriers to employment for underrepresented populations.

Tennessee is leading 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 initiatives: Drive to 55 and the Tennessee Promise.

Drive to 55 aims to bring the percentage of Tennesseans with college degrees or certifications to 55 percent by the year 2025. It's not just a mission for higher education; it's also a mission for the workforce and economic development.

Strategies: Tennessee will continue to develop a marketing plan to create awareness about services offered by AJCs and ensure certain accountability and transparency of funding. Tennessee will continue to provide the State Workforce Development Board a joint partner service annual report which demonstrates program performance to help the Board identify opportunities for funding allocation. We will use Labor market analysis and the needs communicated by employers to inform ongoing AJC system planning and development and expand employer education efforts regarding the benefits of hiring underrepresented workforce populations. We will develop and enhance programs that incentivize employment of underrepresented workforce populations. Also, we will continue to utilize integrated training and education programs as a way to efficiently move adults in need of literacy skills or high school equivalency certificates into the workplace.

GOAL 3: Prepare Tennessee youth to be both career and college ready.

Strategies: Tennessee plans to promote career exploration through career pathways so young people can acquire educational, technical, and social skills that enhance career development. Working with education partners and stakeholders we will develop assessment tools and information regarding career pathways. Working with LWDB policy teams, we will enhance 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. In addition, assessment tools will be used to identify needs for support services and partners that work together to provide and continually assess whether services provided are effective in achieving improved career readiness.

Tennessee Reconnect

Tennessee Reconnect is the Drive to 55 initiatives to help more adults complete a post-secondary degree or credential. Tennessee has between 900,000 and 1 million adults with some college but no degree. It is impossible to achieve the mission of the Drive to 55 without re-engaging these individuals and helping them finish their degree or certificate.

As part of Tennessee Reconnect, all Tennessee adults can now attend and earn a diploma or certificate at any of our 27 Tennessee Colleges of Applied Technology (TCATs) completely free of tuition and fees. In the fall of 2018, participants will have access to Community Colleges in addition to the TCATs.

To make college a reality, Tennessee Reconnect programs are designed to help busy adults achieve dreams of attaining a college degree or certificate to be equipped for the workforce.

Labor Education Alignment Program (LEAP)

Tennessee Labor Education Alignment Program (LEAP) ensures that post-secondary institutions are producing the skills and credentials that Tennessee employers actually need.

Tennessee LEAP eliminates skills gaps across the state in a proactive, data-driven and coordinated manner by encouraging collaboration across education and industry and by utilizing regional workforce data to identify and then fill skills gaps across the state.

With a competitive grant distribution, state funds are being utilized to support local alignment groups to develop skills gap forecasts, identify the highest priorities, and develop programs or purchase equipment needed to fill those gaps.

Governor Haslam's Workforce Sub-Cabinet, consisting of representatives from the Governor's office, Department of Economic and Community Development, Department of Labor and Workforce Development, Department of Education, Department of Human Services, Tennessee Higher Education Commission and Tennessee Board of Regents, are leading this charge and meet

regularly to review, select and support the grant recipients.

Workforce360°

Tennessee aims to be the most aligned state in the nation between workforce, education, and industry. Enter Workforce360°, a systematic partnership among state agencies and the higher education system that delivers a highly skilled workforce for your business.

The best solutions are most often achieved through a collaborative approach. When companies allow the state team to become an extension of their workforce development and recruitment efforts, we are able to provide support that is truly unique to their business. Our project-based

system works with each company to identify workforce gaps and streamlines solutions across Tennessee by utilizing state department communications, interaction, and resources. Region-based tactical teams provide a timely response to immediate business workforce needs, as well as strategic planning for long-term requirements.

A key part of customer outreach and satisfaction is connectivity, expectation, and communication. This is accomplished through the modernization of our state's labor exchange functions housed within the Jobs4TN platform. This platform provides customers with real-time labor market information, virtual recruitment, resume matching, case management and more recently the addition of the unemployment insurance module where all customer workforce functions are housed in a central electronic tool.

This allows 24/7 access to hiring employers, job search and job development which serve to drive efficiency to meet employer demand. This also serves as a central function around business intelligence to better identify and serve customers at all levels. Partner agencies encourage clients looking for work to register in Jobs4TN to better connect, serve and drive response from the workforce system to best meet their needs.

One-Stop Centers under WIOA

The publicly funded workforce system envisioned by WIOA is quality-focused, employer-driven, customer-centered, and tailored to meet the needs of regional economies. It is designed to increase access to, and opportunities for, the employment, education, training, and support services that individuals need to succeed in the labor market, particularly those with barriers to employment. It aligns workforce development, education, and economic development programs with regional economic development strategies to meet the needs of local and regional employers, and provide a comprehensive, accessible and high-quality workforce development system. This is accomplished by providing all customers access to high-quality one-stop centers that connect them with the full range of services available in their communities, whether they are looking to find jobs, build basic educational or occupational skills, earn a postsecondary certificate or degree, or obtain guidance on how to make career choices, or are businesses and employers seeking skilled workers.

One-Stop Centers reflect innovative and effective service design and high-quality one-stop centers in several ways - some significant methods are as follows:

- Use of an integrated and expert intake process for all customers entering the one-stop centers
- Design and implement practices that actively engage industry sectors and use economic and labor market information, sector strategies, and career pathways
- Develop, offer, and deliver quality business services that assist specific businesses and industry sectors in overcoming the challenges of recruiting, retaining, and developing talent for the regional economy
- Balance traditional labor exchange services with strategic talent development within a regional economy. This includes the use of market-driven principles and labor market information that help to define a regional economy, its demographics, its workforce and its assets and gaps in skills and resources.

- Improve the skills of job seeker and worker customers. Tennessee American Job Centers offer access to education and training leading to industry-recognized credentials through the use of career pathways, apprenticeships, and other strategies that enable customers, including those with disabilities, to compete successfully in today's global economy. They provide businesses with access to the quantity and quality of talent they need and support upskill/backfill strategies that expand job opportunities in the community.
- Ensure meaningful access to all customers. AJCs must be physically and programmatically accessible to all customers, including individuals with disabilities
- Include both virtual and center-based service delivery for all customers

One-Stop Centers operate with Integrated Management Systems and High-Quality Staffing - some significant ways this is displayed is by:

- Reflect the establishment of robust partnerships among partners with an increased physical presence
- Organize and integrate services by function (rather than by program)
- Develop and maintain integrated case management systems that inform customer service throughout the customer's interaction with the integrated system and allow information collected from customers at intake to be captured once
- Use common performance indicators
- Provide continuous cross-training opportunity for AJC and partner program staff.

The workforce system will partner and align with various agencies and organizations to improve the educational attainment and workforce skills of Tennesseans. We will continue to modernize technology and embrace an attitude as change agents. Together, we will create a culture that delivers collaborative approaches across state agencies for success, thereby making Tennessee the 1 state in the southeast for high-quality jobs.

2. Goals

Describe the goals for achieving this vision based on the above analysis 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 of employment* and other populations.**
B. Goals for meeting the skilled workforce needs of employers.

---

* 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.

** Veterans, unemployed workers, and youth and any other populations identified by the State.

Jobs and Economic Goal: Make TN the 1 in the Southeast for High-Quality Jobs

"Education is a top priority in Tennessee. Our progress in K-12 and focus on workforce development makes it clear that Tennessee is supporting the development of a better-educated and highly trained workforce on a long-term basis." // Tennessee Governor Bill Haslam

The overarching goal of the Governor's administration is making Tennessee the number one State in the Southeast for high-quality jobs. The Governor is invested in the first-hand perspective of his citizens and constantly seeking opportunities to meet and listen to those who are "on the ground" creating jobs in the State. From meeting with small business owners, economic development professionals, and local government and community leaders to visiting job sites and touring factories, the Governor wants to hear directly how state government could improve strategies and practices to increase the number of jobs in the State. This Combined State Plan outlines the collaborative efforts that will guide a focused partnership between the Workforce System, specifically Title I, II, III and IV, and economic development in growing existing business and attracting new business to the State. The functional alignment outlined in this Plan will support economic development by ensuring that all Tennesseans have the skills and knowledge to meet the needs of employers now and in the future. The five objectives listed below provide the framework by which the Governor seeks to make Tennessee's workforce reign superior in the Southeast:

Objective I - Identify, assess, and certify skills for successful careers

Objective II - Promote economic development by connecting workforce development with job creation and growth

Objective III - Increase employer engagement with the workforce development system

Objective IV - Expand programs of study that bring together a sequence of career-focused courses that start in high school and extend through college

Objective V - Increase work-integrated learning

Education and Workforce Development Goal: Create a more seamless path from high school, post-secondary education or training to the workforce

As a strong advocate for education reform, Governor Haslam understands that this is the pipeline to a successful and ever-growing workforce. He exemplifies this commitment by working alongside teachers, parents, and education leaders to ensure that the innovative

changes which have been made in recent years to the K-12 and higher education systems are implemented effectively and that the state successfully capitalizes on the momentum that presently exists in education. In addition, Governor Haslam is a former chair of the Education and Workforce Committee for the National Governor's Association and continues to serve on this committee. This committee has jurisdiction over issues in the area of education (including early childhood, K-12 and postsecondary) as well as in the areas of workforce development. Members of the committee ensure that the governor's views are represented in the shaping of Federal policy.

In Tennessee, Governor Haslam has made college access, as well as college success a priority by committing to help each region raise its educational attainment rates and enhance its workforce development efforts through innovative public/private partnerships. He knows that to prepare Tennesseans for a competitive 21st-century economy, Tennessee must create a more seamless path from high school, post-secondary education or training, to the workforce. The Workforce System plays a crucial role in assisting with building the skills and knowledge capacity of the Tennessee citizens. All Tennesseans will have access to the same basic workforce services regardless of the access point and educational resources invested by the Workforce System which will focus on credentials and certifications to pursue a career path.

Objective I - Leverage resources, including WIOA statewide and local funding and other non-WIOA funds, and partnerships across departments and programs to aid in developing more seamless paths from training into the workforce

Objective II - Increase the number of credentials and certificates

Objective III - Improve the availability and quality of career and education guidance for students of all ages in high school and postsecondary institutions

Conservative Fiscal Leadership Goal: Eliminating duplication and leveraging dollars to provide more opportunities to existing job seekers and the emerging workforce

Governor Haslam has a record of sound, public and private sector financial management as well as successful job recruitment. It is with this experience that he has been able to pull the State through difficult economic times while keeping taxes low and fostering a business-friendly environment critical to continued job growth. The Governor understands that families and businesses have made sacrifices to sustain the State's economy, and likewise, the state government has been forced to prioritize its fiscal choices. By making tough decisions, managing the State budget conservatively, and guiding the state's finances into a position of strength, the Governor is helping Tennessee compete in the global economy and successfully attract the "jobs of the future" to Tennessee. The Workforce System's functional alignment will assist in eliminating duplication and leveraging dollars to provide more opportunities to job seekers and the emerging workforce. The following objectives provide more details about how the State plans to preserve its fiscal integrity and increase opportunities for the existing and emerging workforce:

Objective I - Improve job search and placement services for unemployed and underemployed workers

Objective II - Establish cost-effective co-investment models, across government funding streams and other funding streams

3. Performance Goals

Using the table provided in Appendix 1, 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.)

Table 1. Employment (Second Quarter after Exit)

Program	PY 2017Proposed/ExpectedLevel	PY 2017/Negotiated/AdjustedLevel	PY 2018Proposed/ExpectedLevel	PY 2019Proposed/ExpectedLevel
Adults	74.00	83.00	74.00	74.00
Dislocated Workers	81.00	84.00	81.00	81.00
Youth	75.00	79.00	75.00	75.00
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	69.00	68.00	69.00	69.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 1

Table 2. Employment (Fourth Quarter after Exit)

jlkt	PY 2017 Proposed/ExpectedLevel	PY 2017 Negotiated/AdjustedLevel	PY 2018 Proposed/ExpectedLevel	PY 2019 Proposed/ExpectedLevel
Adults	74.00	78.00	74.00	74.00
Dislocated Workers	81.00	81.00	81.00	81.00
Youth	75.00	79.50	75.00	75.00

Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	69.00	67.00	69.00	69.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 2

Table 3. Median Earnings (Second Quarter after Exit)

Program	PY 2017 Proposed/Expected Level	PY 2017 Negotiated/Adjusted Level	PY 2018 Proposed/Expected Level	PY 2019 Proposed/Expected Level
Adults	4,300.00	7,000.00	4,300.00	4,300.00
Dislocated Workers	7,300.00	7,400.00	7,300.00	7,300.00
Youth	2,700.00	Baseline	2,700.00	2,700.00
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	4,713.00	4,913.00	4,713.00	4,713.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 3

Table 4. Credential Attainment Rate

Program	PY 2017 Proposed/ExpectedLevel	PY 2017 Negotiated/AdjustedLevel	PY 2018 Proposed/ExpectedLevel	PY 2019 Proposed/ExpectedLevel
Adults	73.00	75.50	73.00	73.00
Dislocated Workers	77.00	79.00	77.00	77.00
Youth	65.00	81.50	65.00	65.00
Adult Education	Baseline	Baseline	Baseline	Baseline

Program	PY 2017 Proposed/ExpectedLevel	PY 2017 Negotiated/AdjustedLevel	PY 2018 Proposed/ExpectedLevel	PY 2019 Proposed/ExpectedLevel
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 4

Table 5. Measurable Skill Gains

Program	PY 2017 Proposed/Expected Level	PY 2017 Negotiated/Adjusted Level	PY 2018 Proposed/Expected Level	PY 2019 Proposed/Expected Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	37.00	37.00	38.0	40.0
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 5

Table 6. Effectiveness in Serving Employers

Program	PY 2017 Proposed/ExpectedLevel	PY 2017 Negotiated/AdjustedLevel	PY 2018 Proposed/ExpectedLevel	PY 2019 Proposed/ExpectedLevel
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline

Program	PY 2017 Proposed/ExpectedLevel	PY 2017 Negotiated/AdjustedLevel	PY 2018 Proposed/ExpectedLevel	PY 2019 Proposed/ExpectedLevel
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	Baseline	Baseline	Baseline	Baseline
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 6

Measure: Employment in 2nd Qtr. After Exit	PY 17/ F Y18 Proposed/ Expected Level	PY 17 / F Y18Negotiated/ Adjusted Level	PY 18 Proposed/ Expected Level	PY 19 Proposed/ Expected Level
Adults	74%	80%	74%	74%
Dislocated Workers	80.5%	83%	80.5%	80.5%
Youth (Education or Employment)	74.5%	76%	74.5%	74.5%
Wagner-Peyser / Labor Exchange	69%	65%	69%	69%
Adult Education	Baseline	Baseline	Baseline	Baseline
Vocational Rehabilitation	58.5%	Baseline	58.5%	58.5%

Measure: Employment in 4th Qtr. After Exit	PY 17 / F Y18 Proposed/ Expected Level	PY 16 / F Y17Negotiated/ Adjusted Level	PY 18Proposed/ Expected Level	PY 17 / F Y18Negotiated/ AdjustedLevel
Adults	70.5%	75%	70.5%	70.5%
Dislocated Workers	79%	79%	79%	79%
Youth(Education or Employment)	69.5%	78%	69.5%	69.5%
Wagner-Peyser / Labor Exchange	68.5%	64%	68.5%	68.5%
Adult Education	Baseline	N/A	Baseline	Baseline
Vocational Rehabilitation	54%	N/A	54%	54%

Measure: Median Earnings 2nd Qtr. After Exit	PY 17 / F Y18Proposed/ ExpectedLevel	PY 17 / F Y18Negotiated/ AdjustedLevel	PY 18 Proposed/ ExpectedLevel	PY 19 Proposed/ ExpectedLevel
Adults	$4300	$7000	$4300	$4300
Dislocated Workers	$7300	$7400	$7300	$7300
Youth	$2700	N/A	$2700	$2700
Wagner-Peyser / Labor Exchange	$4713	$4913	$4713	$4713
Adult Education	Baseline	N/A	Baseline	Baseline
Vocational Rehabilitation	Baseline	N/A	Baseline	Baseline

Measure: Credential AttainmentRate	PY 17 / F Y18Proposed/ Expected Level	PY 17 / F Y18Negotiated/ Adjusted Level	PY 18 Proposed/ Expected Level	PY 19 Proposed/ Expected Level
Adults	73%	75.5%	73%	73%
Dislocated Workers	77%	79%	77%	77%
Youth	65%	81.5%	65%	65%
Wagner-Peyser / Labor Exchange	NA	NA	NA	NA
Adult Education	Baseline	NA	Baseline	Baseline

Measure: Credential AttainmentRate	PY 17 / F Y 18 Proposed/ ExpectedLevel	PY 17 / F Y18 Negotiated/ AdjustedLevel	PY 18 Proposed/ ExpectedLevel	PY 19 Proposed/ ExpectedLevel
Vocational Rehabilitation	TBD	NA	TBD	NA

Measurable Skill Gains	PY 16 / F Y17 Proposed/ Expected Level	PY 16 / F Y17Negotiated/ Adjusted Level	PY 18 Proposed/ Expected Level	PY 19 Proposed/ Expected Level
Adults	Baseline	NA	Baseline	Baseline
Dislocated Workers	Baseline	NA	Baseline	Baseline
Youth	Baseline	NA	Baseline	Baseline
Wagner-Peyser / Labor Exchange	NA	NA	NA	NA
Adult Education	37%	37%	38%	40%
Vocational Rehabilitation	TBD	NA	TBD	TBD
Measure: Effectiveness in ServingEmployers	PY 17 Proposed/ ExpectedLevel	PY 17 Negotiated/ AdjustedLevel	PY 18 Proposed/ ExpectedLevel	PY 19 Proposed/ ExpectedLevel
Adults	Baseline	N/A	Baseline	Baseline
Dislocated Workers	Baseline	N/A	Baseline	Baseline
Youth	Baseline	N/A	Baseline	Baseline
Wagner-Peyser / Labor Exchange	Baseline	N/A	Baseline	Baseline
Adult Education	Baseline	N/A	Baseline	Baseline
Vocational Rehabilitation	Baseline	N/A	Baseline	Baseline

4. Assessment

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

While the state has not yet defined the process to assess the overall effectiveness of the workforce development system, the continuation of the WIOA Focus Group Meetings (as described in section 4 - Coordination with State Plan Programs) will allow for the ongoing discussions amongst partners. Quarterly convening to further develop and define policies and procedures will assist in the improvement of the Workforce System service delivery structure. Feedback will continuously be considered and integrated into all core and partner programs.

The Department of Labor and Workforce Development makes use of many activities to assess the successful provisions of workforce services and the delivery of Tennessee's strategy and goals. The activities discussed below all play a role in ensuring continuous improvement in terms of observing federal and state regulations as well as state and local board policies.

The first way in which the State ensures the overall effectiveness of the workforce development system is through conducting and yearly assessing the systems function through onsite monitoring. Once a year, the LWDBs host a team of state program monitoring staff. The staff conducts a review to ensure that program and fiscal activities in the area are based on the local plan, federal regulations, state policies and the local policies. The staff will also conduct interviews to ensure understanding of regulations determining the cohesiveness of local processes. If the team identifies exceptions, the LWDA is given a list of corrective action tasks to complete. These corrective actions provide the LWDAs opportunity to improve their process and show continuous improvement of the delivery of services.

The Virtual Data Collection System (VOS) that LWDAs use to document information on services provided to individuals is also assessed and monitored by compliance unit staff to support the PAR monitors. The compliance unit staff conducts continuous desk-top monitoring to ensure all support documentation is uploaded in VOS and that participants are eligible for services. The results of the findings if any will be provided to PAR to use it as a part of their review process when they visit the particular LWDA.

As required in WIOA and state guidance, Local boards monitor their sub-recipients to ensure that their processes are adequate for reporting and evaluating purposes including their compliance with the terms of grants and contracts. LWDAs must monitor to determine that necessary reports are provided to the state in a timely manner and validate the accuracy of the data reported within the American Job Center system. Finally, the One-Stop Operator performs quality assurance by continuously reviewing the eligibility of participants, services provided and access to services by proactively intervening to avoid noncompliance. This continuous monitoring assessment of the delivery system safeguards that each LWDB is able to carry out the Governor's vision in an effective manner.

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).

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

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

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

Building the Local Workforce Development Board's Engagement

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

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

Regional Industry Engagement

Tennessee's investment of its resources to develop strategies that fit individual industry sector needs, particularly the high-growth sectors of the economy is a priority. The State Workforce Development Board (SWDB) implemented rigorous local and regional planning elements and requirements to drive high-quality career pathways and strategies. Locally and regionally-based sector partnerships have been formed to provide a

mechanism for establishing sector strategies throughout the state. Workforce services have to tie most of its resources for training workers to those industry sectors that drive the states existing and emerging economy while partnering with the education system developing the curriculum necessary for building these skills.

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

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

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

Leveraging Data and Partnerships to Inform Strategies and Drive Performance

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

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

Career Pathways

Maximizing core program coordination and utilizing career pathways as well as evaluating to ensure that training and education requirements match the state's labor market needs allows Tennessee Workforce Areas an opportunity to lead the way nationwide in K-12 education reform. We have continued that momentum and expanded

our focus to include post-secondary education through a pair of innovative Drive to 55 initiatives through Tennessee Pathways and the Tennessee Promise.

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

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

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

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

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

In June 2012, Tennessee was selected to join a multi-state consortium, the Pathways to Prosperity Network, a multistate initiative aimed to address the "skills gap" that threatens the preparedness of young Americans entering the workforce. Entrance into this consortium led to the founding of Pathways Tennessee. The mission of Pathways Tennessee is to provide Tennessee students rigorous academic/career pathways, which are linked to economic and labor market needs and trends. Rooted in the necessity for a well-rounded and balanced approach to preparation, Pathways Tennessee developed and maintains a state level board comprised of various state government departments and private/sector leaders in business. These organizations include:

- Department of Economic & Community Development
- Department of Education
- Department of Labor & Workforce Development
- Governor's Office
- Tennessee Board of Regents System
- State Collaborative on Reforming Education (SCORE)
- Tennessee Business Roundtable
- Tennessee Higher Education Commission
- Tennessee State Board of Education
- Tennessee Independent Colleges and Universities Association

There is a strong correlation between WIOA-defined career pathways and elements, the focus of the Pathways TN initiative, and the leading agencies that are supporting the implementation of both. Pathways TN provides a seamless approach to developing regional, long-term, workforce pipelines in Tennessee and has been recognized as an approach to reach both education goals as well as workforce development goals. This volunteer-driven, unlegislated initiative is being implemented in multiple counties across Tennessee and has proven to be an effective coordinated effort of resources for lasting economic and workforce development growth. Pathways Tennessee leverages the Career and Technical Education (CTE) programs of study, that reflect 16 nationally recognized career clusters and postsecondary programs; this is done to increase credential and degree attainment for high growth, in-demand jobs in Tennessee. Important to the programs, that make Pathways Tennessee and career pathways initiatives successful in Tennessee, are the incorporation of work-based learning and access to early post-secondary opportunities (dual enrollment, dual credit, AP, IT, etc.).

Focusing on the Governor's Education and Workforce Development Goal, the division of Career and Technical Education at the Department of Education oversees work-based learning (WBL) in Tennessee. This proactive approach to bridging the gap between high school and high-demand, high skilled careers consist of 16 nationally recognized career clusters. Each of these clusters seeks to attain the ultimate goal of preparing students for success at the postsecondary level and in their chosen careers. These clusters are organized into 16 broad categories that encompass virtually all occupations from entry

through professional levels and are aligned with the U.S. Department of Education's structure of Career and Technical Education. Each cluster is divided into different pathways that are grouped by the knowledge and skills required for occupations in these career fields.

The framework for Pathways Tennessee allows for local flexibility and selection of the clusters that would provide the greatest impact on a local/regional economy. The framework includes the following components:

1) Encourage and support active Industry involvement in student learning: Active industry involvement begins early on in a student's learning pathway. This involvement can and should take on many different forms and should progress in involvement as the student progresses through his/her learning pathway. This type of involvement can represent (1) curricular alignment with labor market needs, (2) student career site visits/employer visits to schools, (3) industry advisory councils, (4) teacher externships and student internships, and/or (5) active work-based learning experiences and internships.

2) Allow for college credit and industry certifications in high school Students should be demonstrating proficiency as they progress through their learning pathway. To ensure students are developing college and career ready skill sets, robust learning pathways should encourage opportunities for students to demonstrate these skills by means of early postsecondary and industry credentials. A learning pathway and program of study should be seamless from high school through postsecondary institutions as students build upon prior learning with stackable credentials at various levels of education. Each credential or degree a student receives will, ideally, translate to the professional continuum in his/her selected career (promotions, qualifications for higher paying positions, leadership roles, post-secondary credit, etc.). Figure 2 demonstrates this concept. This example is from the Therapeutic Nursing Services program of study in the Health Science career cluster. The Certified Nursing Assistant certification serves as a capstone industry certification for this particular program of study. Achievement of this certification reflects attainment of required industry skills to be gainfully employed and/or to continue matriculation to a postsecondary degree or credential.

It is important to note that several stackable credentials can and should be included in a student's pathway. Stackable credentials, such as the Microsoft Office Suite certifications, allow a student to demonstrate proficiency in his/her learning pathway. These stackable credentials are just as important as capstone certifications since they build a student's confidence and demonstrate a valuable portfolio of skills.

1) Transition seamlessly from secondary to postsecondary: Robust, aligned learning pathways have clear goals for student entry into postsecondary institutions. They detail the credential and/or degree a student needs to continue along the desired career path. As Figure 1 & 2 demonstrates, there must be clear, aligned pathways for students to advance from secondary to postsecondary. Middle school courses should lay the foundation for a student's chosen program of study in high school, which should, in turn, prepare that student for the next level of postsecondary coursework - whether this is at a TN College of Applied Technology, a two-year community college, or a four-year university. At each stage of the pathway, the student should be building upon the knowledge and skills

learned in previous coursework and demonstrating ongoing academic, technical, and soft-skill mastery.

2) Have multiple entry and exit points robust, aligned pathways with multiple entries and exit points prepare students for life-long growth in their chosen careers. Consider the example of the Therapeutic Nursing Services program of study in the Health Science career cluster. The student is prepared to exit the learning pathway upon high school graduation with a Certified Nursing Assistant certification and go directly into the workforce. However, the student will be equally prepared to take that achieved certification and apply it towards entrance into a Nursing Associate of Applied Science program at a community college and/or move into a nursing program at a four-year university.

3) Have regional workforce relevance robust, aligned pathways must connect to legitimate opportunities for students in and around their communities. Department promoted programs of study if implemented with fidelity, should feed directly into related postsecondary programs that are aligned to the needs of regional labor and economic and community development data. These data should reflect high skill, high wage, and high growth opportunities so that students and parents understand the viable opportunities for employment upon graduation from secondary and postsecondary.

Regional workforce development boards are well positioned to develop and expand regional career pathways; this can be done through using the cross-agency supported Pathways Tennessee career pathways framework.

In addition, in an effort to increase the visibility and success of WBL opportunities for Tennessee students, the Department of Education has developed Work-Based Learning Champions. Through a partnership with TNECD and TDLWD, this initiative seeks to champion a talent pipeline in Tennessee through the development and promotion of work-based learning (WBL) to help motivated, mature high school students to pursue lifelong careers in high-wage, high-demand Tennessee industries. Each of the industry participants competes globally for talent and eagerly seek to bridge the skills gap and address workforce demands. The roles and responsibilities/strategic priorities include the following:

- Increase community awareness that WBL can address regional skills gaps and workforce demands

o Sharing WBL messaging with key community stakeholders, leaders, and peers

- Advocates for early and frequent access to TN workplaces and promote student awareness of growing TN careers

o Breaking down barriers that prohibit minors in the workplace

o Championing the access to early grade exposure and career exploration to high growth Tennessee careers

o Developing and promoting a TN Youth Apprenticeship model for motivated and skilled high school students

- Define the gold standard for soft skills in the Tennessee workforce and promote the activities that foster them

o Promoting the adoption and use of soft-skill development strategies and assessments

- Drive the creation and adoption of WBL legislation that encourages hands-on WBL and protects stakeholders

o Promoting incentives and funding solutions to offset liability costs of employers who adopt the TN WBL/Youth Apprenticeship model

In addition, the increased focused on work-based learning (WBL) in Tennessee has expanded the influence of career pathways. In an increasingly complex global economy, all students must be prepared with intellectual, technical, and social skills needed to compete and contribute meaningfully to their communities. For most, this will mean completing some postsecondary education or training; for all, it will mean learning about themselves and the world of work. WBL is a proactive approach which our state has taken to bridge the gap between high school and high-demand, high-skill careers in Tennessee. Students build on classroom-based instruction to develop employability skills that prepare them for success in postsecondary education and future careers. Through experiences like internships, apprenticeships, and paid work experience, juniors and seniors (16 years or older) may earn high school credit for capstone WBL experiences. WBL Coordinators, educators trained and certified by the State to coordinate these WBL experiences for students. The Department of Education has redesigned its WBL policies and developed new resources to help school districts offer WBL experiences to their students. Updated policies and procedures have been implemented in the 2015-2016 school year and include but are not limited to WBL Certification Training, WBL Professional Learning Communities and a plethora of WBL Coordinator Resources. The integration of industry leaders, workforce development partners, and education policy has proven to be a seamless pipeline to introduce young workers to the growing workforce.

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).

Industry and Sector Partnerships

In an effort to support the State's booming economic growth as well as the three aforementioned goals set out by Governor Haslam, TDLWD has continued to cultivate and expand partnership with other State departments. The Governor's Job and Economic Development Goal will improve and undergird the partnership between the Tennessee Department of Economic and Community Development (TNECD) and TDLWD. Together, these two agencies, as well as other departments, seek to achieve two main strategies:

1. Develop a multi-agency partnership to address workforce needs across the State.
2. Establish a framework to create innovative workforce partnerships and game-changing education reform for skills in high-demand.

The Department of Economic and Community Development is committed to fulfilling Governor Haslam's vision for Tennessee to be the 1 location for high quality jobs in the Southeast. Under the leadership of Commissioner Randy Boyd, TNECD has created five goals to fulfill this commitment. They are:

3. 55% of job commitments will pay above average wages in the county were the project is located
4. Tennessee will be top two in per capita personal income in the Southeast
5. Tennessee will have the highest capital investment per capita in the Southeast
6. Tennessee will have the lowest unemployment rate in the Southeast
7. Tennessee will have zero distressed counties by 2025

To achieve these objectives, the TNECD is utilizing the following 6 strategies:

8. New business recruitment
9. Business expansion
10. Entrepreneurial growth
11. Community development
12. Alignment with education
13. Rural development

Jobs Base Camps continue to be a key element to TNECD's success. With nine regions strategically placed across the State, on a daily basis business development team members are working with businesses within their communities. Each jobs based camp works with local partners to develop and/or revise a regional economic develop plan and align existing federal and state resources around that plan. Understanding the workforce is essential for economic development; thus understanding also reinforces the necessity for all State partners to work together to respond to the workforce needs of recruitment and expansion projects. Workforce360° was designed to fill this need.

Workforce360° is a project based system that works directly with companies interested in recruitment and expansion projects in Tennessee. Region-based tactical teams will identify workforce gaps and streamline solutions across the State by utilizing State department communications, interaction and resources. In addition, teams provide a

timely response to immediate business workforce needs, and strategic planning for long-term requirements.

Workforce360° is a multi-agency partnership and involves specific, strategic roles from each to target and engage business and industry leaders. These State departments are as follows:

STATE PARTNERS	PARTNER FUNCTIONS
Tennessee Department of Economic and Community Development	Workforce is essential to economic development. A member of the regional team will be designated as your project manager to bring the correct players to the table, as well as ensure that solution strategies are actionable and achieved.
Tennessee Department of Education	Building a future pipeline is vital for continued success. Working with the Department of Education, each company will be able to expose and excite future generations to join its team. Work-based learning, early post-secondary opportunities and the pursuit of industry recognized certifications are just a few of the opportunities students are currently taking advantage of to ensure they are career and college ready tomorrow.
Tennessee Department of Labor and Workforce Development	A multi-faceted department, this resource is able to supply prospects, provide recruitment tools, pre-screen and test applicants, interview candidates and provide an international job posting service with Jobs$.
Tennessee Department of Human Services	With a client base of over 500,000 in Tennessee, DHS is charged with evaluating, vetting and providing quality candidates for industry. With up-skill and training dollars available, these candidates are ready and prepared to enter the workforce.
Tennessee Community Colleges	Established to focus on two-year degrees, the 13 community colleges for an ideal asset for any company to utilize. Quick to react, the main campuses and satellite locations are able to produce programs for short-term training, certifications and associate's degrees.
Tennessee Colleges of Applied Technology	With 27 main locations across Tennessee, these institutes are designed to produce the technical workforce of tomorrow and upskill the workforce of today. With an ability to quickly adapt and customize training, the TCATs are a go-to location for all workforce technical training needs.
Tennessee Department of Veteran Affairs	With over 500,000 veterans calling Tennessee home, there is no shortage of service and honor in the Volunteer state. Programs providing education and training assistance, as well as employment placement, ease the transition for soldiers to move from battlefield to boardrooms and manufacturing floors.

In 2014, Governor Haslam created the Workforce Subcabinet, a collaborative team dedicated to develop and oversee implementation of a three year strategic plan that aligns State resources in an effort to attain the Drive to 55 goals. The Subcabinet is comprised of the following state departments and leaders: Commissioner Randy Boyd, Chair (Economic and Community Development), Commissioner Raquel Hatter (Human Services), Commissioner Candice McQueen (Education), Interim Vice Chancellor David Gregory (Tennessee Board of Regents), Commissioner Many-Bears Grinder (Department of Veteran Affairs), Dr. Russ Deaton (Tennessee Higher Education Commission), and

Commissioner Burns Phillips (Labor and Workforce Development). In addition to the initial responsibility of overseeing the Tennessee Labor Education Alignment Program (LEAP), the Governor's Workforce Subcabinet has developed multiple strategies to aide in the alignment of workforce, education and industry.

Tennessee is actively addressing the challenge to ensure a skilled workforce is available for existing, expanding, and newly relocated companies across the state. In 2014, Governor Bill Haslam challenged Tennessee with the Drive to 55— a statewide initiative to equip 55% of Tennesseans with a postsecondary degree or certificate by the year 2025. Tennessee Promise, Tennessee Reconnect and Tennessee LEAP are three programs under the Drive to 55 initiative which implement strategies to ensure access to postsecondary institutions and to ensure that the needs of industry are aligned with classroom curricula.

Tennessee Promise offers high school students two years of tuition-free community or technical college and offers a mentor to help them through the process. Tennessee is the only State to provide this opportunity. The inaugural high school graduating class of 2015 included participation by nearly 60,000 high school seniors, with 15,895 students using Tennessee Promise benefits beginning in the fall of 2015. Community colleges across the state reported a 14% increase of students enrolling as a full-time students directly after high school as compared to the percentage in the fall of 2014. As a result of Tennessee Promise, Tennessee leads the nation in FAFSA completion, comprising 40% of the entire country's growth in FAFSA filings in 2015.

Tennessee Reconnect offers adults the opportunity to attend and earn a certificate at any of the 27 Tennessee Colleges of Applied Technology (TCATs) completely free of tuition and fees. More than 10,000 adult Tennesseans completed the online interest forms and 4,921 adult students have entered the inaugural program in fall 2015. This accounts for an 18% increase in enrollment for adults across Tennessee. Of those enrolled with some college credit but no degree 105,000 or over 50% are predicted to complete their program of study and 25,000 participants may have enough credit hours to graduate.

Tennessee Labor Education Alignment Program (LEAP) is a $10 million grant opportunity designed to ensure that postsecondary institutions are producing the skills and credentials that Tennessee employers need through alignment of education and industry. Drive to 55 is not just a mission for higher education, but a mission for Tennessee's future workforce and economic development. In LEAP's first year of operation (2014), 12 grants were awarded allowing Tennesseans from 51 counties to participate in 15,584 training and workforce development opportunities created by LEAP grants. Some highlights of the impact of this program are as follows:

- 1,591 high school students have enrolled in courses that have been initiated or expanded by LEAP programs as of December 2015. Students completing these courses will be eligible to apply their training to earn college credit in a variety of high-demand fields, such as advanced manufacturing, electrical engineering, and mechatronics. These students will serve as the foundation for new workforce pipelines benefitting the State for many years.
- 630 students have enrolled in community college and TCAT programs supported by LEAP-funded equipment and instructors. These students are eligible to earn

Mechatronics and Industrial Maintenance certificates or an Associate of Applied Science degree.

- 13,363 students across middle school, secondary, and postsecondary education levels have engaged in LEAP-funded extracurricular programming, including career readiness initiatives, work-based learning experiences, academic clubs, and career exploration programs.

The Tennessee Longitudinal Data System (TDLS) connects an individual's employment history with data beginning at entry to Pre-K through high school, college, and over the individual's education and skills development life cycles. The system's capabilities will allow the Partners, as well as a consumer-facing interaction to compute performance metrics for Federal and State accountability. These metrics will also be used for and for informational displays for the general public; the metrics will also provide vital information for researchers and evaluators of WIOA programs and for Tennessee workforce initiatives, such as the initiatives undertaken by the Governor's Workforce Subcabinet and its committees.

The Partners in the work to further integrate and improve TDLS include the Tennessee Departments of Labor and Workforce Development, Education, Children's Services, Human Services and Intellectual and Developmental Disabilities; two others are the Tennessee Higher Education Commission, the University of Tennessee's Center for Business and Economic Research., and the Tennessee Independent Colleges and Universities Association.

All of the core partners also will have performance accountability metrics for each program. The metrics help each partner to further assess how high school achievement, as well as educational attainment overall, impacts skills development and the likelihood of obtaining demand-and industry-level employment at sustaining wages. These dashboards will focus on both pre-program and post-program outcomes.

Serving as the State's primary vehicle to drive cross-sharing and down-sharing of data relevant to the Drive to 55 initiative and Pathways TN, TLDS will leverage current and future investments and developments to provide: on-demand data that are as real-time as possible; recurring intelligence to drive strategic priorities of the Governor's Office and state agencies; user-friendly tools that assist trained users in generating pre-designed and customized reports; and information necessary to assist agencies in articulating "stories" for external customers about critical "focus populations" and Tennessee's citizens as a whole.

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.

Governor Bill Haslam's Executive Order 46 designates the reconstitution of the State Workforce Development Board (SWDB) in accordance with Section 101 of WIOA. The SWDB has three 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 members. 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
- Lead the development, maintenance, and modification of State, regional and local plans
- Serve as an advisor to review statewide program alignment
- Review and make recommendations on program funding allocations

- Lead review of statewide Workforce System

Operations Committee - The Operations Committee has the following responsibilities:

- Oversee the continuous improvement of WIOA programs and activities
- Be the lead monitor on State performance/accountability
- Be the lead coordinator of policies and provision of WIOA services
- Review and make recommendations for performance reporting, including Labor Market Information

Opportunities Committee - The Opportunities Committee has the following responsibilities:

- Identify and share Workforce System best practices
- Develop strategies for technology alignment and integration
- Be the lead reviewer of service-model strategies in WIOA programs
- Oversee all WIOA Youth program initiatives

The Division of Workforce Services merged multiple programs and services to better align and administer required services. 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). These efforts are important to capitalize on our economic development successes and how those successes align with workforce development and educational attainment in Tennessee.

2. Implementation of State Strategy

Describe how the lead State agency with responsibility for the administration of each core program or a Combined State 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 reduces duplication. This is also achieved through the close integration of Wagner-Peyser, WIOA Adult, Dislocated Worker, and Youth, and other partners in the Tennessee American Job Centers (AJCs).

In accordance with the Governor's restructuring of regional staff and responsibilities, the Workforce System has been realigned to allow for optimal collaborative functionality and streamlining the delivery of services. After the reorganization of the comprehensive and affiliate AJC's, the Workforce System fully implemented the Jobs4TN online job database. This implementation included training over 300 Title I and Title III staff on the use of case management and performance metrics for their respective programs. Next, the Workforce System has realigned the management structure to closely resemble the job base camp structure of the Tennessee Department of Economic and Community Development (TNECD). With a regional structure that includes nine regions, each has a Regional Director who has optimal decision-making authority on the Local Workforce Development Boards and the Workforce System's functions in the respective area.

This leadership structure helps assure that the State's strategies are effectively implemented in the local areas, especially allowing for a more integrated, job-driven service delivery system as well as maintaining the structure across the State.

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 disciplines
- Job applicants range from no high school equivalency diploma to 16 years of education and beyond

Figure 1: Core Program Partner Activities

Tennessee has a long history of coordinated implementation to integrate employment and training services in the local career center system under the previous program (WIA). All state policies that are currently created 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.

Businesses are engaged in the talent development system through sector partnerships and through the statewide business services team. To continue the excellent work that has been done over the past two years, AJC partner services will be used as a focus by the

business services team to connect employers to the AJCs. In addition, manuals are developed to align the work of multiple agencies and to serve businesses through an overall sector strategy approach.

By providing intensive technical assistance to focus the workforce areas on key industries that drive their local and regional economies, Tennessee will be taking the next step in the coming two years to implement its long-term sector strategy approach to transform the workforce system. The local boards and local decision-makers will be aligning with career pathway strategies and the Tennessee Community College System, and address the skill upgrade needs of low-skilled adults. Sector strategies will serve as the driver for all discretionary initiatives funded by the Tennessee Workforce Development boards.

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: While there are several points of entry into the workforce system, UI serves as the portal for many customers. As the provider of UI, it is poised to welcome customers into the workforce system and provide comprehensive and targeted referrals to the other core partners. While a large amount of WP referrals come from UI, that system is not the only source of workforce customers. No matter the entry point, customers are first provided career services through the Wagner Peyser, employment services program. These services are provided through the AJCs and affiliate sites. If the customer is deemed to be ready for gainful employment after receiving career services, staff assists the customer with job search and placement. If the customer is deemed to need training services, then staff refers the customer to other core partners based on the needs of the customer. Training services are then provided to the customer through WIOA, VR, or Adult Education Services. The Virtual One Stop data management system (VOS) also offers job seekers a self-service tool to manage their career path leading to successful career placements. Customers are able to load, paste and create up to five resumes and identify gaps in skills, experiences, and education. Other service recipients of labor exchange programs include: Unemployment Insurance (UI) claimants, veterans, migrant and seasonal farmworkers, older workers, SNAP program recipients, and individuals with disabilities AJCs provide workforce development services as well as access to other programs and activities carried out by One-Stop partners identified in the WIOA. Basic services provided to job seekers and those seeking to upgrade their skills include: career assessment and guidance; access to training and education programs; job fairs and workshops; information on the job market; assistance with searching for jobs and with resume preparation; interviewing skills for jobs; free computer and internet access; and help registering with and using Jobs4TN Online. In addition, other services include job applicant screening and qualified candidate referrals; up-to-date labor market facts and projections, such as wages; information on tax credits for hiring particular groups of workers; space to conduct job interviews; arranging job fairs; workshops on employer-related subjects; employee training resources; layoff/closure prevention services for employers.

Core Partner Program Activities

Vocational Rehabilitation Programs fall under the authority of the Division of Vocational Rehabilitation. The relationship with DVR creates natural and meaningful partnerships with other WIOA services to better serve Tennesseans with disabilities who have previously struggled to participate in the workplace, including those with disabilities for whom employment has remained completely out of reach, as well as other groups such as youth, recently discharged veterans, and the long-term unemployed. The DVR mission is to assist persons with disabilities to succeed at work and to live independently. DVR accomplishes this mission with a variety of employment and training activities including Evaluation and diagnostic services provided to determine eligibility and the services needed for the individual to become employed; Vocational rehabilitation counseling and guidance provided directly by a vocational rehabilitation counselor during the individual's plan of services; Physical and mental restoration services which may be provided to correct or substantially modify an individual's physical or mental condition; Training services, when necessary to become employed, including vocational training, academic training, personal and vocational adjustment training, job coaching, on-the-job training, job-seeking skills training, and books, tools, and other training materials; Specialized services for individuals who are blind, deaf, and deaf-blind, including interpreter services, note-taking services, and reader services; Rehabilitation technology services, including assistive technology devices, assistive technology services, and rehabilitation engineering services to address barriers encountered by an individual in attaining or retaining employment; and Placement services provided to assist an individual with a disability to find adequate and suitable employment in his/her chosen career.

Supportive services, such, assistive technologies, transportation, personal assistance services, and services to family members may also be provided if necessary for the individual to utilize the services identified above. Post-employment services may be provided to previously rehabilitated individuals when needed to maintain or regain suitable employment. Pre-employment transition services provided to students with disabilities include job exploration and counseling, work-based learning experiences, counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy. Technical assistance, training, outreach and other supportive services are provided to public and private employers of all sizes, including Federal and Federal contracting employers for the purpose of increasing employment opportunities for job seekers with disabilities.

WIOA Title I

The Workforce Innovation and Opportunity Act of 2014 (WIOA), which supersedes the Workforce Investment Act of 1998 (WIA), authorizes formula grant programs to States to help job seekers access employment, education, training and support services to succeed in the labor market. Using a variety of methods, States provide employment and training services through a network of American Job Centers (AJC) (formerly known as One-Stop Career Centers or by another name). The WIOA programs provide employment and training programs for adults, dislocated workers, and youth.

Other PARTNER PROGRAM ACTIVITIES:

SNAP: Supplemental Nutrition Assistance Employment and Training (SNAP E&T) is a funding source that allows states to provide employment, training, and related supportive services to individuals receiving Supplemental Nutrition Assistance Program (SNAP) benefits (formerly this program was known as "food stamps"). The purpose of SNAP E&T is to assist participants in finding a career that pays a self-sustaining wage and allows SNAP recipients to become totally independent of government assistance. The Food and Nutrition Act requires all states to provide employment and/or training opportunities for individuals receiving SNAP. In Tennessee, SNAP E&T is operated as a joint partnership between the Department of Human Services (TDHS) and the Department of Labor and Workforce Development (TDLWD) through a grant from United States Department of Agriculture (USDA). SNAP E&T has the potential to improve the job prospects for thousands of low-income, low-skilled workers across the country with more effective and robust training programs provided by the American Job Centers.

Senior Community Service Employment Program The purpose of the Senior Community Service Employment Program (SCSEP) program is to provide, foster, and promote useful part-time work opportunities (usually 20 hours per week) in community service employment activities for unemployed low-income persons who are 55 years of age and older. To the extent feasible, SCSEP assists and promotes the transition of program participants into unsubsidized employment.

Trade Adjustment Assistance The purpose of the Trade Adjustment Assistance (TAA) program is to provide assistance to workers adversely affected by foreign trade. Services are provided under the TAA program to enable workers to return as quickly as possible to work that will use the highest skill levels and pay the highest wages, given the workers' preexisting skill and educational levels, as well as the condition of the labor market. The Trade Act of 1974 has been amended multiple times-most recently by the Trade Adjustment Assistance Reform Act of 2002 (Pub. L. No. 107-210) (TMRA or Trade Act of 2002); the Trade and Globalization Adjustment Assistance Act of 2009 (TGMA or Trade Act of 2009) (Division B, Title I, Subtitle I of the American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5); the Trade Adjustment Assistance Extension Act of 2011 (TAAEA or Trade Act of 2011) (Title II of Pub. L. No. 112-40); and the Trade Adjustment Assistance Reauthorization Act of 2015 (TAARA 2015 or Trade Act of 2015) (Title IV of the Trade Preferences Extension Act of 2015, Pub. L. No. 114-27).] 12 Compared to the Trade Act of 2002, the Trade Act of 2011 expanded eligibility of the TAA program and replaced Alternative Trade Adjustment Assistance (ATAA) with Reemployment Trade Adjustment Assistance (RTAA), - but at the 2002 benefit levels. The TGAAA extended the TAA program through December 31, 2010, and the Omnibus Trade Act of 2010 further extended TAA through February 15, 2011. After that date, the TGAAA amendments to the Trade Act expired, and the TGAAA required the TAA program to operate under the TAARA provisions, through October 21, 2011. On this date, the TAAEA was passed, which reauthorized many of the provisions of the Trade Act of 2009, but with slight modifications. The TAAEA amendments to the Trade Act expired on December 31, 2013, and the TAAEA required the TAA program to operate under the provisions of the Trade Act of 2002, with three provisions of the Trade

Act of 2011 remaining (referred to as Reversion 2014). The TAARA 2015 both amends and reauthorizes the TAA Program. The TAARA 2015 restores the worker group eligibility and benefits established by TAAEA. The TAARA 2015 also (1) authorizes the operation of the 2015 Program and continuation of the 2002 Program, the 2009 Program, and the 2011 Program through June 30, 2021; (2) provides a 90-day transition period for Reversion 2014 Program participants to transition to the 2015 Program; (3) expands coverage of certifications of petitions filed since January 1, 2014, for 90 days; (4) requires reconsideration of negative determinations of petitions filed since that date and before the date of enactment under 2015 Act certification requirements; and (5) reauthorizes the Health Coverage Tax Credit (HCTC) program benefit for eligible TAA participants. TAARA 2015 also added new requirements to align performance reporting for the TAA Program with the requirements of the Workforce Innovation and Opportunity Act (WIOA).

Employment services for veterans and the Disabled Veterans Outreach Program (DVOP) are administered through the AJCs. Staff is strategically placed in American Job Centers aimed at meeting the needs of all veterans with significant barriers to employment. WIOA partners trained in case management will assess and serve veterans at all local workforce center locations. Tennessee has integrated all DVOP specialists into the AJC's system. Veterans are initially identified by a front desk member as a priority population to receive integrated services. An assessment to identify any significant barriers to preventing employment (SBE) is conducted. Veterans with SBE's are referred to a DVOP. Those who do not have SBE's are provided services through the workforce center staff. Despite the determination of SBE status, all veterans remain entitled to and do receive Veteran Priority of Service.

Local workforce development boards provide priority job placement and training activities to veterans. The state has required priority of services through its policy development so that veterans are provided priority in placement services and activities including a detailed description of how case management services are provided to veterans.

Business Services:

All workforce centers have an integrated, business services function responsible for connecting local employers to the local AJC system. According to WIOA Section 108(b)(4) (B) business services are intended to promote, market, connect and provide access to initiatives such as:

- Work Opportunity Tax Credit
- Worker Adjustment Retraining Notice (WARN)
- Rapid Response
- Federal Bonding
- Incumbent worker training programs
- On-the-job training programs

- Customized training programs
- Industry and sector strategies
- Career pathways initiatives
- Utilization of effective business intermediaries
- Apprenticeship promotion
- Assistance for apprenticeships
- Recruiting employers to AJCs
- Connecting job seekers and employers by facilitating relationships
- Mobile American Job Center

These programs are designed to meet the needs of employers in relation to the economic needs of their respective region. An educated, adaptable labor force is the primary objective for workforce development in Tennessee; this sustained improvement of the State's economy is accomplished through the alignment of business personnel needs and skills training. It is the responsibility of business service staff to perform ongoing outreach activities such as:

- Conducting on-site meetings with employers or maintaining a presence at job fairs
- Encouraging employer access to resources provided through grants and tax funding
- Consulting employers on how to reduce high employee turnover rates
- Providing information concerning employee training programs as they relate to labor market needs.

Core program activities to implement the State's strategy include:

56. Partnership and Leveraging Resources

The Governor's Education and Workforce Development Goal: Objective I- leveraging resources, and partnerships across departments and programs to aid in developing more seamless paths from training into the workforce, along with the Governor's Conservative Fiscal Leadership Goal and Objectives, are a key component of the development of this State Combined Plan.

2. Leveraging Discretionary and Formula Resources

In keeping with the Governor's conservative Fiscal Goal, the Tennessee Department of Labor and Workforce Development has encouraged its Local Workforce Development Areas to maximize resources and braid WIOA funds with other Federal and State Discretionary funds and with local entities which have a vested interest in the development of the local workforce.

3. Expanding Opportunities to Leverage Resources

- Partnering regionally with economic development entities and other critical stakeholders, including Pathways Tennessee, to better align education and workforce development activities and policies with regional labor markets, economic growth strategies, and employer demand
- Partnering with the business community, including business associations, and educational institutions (including secondary and post-secondary institutions such as community colleges) to design and implement programs and career pathways that lead to credentials and employment
- Partnering with and leveraging resources from other Federally-funded programs, such as Adult Education, Vocational Rehabilitation, Temporary Assistance for Needy Families (TANF), Small Business Development Centers, etc.
- Partnering with community-based organizations, since they are key providers of basic skills training, technical skills training, supportive services, and workforce development services in communities across Tennessee
- Sustaining summer employment and work experience opportunities - State and local workforce development boards should consider using additional sources of funding to leverage summer employment program activities. In addition to regular WIOA Youth formula funds, local areas can use other resources, such as Job Corps, and fund matching from private industry.

4. Policy Alignment.

The renewed focus on business services and on ensuring that job seekers and youth are positioned to meet Tennessee employer needs requires TDLWD to significantly restructure many of its policies that dated to the beginning of WIA. 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. Such programs will include those that are responsive to various needs of customers returning to the job market or needing an upgrade of their skills to meet job market demands.

Within Tennessee's American Jobs Centers, the State Workforce Development Board has adopted the functional alignment strategies outlined in this plan and supporting policies to further integrate the partner services with AJCs, to also leverage funding, reduce duplication, and provide improved quality customer service to Tennesseans.

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.

The activities listed in the chart below identify the required and optional activities that will be carried out by the Workforce System. In order to align the activities, the State Board approved the Service Integration Policy. This policy requires that both required

and optional partners work collaboratively and seamlessly in the delivery of services available under multiple workforce service programs. The Workforce System strives for a rigorous implementation of business sector strategies, jobseeker universal access to labor exchange services; streamlined business services teams, linked assessments, and referrals, and targeted training and placements. This implementation will be achieved through the close integration of Wagner-Peyser, WIOA Adult, Dislocated Worker, and Youth, Adult Education, and other partners in the AJC.

Figure 2: Programs outside of State Plan

CTE

Tennessee's Career & Technical Education consists of 16 nationally recognized career clusters with the ultimate goal of preparing students for success at the postsecondary level and in their chosen careers. More information detailing program specifics is outlined in Section II: State Strategy, specifically Career Pathways, and also addressed in Section III: State Strategy Implementation, specifically regarding Partner Engagement with Educational Institutions.

SCSEP

Targets subsidized temporary employment for workers over age 55 and contract management. More information detailing program specifics is outlined in Section VII regarding SCSEP.

SNAP Employment & Training Program

The Tennessee Department of Human Services (TDHS) is the direct grantee of Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) Funds. TDHS and the Tennessee Department of Labor and Workforce Development (TDLWD) have partnered through an Interagency Grant Agreement to administer the SNAP E&T program. TDLWD will be responsible for serving the E&T participants through a vast array of employment and support services to promote workforce development in Tennessee. TDLWD will partner with the Local Workforce Development Boards (LWDB) and several Third Party Partners (TPPs) to accomplish this task. DHS makes the eligibility determination for SNAP benefits and refers participants through an automated interface. Communication is maintained throughout each individual's participation to ensure their status is accurately tracked by both departments.

Participants are required to observe a program orientation that explains the work requirements, components offered, component requirements, and assistance provided for each component. We hope to implement an Online Orientation during Fiscal Year 2018. After the Orientation has been completed, program participants are assessed during a one-on-one meeting to develop an Individual Employment Plan (IEP). The assessment will review the individual's background, education, work history, hobbies, and any barriers to employment. The plan can include education and/or training activities, but the overall goal is obtaining employment with a gainful wage that significantly reduces or eliminates the need for governmental assistance. After the IEP is developed, participants will immediately begin their participation in their most suitable component.

TDLWD has a number of divisions and programs that provide a vast array of services that combine to support jobs and workforce development in Tennessee. The Workforce Services Division is responsible for delivering the Department's employment and educational services to employers and job seekers in the local AJC, partner agencies and online at Job4TN.

SNAP E&T is fully integrated within that structure offering all training and educational opportunities to SNAP E&T participants. The AJC Workforce Services structure also allows the leverage of Non- Federal funds of Partner Programs/Agencies to create 50/50 partnerships to expand services and move more SNAP E&T participants to self-sufficiency. There are currently two 50/50 partners in the State of Tennessee (Goodwill Industries-Knoxville and University of Tennessee Extension) and we plan to expand to more partners in 2018.

The Governor of Tennessee, Bill Haslam, has challenged our State with a "Drive to 55" mission for Tennessee's future workforce and economic development. The drive is to get 55% of Tennesseans equipped with a college degree or certificate by the year 2025.

SNAP E&T will utilize the TN Reconnect initiative to assist adults with their training needs. Reconnect will cover tuition/ fees, so there is no cost to the program, other than supportive services. We plan to explore Reconnect as a potential Third Party Partnership during this Fiscal year.

Federal Fiscal Year (FFY) 2015 was a transition year for Tennessee's SNAP E&T Program. New staff members were hired, an automated referral process was implemented, and reviews were completed in all TDLWD offices to identify deficiencies

and address them in all offices. Training and technical visits were completed to ensure that the new vision of the program was clearly relayed and understood by all staff assigned to the program. We feel a solid foundation has been established and we are ready to take full advantage of being integrated into Tennessee's Workforce System and begin pursuing Third Party Partnership opportunities.

There are currently no Tribal Organizations in the State of Tennessee, so there are no specific plans for this population at this time.

SNAP E&T Program Changes

As of October 1, 2016, SNAP E&T has moved to a voluntary, statewide program serving all 95 counties in Tennessee. This expansion has allowed access to training and educational opportunities to all Tennessee's SNAP recipients who wish to volunteer for SNAP E&T. As of February 1, 2018, Tennessee has removed the ABAWD waivers for 79 counties. This will require any participant determined to be an Able-Bodied Adult Without Dependent (ABAWD) to meet their work requirements on a monthly basis to maintain their SNAP benefits. SNAP E&T will serve as a system to help serve these ABAWDs in meeting their requirements and connecting them to employment and training.

To ensure all SNAP E&T participants in all 95 counties have access to qualifying components, Career Specialists will become mobile and travel to surrounding counties within their Local Workforce Development Area (LWDA).Contact with each participant will be required on a monthly basis.

WIOA legislation requires recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient be given priority of service for adult career and training services. This makes SNAP E&T participants a priority to all programs offered under WIOA youth and adult/dislocated workers. SNAP E&T participants can take full advantage of this opportunity since we are housed within the AJC with the WIOA as a partner. We plan to refer a majority of participants to WIOA for training programs. Our partnership with TCAT's and Community Colleges will allow us to select several short-term training programs to quickly train participants interested in attending school. WIOA can then move them to On-the-Job (OJT) opportunities that would not be available to participants, outside of our partnership.

TDLWD plans to identify and partner with a Community Based Organization (CBO) in West, Middle, and East Tennessee during the FFY 2018. CBO's could possibly provide soft-skills training, assist with case management functions, and provide specialized services. TDLWD will seek to amend the plan when those Organizations have been identified, along with their Non-Federal match funding and the establishment of an MOU.

We expect to amend this plan as MOU's are established with training institutions and CBOs since their matching funds will need to be allocated. Once the MOUs are established, we will have the capacity to expand to additional areas/counties within Tennessee.

SNAP E&T PROGRAM COMPONENTS

TDLWD will offer the following Four Components during FFY 2016:

- Basic Adult Education
- Work Experience
- Job Search Training
- Career/Technical Education/Training
- Work Readiness

SEQUENCING OF COMPONENTS

Participants will be advised of all component options at Orientation. Any participant who has not attained a Diploma or a High school equivalency certificate will be required to enroll in the Adult Education component. Once the participant has passed the HiSET, he or she will be allowed to enroll in another component that best suits the participant's employment goals. Other participants may request to be placed in a different component. The request will only be approved if funds are available and if it's a qualifying component based on the participant's type. If approved, that participant will be placed in the new component on the first of the following month.

Trade Adjustment Assistance (TAA)

Upon the notification of a WARN notice and/or the receipt of a Certified Trade Petition, the Rapid Response Unit, and TAA Unit coordinates with WIOA partners to provide a seamless path from dislocation to gainful employment for trade-affected workers and their employers. As detailed in Section VI (2)(b), the Rapid Response Unit acts as a first responder to engage trade affected companies and their employees to the Workforce System. This early intervention ensures that workers are fully informed and able to request assistance sooner, which will ultimately lead to gainful employment more quickly.

To keep TAA-affected workers engaged in AJC services across the State, the collaborative effort between the TAA program and WIOA partners is paramount in providing a continuum of career services (Basic, Individual, and Follow Up Services). These services include early assessment, labor exchange services, employment counseling, the Test of Adult Basic Education (TABE) assessment or the Comprehensive Adult Student Assessment Systems (CASAS), subsistence/transportation cost, and other services deemed appropriate. Through colocation and co-enrollment efforts, we work to provide the trade affected worker with the services necessary to obtain skills and credentials that will lead to gainful employment.

The TAA program utilizes the Jobs4TN system to promote a more consistent framework for maintaining and reporting data collected from the partners. This system allows for linking between all partners, provides a common ground for storage of documentation, reduces duplication of services, and fiscal integrity and undergirds reliable performance reporting. TDLWD Fiscal Division continually tracks TAA funding to ensure compliance with all program financial mandates. Program information stored in the VOS system is utilized to create the Participant Integrated Reporting Layout (PIRL) which indicates if

performance goals have been obtained. Further, the TAA Data Integrity (TAADI) scorecard, which identifies areas of questionable or non-compliant data, is utilized on a quarterly basis to evaluate the effectiveness of the program and to ensure that participants are being served in accordance with TAA laws.

TAA Activity Alignment

The TAA program has aligned its service delivery structure to engage and leverage a partnership with WIOA partners and by also to expanding opportunities to educate and empower trade-impacted workers. The following activities are aligned to accomplish the State's strategies:

67. EARLY ASSESSMENT OF TRADE AFFECTED WORKERS. Early assessment is a priority for TAA affected workers. It is important to determine whether the worker has the skills necessary to re-enter the workforce or is in need of further training to assist with future employment. TAA relies on WIOA partners to assist with the assessment and recommendation of training. Training may include occupational, customized, or On-the-Job (OJT) training. These assessments are always conducted in the local AJC. Co-location of the partners prevents the workers from traveling from one location to another to obtain services. All workers recommended for training are further evaluated by merit staff, in the TAA Unit, against the six TAA training criteria as identified in Federal Regulations 20 CFR 617.22 to ensure eligibility.

68. CROSS-TRAINING OF ALL STAFF. It is imperative that these workers get needed aid to regain employment more quickly. The cross-training of partner staff, in all programs, assists in better counseling of the TAA-affected workers concerning their needs and where services are available to meet the needs.

69. SHARED RESOURCES. Funding is essential to provide services to workers involved in the seamless Career Center System; and, leverage funding, when possible, can better ensure that workers receive necessary assistance. Case Management Funds, along with WIOA Partner funds enables a full assessment of trade-dislocated workers and also can ensure re-employment services for gainful employment.

70. EXPERTS WITHIN THE PROGRAM. It is essential that TAA and TRA use trade experts because of their program knowledge. Such expertise continues to ensure consistency and accuracy and thus ensures higher outcomes in re-employment for program participants.

71. CO-LOCATION OF PARTNERS. Co-location of partners is essential for a successful program. Trade is a complicated program with four different programs operating "under one umbrella." Workers should never be expected to know all program details or even all service deliverers. With co-location, workers may obtain necessary services in one place where teamwork presents a seamless and competent organization.

Temporary Assistance for Needy Families (TANF)

Coordination across programs generally aims to improve efficiency in service delivery and increase the effectiveness of the provided services. TDHS has worked with the Department of Labor and Workforce Development and implemented a standard referral or co-enrollment process of Families First/TANF clients to the WIOA program. In addition, an automatic WIOA referral policy was developed for the enrollment of Families First/TANF clients after a specific timeframe or for specific purpose to provide a seamless transition between programs, which affords clients easy access to an extended menu of services. TDHS continues to work with the Department of Labor and Workforce Development in determining guidelines for co-enrolled clients and guidance for clear communication in order to track participation and coordinate funding for support services. The Families First/TANF program's presence in the American Job Centers (AJCs) is provided through our contracted partners, the ECMS Providers. ECMS Providers are physically located in several of the AJCs in the Labor and Workforce Development Areas (LWDAs). In areas where co-location does not exist, there is an electronic or appointment referral process in place between the ECMS Provider and AJCs (e.g. refer TANF customers to WIOA for training assistance when a TANF recipient has a demonstrated need for a private education program; refer TANF customers to WIOA counselors if their participation in job search and job readiness activities does not lead to employment after two (2) weeks). TDHS continues to collaborate with the Department of Labor and Workforce Development to explore the use of a common employment or service plan across both programs to increase communication on the client's status in terms of his or her service plan and/or employment needs.

Infrastructure agreements have been established between Families First/TANF and other core partners in order to maximize the resources available to support common services when clients are co-enrolled. The commingling of these funds allows both programs to establish informal efforts to assemble a package of services that best meets the needs of co-enrolled clients (e.g. co-enrolled client takes the nursing board examination and WIOA pays for the initial exam; if they fail the examination the first time, the Families First/TANF program pays for the second examination, and then the two programs split costs associated with the licensure; client receives tuition assistance from WIOA to participate in a certified nursing program and the Families First/TANF program pays for associated certification fees).

The co-enrollment processes that have been implemented amongst the Families First/TANF and WIOA core programs will be periodically evaluated on the local and state level for purposes of strengthening and improving access and coordination of services for a seamless process.

TN Jobs for Veterans State Grant (VETS)

Tennessee Veterans are a valuable part of our state's success and safety on a daily basis. Congruently, the success of our Veterans is an asset in our Workforce System and as a result, employment and training are always a priority for these for these respected individuals. Services provided at the AJC are focused on assisting Veterans and other eligible persons with Significant Barriers to Employment (SBE), in receiving quality training, if needed, and in obtaining gainful employment. In accordance with the Jobs for

Veterans State Grant (JVSG), these individuals receive personalized coaching to help them obtain and keep jobs that promote self-sufficiency.

During the integration of WIOA and W/P, Veterans will continue to receive the established preferences (as identified in the Priority of Service section below) and will be included among the populations targeted for outreach. Tennessee has developed a coordinated intake form, Veteran Service Form, to facilitate services for Veterans.

TARGETING SERVICES TO VETERANS

The primary objective of the JVSG is to develop and support activities to increase employment and job training opportunities for Veterans and eligible persons. AJC staff provide job search and placement services for Veterans including counseling, testing, occupational and labor market information and skill evaluations. These services assist Veterans in making an educated and up-to-date decision about their training and employment needs. Veterans are introduced to local resources that offer career exploration, education, and job tools to the best career decision. These services include:

- Assessment of personal marketability
- Use of skills translators to assess strengths
- Researching occupations on a national, State or local level
- Researching employers for job searches
- Tracking labor market trends
- Learning how to network in various career fields using professional associations and Career
- Resource links
- Researching training options by occupation such as certifications, schools, programs, and licenses
- Exploring credentialing options
- Finding financial aid resources

Integration of the DVOP and LVER into the WIOA Service Delivery system is accomplished by utilizing in-place procedures for servicing Veterans with SBEs and combining them with the new policies and processes that will support the law. Per US Dept. of Veterans Affairs, there are 501,907 Veterans in Tennessee. Those between ages 18-64 are 450,313kii.

INCREASING VETERANS TRANSITION SERVICES

Tennessee has developed a partnership with the Tennessee College of Applied Technology (TCAT) and the Army Career and Alumni Program (ACAP) at Fort Campbell Army base. This partnership is to provide production line training (Mechatronics) and certification to transitioning service members, allowing veteran participants to obtain the necessary skills required by manufacturing. This pilot program

has been extremely successful in the advocacy and placement of Veterans within local manufacturers.

As an added benefit to employers, Veterans are mentioned when describing WOTC eligible population groups. These benefits are becoming increasingly attractive to eligible applicants. Strategies for partner coordination are also in place to optimize employment outcomes for these special populations. Strategies include the collaboration of services providers and coordination of resources to serve the military facilities, service members, Veterans and their families, located throughout Tennessee.

Veterans Referral Process

One Stop partners are included in the intake process for JVSG DVOP services. Upon entering the AJC, Veterans are met by a front desk staff member, who asks several questions to help identify veterans and their needs. After identifying the veteran's purpose for visiting the AJC, a staff member will conduct an intake assessment using the Veterans Service Form (VSF) to identify any significant barriers preventing employment. Upon identifying SBEs, partner staff members refer the veteran to the DVOP. Those veterans who do not have SBEs, however still require employment services and are provided services by our AJC staff, but not from a DVOP. Furthermore, when necessary, JVSG staff is often consulted with by AJC staff regarding military, DD-214, and other language translation in addition to other employment/ service related questions, as needed.

JVSG, DVOP/ LVER, integration into the One Stop extends beyond co-location. Veterans seeking services at affiliate centers, that do not have DVOP within that facility, still receive priority of service. After the staff identifies a veteran, an initial needs assessment will be conducted, and a determination of services will be made at that time. In addition, the VSF form is completed to help identify SBEs and additional barriers that may require intensive services from a DVOP. Upon identifying that the veteran has SBEs, the DVOP assigned to that county will be notified. Within 24 hours, the DVOP makes contact and schedules an appointment to meet with the veteran and proceeds with the subsequent intensive services.

Individuals entering the American Job Center are met with signage and are encouraged to identify themselves as Veterans. In addition, a front-desk American Job Center representative provides an appropriate greeting and inquires by asking, "Have you or your spouse ever served in the Military?"

When a Veteran is recognized, that Veteran will receive an initial intake assessment, performed by Wagner-Peyser staff; upon determining eligibility (disabled veteran or with an SBE), that Veteran is immediately referred to the DVOP specialist to receive intensive services, based on the veteran's needs. All Veterans will receive Veteran Priority of Service and subsequent staff-assisted services.

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.

The Workforce System ensures that all individuals seeking employment are provided comprehensive career services as defined by the labor exchange system. Those services include assisting job seekers in finding employment, assisting employers in filling jobs; facilitating the match between jobseekers and employers, participating in a system for labor between states, meeting work test requirements of the unemployment compensation, job search and placement assistance, career counseling; and providing business service activities to employers. Job seekers are able to receive multiple services at an AJC:

- Basic individual or group counseling. Learn how to set goals and develop a personal plan of action.
- Signing up for workshops to hear valuable information on job-related topics. Workshops are conducted by workforce professionals.
- Receiving an assessment, which helps all involved learn about the participant's interest, aptitude, basic skills, work values, personality and more. These assessments may be self- served or staff assisted and is comprehensive and specialized exams that identify employment needs.
- Receiving Career Guidance/Planning to develop an individual employment/career plan with a workforce professional to identify employment goals and appropriate combination of services to achieve the goals.
- Receiving information and assistance with an internship, work experience, or relocations assistance based on the assessment or individual's employment plan.
- Receiving training and education-skills training or educational program information.
- Receiving additional referral services to appropriate programs and partners to further assist with any other services such as health, welfare, and financial assistance where eligibility requirements are met.
- Connecting with a case manager who will advocate, communicate, and provide resources to aid in achieving the goals established in the individual employment plan.

CUSTOMER RECRUITMENT/ENGAGEMENT

Individuals are engaging the system through various methods: rapid response meetings, unemployment insurance claims, walk-ins, outreach via community job fairs, social media, as well as through referrals from internal and external agencies and organizations. The following identifies the basic flow through such activities:

WELCOME & ASSESSMENT

The welcome and verbal assessment allows AJC staff (Title I and Title III) an opportunity to pre-assess the individual and advise the individual to about the most appropriate next steps. This includes but is not limited to services offered in the resource room, through registration on the Jobs4TN, by identification of barriers to employment, identification of a service member for priority of service, and by identification of individuals with a disability and in need of additional resources or services.

STAFF-ASSISTED OR SELF-ASSISTED SERVICES

The Workforce System provides an opportunity for both staff assisted and/or self-assisted services to individuals. After the verbal assessment, the individual is able to engage Title I, Title II, Title III, and Title IV self-assisted and staff-assisted services. These services include educational or training services and labor exchange services. Staff-assisted services can include group orientation or a face-to-face meeting which allows a more in-depth explanation of services and an appraisal of the individual's goals and interest. During these more personal interactions, the staff and the individual establish an action plan of next steps that best fit the individual's needs and eligibility. In addition, individuals can attend workshops (resume reviewing/writing, interviewing skills, etc.) soft-skills training, occupational skills training/certification, etc. with the goal of gainful employment.

REFERRAL, PLACEMENT & FOLLOW-UP

Upon determination of the individual eligibility and needs, the individual is referred to the necessary services. This can include educational and training services, vocational rehabilitation services, supportive services, and/or placement to a job, work experience, apprenticeship, etc.

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 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.

For businesses, 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:

90. Sector convening to clarify and articulate the education and training pathways into high demand and emerging occupations
91. Identifying systemic opportunities for improved service delivery so that more youth and adults access and complete the programs
92. 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 work groups 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.

Future improvements to our system will include:

- Develop and expand State partnerships for business services and assist LWDAs to create sub- workgroups. This new focus will build on this process by developing and expanding the partnerships. The exact involvement of the local teams will be determined locally. However, additional partners (if not already present) may include local representatives of economic development councils, chambers of commerce, SHRM, community and technical colleges, the Division of Vocational Rehabilitation, and local government. As with the State Level workgroup, the local teams will focus on workforce and related economic development programs and services. Local teams will also provide access and referrals to other government programs that serve business
- Utilized and integrate Workforce OneTouch that will allow for improved customer relationship management tracking for business service representatives. Incorporate additional operator access levels that will allow partner access to relevant information regarding services delivered/needed
- Incorporate "Brand" into activities using an implementation plan for branding throughout the State
- Develop technical assistance and training for Business Services Representatives (State & Local) on "Promising Practices" in Workforce Development services to employers
- Develop standard "Outreach" strategies, techniques, and templates for materials
- Work with local leadership to develop specialized technical assistance for "promoting Veteran Services to employers," Tax Credits, and other incentives. Delivering training to LVERs and Business Services Representatives (State/Local); to include written scripts on Tax Credits, strategies and techniques for serving Business

To support cross-program strategies, Tennessee has engaged in a collaborative effort to redesign the State and local Workforce System to provide a seamless service model that focuses on the following customer needs and expectations:

99. FUNCTIONAL ALIGNMENT. Functional alignment is both an opportunity and a tool to effectively organize staff and facilities in a manner that streamlines customer service delivery, capitalizes on the strengths of staff and technology to deliver services, and thereby reduces duplication. It is not enough to co-locate partners, orient customers to partner programs, and refer customers to these programs. In order for the one-stop delivery system to succeed, services must be integrated and delivered according to customer need rather than program focus.

100. BUSINESS SERVICES FUNCTION. The AJC staff and partners involved in the business services function are responsible for building relationships with employers through local and regional initiatives including but not limited to sector partnerships and business alliances, and identifying opportunities to address the human resource needs of employers. The goal is to become the bridge between business and job candidates by coordinating with all AJC staff and partners to actively recruit and refer qualified job candidates based on the needs of the business. Services associated with the business services function include but are not limited to the following: business outreach; recruitment and referral for job vacancies primarily for targeted business and industry; job candidate qualification review; provision of economic, business and workforce trends; the organization of specialized training programs around business and industry needs; provision of information about human resource services.

101. BUSINESS DEVELOPMENT AND JOB DEVELOPMENT. For purposes of clarifying roles and responsibilities, there is a difference between business development and job development. Business development is the process of focusing on business needs and expectations in order to maximize the development of employment and training opportunities and then find suitable and appropriate workers; while job development is the process of having specific individual and targeting employers to hire to that individual. Each funding source will continue to conduct job development within its own organizational structure and within the framework of funding source requirements. Individuals engaged in job development for targeted populations will be a part of the local business service team. This cross-functional strategy will ensure that targeted populations and the staff that work with them are engaged in conversation and planning to increase job opportunities for their respective populations. Business development will become a functionally aligned process that will be managed by local business service teams.

102. TDLWD BUSINESS SERVICE SUPPORT. TDLWD Workforce Services State and regional leadership will support local Business Service Teams by providing direct oversight, training, and technical assistance. The collective leadership of the Division of Workforce Services will assist with outreach materials, event planning, labor market information, data collection, technical

assistance, and reporting. The Administrator of Workforce Services will be the primary contact to coordinate with TNECD and Jobs Base Camps. Each regional team will assist with these efforts to support the administrator in the cross-program collaborations.

103. LOCAL BUSINESS SERVICE TEAM FUNDAMENTALS.

- Workforce System partners, mandated in the WIOA and other appropriate partners will participate on local business service teams if their job duties require them to communicate with a business.
- The local business service teams will have a lead or co-leads from (Title I or Title III).
- The team will establish a memorandum of agreement on the protocols that will be followed related to meetings, communication, roles and responsibilities, and tracking.
- Regional and local teams will have options as to how to approach service delivery and they will participate in statewide planning sessions to understand and formulate local service delivery recommendations.
- Standardized forms, data input, and tracking will be developed to provide consistency and better analyses statewide.
- Regional and local business teams will be trained on OneTouch/Zendesk and will work with the TDLWD Administrative Team of Workforce Services to facilitate working with TNECD around job expansions and new business growth.
- Branding and outreach materials will be a statewide theme including the national DOL brand information.
- Common definitions will be established to support all funding streams' understanding and requirements.
- A performance management dashboard inclusive of State Board measures and locally selected measures will be required to help drive positive behaviors in regard to employers.
- The rapid response will be included in the regional and local business service team responsibilities. Rapid Response activities have been functionally aligned and provided through local workforce areas to establish a more integrated seamless approach to helping job seekers and business customers. Title I has the primary responsibility to provide Rapid Response activities.
- AJC certification requirements will include business service parameters that each local business service team must meet or exceed.
- Business service teams are expected to collaborate with job seeker services to fill positions and focus training on needed skills and knowledge.

6. REGIONAL AND LOCAL BUSINESS SERVICE TEAMS. There will be two primary partners in forming a local business service team: Wagner-Peyser Labor

Exchange and WIOA Adult/Dislocated Worker Programs. Local Workforce Development Areas are required to submit local plans.

These plans will be received by TDLWD, in its role as an administrative entity, for approval that is developed in consultation with local Wagner-Peyser staff and other relevant partners evidenced by a signatory agreement on the plan. The plan is to address:

- Which partner agencies will participate in the local business services team?
- Who will lead or co-lead the team?
- What is agreed upon roles and responsibilities for each team member?
- A flowchart of job seeker and business customer flow for all team members' funding streams. e. A flowchart of the paperwork flow for all team members' funding streams.
- The sectors that will be focused on and justification for the selection of the sectors.
- Common definitions and recommendations for local performance management dashboard key indicators.

MEETING THE SKILLS NEEDS OF EMPLOYERS

A critical factor in meeting the skills needs of employers is an understanding of exactly what those needs are. TDLWD will work with its education and economic development partners to clearly identify and forecast employer needs to be aligned with the industry clusters and sectors identified in the Governor's vision. Concerning the cornerstone of the Governor's Jobs and Economic Development Goal and Objectives, TDLWD considers employers to be primary customers. The Workforce System focuses on "people for jobs" and "jobs for people"; that can be achieved through a collaborative relationship among partners. Outreach and promotion as well as providing time sensitive and effective customized screening and recruiting services have developed strong ongoing relationships with employers. The Department will:

122. Enhance relationships with employers currently served through local AJCs via Labor Exchange, Veterans Programs, the Trade Act, Re-employment Services, Unemployment Insurance, and Local Workforce Area Business Service efforts. This includes working with TNECD to identify, connect and serve companies with workforce needs.

123. Establish protocol and policy to deliver employer services through a functionally aligned approach with seamless service delivery.

124. Establish an AJC certification process that has standards required for business services statewide

125. Continue to provide and track training to Workforce System partners to build the capacity to serve employers and to better understand labor market information data and analyses

126. Establish policies and procedures to support meeting the skills needs of employers

127. Use the AJC brand to market a consistent message and image to employers and job seekers (Governor's Jobs & Economic Development Goal: Objective III)

128. Develop job opportunities for the supply side of the Workforce System by demonstrating the value and benefit of participation to employers; all of this will result in increased job postings in Jobs4TN

129. Pursue high-demand, sector-based workforce collaborative that includes employer engagement

130. Continue the practice of assisting employers in recruiting skilled workers

131. Provide services requested by employers based on the employers' individual and specific needs

132. Develop a plan to manage participation in community events and promote services available through the American Job Centers

133. Establish a balanced scorecard/performance management dashboard that provides success indicators for employer services

E. Partner Engagement with Educational Institutions

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

In addition to the focus on career and technical education, work-based learning and career pathways in the Department of Education, the Tennessee Board of Regents system provides a variance of training and certifications through the 27 Tennessee Colleges of Applied Technology (TCAT) and 13 Community Colleges. Each of these institutions works closely with the State and local workforce development boards to develop training and support for emerging workforce demographics across the State. The expansion of programs of study that bring together a sequence of career-focused courses that start in high school and extend through college have grown in their availability and connectivity to emerging occupations. In addition to the collaboration in recruiting industries, retraining displaced workers, assisting with plant closings, and introducing youth to post-secondary career options/programs, the entities work closely with clients to assist in meeting the States workforce needs. Such coordination of services and training is done through meetings, serving on boards, and organizing job fair events to maintain a constant communication and pipeline to serve our clients and better meet the needs of industry. In addition, the Workforce360 program brings workforce, education, and employers to the table during a single meeting to discuss workforce challenges and identify attainable strategies to address concerns. This program directly increases alignment and promotes job-driven education.

Likewise, programs such as Pathways TN allow for multiple pathways to high skill/high wage employment beginning as early as high school. The variety of pathways allows high school students a chance to earn credits for both high school and college through programs providing an easy transfer of "dual credits" between high school and post-secondary institutions. These previously earned credits contribute to the improved articulation between the State's two-year colleges and also between two-year and four-year institutions concerning credits earned in one institution being applicable (and transferable) to another.

F. Partner Engagement with Other Education and Training Providers.

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

The State is constantly working on strategies that will engage the State's other education and training providers (including providers on the State's Eligible Training Provider List) as partners in the Workforce System. In some areas, the local boards have created skills panels that will work to analyze skill gaps for each industrial cluster and identify resources for growth.

Much like locally determining eligible training providers, the local leadership, for the skills panels, is helpful in identifying the relevance and potential success of employer-developed curriculums to meet the local employers' needs.

Tennessee's Community and Technical Colleges play an integral role in the economic growth of our State. From providing short-term training programs to customized, long-term initiatives, these 40 colleges have developed innovative strategies to meet the workforce training needs of local, regional and State employers.

The colleges work closely with the following Tennessee departments:

- 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

Collectively, Tennessee's colleges, with its partners, are able to offer workforce development programs, provide training for industries and small businesses. Through continued collaboration, the educational partners can meet with the State departments for a fast track to meeting training needs. In addition, Adult Education, Vocational Rehabilitation, and CTE services are beneficial for reaching and serving participants with significant barriers to education, training, and employment.

G. Leveraging Resources to Increase Educational Access

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

The State will use workforce development system partnerships as described above to ensure all resources are leveraged for education participants in attaining their educational goals. All workforce programs will use WIOA, TAA, Vocational Rehabilitation, Pell Grants, public and private grants, and other resources to assist participants in achieving their education and employment 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.

H. Improving Access to Postsecondary Credentials

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

The 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:

139. an increase in student attainment of department-promoted industry certifications

140. an increase in student transference of department-promoted industry certifications to meaningful postsecondary and workforce opportunities following high school graduation

141. provision to ensure consistency in the promotion of all department-promoted industry certifications with various stakeholders.

Department of Education an industry certification policy recap:

142. Increase student attainment of department-promoted industry certifications

    1. Increase number of students sitting for promoted certification exams

    2. Increase pass-rates for said exams

2. Increase transference of department-promoted industry certifications to meaningful opportunities for students following high school graduation

143. Increase number of credit and/or hours awarded upon entering a postsecondary program

144. Increase employment rates and workforce matriculation

3. Ensure consistency in the promotion of department-promoted industry certifications with various stakeholders, including students, caregivers, school personnel, and postsecondary and industry partners. Promotion may include:

145. Capstone experiences in CTE programs of study

146. Recognition for “state distinction” upon graduation

147. Opportunities available through the attainment of a certification

It is important that department-promoted certifications meet a set of criteria designed to ensure students can transfer attained certifications to postsecondary matriculation and workforce employment. Certifications should further a student’s pathway, not hinder it. In so keeping, the department used the following criteria to determine which industry certifications to promote:

148. Industry recognized and valued

149. Aligned with CTE course and/or program of study

150. Transference to postsecondary

151. Transference to high-quality employment

INDUSTRY-RECOGNIZED AND VALUED

For any certification to be promoted, it is essential that the certification is recognized and valued by the targeted industry. The industry certifications promoted by the Department have been vetted by respective career cluster advisory councils (composed of Tennessee industry representatives).

If an identified certification was recognized but not valued, it was not included in the final department-promoted list. All promoted certifications must show both.

ALIGNED TO CTE COURSE AND/OR PROGRAM OF STUDY

Department-promoted industry certifications should be representative of the learning a student has mastered through the successful completion of an aligned CTE course and/or program of study. It is important that this alignment exists and that the content in the certification is not simply representative of a few standards within a course.

Industry certifications can be stackable credentials such as Microsoft Office Suite certifications (as identified with the Office Management program of study), or they can be the capstone, meaning they represent the culmination of acquired skills through the completion of a particular program of study. TDLWD 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, Tennessee 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.

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. For these jobs in demand by region listed in the gap analysis in Appendix 2, common employer licenses and certifications found in jobs posted to the jobs4tn.gov were identified. Many of the certifications and licenses on the list of 2015-2016 Career and Technical Education Promoted Student Industry Certifications were associated with jobs in demand, particularly in healthcare, construction, information technology, and finance.

I. Coordinating with Economic Development Strategies.

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

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

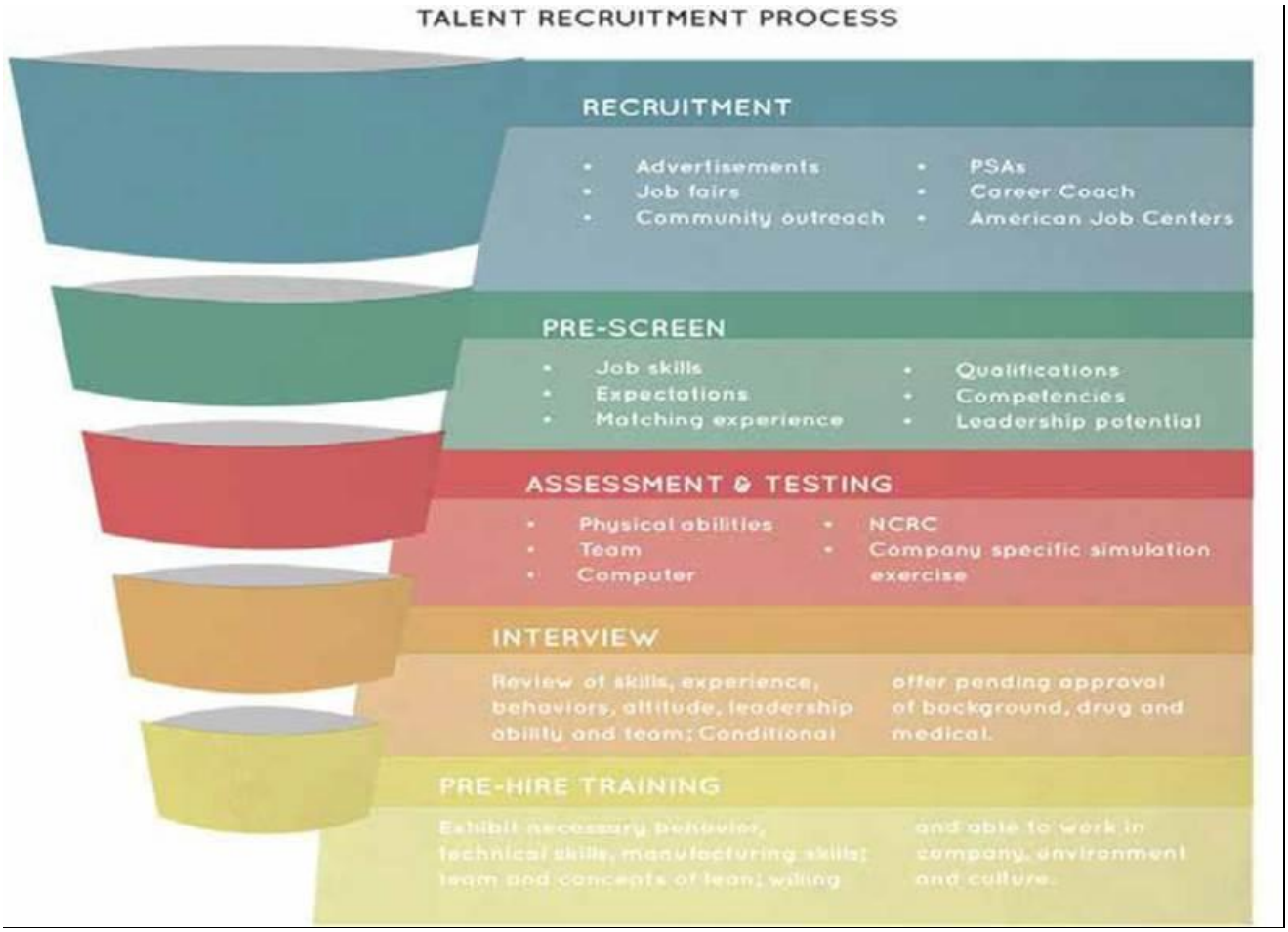


Figure 3: Talent Recruitment Process

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

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 the implementation of the State's strategies. This must include a description of–

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

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

- Self-Service for Job Seekers
- Self-Service for Employers
- Labor Market Information
- Mediated Labor Exchange
- Case Management through Virtual One-Stop System (VOS)
- Reemployment Exchange (REX)
- 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 that will aim in workflow improvements and increase efficiencies across the board.

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

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

Zendesk Chat also offers helpful features including:

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

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

Our goal is to carry out all data-collection and reporting processes under this plan using a single virtual system, specifically, the Jobs4TN system which is being deployed by Geographic Solutions, Inc., TDLWD's system of record for workforce data across all core programs. And to the extent possible, recognizing cost and infrastructure limitations, also to be deployed for certain mandatory and optional partners as WIOA takes 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 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
- Labor Force Information by County, Region, and Statistical Area
- Tennessee Training Providers with Demand Occupations
- 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 positioning 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 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 lead by the Tennessee Department of Labor and Workforce Development, Workforce Services Division, and this combined plan for performance data collection and reporting 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, and 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. In addition, and as shown in Appendix 1, we have stated performance targets.

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

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

The system design of American Job Centers across Tennessee rests upon the principles of leveraging resources and coordinating services through Memorandums of Understanding (MOU) and/or Resource Sharing Agreements (RSAs). Through these agreements, multiple partners leverage resources which support the infrastructure and programmatic functions in the AJCs. Such partners include WIOA (Adult/Dislocated Worker/Youth), Wagner-Peyser, Adult Education, SNAP Employment and Training, Re-employment Services and Eligibility Assessment, Trade Act, Veterans, Human Services (including TANF and Vocational Rehabilitation), Job Corps, and Title V Senior Services. Pursuant to WIOA section 121(h)(1)(B), the State's policy on the One-Stop Delivery System provides guidance on MOUs and the RSAs to assist local boards, chief elected officials, and one-stop partners in local areas in determining equitable and stable methods of funding the cost of infrastructure of one-stop center in such areas.

Tennessee is in the process of reviewing and updating several policies to adapt to regulatory changes as well as new technology that support the implementation of WIOA. The following list contains the policies that are currently in draft. Upon the receipt of the final Federal regulation (expected to be released in June 2016), more policies will be developed to provide guidance to WIOA partners.

187. Appointment and Certification of Local Boards

188. Access to Local Board meetings by people with disabilities

189. Conflict of Interest

190. Priority of Service to Low-income individuals and those with disabilities

191. Priority of services to Veterans

192. WIOA Allocation

193. Initial Assessment and Co-enrollment

194. Youth 5% and Additional Assistance

195. Certification (AJC/One-Stop Certification)

Since June 2016, the Tennessee Workforce System State under the auspices of the Workforce Development Board have developed 72 WIOA policies, guidance, and manuals that guide the workforce system.

3. State Program and State Board Overview

A. State Agency Organization

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

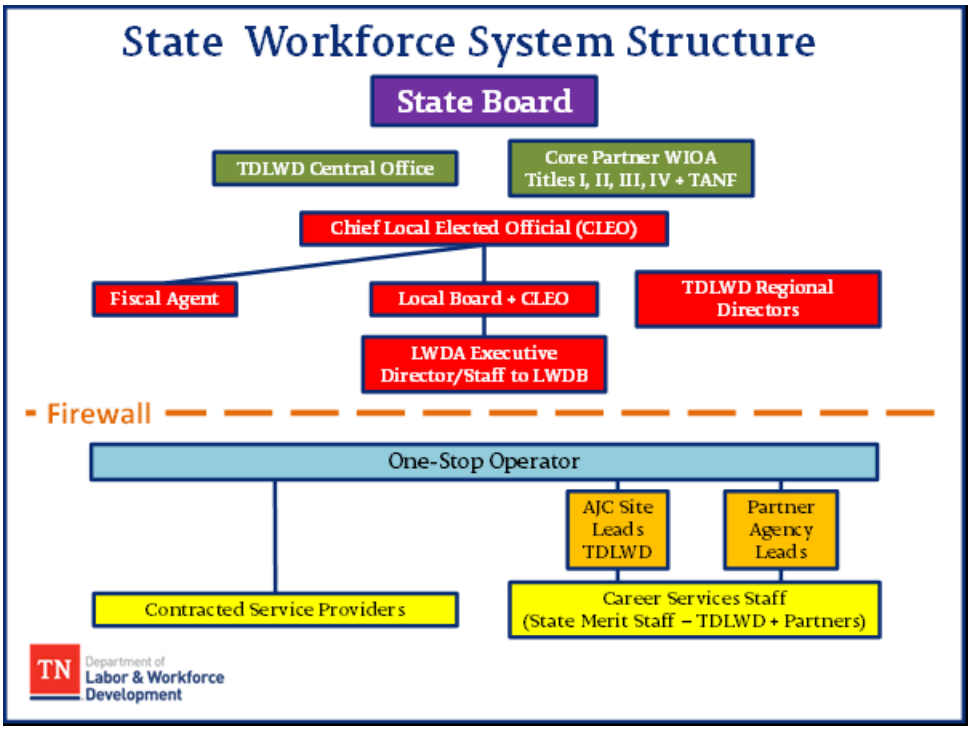


Figure 4: Tennessee State Agency Organization

Tennessee Workforce Development System has made significant strides to align not only to the WIOA standards, but also to align to Governor Bill Haslam goals of jobs and economics, education and workforce development, and fiscal leadership. In doing so, there is a comprehensive system that works across government agencies and partners to accomplish these goals.

Under Governor Haslam's Executive Order 46 twenty-four members were appointed to the State Workforce Development Board. These members would delineate oversite - policy and programmatic development, operations - performance monitoring and continuous improvement of WIOA programs/activities, and opportunities - technological and best practices strategies which govern the Tennessee Workforce System in accordance to section 101 of WIOA.

The activities within the Tennessee Workforce System could not be carried out without the collaboration of multiple departments of the State of Tennessee known as TeamTN including the Local Workforce Development areas. These partnerships include:

1. **Tennessee Department of Labor and Workforce Development (TDLWD)** - authorized as the signatory entity designated to receive funds under WIOA. Within the context of WIOA, it 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 oversite 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.

2. **Tennessee Department of Education (TDOE)** - as administers support to districts, schools, and educators across the state in increasing student achievement results and closing achievement gaps. Through the partnership Division of College, Career and Technical Education, the Tennessee Workforce System is able to align services and training services that support Governor Haslam's Drive to 55 - a statewide initiative to equip 55% of Tennesseans with a post-secondary degree or certificate by 2025.

- *Tennessee Promise* administered by offers high school students two years of tuition-free community or technical college and offers and mentor to help them through the process.
- *Tennessee Reconnect* administered by **Tennessee Higher Education Commission** offers adults the opportunity to attend and earn a certificate at any of the 27 Tennessee Colleges of Applied Technology (TCATs) completely free of tuition and fees. THEC and TDLWD have partnered to train and prepare AJC staff as TNReconnect Ambassador which will enable staff to navigate Tennesseans through the process of going to college for the first time or returning to college.
- *Tennessee Labor Education Alignment Program* is a $10 million grant opportunity designed to ensure that post-secondary institutions are producing skills and credentials that Tennessee employers need through alignment of education and industry.

3. **Tennessee Department of Human Services (DHS)** - offers temporary economic assistance, work opportunities, and protective services to improve the lives of Tennesseans. DHS is also a partner of the Tennessee Workforce System as they administer several programs and services to the population that has the greatest barriers to employment. These programs include:

- The *Supplemental Nutrition Assistance Program (SNAP)* under USDA regulations supplies the participant pipeline to the SNAP Employment and Training Program within the Workforce Services Division. Through that collaboration, SNAP participants with education and training opportunities that will increase their student achievement thereby increasing their employability.
- *Vocational Rehabilitation Services* manages the Vocational Rehabilitation Program which provides a variety of individualized services to persons with disabilities as well as an employer in preparation for their employment. They also assess the Tennessee American Job Centers to ensure they are properly attired with the necessary technology, services, programmatic accessibility of facilities, and materials for individuals with disabilities.
- *Temporary Assistance for Needy Families (TANF)* focuses on gaining self-sufficiency by providing transportation, child care assistance, education, job training, employment activities, and other supportive services. The TANF program will bring insight to the Tennessee Workforce System by equipping staff on the Two-Generational Approach - Family Focused Solutions that provides assessments, case management, family and individual counseling, self-advocacy training, in-house services, and other skills training that promote self- sufficiency.

4. **Tennessee Department of Economic and Community Development (TNECD)** - develop and implement strategies to attract new corporate investment in Tennessee and works with Tennessee companies to facilitate expansion and economic growth. TNECD completes the strategic arm of the Tennessee Workforce System by providing business development strategies within the local areas that revise or develop regional economic development plans thereby aligning the state and federal resources to help their local communities. The *Workforce 360° Project* is a region-based, multi-agency partnership targeted to engage businesses and industry leaders that are interested in recruitment and expansion projects.

TeamTN provides subject matter expertise to the State Workforce Development Board. They are also the core management team for implementation and performance of WIOA activities. In March 2016, TeamTN signed a Memorandum of Understanding to establishing a collaborative framework encouraging cooperation, collaboration, communication, policy and technical guidance to assist the efficient and effective participation of WIOA implementation within the Local Workforce Development Areas across Tennessee.

B. State Board

Provide a description of the State Board, including—

The State Workforce Development Board (State Board) consists of 24 members representing various state agencies, State, local, and city government, public and private sector businesses and the general public.

More details are included in the following responses.

i. Membership roster

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

Those members are as follows:

The Governor of Tennessee leads state workforce efforts and organizations for the entire state. The organizational chart shows the Governor at the top. The Governor appointed the State workforce Board. The WIOA State Board is created in accordance with the newly-established WIOA guidelines and reports directly to the Governor and has direct lines of responsibility and communication with all WIOA partner organizations and agencies.

Board Member Name	Employer or Organization of Board Member	Member Organization
Martha Axford	ABC Design, LLC	Business
Jason Bates	Toyota Bodine Aluminum, Inc.	Business
Timothy Burchfield	Chick-Fil-A	Business
vacant	Business	
Ann Hatcher	HCA	Business
Christine Hopkins	Middle TN Rural Reentry	Business
Greg Persinger	Yates Services, LLC	Business
Stuart Price	Lee Company	Business
James Williamson	Aztec Pest Control	Business
Mr. Bob Ravener CHAIR	Dollar General Corporation	Business
vacant	Business	
Warren Logan	Urban League of Chattanooga	Organized Labor

Board Member Name	Employer or Organization of Board Member	Member Organization
Sandra Woods	Retiree Member Club	Organized Labor
Yolanda Shields	Let's Go Innovative, LLC	Community Based Organization
Kevin Vaughn	FirePro LLC	Apprenticeship/Training
Representative Susan Lynn	Tennessee State Government	State Legislature Representative
Senator Mark Norris	Tennessee State Government	State Legislature Representative
Dr. Candice McQueen	Tennessee Department of Education	Education (Perkins)
Mr. Bob Rolfe	Tennessee Department of Economic and Community Development	Economic & Community Development
Mr. Burns Phillips	Tennessee Department of Labor and Workforce Development	Labor & Workforce Development
Mrs. Danielle W. Barnes	Tennessee Department of Human Services	Human Services (VR & TANF)
Mayor Rogers Anderson	Williamson County Government	Chief Elected Official - County
Mayor John Clark	City of Kingsport	Chief Elected Official - City
Governor Bill Haslam	Tennessee State Government	Governor

Description of the State Board:

The Governor appoints members of the Tennessee State Workforce Development Board (SWDB) in accordance with WIOA section 101(b) (1). The Board through its bylaws established working committees to assist the Governor and the full Board in carrying out the functions and responsibilities it has under WIOA.

ii. Board Activities

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

The three working committees include the Oversight Committee; Operations Committee and Opportunities Committee. These committees are essential in guiding the workforce system and carrying out the Governor's vision for the workforce.

Responsibilities of the Oversight Committee are as follows:

206. Advising the Governor on program and policy changes under WIOA

207. Leading the development, maintenance, and modification of State, regional and local plans

208. To serve as an advisor to review statewide program alignment

209. To review and make recommendations on program funding allocations

210. To lead a review of statewide Workforce System

The responsibilities of Operations Committee are to:

211. Oversee the continuous improvement of WIOA programs and activities

212. Be the lead monitor on State performance/accountability

213. Be the lead coordinator of policies and provision of WIOA services

214. Review and make recommendations for performance reporting, including Labor Market Information

The responsibilities of Opportunity Committee are to:

215. Identify and share Workforce System best practices

216. Develop strategies for technology alignment and integration

217. Be the lead reviewer of service-model strategies in WIOA programs

218. Oversee all WIOA Youth program initiatives.

The State Board meets every quarter to consider recommendations, policies, and initiatives.

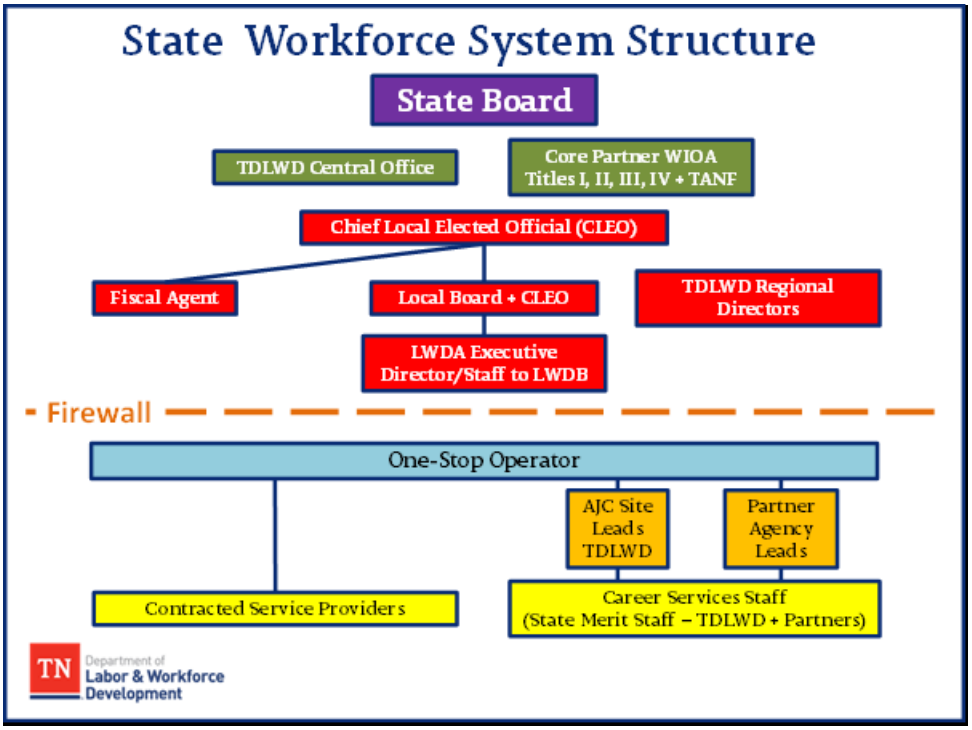


Figure 6: State Workforce System Structure

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. 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); CLEOs role on behalf of each unit of government is crucial 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 approval of the budgets the area will use to operate the workforce system. Additional, CLEO responsibilities include the development of 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 allocating funds and reporting results of activities and expenditures of these funds to the State Board as requested.

The Fiscal Agent is an entity designated by the Chief Local Elected official (CLEO) (see slide 21) 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.

The State workforce board staff (Workforce Services) is assisting the local areas in restructuring the workforce system based on the State Workforce Board policy which necessitates creating firewalls between the Local Boards and the One Stop operators to prevent conflict of interest or the appearance of a conflict of interest. The LWDAs are in the process of creating this firewall and refining the local workforce structure.

One Stop Operators

One-Stop Operators are charged with coordinating service delivery among partner agencies in American Job Centers. One-Stop Operators are responsible for:

- Managing daily operations in coordination with the WIOA Fiscal Agent for the lease, utilities, and other activities to support the center
- Managing responsibilities as defined in the memorandum of understanding (MOU) among Partners
- Coordinating services across the Local Workforce Development Area
- Managing hours of operation
- Managing services for individuals and businesses
- Ensuring that basic services - such as orientations, labor market information, resource room - are available
- Implementing Local Board policy
- Adhering to all federal and state regulations and policies
- Reporting to the Local Board on operations, performance, and continuous improvement recommendations

Site Leads and Partner Agency Leads

AJC Leads supervise TDLWD Merit Career Pathway staff in regard to timekeeping, personnel matters, and operational performance. Leads are responsible for coordination

of staff and not what services they offer, which is provided by the One-Stop Operator. The partner agency leads supervise the staff under their agency located in the AJCs.

Career Service Staff:

These are individuals who provide labor exchange services under the authority of the Wagner-Peyser Act including delivery of services to Veterans (20CFR 652.215) and all career services. Partner Agency staff (Adult Education/Vocational Rehab) are placed in the comprehensive AJC's to carry out the activities and services as described in section 121 and 134 (c2) of WIOA.

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

A. Assessment of Core Programs

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

Each quarter the SWDB receives a dashboard that assesses the services provided in each AJC. The dashboard incorporates all partner services to assess program delivery and efforts made for continuous improvement in the integrated delivery system. SWDB staff will continue to conduct annual monitoring of contractors, local area board activities, and the appropriate use of funds. Regular reports will be presented to the State board, including an analysis of economic and labor market data to assist the board in making an educated decision for changes and improvements. Under the direction of the SDWB, the board staff will prepare models of analysis that assists system partners with understanding the impact of career pathways and other strategies that address disparate impact populations within the WIOA programs and the system at large. In addition, core programs will be assessed annually based on the state performance accountability measures described in Section 116(b) of WIOA. Assessments include the quality, effectiveness, and improvement of programs. Under the leadership of the SWDB, core program partners will meet to define performance accountability measures and sources of data, and how the information will be used to for improvements Tennessee will use previous performance measures s base measurements. A determination of each of the core partners' success will be measured by their ability to meet or exceed their agency's target.

WORKFORCE DEVELOPMENT SYSTEM CERTIFICATION

Tennessee's Workforce System is in the process of developing certification requirements in accordance with WIOA. This will establish the criteria that the Local Workforce Development Boards, the Local Workforce Development areas, and the One-Stop Operators must use for certification of Tennessee's AJC.

ACCOUNTABILITY

Tennessee leadership has recognized, and some cases confirmed, the strengths and weaknesses of an accountability system that is primed for transformation. We still have skills and education gap when it comes to employer job openings, and each year the workforce development system serves more than 200,000 Tennesseans with career and training services, placing over 100,000 in jobs each year.

"For all the services an effective state government can provide we know that nothing takes the place of having a job." // Tennessee Governor Bill Haslam, February 1, 2016

What this means is, under WIOA, we need a Workforce System certification process, as well as certification processes, developed by the Core Partners and the Local Workforce Development Areas (LWDA). All of this help in reviewing and sustaining continuous improvement and high-quality customer service at Tennessee's American Job Centers as part of regional and local operational strategies. The WIOA Partner team has carried out the following:

- Created a Focused Partnership Team
- Developed an Integrated System Vision
- Developed a Focus Team Action Plan
- Developed a Combined Workforce Development Plan
- Implemented a Combined Plan in Support of Continuous Improvement
- Planned Evaluations
- Used the Results of Evaluations to Improve the System

In addition, the central concepts to guide system assessments, accountability, transparency, integration, and sufficiency will be deployed system-wide, as follows:

- System Self-Assessment
- Letter of Intent to Comply with WIOA
- System Certification Application
- System Application Review
- Certification Recommendation

The system shall be certified under the authority of Public Law 113-128 WIOA of 2014, as amended (29 U.S.C. 3101 et seq.), Section 121(g), ; Notice of Proposed Rule Making (NPRM) WIOA Regulations, 20 CFR 601, 651, 652 et al., Office of Management and Budget (OMB) cost principles codified in 2 CFR Part 220, CFR 225 and CFR 230; TEGL 4-15. 678.800; 678.305(d).

REGION AND LOCAL LEVEL ACCOUNTABILITY

Tennessee's workforce development system, both regional and local, requires that programs and providers co-locate, coordinate, and integrate activities and information so that the system is cohesive and accessible for individuals and businesses alike. Accountability goals increase the long-term employment outcomes for individuals

seeking services, especially those with barriers to employment; to improve services to employers; and to demonstrate continuous improvement. The certification policy is the foundation for aligning programs, policies, and activities in the State's Workforce System. This policy will assess the effectiveness, physical and programmatic accessibility in accordance with section 188 and the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) and will undergird continuous improvement of one-stop centers. It specifies minimum standards for the service menu and customer service to be met and branding requirements that demonstrate a statewide Workforce System. This certification process will demonstrate that the local workforce development boards can ensure that employment and training programs in their communities operate at the highest level of quality and consistency while satisfying the expectations and needs of their customers.

B. Assessment of One-Stop Program 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.

Since 2016, Tennessee has made incremental structural changes based on how WIOA programs could be effectively implemented in local development areas. With each incremental change, the state consulted with several workforce stakeholders. The final phase of the structural change was approved by the State Workforce Development on May 11, 2018. As one of the implementers of the WIOA programs, Workforce Services will continue to conduct regular assessments and will submit the results upon request.

The State assesses the quality and effectiveness of programs through the following mechanisms:

1. State and local level fiscal and programmatic monitoring - quarterly the State provides the State Workforce Development Board with an analysis of each local workforce board's financial status and programmatic outcomes through the Tennessee Workforce Dashboard. The board has three standing committee's Oversight Committee, Operations Committee, and Opportunities Committee that review the fiscal and programmatic activities and discuss ways to better administer services and continuous improvement of the Tennessee Workforce System.

2. Data validation - Tennessee has established procedures, consistent with the guidelines issued by the Secretary of Labor and Education, to ensure the information contained in all federal reports is valid and reliable. Data validation is a process intended to review participant files for accuracy and compliance. Eligibility and verification documentation is reviewed in this process quarterly, as well as annually, which is required by USDOL. Tennessee requires that the LWDAs use VOS to upload documents for data validation immediately and ensure that all information is present no later than June 30 of the current program year. This digital medium streamlines the process by eliminating the need for paper documents while allowing the validation process to be conducted remotely and accurately.

The state monitors local areas and providers to meet performance measures through technical assistance when needed and plans to develop metrics to evaluate performance and programmatic outcomes of core and partner programs. The State along with the State

Workforce Development Board will work to ensure the vision, goals, and strategies of the state plan are moving the Tennessee Workforce System in the right direction. As a part of the state assessment process, performance based on program activities and goals based on regional and local plans will be reviewed to mark program on achieved outcomes.

C. Previous Assessment Results

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

Based on the data provided within the Tennessee Workforce Dashboard, the state has seen an increase in the overall number of program enrollments and coenrollments compared to third quarter PY16. Also, there has been an increase in the number of individuals and employers seeking workforce services in the American Job Centers. The Tennessee Department of Labor and Workforce Development have created a Economic Data portal which is accessible to all, providing detailed performance information to local areas. (Please see the link attached www.tn.gov/workforce/tennessee-economic-data-/performance-metrics.html) More specific information on the results of assessments can provided in the dashboard upon request.

D. Evaluation

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

The description of State evaluations has been included in the response to Part A of this question.

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

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),

The State Workforce Development Board (State Board) provides oversight in the development of allocation formulas and is supported by TDLWD staff that also supports the Board. Staff members provide the Board with timely updated information regarding

newly released Federal guidance and provide feedback from local areas and local chief elected officials, including the Commissioner's listening tours or comments received during any applicable public comment periods.

In accordance with WIOA section 128 and 133, the State's established written policy on the Equitable Distribution of WIOA Formula Funds which provides guidance on the methods used for the development of allocation formulas for the distribution of funds. Such funds are allocated for: for employment and training activities for adult, and youth workforce development activities; to local areas as permitted under sections 128(b)(3) and 133(b)(3). For Dislocated Worker funding formulas, the State's policy/procedure includes the data used and the weights assigned. Also, as provided under the same sections of WIOA, 128(b)(2)(A) and 133 (b)(2)(A) and (B), local areas shall receive a minimum funding; whereby, the local area shall not receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the local area for the 2 preceding fiscal years.

The following chart provides a description of the State's methods and factors used to distribute Title I programs funds to local areas:

Tennessee Allocation Formula for WIOA programs

Allocation Factor	Weight Assigned in Formula	Data Source
Unemployment in Areas of Substantial Unemployment (6.5%)	33.3%	Local Area Unemployment Statistics (Annual Data)
Excess Unemployed (4%)	33.3%	Local Area Unemployment Statistics
Economically Disadvantaged Adult/Youth (when determining Adult allocation)	33.3%	Census

240. Number of unemployed persons in areas of an unemployment rate of 6.5 percent and above

241. Number of unemployed in excess of 4.5 percent of the civilian labor force (in the LWDA or in the area of Substantial unemployment within the LWDB, whichever is higher)

242. An adult aged 18-72 whose income, or whose family income was below the poverty or below 70 percent of the poverty lower living standard.

243. A youth aged 14-24 whose income or whose family income was below the poverty or below 70 percent of the poverty lower living standard

Dislocated Worker Allocation Formula for WIOA programs

Allocation Factor	Weight Assigned in Formula	Data Source
Unemployment Insurance Beneficiaries	35%	Unemployment Insurance data (Most Recent Year)
Unemployment in Areas of Substantial Unemployment (6.5%)	35%	U.S Dept. Of Labor, Bureau of Labor statistics and TN Labor of statistics
Plant closure and Mass Layoffs	5%	Plant Closures and mass layoffs employers report to TDLWD according to WARN (Annual)
Declining Industries	5%	Declining Industries data TN Bureau of Labor statistics (Recent Data)
Long-Term Unemployment Insurance Beneficiaries	20%	Unemployment Insurance data (most recent year; beneficiaries' 15 weeks or more)

244. UI beneficiaries' claimants less than 15 weeks by LWDA

245. Number of unemployed persons in areas of unemployment rate of 6.5 percent and above

246. Plant closures employers reported to TDLWD in each LWDA.

247. Number of jobs lost as determined by employment reports of employers as filed with the TDLWD under the Unemployment Insurance program past five years.

248. UI beneficiaries' claimants less than 15 weeks by LWDA

Regarding within State allocations and in accordance with WIOA section 128 and 133, the State will establish policy and procedures outlining the methodology to be used in determining the discretionary allocations of Title I formula funds if the State Board deems this necessary. The policy will be established utilizing extensive Labor Market data. If implemented, this would not go into effect until Program Year 2017.

If the State uses other information or chooses to omit any of the information sources set forth in WIOA when determining the formula methodology used in determining within State allocations of Title I formula funds, the State assures that written rationale exists to explain the decision.

ii. Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3),

The State Workforce Development Board (State Board) provides oversight in the development of allocation formulas and is supported by TDLWD staff that also supports the Board. Staff members provide the Board with timely updated information regarding newly released Federal guidance and provide feedback from local areas and local chief elected officials, including the Commissioner's listening tours or comments received during any applicable public comment periods.

In accordance with WIOA section 128 and 133, the State's established written policy on the Equitable Distribution of WIOA Formula Funds which provides guidance on the methods used for the development of allocation formulas for the distribution of funds. Such funds are allocated for: for employment and training activities for adult, and youth workforce development activities; to local areas as permitted under sections 128(b)(3) and 133(b)(3). For Dislocated Worker funding formulas, the State's policy/procedure includes the data used and the weights assigned. Also, as provided under the same sections of WIOA, 128(b)(2)(A) and 133 (b)(2)(A) and (B), local areas shall receive a minimum funding; whereby, the local area shall not receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the local area for the 2 preceding fiscal years.

The following chart provides a description of the State's methods and factors used to distribute Title I programs funds to local areas:

Tennessee Allocation Formula for WIOA programs

Allocation Factor	WeightAssigned in Formula	Data Source
Unemployment in Areas of Substantial Unemployment (6.5%)	33.3%	Local Area Unemployment Statistics (Annual Data)
Excess Unemployed (4%)	33.3%	Local Area Unemployment Statistics
Economically Disadvantaged Adult/Youth (when determining Adult allocation)	33.3%	Census

249. Number of unemployed persons in areas of unemployment rate of 6.5 percent and above

250. Number of unemployed in excess of 4.5 percent of the civilian labor force (in the LWDA or in the area of Substantial unemployment within the LWDB, whichever is higher)

251. An adult aged 18-72 whose income, or whose family income was below the poverty or below 70 percent of the poverty lower living standard.

252. A youth aged 14-24 whose income or whose family income was below the poverty or below 70 percent of the poverty lower living standard

Dislocated Worker Allocation Formula for WIOA programs

Allocation Factor	Weight Assignedin Formula	Data Source
Unemployment Insurance Beneficiaries	35%	Unemployment Insurance data (Most Recent Year)
Unemployment in Areas of Substantial Unemployment (6.5%)	35%	U.S Dept. Of Labor, Bureau of Labor statistics and TN Labor of statistics
Plant closure and Mass Layoffs	5%	Plant Closures and mass layoffs employers report to TDLWD according to WARN (Annual)
Declining Industries	5%	Declining Industries data TN Bureau of Labor statistics (Recent Data)
Long-Term Unemployment Insurance Beneficiaries	20%	Unemployment Insurance data (most recent year; beneficiaries' 15 weeks or more)

253. UI beneficiaries' claimants less than 15 weeks by LWDA

254. Number of unemployed persons in areas of unemployment rate of 6.5 percent and above

255. Plant closures employers reported to TDLWD in each LWDA.

256. Number of jobs lost as determined by employment reports of employers as filed with the TDLWD under the Unemployment Insurance program past five years.

257. UI beneficiaries' claimants less than 15 weeks by LWDA

Regarding within State allocations and in accordance with WIOA section 128 and 133, the State will establish policy and procedures outlining the methodology to be used in determining the discretionary allocations of Title I formula funds if the State Board deems this necessary. The policy will be established utilizing extensive Labor Market data. If implemented, this would not go into effect until Program Year 2017.

If the State uses other information or chooses to omit any of the information sources set forth in WIOA when determining the formula methodology used in determining within State allocations of Title I formula funds, the State assures that written rationale exists to explain the decision.

iii. Dislocated worker employment and training activities in accordance with WIOA section 133(b)(2) and based on data and weights assigned.

The State Workforce Development Board (State Board) provides oversight in the development of allocation formulas and is supported by TDLWD staff that also supports the Board. Staff members provide the Board with timely updated information regarding newly released Federal guidance and provide feedback from local areas and local chief elected officials, including the Commissioner's listening tours or comments received during any applicable public comment periods.

In accordance with WIOA section 128 and 133, the State's established written policy on the Equitable Distribution of WIOA Formula Funds which provides guidance on the methods used for the development of allocation formulas for the distribution of funds.

Such funds are allocated for: for employment and training activities for adult, and youth workforce development activities; to local areas as permitted under sections 128(b)(3) and 133(b)(3). For Dislocated Worker funding formulas, the State's policy/procedure includes the data used and the weights assigned. Also, as provided under the same sections of WIOA, 128(b)(2)(A) and 133 (b)(2)(A) and (B), local areas shall receive a minimum funding; whereby, the local area shall not receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the local area for the 2 preceding fiscal years.

The following chart provides a description of the State's methods and factors used to distribute Title I programs funds to local areas:

Tennessee Allocation Formula for WIOA program

Allocation Factor	Weight Assigned In Formula	Data Source
Unemployment in Areas of Substantial	33.30%	Local Area Unemployment Statistics (Annual Data)
Unemployment (6.5%)		
Excess Unemployed (4%)	33.30%	Local Area Unemployment Statistics
Economically Disadvantaged Adult/Youth (when determining Adult allocation)	33.30%	Census

258. Number of unemployed persons in areas of unemployment rate of 6.5 percent and above
259. Number of unemployed in excess of 4.5 percent of the civilian labor force (in the LWDA or in the area of Substantial unemployment within the LWDB, whichever is higher)

260. An adult aged 18-72 whose income, or whose family income was below the poverty or below 70 percent of the poverty lower living standard.

261. A youth aged 16-24 whose income or whose family income was below the poverty or below 70 percent of the poverty lower living standard

Dislocated Worker Allocation Formula for WIOA programs

Allocation Factor	WeightAssignedin Formula	Data Source
Unemployment Insurance Beneficiaries	35%	Unemployment Insurance data (Most Recent Year)
Unemployment in Areas of Substantial Unemployment (6.5%)	35%	U.S Dept. Of Labor, Bureau of Labor statistics and TN Labor of statistics
Plant closure and Mass Layoffs	5%	Plant Closures and mass layoffs employers report to TDLWD according to WARN (Annual)
Declining Industries	5%	Declining Industries data TN Bureau of Labor statistics (Recent Data)
Long-Term Unemployment Insurance Beneficiaries	20%	Unemployment Insurance data (most recent year; beneficiaries' 15 weeks or more)

262. UI beneficiaries' claimants less than 15 weeks by LWDA

263. Number of unemployed persons in areas of unemployment rate of 6.5 percent and above

264. Plant closures employers reported to TDLWD in each LWDA.

265. Number of jobs lost as determined by employment reports of employers as filed with the TDLWD under the Unemployment Insurance program past five years.

266. UI beneficiaries' claimants less than 15 weeks by LWDA

Regarding within State allocations and in accordance with WIOA section 128 and 133, the State will establish policy and procedures outlining the methodology to be used in determining the discretionary allocations of Title I formula funds if the State Board deems this necessary. The policy will be established utilizing extensive Labor Market data. If implemented, this would not go into effect until Program Year 2017.

If the State uses other information or chooses to omit any of the information sources set forth in WIOA when determining the formula methodology used in determining within State allocations of Title I formula funds, the State assures that written rationale exists to explain the decision.

Formula PY 2017-2018 Allocations

LWDA	Youth	Adult	Dislocated Worker	TOTAL
1	$884,511.00	$882,804	$878,692	$2,646,007

LWDA	Youth	Adult	Dislocated Worker	TOTAL
2	$1,073,032.00	$1,134,673	$1,068,889	$3,276,594
3	$880,349.00	$723,821	$834,399	$2,438,569
4	$1,042,637.00	$1,107,718	$1,066,483	$3,216,838
5	$1,393,891.00	$1,337,552	$1,448,770	$4,180,213
6	$434,085.00	$451,870	$618,923	$1,504,878
7	$574,389.00	$587,164	$481,215	$1,642,768
8	$1,041,311.00	$1,025,618	$1,364,594	$3,431,523
9	$1,794,243.00	$1,622,014	$2,027,870	$5,444,127
10	$519,704.00	$509,893	$561,541	$1,591,138
11	$722,096.00	$727,915	$644,093	$2,094,104
12	$1,052,878.00	$1,049,154	$928,790	$3,030,822
13	$2,981,558.00	$2,742,027	$2,501,285	$8,224,870
TOTAL	$14,394,684	$13,902,223	$14,425,544	$42,722,451

Regional PY 2017-2018 Allocations

Regions	Youth	Adult	Dislocated Worker	TOTAL
East	$5,274,420.00	$5,186,568.00	$5,297,233.00	$15,758,221.00
Middle	$4,363,732.00	$4,196,559.00	$5,054,143.00	$13,614,434.00
West	$4,756,532.00	$4,519,096.00	$4,074,168.00	$13,349,796.00

B. For Title II:

i. Multi-year grants or contracts

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

Using the considerations specified in section 231(e) of WIOA, The Division of Adult Education plans to conduct a statewide competitive bid for the term of July 1, 2018 - June 30, 2021. The application will be for the duration of three (3) years, the contracts issued yearly. The competition shall be in the form of a Request for Proposals (RFP). The RFP shall include all three programs: 1) Adult Basic Education; 2) Corrections, and 3) IELCE.

Eligible providers may write for any of the three programs, a combination of the three programs or all three programs.

The Division of Adult Education will post a Notice of Funding Opportunity on the Tennessee Adult Education website for each designated Adult Education District. Potential eligible providers shall submit their application be reviewed and scored by independent reviewers using the Adult Education Grant Application Score Sheet (see *Adult Education Grant Application Score Sheet* included herein as Appendix A).

Reviewers of the applications will note the thoroughness of the proposed plan by specific criteria as set forth in the Adult Education Grant Application Score Sheet. Each section of the application will be evaluated and scored on the basis of completeness, clarity, and merit. The minimum score to qualify for funding is 70% or 129 total points. One eligible provider for the service delivery area will be recommended for funding based on scores as evidenced by the thoroughness of plan, evidence of previous program effectiveness and sound, research-based practice and evaluation.

Any organization that has demonstrated effectiveness in providing adult education and literacy activities is eligible to apply for a grant or contract. These organizations may include, but are not limited to: (a) a local educational agency; (b) a community-based organization or faith-based organization; (c) a volunteer literacy organization; (d) an institution of higher education; (e) a public or private nonprofit agency; (f) a library; (g) a public housing authority; (h) a nonprofit institution that is not described in any of paragraphs (a) through (g) and has the ability to provide adult education and literacy activities to eligible individuals; (i) a consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described in any of paragraphs (a) through (h); and (j) a partnership between an employer and an entity described in any of paragraphs (a) through (i)

An eligible provider must demonstrate past effectiveness by providing performance data on its 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, English language acquisition, and other subject areas relevant to the services contained in the application for funds. An eligible provider must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training. An eligible provider may demonstrate their past effectiveness by providing performance data required under section 116 if they have been funded under title II of the Act or by providing performance data to demonstrate its past effectiveness in serving basic skills deficient eligible individuals if they have not been funded under title II of the Act.

The Division of Adult Education will utilize the thirteen considerations set forth in section 231(e) as evaluative criteria to score eligible providers' application for funding. All eligible providers will be notified by the same grant announcement and will be accountable to the same process to adhere to all direct and equitable provisions.

The grant shall be a multi-year grant for a term of three (3) years. For each year after the first year of the contract, programs shall submit an application for continuation of funding to demonstrate continued effectiveness.

The grant application shall be in the form of a Request for Proposals (RFP). The RFP shall include all three programs: 1) Adult Basic Education; 2) Corrections, and 3) IELCE. Eligible providers may write for any of the three programs, a combination of the three programs or all three programs.

Where multiple applications are received for a service delivery area that meets the minimum score and qualifications, the applicant having the highest score for that service delivery area will be awarded the grant. In the event that no eligible agency meets the minimum score and/or qualifications for a service delivery area or if no eligible agency applies, a new Application for Funding will be posted for other eligible agencies to submit an application.

The Division of Adult Education, based upon the recommendation of the reviewer, shall submit to the successful applicant an "Intent to Fund Letter" outlining special terms and the award amounts. The successful eligible provider will adhere to the Scope of Services and Assurances that will delineate approved activities and set forth the terms and conditions under which to manage the Adult Education grant for the term of July 1, 2017 - June 30, 2020. The timeline for the competition shall be as follows:

January 2017……RFP Posted on TDLWD Website

March 2017……..RFP Application Due

March 2017……..External Readers Score Applications

March 2017……..Notify Applicants

ii. Ensure direct and equitable access

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.

Using the considerations specified in section 231(e) of WIOA, The Division of Adult Education plans to conduct a statewide competitive bid for the term of July 1, 2017 - June 30, 2020.

The Division of Adult Education will post a Notice of Funding Opportunity on the Tennessee Adult Education website for each designated Adult Education District. Potential eligible providers shall submit their application be reviewed and scored by independent reviewers using the Adult Education Grant Application Score Sheet (see *Adult Education Grant Application Score Sheet* included herein as Appendix A). Each applicant will receive the same Application Instructions as set forth in the Application Completion Instructions (see *Application Completion Instructions* included herein as Appendix B).

Appendix A

Adult Education Grant Application Score Sheet

Tennessee Department of Labor and Workforce Development

Division of Adult Education

Proposal Item	Possible Points	Points Awarded	Comments
1. Organizational Overview and Statements of Past Effectiveness and Need (20 Points) A. An organizational overview that describes existing Adult Education services B. A description of past effectiveness in improving the literacy skills of adults (NRS Tables 4-5 for 2013-14 and July 1, 2014-February 28, 2015) C. A statement of the local service delivery area's demonstrated need for additional adult education programs and D. A plan to serve individuals in the community who are most in need of literacy services, including individuals who are low- income or have minimal literacy skills	20		
2. Program Goals (15 points) A. A plan to serve 6% of the Service Area's potential to serve B. A plan to meet program performance measures as compared to the Division of Adult Education's state and federal performance measures	15		
3. Program Design (30 points) A. A proposed schedule of classes to demonstrate the intensity and duration for participants to achieve substantial learning gains. B. Instructional practices used in the Adult Education program. The description should include: (1) Enrollment process and orientation for students (2) The use of managed enrollment (3) Description of the plan to use Tennessee Curriculum including key elements: a) assessment - Locator, CASAS, OPT; b) leveled classes; c)scheduled classes; d) individual student profiles; e) class syllabus; f) in-class practice/ homework; g) in-class monitoring and feedback; h) scheduled re-test and feedback (4) Description of the plan to serve ESOL students in the service delivery area	30		

Proposal Item	Possible Points	Points Awarded	Comments
4. Program Implementation (40 points) A. A plan to serve a multi-county area, if applicable B. How applicant will build on a strong foundation of research and effective educational practice; C. How program will effectively employ advances in technology, as appropriate, including the use of computers; D. How project will provide relevant instruction to ensure that an individual has the skills needed to compete in the workplace and exercise the rights and responsibilities of citizenship; E. Plan to staff the classes with well-trained instructors and monitor classroom instruction; F. Plan to coordinate with other available resources in the community, such as establishing strong links with schools, post-secondary institutions, one-stop centers, job training programs and social services agencies; G. Plan to offer flexible schedules and support services, including partnering with other agencies, to provide transportation and child care, if applicable, to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs. H. A description of steps to ensure equitable access to, and equitable participation in, the proposed grant activities conducted with Adult Education funds. Address the special needs of students, teachers, and other program beneficiaries in order to overcome barriers to equitable participation, including barriers based on gender, race, color, national origin, disability, and age.	40		
5. Evaluation (20 points) A. A plan to comply with data entry standards, to report participant outcomes and to monitor program performance against the current year negotiated performance measures B. A description of how the teacher(s), learners and others will be involved in the evaluation. Evaluation should include methods based on Tennessee's performance standards as included in the National Reporting System (NRS). C. A plan for assessment must include pre- and post- testing using a standardized instrument. Approved tests for Tennessee include CASAS, BEST Literacy, BEST Plus, TABE CLAS-E	20		
6. Budget (30 points) A. Included the budget sheet to provide an itemized project budget that is cost-effective, matches the scope of the project outlined in the application, is reasonable in relation to the number of persons to be served, and is based on allowable expenses. B. Provided a budget narrative that shows in detail how the applicant plans to use the grant resources to accomplish the work described above. The narrative indicates how budget amounts were developed including all salaries, materials, etc. that will be used/purchased to support the project. C. A description in the narrative of what will be used for the required 10% match. A. The budget shows that not more than five percent of the grant total will be used for administration.	30		

The minimum score to qualify for funding is 70% or 129 total points. Where multiple applications are received for a service delivery area that meets the minimum score and qualifications, the applicant having the highest score for that service delivery area will be

awarded the grant. In the event that no eligible agency meets the minimum score and/or qualifications for a service delivery area or if no eligible agency applies, a new Application for Funding will be posted for other eligible agencies to submit an application.

A reader/reviewers name, signature and date are required to complete this form (Appendix A)

C. Title IV Vocational Rehabilitation

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.

In Tennessee, the Vocational Rehabilitation Program is considered a Combined Program. As a combined program, Tennessee Vocational Rehabilitation operates under one agency that serves all disabilities in the State and not two agencies. Therefore, there is no distribution of funds between two agencies.

6. Program Data

A. Data Alignment and Integration

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

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

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:

267. providing continuous improvement in operational efficiency;

268. providing a single system capable of supporting a full range of programs and services with limited customization required to roll-out future programs;

269. increasing visibility and providing actionable data to staff; and

270. 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.

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 1, Title II, Title III, Title IV (in December 2016), as well as Trade, SNAP, and RESEA Case Management Modules. UI Module
- Virtual Recruiter for Employers
- Labor Market Information
- Labor Force Information by County, Region, and Statistical Area
- Tennessee Training Providers with Demand Occupations
- Adult Education Module

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 positioning 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 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 lead by the Tennessee Department of Labor and Workforce Development, Workforce Services Division, and this combined plan for performance data collection and reporting 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, and 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.

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, including Jobs4TN and other workforce systems, has transformed the way information is collected and shared across programs. The system fully integrates Adults, Dislocated Workers, Youth, Veterans, SNAP E& T, TAA, RESEA, labor market information, and Unemployment Insurance programs under one system. 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. TDLWD, along with numerous other state agencies has transitioned to paperless record keeping by using an electronic document imaging and storage system. TDLWD elects to first utilize electronic documents and requires electronic verification of eligibility requirements. 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 data collection system to support the workforce development activities. One of the partners (VR) may adopt the system in time. The Integrated data systems will eventually be 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. 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. 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. 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.

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.

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

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

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

Planning Note: States should be aware that Section 116(i)(1) 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. States should begin laying the groundwork for these fiscal and management accountability requirements, recognizing that adjustments to meet the elements above may provide opportunity or have impact on such a fiscal and management accountability system.

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.

Lead agencies are invested in and committed to the Governor's vision for workforce development in Tennessee. The Departments of Labor & Workforce Development, Education, Economic & Community Development, Human Services/TANF, Adult Education, and Rehabilitation are poised to offer educational and employment transitional services. Much of the progress of participants will be tracked through the state's education, 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 value that the Tennessee Department of Education, Division of Career and Technical Education will bring to following up on youth completers with an eye toward continuing competency models in STEM fields; the Adult Education tracking and reporting of employment and wages through the Jobs4TN.gov training and jobs site will allow for

long-term interventions to ensure continuous improvement and post-secondary attainment, as well as placement in in-demand occupations. 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. Accountability also serves retention and sustainability by a focus on continuous improvement, and Tennessee will utilize the Performance Reporting and Flexible Ad Hoc Reports module within Jobs4TN, as referenced on pages 56-59, to track participants who are exiting from core programs, completing postsecondary education, or entering employment in accordance to the Common Measures under WIOA.

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 employer wage reports (section 1137 Social Security Act), as the regulations make clear the requirement that states use the confidential UC quarterly wage record data to prepare and submit performance reports. Now, however, Tennessee also will use education information to measure the performance of the six core programs under WIOA Titles I, II, III, and IV. This means that under WIOA, we will continue our Team Tennessee Performance engagements with leadership in OCTAE, Tennessee Department of Education; Tennessee Department of Human Services - TANF and Rehabilitation Services; the Tennessee program of Adult Education and Family Literacy Act program here at TDLWD; the Tennessee Department of Economic and Community Development, and our Unemployment Insurance division staff.

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 emerging requirements of the SWIS (State Wage Interchange System) data sharing agreement. TEGL 7-16, *Data Matching to Facilitate WIOA Performance Reporting*, also is being used to guide the process and direction of partnership agreements, similar to MOUs, which define, if needed, authorized data share staff among program and IT staff of the TN agencies noted above. One of the options under TEGL 7-16 is a centralized process carried out by TDLWD which consolidates earnings and post-secondary attainment into the full PIRL reporting file; but it will be December 2016 before this decision is fully approved, through full engagement with partners. TDLWD also will engage internal staff, already authorized to view and handle education data under FERPA, to extend the reach of the department's sharing agreements with the University of Tennessee. This will authorize the transfer to TDLWD of TN's longitudinal data, named P20, which is currently being used to track student and thus WIOA participant progress through career pathways carried out in the partnership with OCTAE, AE, and all core programs under WIOA.

In these ways, both post-secondary achievement and earnings improvements can be measured and published in both federally required reports associated with the core

programs. Our next meeting with Team TN Performance is scheduled for September 13, 2016; this will continue our work to establish data sharing agreements with all and to implement TEGL 7-16 no later than the close of this calendar year.

Tennessee as a participant in the pilot project conducting by the University of Chicago "Training Provider Outcomes Toolkit Project Plan & Technical Requirements " (TPOT) will be providing at least three schools to participate in the technical working group calls to report any concerns or suggestions they have regarding performance reports for Eligible Training Providers. We also have The City of Memphis which is one of the Centers for Data Science and Public Policy for the pilot project.

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 is in the process of updating 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:

Information Security Policies

Management Direction for Information Security (3.1)

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.

Policies for Information Security (3.1.1)

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.

Policies for Information Security (3.1.2)

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.

Policies for Information Security (3.1.3)

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

7. Priority of Service for Veterans

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

IMPLEMENTATION OF PRIORITY OF SERVICE

WIOA ensures that Priority of Service (POS) is provided to Veterans and other eligible persons, defined as covered persons, who meet the requirements. When veterans first enter the Workforce System, the following procedures take place for each veteran participant:

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

Covered persons receive POS in all department-funded employment and training programs. POS IS DEFINED AS:

- The right to take precedence over non-covered persons - Depending on the type of service or resource being provided, taking precedence may mean:

o Covered person gains access to service or resource earlier than the non-covered persons

o Covered person receives service or resource instead of a non-covered person when resources are limited

- Priority of Service applies to every qualified job training program funded, in whole or in part, by the Department of Labor
- The proposal states that those with the greatest need should receive priority of service in programs for which they are eligible.

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

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

Management staff works closely with all WIOA partners to provide the most effective services to Veterans and other eligible persons possible. 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.

MONITORING PRIORITY OF SERVICE

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

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

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

Physical accessibility for people with disabilities was implemented and upgraded with the assistance of Tennessee Department Human Services (DHS) - Vocational Rehabilitation Program. Tennessee will be undergoing an accessibility study to ensure all AJC's can be accessed. In consultation with DHS Vocational Rehabilitation, Technical Assistance Program (TTAP) to determine the types of AT equipment/software needed to ensure AJC computers are accessible for persons with disabilities. Through links established within and outside the AJC the number of people with disabilities taking advantage of workforce services has steadily increased. The State Workforce Board has been involved in challenging LWDAs to enhance services to individuals with disabilities. The LWDAs are asked during the planning process, to explain challenges and solutions to increasing services to individuals with disabilities. TDLWD and its partners plan to coordinate services with VR and with other community disability service provider to achieve greater educational and employment opportunities for people with disabilities.

Assisting those with disabilities to enter the labor force and increase their employment, requires hours of work; and also involves assessing their individual capabilities as to education, job skills, and work experience. After that comes a determination of how those characteristics align with occupations experiencing skill gaps listed in the Occupational Analysis in the Appendix. Identifying needed support services and special work features is also essential to employment. Partnering with the Tennessee Department of Human Services, Vocational Rehabilitation Program in accomplishing these services as well as in obtaining information on the prevalence of major types of disabilities of job seekers is essential in improving workforce outcomes.

Partnerships and collaboration across systems provide effective and efficient employment or employment support services utilizing leveraged resources and funding from multiple systems. The use of self-direction in service and funding across various systems along with the use of self-directed career accounts to assist in achieving employment outcomes. Economic self-sufficiency through leveraging of all resources including tax incentives, financial education, social security work incentives, benefits planning, and other

strategies to enhance profitable employment. The use of a universal design as a framework for the organization of employment policy and services in Tennessee. Customized and other flexible work options for individuals with disabilities. The assurance that the structural and technological accessibility of all AJC's for persons with disabilities who are seeking employment services is further enhanced by participation in disability awareness/sensitivity training to assist AJC staff to understand how to provide quality employment services for this targeted population. The concept immediately increased the use of AJC by persons with disabilities. Outreach and education of AJC and partner staff will be increased with training on basic competencies when servicing those with disabilities. With broadened collaborative partnerships, TDLWD expects to see the heightened use of the AJC by job seekers with disabilities.

This helps accomplish the Governor's Conservative Fiscal Leadership Goal, Objective I- Improve job search and placement services for unemployed and underemployed workers. Additionally, it aids the Governor's Education and Workforce Development Goal, Objective III- Increase employer engagement with workforce development system: Engage employers to market and educate employers on the value of hiring diverse populations, to include but not limited to the specialized target populations, as the individual is able to utilize the services of the career center to achieve job placement.

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.

Tennessee LEP Population

Limited English Proficient (LEP) Population: Change over Time	Foreign Born	U.S. Born
% change: 2000-2013	90.8%	-29.4%
% change: 1990-2000	394.4%	29.3%

According to the Migration Policy Institute, US Census Bureau statistics, in 2013, Tennessee had 162,100 LEPs or nearly three of every 100 Tennesseans was listed as being Limited English Proficient. The individuals with Limited English Proficiency are assisted through the AJC using the language-line, a telephonic interpreter service that includes over 170 languages. This service is available during operational hours and is at no cost to the customer. Some of the Career Centers also have a bilingual staff who provide interpretation and translation services. Depending on the individual's needs, the AJC staff members will refer that individual to adult education within the Career Center to help him/her learn English as a second language (since English is a priority for Tennessee employers). This helps accomplish the Governor's Conservative Fiscal

Leadership Goal, Objective I- Improve job search and placement services for unemployed and underemployed workers. In addition, it aids the Governor's Education and Workforce Development Goal, Objective III- Increase employer engagement with workforce development system: Engage employers to market and educate employers on the value of hiring diverse populations, to include but not be limited, specialized target populations, as the individual is able to utilize the services of the career center to achieve job placement.

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.

In an effort to foster coordinated communication and collaboration for WIOA implementation, the Tennessee Department of Labor and Workforce Development hosted WIOA Focus Groups meetings. These convening's allowed the State to provide its current and potential partners with an opportunity to participant in WIOA implementation planning discussions and to assist with the development of policy and procedure structures. The partners that were a part of the Focus Group meetings included the Tennessee Department of Education, all the Local Workforce Development Areas, the Tennessee Department of Economic and Community Development, the Tennessee Department of Human Services (Vocational Rehabilitation), Tennessee Department of Labor and Workforce Development divisions (Unemployment Insurance Division, Division of Workforce Services and Division of Adult Education), Tennessee Board Regents (Tennessee Colleges of Applied Technology and Tennessee Community Colleges), Tennessee Opportunity Programs, Inc., and State Workforce Development Board Members. There were three Focus Group meetings held and included the following details:

- Focus Group 1 (April 2015) - provided an informational on WIOA (State Board composition, policy implications, and development of State and local plans) as well as an opportunity to review and discuss the Quick Start Action Plans (QSAP).
- Focus Group 2 (June 2015) - allowed for breakout sessions based on QSAP topics for a deeper exploration of WIOA implantation next steps and alignment of partnerships based on resources available among the group.
- Focus Group 3 (July 2015) - allowed for a discussion about how WIOA implementation would impact each required and optional partner.
- Regional Asset Mapping (August 2015) - provided an opportunity for the Local Workforce Development Areas to invite various organizations and agencies to the table to map out the various labor exchange resources in their respective area and to collaborate about how those leveraged partnerships can maximize serving their immediate communities.

Additional joint planning and coordination of programs have taken place at quarterly State Board meetings, Governor's Subcabinet meetings and various department-led committee meetings.

V. Common Assurances (for all core programs)

The Unified or Combined State Plan must include assurances that—

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; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board; Yes

5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities; Yes

6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3); Yes

7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable; Yes

8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program; Yes

9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs; Yes

10. The State has a One-Stop certification policy that ensures the physical and programmatic accessibility of all One-Stop centers with the Americans with Disabilities Act of 1990 (ADA); Yes

11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and Yes

12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor. Yes

VI. Program-Specific Requirements for Core Programs

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

Program-Specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B

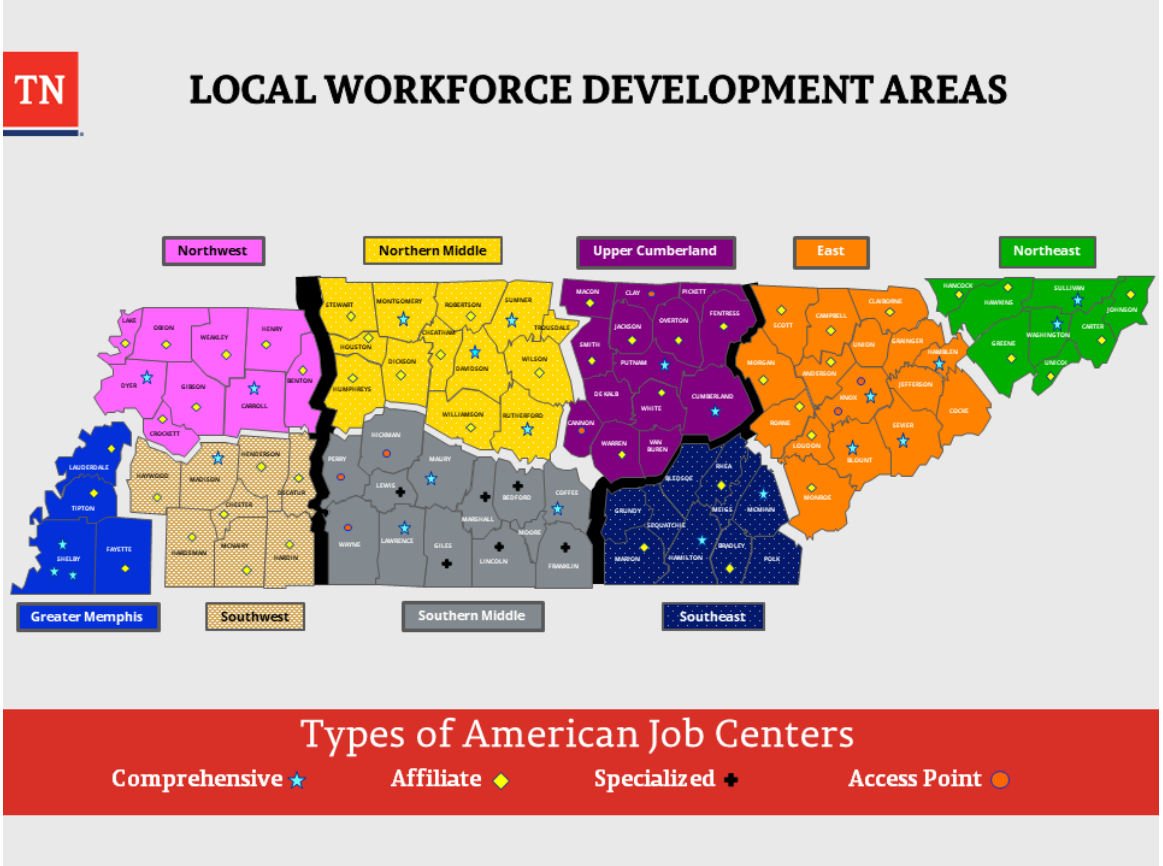
The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B--

a. Adult, Dislocated Worker, and Youth Activities 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 restructured the thirteen (13) local workforce development areas and three regions - East, Middle, and West to nine (9) local workforce development areas and the three regions remain. The map below depicts the designations across the State. LWDAs Southeast, East, and Northeast comprise the East Region; LWDAs Southern Middle, Upper Cumberland, and Northern Middle comprise the Middle Region; and LWDAs Greater Memphis, Southwest, and Northwest comprise the West Region.



B. Describe the process used for designating local areas, including procedures for determining whether the local area met the criteria for "performed successfully" and "sustained fiscal integrity" in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.

In February 2018, the State Workforce Development Board (SWDB) elected to review the alignment of Tennessee's Local Workforce Development Areas (LWDAs). The 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, it was apparent that a comprehensive alignment analysis was needed of all the local areas.

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 workforce development partnerships while continuing to create access to services and opportunities in rural areas.

Upon completion of this analysis, at the May 11, 2018 SWDB meeting, the board elected to recommend realignment of the current thirteen LWDAs with the nine ECD Base Camps supporting the vision of streamlining and aligning regional service delivery. Upon careful consideration and deliberation with the state agencies, partners, and local leaders, the Governor 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.

C. Provide the appeals process referred to in section 106(b)(5) of WIOA relating to designation of local areas.

State Policy information regarding this full process can be found in DESIGNATION OF LOCAL WORKFORCE DEVELOPMENT AREA TN-WIOA (15-1). The content of this policy is as follows:

The Workforce Innovation and Opportunity Act (WIOA) require the Governor, in partnership with the State Board and in consultation with the Chief Elected Officials (CEOs), to develop a policy for initial designation of the Local Workforce Development Areas. WIOA requires that existing federally recognized workforce areas are designated during the first two program years; this designation is referred to as Initial Designation. The WIOA states that a unit of general local government (including a combination of such units) or a grant recipient that requests but are not granted designation of an area as a local area, may submit an appeal to the State board under the appeal process established in this policy. The public comment period must offer adequate time for public comment prior to designation of the local workforce development area and it must provide an opportunity for representatives of interested business, education, and labor organizations to have input into the development of the formation of the local area.

Appeals Process

For purposes of appeal, a unit of general local government (including a combination of such units) or grant recipient that requests but are not granted designation as a local area may submit an appeal to the SWDB under an appeal process established below. If the appeal does not result in such a designation, the Secretary of Labor, after receiving a request for review from the unit or grant recipient and on determining that the unit or grant recipient was not accorded procedural rights under the appeals process described in the State procedure, may require that the area be designated as a local area.

Procedures for Appeals to the State:

302. An appeal must be in writing and filed with the TDLWD within fourteen (14) days after notification of the decision. The appeal is to be submitted to the Commissioner of the TDLWD.

303. The appeal must contain a specific statement of the grounds upon which the appeal is sought.

304. The SWDB will have sixty (60) days to review the appeal and make a recommendation to the Governor. The review will take into account the information in the original request and supplemental information provided in the appeal to determine if the criteria set forth in this policy have been met.

305. The final decision rests with the Governor.

306. If the appeal is connected to a request for initial designation under this policy, and if the appeal does not result in designation, the entity may request review by the Secretary of Labor to determine if procedural rights were granted or if the minimum criteria of WIOA Section 106(b)(2) or Section 106(b) (3) was met. This second level of appeal must be sent within 14 days to:

Assistant Secretary of Employment and Training

U.S. Department of Labor

200 Constitution Avenue, N. W.

Washington, DC 20210

A copy of the appeal must be simultaneously provided to

ETA Regional Administrator

U.S. Department of Labor, Employment and Training Administration

61 Forsyth Street, SW, Room 6M12

Atlanta, GA 30303

D. Provide the appeals process referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding.

One-Stop partner may appeal the Governor’s determination regarding their portion of funds to be provided for infrastructure costs. The appeals process is described in the Unified State Plan and is consistent with the current Grievance and Complaint Policy TN (16-6). This policy applies to all entities and individuals who would like to appeal a decision at the local or the state levels.

The appeals process relating to determinations for infrastructure funding are as follows:

A. The Governor, through the assistance of the SWDB, will make the final determination of each required partner's proportionate share of statewide infrastructure costs under the State funding mechanism.

B. Any required partner may appeal the Governor's determination on the basis of a claim that:

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

308. The Governor's determination is inconsistent with the cost contribution caps described in ***20 CFR 678.736*** and ***20 CFR 678.738.***

C. The process will ensure resolution of the appeal in order to ensure the funds are distributed in a timely manner, consistent with the requirements of 20 CFR 683.630.

D. An appeal must be made within twenty-one (21) days of the Governor's determination and must be submitted formally, in writing, by registered mail no later than the twenty-first (21st) day from the date of receipt of the notice of denial or revocation.

2. Statewide Activities

A. Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.

The Workforce Innovation and Opportunity Act provide new opportunities for use of funds to support entrepreneurial activities among youth and the unemployed. In consultation with the State Board, TDLWD is exploring partnerships with Local Workforce Development Areas, Community Based Groups, and other entities to assist with facilitating activities to help boost access to entrepreneurial resources to youth and the unemployed. Activities will range from workshops, resource fairs, to events that will connect entrepreneurs to other resources and investments.

As outlined in Section 128 (a)(2), the Youth, Adult, and Dislocated Worker funds reserved by the Governor to carry out statewide activities support the required Statewide Employment and Training activities outlined in 20CFR 682.200. In addition to the required activities, the State Workforce Development Board considers the funding of allowable activities with statewide set-aside funds. Through an annual planning and budgeting process that is initiated by the Oversight Committee of the State WFB, allowable activities outlined in 20 CFR 682.210 are approved for funding during the respective program year. Adjustments are made during the course of the year as state staff evaluate obligations and expenditures of approved statewide activities, as well as trending economic factors that impact the need to redirect funding in support of other allowable activities.

Also, in accordance with WIOA Section 134 (a)(2)(A)(ii), unobligated Rapid Response funds after the first program year for which such funds were allotted may be redirected to support statewide activities authorized under Statewide Employment and Training activities. As outlined in 20 CFR 682.210 the SWB traditionally has supported innovative programs and strategies in support of employers to include Incumbent Worker, Governor’s Fast Track Initiatives (On-the-Job Training), and Apprenticeships. The SWB will utilize Performance-Based Contracts in developing strategies for serving individuals with barriers to employment, and for coordinating programs and services among one-stop partners.

Sub-recipients may request State set aside funding. Guidance for requesting additional funding is provided the State’s reserve funds policy. State staff will review the request for

funding to determine if reserve funds will are awarded. State staff will monitor expenditure and obligation to provide updates to the SWDB.

B. Describe how the State intends to use Governor's set aside funding. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers

The State intends to utilize set aside funding to test pay for performance contracting strategies to increase the effectiveness and efficiency of limited formula funds to improve outcomes for WIOA participants, particularly for individuals with barriers to employment. The state will offer technical assistance to local workforce areas about how to implement pay for performance with local formula funds; and that State expects to enhance overall outcome-based strategies by utilizing existing performance-based contracting in combination with the new WIOA pay for performance for the achievement of high bar outcomes as outlined in Title I of the NPRM Section 683.520.

Regarding Rapid Response services, Jobs4TN is the management system used to manage WARN activities in Tennessee. The State has established 13 Local Rapid Response teams, consisting of LWDA staff and state staff, business service team staff, and the mobile units. Tennessee's mobile units better known as "Mobile American Job Centers," have computers with internet and Microsoft Office access and with copy and fax machines available for use by job seekers. These units will allow full service, on-site facilitation of Rapid Response services.

These local 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 also work to connect participants to training opportunities through WIOA and partner programs, including the higher education system. In addition to connecting participants to formal training opportunities, Rapid Response teams will also work with the AJCs to connect participants to apprenticeships, to OJTs, and other dislocated worker re-employment activities.

Rapid Response funds will be used to assist with the expenses associated with technical features such as Jobs4TN, the mobile units, materials, and staff time associated with Rapid Response activities.

Also, in accordance with WIOA Section 134 (a)(2)(A)(ii), unobligated Rapid Response funds after the first program year for which such funds were allotted may be redirected to support statewide activities authorized under Statewide Employment and Training activities. As outlined in 20 CFR 682.210 the SWB traditionally has supported innovative programs and strategies in support of employers to include Incumbent Worker, Governor's Fast Track Initiatives (On-the-Job Training), and Apprenticeships. The SWB will utilize Performance-Based Contracts in developing strategies for serving individuals with barriers to employment, and for coordinating programs and services among one-stop partners.

Sub-recipients may request State set aside funding. Guidance for requesting additional funding is provided the State's reserve funds policy. State staff will review the request for funding to determine if reserve funds will are awarded. State staff will monitor expenditure and obligation to provide updates to the SWDB. The specific technology features of Jobs4TN facilitates an online WARN to help employers easily access rapid response services when a layoff or closure occurs. Upon receipt of an official WARN, the State Dislocated Workers Unit (DWU) will create a WARN notice in VOS. If an official WARN notice is not received but layoff information is obtained, local LWDA representatives work with the company to provide services to the affected employees. Once this WARN has been created, the DWU Rapid Response 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 other 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 in 24 -48 hours. The DWU works with the LWDAs to coordinate outreach efforts.

Upon Notification of WARN Information from the DWU, 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 an initial planning meeting and begin the information gathering for the Rapid Response Company Information Report. The initial planning meeting will provide the company with an overview of what will be delivered at an employee mass meeting, scheduling of the mass meeting and completion of the information gathering.

C. In addition, describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.

Services Following a Disaster

If the Federal Emergency Management Agency (FEMA) organizes services for disaster victims, the Department FEMA contact will assess the need for a NEG within 24 hours. The State will contact FEMA to secure a list of job orders required to assist disaster victims and to begin the cleanup afterward.

FEMA will set up Disaster Centers. These centers will include a career center, unemployment insurance, and WIOA job training programs. Other agencies and programs typically represented are American Red Cross, Internal Revenue Service, Tennessee Attorney General, Tennessee State Emergency Management Agency, local law enforcement, Salvation Army, Small Business Administration, Social and Rehabilitation Services and other appropriate local service organizations.

If FEMA is not involved in a local disaster, the DWU and LWDA will contact the following to organize services for disaster victims: chamber of commerce, city clerk and/or administrator, city mayor, Red Cross, Salvation Army and employers affected by the disaster. Once these contacts are made, the information regarding the services available to assist those who lost their jobs due to the disaster should be provided. A

temporary office in the area may be set up to provide these services. Workers who have lost their jobs due to the disaster may be offered the following additional services:

- 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 6 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 in order to provide DWU and Rapid Response services.

D. Describe how the State provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A).) This description must include how the State disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the trade-affected dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition.

It is vital to provide early intervention to dislocated workers in Tennessee and such services are rendered through Rapid Response. The effectiveness of these services is driven by the collaboration of the TAA unit and Rapid Response at TDLWD. The services provided are paramount in creating a seamless path from dislocation to gainful employment for trade-impacted workers, especially during the first few days of the petition's filing.

Upon the receipt of a Trade Adjustment Assistance petition, the TAA Unit verifies if assistance efforts are already underway. If this is the first notification, the Rapid Response unit contacts the employer to begin the process of providing the full array of services and benefits available.

The Rapid Response process consists of these steps:

- Schedule and conduct mass meetings once a WARN Notice or Certified Trade Petition is received.

- Provide trade-affected workers with information regarding re-employment services (WP, WIOA partners), Unemployment Insurance (UI), TAA services, and Trade Readjustment Assistance (TRA).

Funding is essential to provide services to dislocated workers. Leverage funding, when possible, can better ensure that workers receive the necessary assistance. Case management funds along with WIOA partner funds enable a full assessment of trade-dislocated workers and also ensures re-employment services for gainful employment. Additional funding information has been detailed in the explanation of the distribution of funds for core programs.

b. Adult and Dislocated Worker 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.

In an effort to support work-based training models, Tennessee utilizes the Incumbent Worker Training (IWT) Program. This broad program is designed to support training that results in either skill attainment for employees or process improvement that contributes to the competitiveness and productivity of a business.

For-profit and (not-for-profit healthcare related only) related Tennessee businesses may be eligible to apply for participation in the IWT Program. Such eligible businesses must also: have been in operation for a minimum of one year prior to the application date; employ at least five full-time employees; be current on all Federal and State tax obligations; and be financially viable. Each LWDA receives individual allotments from State set-aside funds that are then used to contract with local, qualifying businesses to provide Incumbent Worker Training.

During the 2017 Program Year, Rapid Response/Layoff Aversion funds were obligated to 98 companies to train 6,042 Incumbent Workers. The program year ran through June 30, 2017.

2. Registered Apprenticeship

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., job center staff taking applications and conducting assessments).

The Tennessee Department of Labor and Workforce Development administers the Apprenticeship Assistance Training Grant (AATG) in support of Tennessee companies/organizations with a DOL Office of Apprenticeship Registered Apprenticeship Program or those that are interested in starting an apprenticeship program. In partnership with the 13 Local Workforce Development Areas, TDLWD administers this grant to provide strategies to significantly increase apprenticeship

opportunities for job seekers and existing first & second-year apprentices. The following benefits are provided to participating companies:

- OJT assistance for eligible Dislocated Workers entering a DOL Registered Apprenticeship program as a new hire, and or
- To provide assistance in the Classroom Training of existing first or second-year apprentices or for participants in a pre-apprenticeship program

The Tennessee State Workforce Development Board authorized $1,000,000 to develop and implement the AATG program. The program started in August 2015 and LWDAs began promoting and receiving applications at that time.

To date there, have been six (6) applications submitted and approved, training 225 apprentices for a total of over $144,000. There have been numerous inquiries about the program and more applications and approvals are expected during the continuation of the grant.

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 ETPL Eligibility

Initial eligibility procedures for the Eligible Training Provider List (ETPL) apply to all training providers, with the exception of Registered Apprenticeship. Providers must complete a detailed application and complete all vetting procedures under which programs become eligible. Initial eligibility is based on the following:

322. Meeting State minimum performance criteria, as approved by the State Board.

323. Training must be for occupations in industry sectors that are in-demand. Training must result in the completion of an industry-recognized credential, national or State certificate, or degree, including all industry appropriate competencies, licensing and/or certification requirements. Providers must provide evidence of accreditation and/or licensure with the appropriate State or other governing entity to have their programs listed on the ETPL.

In addition, Eligible Training Providers must provide the following for Initial Eligibility:

- Evidence that programs result in the awarding of an industry-recognized credential, national or state certificate, or degree, including all industry appropriate competencies, licensing and/or certification requirements
- Cost information, including tuition and fees
- Information that addresses alignment of the training services with in-demand industry sectors and occupations, to the extent possible

- Information related to the indicators of performance, which include for all students (all students are defined as every student enrolled in a WIOA-approved training program):
    - Unsubsidized Employment during the Second Quarter after Exit
    - Unsubsidized Employment during the Fourth Quarter after Exit
    - Median Earning in the Second Quarter after Exit

All providers must also meet the minimum established performance criteria, as approved by the State Workforce Development Board.

Appeal of Local Workforce Development Board Denial

Provider Application Denial: If an LWDB denies an ETP's initial application for listing on the ETPL, the LWDB must, within thirty (30) days from the date of determination, inform the ETP in writing, including the detailed reason(s) for the denial and complete information on the appeal process.

Reasons for Denial of Application for Initial Eligibility

328. The LWDB or the State may deny eligibility if the application from an ETP is not complete or not submitted within the required time frame.

329. The LWDB or the State may deny eligibility if an applicant fails to meet the minimum criteria for initial listing specified in this policy (WIOA Section 122[c][1]).

330. The LWDB may deny eligibility if the training programs offered by the ETP do not lead to gainful employment in in-demand occupations as determined by a labor market analysis.

331. The LWDB may deny eligibility if the training program demographics (i.e. cost and length) are substantially higher (beyond fifty percent [50%]) than previously approved programs offering the same credential (within the past two [2] program years).

332. The LWDB or the State may deny eligibility if it is determined that the applicant intentionally supplied inaccurate information (WIOA Section 122[f][1][B]).

333. The LWDB or the State may deny eligibility to a training provider who has been found to have substantially violated any WIOA requirements (WIOA Section 122[f][1][B]).

Appeals to the Local Workforce Development Board (WIOA Section 122[C][1])

This procedure applies to appeals by ETPs to the LWDBs based on the denial of an ETP's application for the initial listing on the ETPL. The LWDB must establish an appeal procedure for providers of training to appeal a denial of eligibility that meets the requirements of 20 CFR 683.630(b). The LWDB must have a written appeal process that includes the following provisions:

334. 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. The appeal must be in writing and include a statement of the desire to appeal, the specification of the program(s) in question, the reason(s) for the appeal (i.e. grounds), and the signature of the appropriate provider official.

335. The LWDB appeal process must grant the training provides the opportunity to directly address the reasons for their denial and do it either in writing or through an appeal hearing.

336. The LWDB must have one to three (1-3) impartial appeal officers who are responsible for re-evaluating the supplemental materials supplied by the ETP in addressing the initial reasons for denial. An impartial appeal officer may be any staff member uninvolved in the initial designation.

337. The LWDB will notify the ETP of the final decision made by the LWDB on an appeal within thirty (30) days of receipt of the appeal. e. The LWDB appeal notification to the ETP must reference the process for filing a State appeal in the event that the ETP is not satisfied with the outcome of the local appeal.

Appeals to the State (WIOA Section 122[c][1])

This procedure applies only to ETPs who have exhausted the appeal process of a LWDB and are dissatisfied with the LWDB's final decision.

338. A training provider wanting to appeal to the State must submit an appeal request to the State within thirty (30) days from the LWDB's notification to the training provider of its final decision on an appeal. The request for an appeal to the State must be in writing and include a statement of the desire to appeal, specifications of the program(s) in question, the reason(s) for the appeal (i.e. grounds), and the signature of the appropriate provider official.

339. The State will promptly notify the appropriate LWDB when it receives a request for appeal. The State will also notify the appropriate LWDB when it makes the final decision on an appeal.

340. The State appeal process includes the opportunity for the appealing ETP to have a hearing. The hearing officer must be impartial. The hearing officer must provide a written notice to the concerned parties of the date, time, and place of the hearing at least ten (10) calendar days before the scheduled hearing. Both parties must have the opportunity to: present oral and written testimony under oath, to call and question witnesses, to present oral and written arguments, to request documents relevant to the issue(s), and to be represented.

341. The five-member State appeals committee, chaired by the hearing officer, will administratively review the appeal, make a preliminary decision, and notify the ETP and the LWDB. The committee may either uphold or reverse the LWDB decision.

342. The State appeals committee must render a decision within sixty (60) days from receiving the training provider's initial state-appeal request.

Apprenticeship programs registered under the National Apprenticeship Act (NAA) are exempt from initial eligibility procedures since the vetting of these programs is done by USDOL Office of Apprenticeship. Registered apprenticeships must only make a request to be included on the ETPL list by filling out the application in our Jobs4tn system and provide documentation that they are a certified registered apprenticeship program to be included on the ETPL list. Under WIOA title 1-B, Registered Apprenticeship program sponsors that request to be ETPs are automatically included on the list and will remain as long as the program is registered or until the program sponsor notifies the State that it no longer wants to be included on the list [TEGL14-41]. Providers receive initial eligibility for only one fiscal year for a particular program. After the initial eligibility expires, these initially- eligible providers are subject to application procedures for continued eligibility.

4. Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.

PRIORITY OF SERVICE IMPLEMENTATION

WIOA provides many opportunities to help low-income and lower-skilled youth and adults achieve economic success. For the Title I - Adult program, the priority of service in Sec. 133(c)(3)(E) requires that recipients of public assistance, other low- income individuals, and individuals who are basic-skills deficient receive priority for career and training services. To ensure that adults meeting the priority of career and training services is implemented, Tennessee has issued Adult Priority of Services Guidance to Local Development Boards (LWDBs), One-Stop Operators, and Service Providers. The guidance defines priority of service in accordance with WIOA regulations. The guidance also provides an opportunity for LWDBs to develop local policy identifying additional barriers adults in their community face. In addition, guidance has also been provided to LWDBs outlining the requirements for Veterans and Eligible Spouse Priority of Services.

Priority of services for the adult population begins when an individual receives staff assistance to register into Jobs4TN. Jobs4TN is the data collection system that enables a career specialist to determine eligibility for priority of services. Monitoring begins after the completion of the service strategy process and services commence.

PRIORITY OF SERVICE MONITORING

The Tennessee Department of Labor and Workforce Development has established a tiered layer of monitoring to ensure compliance with state and federal regulations. The first tier of monitoring takes place within the Workforce Services Division, Compliance and Policy Unit (CPU). The CPU monitors services of WIOA participants including low-income adults with basic skills deficiencies, to ensure these participants are receiving career and training services to improve their opportunity for employment. Throughout the program year, the staff conducts desktop monitoring to confirm that the individual service delivery has been established and the opportunity for being the first to receive career and training services has taken place. To strengthen the initial desktop monitoring process the, CPU sends their findings to the Department’s internal Program

Accountability Review (PAR) Unit to combines the findings identified and conduct site reviews to check that the services provided include career and training services for those identified as basic skills deficient and low income.

5. Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs.

In accordance with WIOA statutes (WIOA Section 133(b)(4)), a local board may transfer, if such a transfer is approved by the Governor, up to and including 100 percent of the PY funds allocation between the adult and dislocated workers funding streams. As outlined in the State's Workforce Services Policy local areas must provide supporting documentation indicating the required rate of expenditure/obligations and other specified criteria have been met.

c. Youth Program Requirements

With respect to youth workforce investment activities authorized in section 129 of WIOA,—

1. Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants or contracts.*

* Sec. 102(b)(2)(D)(i)(V)

The state-developed criteria to be used by local boards in awarding grants seeks to establish strong program design and assure full compliance with WIOA youth program standards. There are 13 Local Workforce Development Areas in Tennessee, and whether local government/higher education or 501(c)(3), each has an administrative entity which is held accountable for costs and for competitively procuring and monitoring the success of youth services delivered by youth vendors. Tennessee, as shown in this state plan, requires that all program elements are to be competitively procured by the administrative entity, through scrutiny by the LWDB and in turn by TDLWD.

We measure the effectiveness of the vendors by way of computed return on investment, economic impact, and target-guided common measure outcomes under WIOA; and the penalties for failure up to termination of the contract, are made clear in the RFP and the rubrics that are used to select vendors. The required items of RFPs include:

- Checklists for the youth services covered by the proposals
- Program design
- A detailed cost budget with admin costs
- And required performance outcomes under the common measures

In addition, the proposed vendor must provide a detailed narrative on the youth services to be provided, such as 1) Leadership Development Services: a. develop responsibility, employability, and positive social behaviors; b. organizational and professional leadership skills in i) teamwork, ii) communication, iii) competition, and iv) commitment.

2. Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available.

The State is implementing a WIOA common intake and reporting system, VOS, which will capture common participant information for core programs. The system will align resources and generate automatic referrals among the core programs as applicable to the individual's needs.

As it specifically pertains to out-of-school youth, individual service plans will identify the participants' needs and interest 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 indication of a work experience opportunity, career pathways program of study, and any of the other 14 program elements. This model is an integrated compilation of programs and services intended to develop basic, technical and employability skills; provide continuing education and training, and work supports that lead to high-demand jobs in targeted sectors. The combined efforts of all of the aforementioned items can contribute to the improved outcomes for the growing number of out-of-school youth participants.

As it pertains to leveraging and aligning with core and partner programs, the expanded partnerships with the Department of Children Services and school districts (under the Department of Education) across the state will allow local areas to have direct access to potential out-of-school youth are involved in the juvenile justice system and/or at risk of dropping out of secondary education. Local staff serves as facilitators for onsite training sessions in their local YDCs and provide information on job readiness, establishing educational and career goals, exploration of demand occupations and identification of potential training needs. Due to the variance in each potential participant's permanent residence across the state, the staff has developed "release resource packets" to include workforce services staff contact information, checklists for paperwork and partner programs that can assist the juvenile offender with a successful transition into their community. This comprehensive information sharing helps mitigate barriers and increases the chances a participant will accomplish their goals for success as initially outlined in their individual service strategy.

In the same regard, local area staff members are encouraged to maintain working relationships with the local school districts and education providers to assure that youth participant have the necessary resources for career exploration (vi Jobs4TN), career readiness and job skills training. These resources are especially helpful for youth participants who are engaged in an education program or other formal partner programs,

however, new challenges are presented when disconnected youth are included in the target service population. In hopes of eventually mitigating these issues, TDLWD and TDOE staff along with several community stakeholders seek to develop legislation regarding the sharing of student drop-out records. Such sharing, with the appropriate provisions in place, can improve outreach efforts for AJC staff and other workforce system partners as they seek to quickly re-engage disconnected youth and connect to beneficial training and supportive services. While there is no proven effectiveness of these potential strategies, they can increase the accurate leveraging of partner program resources and services to improved outcome for out-of-school youth.

Tennessee Workforce System will continue its collaboration with the statewide PreEmployment Transition Services (Pre-ETS) team comprised of Pre-ETS Specialists and Field Supervisors in serving youth with disabilities. This implementation will include both internal staff training and external training for AJC staff, partners, and other stakeholders.

3. Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented, including quality pre-apprenticeship programs under the work experience program element.*

* Sec. 102(b)(2)(D)(i)(I)

Our workforce system and partners are aligned in order to prevent duplication, but more importantly, to better manage and carry out the WIOA adult, dislocated worker, and youth programs. Allocations for youth began in April 2015, and we prepared for this eventuality by having a strong state plan linked internally and externally to local Consortiums, Consortium Youth Councils, local workforce boards, and local education agencies. Currently, there are comprehensive MOU's which exist between these local organizations covering everything between youth service model maps and employment pathways, to multi-county roles and responsibilities for fiduciary and program integrity.

Our statewide monitoring manual, which these agencies localize for their monitoring purposes, has an entire chapter devoted to audit questions and requirements, including that the fourteen (14) youth program elements must be actively available and carried out by vendors selected by competitive procurement. Workforce Services Guidance- Youth Program Service Design, makes it clear that functional organization, and service delivery and customer flow are conducive to prompt enrollment, whether in AEFLA, RSA, SNAP, or public higher education, regular case management in accordance with youth individual service strategies, and eventual achievement of post-secondary opportunities and employment.

In alignment with the Governor's Conservative Fiscal Leadership Goal, TDLWD partners with other agencies to eliminate duplication and also to leverage dollars to provide more opportunities to existing youth participants and the emerging workforce. Services to eligible youth are delivered through a network of approved youth providers. LWDAs competitively procure independent contractors to deliver youth services in alignment with WIOA Section 129(c)(2). As a part of the procuring process, local areas are encouraged to review and assess all contractors' capacity and experience in providing

the necessary services for the 14 program elements. Evaluation criteria and awarding of contracts is not limited to but must specifically include the provider's ability to track participation activities, progress towards success goals and attainment of employment, to name a few. Use of the Jobs4TN system is essential for both provider and participant success in effectively implementing WIOA standards for the 14 program elements.

Evaluation of the delivery of the 14 program elements is a function of regular reviews of performance outcomes and changes done quarterly by TDLWD staff. This assessment includes an examination of extract files and enrollment records within the VOS system.

Any discrepancies identified in performance outcomes that are greater than 2% are flagged for further review and consultation with the applicable local area. This consultation includes a written explanation from the local area providing details on the inconsistencies in youth performance outcomes and potential strategies for changes and improvement. As a secondary measure of evaluation, the monitoring of priority of service populations, including youth, is carried out under the auspices of our WIOA monitoring guide. TDLWD's PAR monitoring group is currently using the guide to oversee compliance with the development of youth participant files to include an objective assessment and an individual service strategy that are both linked to case notes, activities, and providers in the VOS system. The User Guide for VOS provides all of the specific business rules regarding intake, enrollment and eligibility determination that determine case management for participants. Both state and local monitors are required, to monitor the effectiveness of each, and regularly report outcomes to the respective workforce boards. Our draft WFS Policy on *Certification* sets out teams of reviewers and observers at the onset of WIOA planning, both regional and local, who report back on youth program compliance and effectiveness with recommendations to certify or no.

Additional innovative programs or approaches to services are always welcomed and encouraged by youth service providers. Unique partnerships with local employers, integration of education/training activities in work experiences, and increased attainment of credentials all are indicators of administration and transformation of program elements by youth service providers. State and LWDA core and partner staff members are integral stakeholders in the overall achievement of youth participants across the state and the continued growth of the youth program. The following is a list of agencies and organizations that are currently meeting regularly to address cross-agency collaboration, planning and resource sharing as well as assisting in making available all 14 program elements to youth in Tennessee.

Youth ServingAgencies	Snapshot of Activity
Department ofEducation	• Commissioner serves on the State Workforce Development Board • Pathways TN, State Planning Team - career pathways alignment • TDLWD staff participates in evaluating Lottery Education After School Program grants (LEAPS) targeting dropout prevention and increase in SAT/ACT exam • Partners with Special Education on the Tennessee Transition Leadership team

Youth ServingAgencies	Snapshot of Activity
HumanServices	• Provides expertise in serving youth with disabilities through its Vocational Rehabilitation Program and participates on the Tennessee Transition Leadership Team with community-based organizations and the Disability Rights Tennessee. Partner Agency in Youth Memorandum of Understanding Regarding Transition Services for Youth with Disabilities (Division of Rehabilitation Services)
Youth Transitions AdvisoryCouncil	○ Includes many of the same agencies already listed with strong ties to the foster-care system. Meets quarterly. Efforts are coordinated by the Tennessee Commission on Children and Youth
Department of MentalHealth and SubstanceAbuse	○ It has also invited Career Center and previous Disability Navigator staff from local Career Centers to speak at town hall meetings and other outreach opportunities. Partner Agency in Youth Memorandum of Understanding Regarding Transition Services for Youth with Disabilities
Volunteer Tennessee	○ Provides oversight of AmeriCorps and service-learning programs to advance volunteerism and citizen services to solve community problems in the State. Meets quarterly.
Governor's Subcabinet on Children	○ Part of Core Group Team for Childhood Poverty Initiative
Tennessee Department ofChildren's Services	○ Youth Serving Agencies
Tennessee Commission on Children and Youth	○ Part of the strategic vision team and provides data related to at-risk youth. Serves on several LWDA boards and provides support for Tennessee Suicide. Prevention Network (TSPN) with an emphasis on teen suicide prevention. Part of Core Group Team. Responsible for coordinating and compiling the Resource Mapping report to analyze all State programs which provide services to youth. Coordinates grant applications among departments. Serves as lead for Youth Transitions Advisory Council. Provides administrative support for the Council on Children's Mental Health, a statewide stakeholder group working to implement a more coordinated system of care for children's mental health, including services to facilitate a successful transition to adulthood. Collects data for and publishes and disseminates an annual KIDS COUNT Data Book and The State of the Child in Tennessee report that includes county-by-county data on youth unemployment and other factors that impact the workforce.
Tennessee Council on Developmental Disabilities	○ Partner Agency in Youth Memorandum of Understanding Regarding Transition Services for Youth with Disabilities

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.

TDLWD has identified the following criterion for youth who "require additional assistance to enter or complete an educational program, or to secure and hold employment":

In-School Youth

354. Has poor attendance patterns in an educational program during the last 12 months

355. Has been expelled from school within the last 12 calendar months

356. Has been suspended from school at least within the last 12 calendar months

357. Has below average grades

358. Has been previously placed in out -of home care (foster care, group home or kinship care) for more than 6 months between the ages of 14-21

359. Currently incarcerated parents (s), guardian

Out-of-School Youth

360. Has dropped out of a post-secondary educational program during the past 12 months

361. Has a poor work history, to include no work history, or has been fired from a job in the last 6 calendar months;

362. Has suspended from school at least within the last 12 calendar months; or

363. Has below average grades; or;

364. Has been previously placed in out -of home care (foster care, group home or kinship care) for more than 6 months between the ages of 14-21; or

365. Currently incarcerated parents (s), guardian

5. Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If State law does not define "not attending school" or "attending school," indicate that is the case and provide the state policy for determining whether a youth is attending or not attending school.

School - any secondary or post-secondary school as defined by the applicable State law (TCA 9-6-301 and 49-7-2001-2003) for secondary and postsecondary institutions (20 CFR 681.230). For purposes of WIOA, the Department does not consider providers of adult education under Title II of WIOA, YouthBuild programs, the Job Corps program, high school equivalency programs, or dropout re-engagement programs to be schools (20 CFR 681.230). In all cases except the one provided below, WIOA youth programs may consider a youth to be an OSY for purposes of WIOA youth program eligibility if he or she attend adult education provided under title II of WIOA, YouthBuild, Job Corps, high school equivalency programs, or dropout reengagement programs regardless of the funding source of those programs. Youth attending high school equivalency programs funded by the public K-12 school system who are classified by the school system as still enrolled in school are an exception: they are considered ISY.

Attending School - An individual is considered to be attending school if the individual is enrolled in a secondary or post-secondary school. Such schools include, but are not limited to: TCATs, community colleges, 4-year college/university, traditional K-12 public and private, and alternative (e.g., continuation, magnet, and charter) schools.

Not attending School - is an individual who is not attending a secondary or post-secondary school (WIOA Section 129[a][1J[BJ). An individual who is enrolled in adult education, Youth Build, or Job Corps is not considered to be attending school (Final Rule 681.230-32).

Alternative School - is a type of school designed to achieve grade-level (K12) standards and to meet student needs (Education Code EDC Section 58500). Examples of alternative schools include, but are not limited to: continuation, magnet, and charter schools. If the youth participant is attending an alternative school, at the time of enrollment, the participant is considered to be in-school.

6. If using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the State definition which must further define how to determine if an individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society. If not using the portion of the definition contained in WIOA Section 3(5)(B), indicate that is the case.

The State will use the basic skills deficient definition contained in WIOA Section 3(5)(B).

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).)

Tennessee is not a single area State - this section does not apply.

4. A description of the roles and resource contributions of the one-stop partners.

5. The competitive process used to award the subgrants and contracts for title I activities.

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.

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.

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.

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:

BBBBBBBBBBBBBBB. supporting employer engagement;
CCCCCCCCCCCCCCC. connecting education and training strategies;
DDDDDDDDDDDDDDD. supporting work-based learning;
EEEEEEEEEEEEEEE. improving job and career results, and
FFFFFFFFFFFFFFF. 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:

GGGGGGGGGGGGGGG. Monitor the progress in implementing the waiver;
HHHHHHHHHHHHHHH. Provide notice to any local board affected by the waiver;
IIIIIIIIIIIIIII. Provide any local board affected by the waiver an opportunity to comment on the request;
JJJJJJJJJJJJJJJ. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.
KKKKKKKKKKKKKKK. Collect and report information about waiver outcomes in the State's WIOA Annual Report

7. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver;

Title I-B Assurances

The State Plan must include assurances that:

1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient; Yes

2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist; Yes

3. The state established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members. Yes

4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2). Yes

5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership. Yes

6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the

methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions. Yes

7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). Yes

8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. Yes

9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I. Yes

10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. Yes

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

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 Professional Staff Development.

1. 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.

In 2014, the Workforce System incorporated combined training for AJC (Title III staff) and LWDA (Title I staff) staff to ensure staff members are able to provide high-quality services to both job seekers and employers in the Jobs4TN.gov online jobs database. This joint training was followed by a champion seminar called Inside Workforce Development Summit in May 2015. This meeting encouraged a consistency in collaboration between Workforce System leaders, economic development leaders, education leaders, social service leaders, business leaders and partners for successful implementation of WIOA. After the summit, the efforts of joint training remained consistent when providing training and professional development for RESEA staff (July 2015), SNAP E&T staff (September 2015), Veteran's staff (October 2015), and training of the Business Services Team (December 2015). In tandem with mass scaled conference style training, the Workforce System encourages collaborative training in local AJC to educate staff (Title I, Title III, and other partner staff) about services provided as well as best practices.

The Workforce System prepares and equips one-stop center staff in an ongoing learning process with the knowledge, skills, and motivation to provide superior service to job seekers, including those with disabilities, and businesses in an integrated, regionally focused framework of service delivery. AJC staff is cross-trained, as appropriate, to increase staff capacity, expertise, and efficiency. Cross-training allows staff members from differing programs to understand every program and to share their expertise about the needs of specific populations so that all staff can better serve all customers. AJC staff are routinely trained and are made aware of how their particular function supports and contributes to the overall vision of the local board.

The State provided training and technical assistance for staff and partners across the state about referring Unemployment Insurance claimants to adjudicators and providing meaning assistance to UI claimants. The Workforce One Touch system (Zendesk) enhances and automates the communications between unemployment insurance claimants when issues regarding eligibility arise. Also, with the addition of the Geographic Solutions Unemployment Insurance system (GUS) to the Jobs4TN system, unemployment insurance claimants are automatically connected to the Wagner-Peyser services within VOS.

2. 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.

TN strategies in support training and awareness across core programs:

The goal is to staff the center with a highly trained career specialist, skilled in advising job seekers of their options, knowledgeable about local labor market dynamics, aware of available services inside and outside the one-stop center, and adept in developing customers' skills for employment success. As discussed throughout the plan, the Workforce System has engaged and involved core programs and partners in combined training efforts not only to focus on a specific subject matter but to also allow learning across programs. As a part of continuous learning across core programs, the Workforce Services Division hosts quarterly all-staff meetings which provide state staff with updated information on WIOA implementation across core programs and programs within the Workforce System. Also, to ensure specific and relevant training across programs is provided to all staff in the American Job Centers, the State encourages local area training with all partner staff about the services provided, benchmarks accomplished, and best practices.

TN strategies to support training and awareness of the UI program: During the implementation of the new state unemployment insurance system, staff was presented with updates on Tennessee's new Unemployment Insurance (UI) Benefits system called Geographic Unemployment System (GUS). During this presentation, the Administrator provided insights on the rollout of the GUS module and the various components within the system. Staff was also provided with information on how GUS would automatically link to the Virtual One-Stop (VOS) recruitment system, what American Job Center (AJC)

staff should expect with the new UI benefit system, and how the AJC staff will assist unemployment insurance claimants. The training included the advantages of the new system - integration of charges, claimant response, protest and appeal management module; alternative methods for assistance from UI staff; registration and claimant verification through document scanning and uploading.

The GUS module was one of the first systems across the United States that automatically integrated the unemployment claims system to the virtual recruitment system in real time. Upon the submission of an unemployment claim in GUS, a Wagner-Peyser application within the VOS system is automatically created. Thereby allowing AJC staff to immediately begin the process of working with claimants - assisting with job search, and providing any necessary education and/or training to get the claimants back to work - through the RESEA program. AJC staff can see the active status of a current UI claimant in the VIS system, however, they do not have access to any additional information. In the event that a claimant is experiencing issues with their unemployment insurance claim, the staff is trained to route their information to UI Assistance/Escalation Team through Workforce OneTouch (Zopim Chat or Zendesk) or call the UI Assistance Team.

TDLWD implemented Workforce OneTouch, the help desk feature to provide immediate guidance to related topics including Unemployment Insurance (UI) information, Labor laws, labor exchange services, etc. Title III staff throughout the State have been trained on the functionality of Workforce OneTouch to allow the subject matter experts to address specific questions under the guise of TDLWD. Zendesk is a cloud-based customer service platform that provides the fastest path of communication to our internal and external customers. This is a one-stop customer service tool to streamline tools like ticket views, triggers, and automation. Zopim Chat allows for immediate, real-time interaction between the customer and the agent.

TN strategies to provide training for Employment Services and WIOA staff on identification ofUI eligibility issues and referral to UI staff for adjudication:

Tennessee is in the process of developing a plan of how WIOA staff will be trained to identify UI eligibility issues and refer their findings to the appropriate UI staff for adjudication.

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.

Due to the changes in procedures within the Unemployment Insurance Division, TDLWD decided that the best course of action to mitigate assistance in filing a UI claim was to directly connect to an unemployment specialist via Zendesk and Zopim chat. The Workforce System provided training over to 30 AJC staff to act as customer service regional agents throughout the state and trained others within their regions to provide immediate assistance via Zendesk and Zopim chat.

The Workforce System will ensure those needing assistance in filing a claim can utilize the resource room facilities to file and gain meaningful assistance with their UI claim.

c. Describe the state's strategy for providing reemployment assistance to Unemployment Insurance claimants and other unemployed individuals.

States are strongly encouraged to provide integrated Re-employment Services and Eligibility Assessments that combine a review of the individuals UI eligibility with re-employment service delivery at the AJC's.

Whether the State decides to use UI, Wagner-Peyser, WIOA, and/or other AJC staff to conduct RESEAs, States must ensure that the staff members assigned for each activity have the necessary training and that UI staff are involved in the development of the staff training and the delivery of such training, as appropriate. States are encouraged to consider designating the same staff to provide both the required RESEA activities and some or all of the re-employment services deemed appropriate for an individual claimant, thus ensuring continuity for the claimant.

UI staff members must be engaged in RESEA planning, administration, and oversight as well as all appropriate staff training concerning UI eligibility requirements. UI staff members must be available and involved in the RESEA functions including reporting but a full-time position is not required. Program staff members delivering RESEAs must have sufficient training to conduct a thorough eligibility review and to detect eligibility issues requiring adjudication. Further, states must have UI staff participation to ensure accurate data are provided in the RESEA required reports including the new Quarterly Narrative Progress Report (ETA 9178) for SBR project activities.

The Re-Employment Services and Eligibility Assessment (RESEA) program will continue as a major area of emphasis to service employment, re-employment, and the training needs of unemployment compensation claimants. RESEA uses a modernized statistical model that focuses on general variables to reflect a number of economic and motivational aspects of the unemployed. The newly- expanded method of selection concentrates on those claimants most likely to exhaust benefits and recently separated Veterans receiving Unemployment Compensation for Ex-Service members (UCX).

RESEA clients are referred to labor exchange services to facilitate an early return to employment, resulting in a decrease in expenditures of trust-fund money. RESEA collaborates with all AJC partners to deliver supportive activities and services through a comprehensive and integrated delivery system. The claimants targeted for the services are referred for:

- initial and comprehensive assessments
- employability development plans focusing on potential barriers to employment
- training opportunities
- supportive services
- and/or job service referrals (if deemed to be job ready for the initial assessment)

The re-employment services offered to UI claimants are further enhanced through the use of JOBS4TN (a comprehensive solution to job searching and labor market information).

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;

Funding received for RESEA supports staffing in 23 Comprehensive and 28 Affiliate American Job Centers across the State, providing re-employment services to UI claimants identified as mandatory participants. RESEA funding also trains American Job Center staff in using technological tools such as skills transferability, ability profiler, labor market information, and initial and comprehensive assessments.

To improve the scope and depth of re-employment services to UI claimants, the review team evaluates these activities as part of the local office review process. In addition, review staff analyzes applications to determine compliance with work test requirements. If deficiencies are identified, the review team makes recommendations for improvement, and the local office develops a corrective action plan that is monitored by management until the desired improvement is achieved.

The Workforce System streamlined the claims process to auto create the partial WP application in the Virtual One Stop System after the initial UI claim is submitted, allowing provisions for labor exchange services to be rendered to UI claimants.

2. Registration of UI claimants with the State's employment service if required by State law;

The Workforce System has a process in place that automatically creates a partial WP application upon the completion of a UI claimant as required by State law, T.C.A. 50-7-302(a).

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

Additional information regarding this response has been included in an action plan.

4. Provision of referrals to and application assistance for training and education programs and resources.

The Workforce System ensures that all individuals, including UI claimant, seeking employment are provided comprehensive career services as defined by the labor exchange system. Those services include assisting job seekers in finding employment, assisting employers in filling jobs; facilitating the match between jobseekers and employers, participating in a system for labor between states, meeting work search requirements of the unemployment compensation, job search and placement assistance, career counseling; and providing business service activities to employers. Job seekers are able to receive multiple services at an AJC:

• Basic individual or group counseling. Learn how to set goals and develop a personal plan of action.

- Facilitate workshops that provide valuable information on job-related topics. Workshops are conducted by AJC staff.
- Receiving an assessment, which helps all involved learn about the participant's interest, aptitude, basic skills, work values, and personality. These assessments may be self-served or staff assisted and are comprehensive and specialized exams that identify employment needs.
- Receiving Career Guidance/Planning to develop an individual employment/career plan with a workforce professional to identify employment goals and appropriate combination of services to achieve the goals.
- Receiving information and assistance with an internship, work experience, or relocations assistance based on the assessment or individual's employment plan.
- Receiving training and education-skills training or educational program information.
- Receiving additional referral services to appropriate programs and partners to further assist with any other services such as health, welfare, and financial assistance where eligibility requirements are met.

Connecting with a case manager who will advocate, communicate, and provide resources to aid in achieving the goals established in the individual employment plan.

Once an assessment is completed and it is determined that an educational and training services are needed, an UI claimant will be referred to the appropriate program staff member and/or training or educational service as needed.

In the context of WIOA, Re-Employment Services and Eligibility Assessment (RESEA) program services are a valuable one-stop resource as well, particularly given the new focus that the Wagner- Peyser Act now places on employment services for UI claimants.

RESEA offers participants re-employment services and the following benefits towards self- sufficiency:

- Orientation to help claimants access career services offered at AJCs through the resource room or virtually, with particular emphasis on accessing available labor market and career information
- Registration with the virtual one-stop
- Referrals to appropriate services offered through AJCs such as resume writing workshops, self-assessments, education, and training information, interviewing techniques, networking, career exploration, and online job and occupations resources
- Support in the development of the claimant's tailored individual re-employment plan that must include work search activities, workshops on topics such as resume writing, job search strategies if needed, and/or approved training

A RESEA participant is provided with one-on-one services for the eligibility review and the development of an individual re-employment plan during the initial RESEA and during any subsequent RESEA. The individual re-employment plan must be developed during the initial RESEA and updated during subsequent RESEA and in collaboration with the claimant and tailored to their individual needs. It must contain specific steps to which the claimant agrees to adhere including reporting to and participating in the re-employment service(s) determined to be most likely to result in reemployment or referral to career-related training. During the development of the individual reemployment plan, specific labor market information should be discussed, thus, ensuring that the claimant understands how labor market information can be used in an appropriate job search. All states should provide re-employment services as a component of each RESEA.

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--

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.

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's agricultural sector includes farming and related industries, as well as value-added food and fiber products, processing, and manufacturing. Tennessee's agriculture accounts for 10.5 percent of the State's economy and generates $69.4 billion in output, which is an increase of $18.2 million from the previous year. Tennessee is ranked 3rd in the United States for tobacco production, 8th for cotton production, 17th for soybean and corn production and 9th for the total number of farms. During 2014, there was a decrease of farms in the State which left Tennessee's estimated total at 67,300. Over 41 percent of Tennessee's total land area is farmland (10,867,812 million acres), with cropland accounting for approximately 49 percent of farmland. About 238,000 Tennesseans are employed in agriculture, with 127,000 connected (full and part-time) with agricultural production. The State's top five agricultural commodities, cattle/calves, soybeans, broilers, corn, and cotton and cottonseed, comprise about two-thirds of the farm-marketing cash receipts. Crop cash receipts totaled $2.30 billion and soybeans lead those receipts with $592 million. Tennessee's top-ranking crops are soybeans, corn, wheat, cotton, tobacco, and hay. The following chart indicates Tennessee's major intensive crop activity in 2014. Below is a graph showing the soybean production amounts for Program Year 2014. Production estimates for TN soybeans are measured in pound per acre.

Year	State	Soybeans Acres Harvested	Soybeans Acres Planted	Soybeans Production	Soybeans Yield
2014	Tennessee	1,610,000	1,640,000	74,060,000	46

A. 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.

LEARS report indicates there were 115 MSFWs registered in Wagner-Peyser, but only four were referred to jobs and only two received staff-assisted services. Even though the state is a non-significant MSFW state, we plan to collaborate with agricultural organizations detailing the services that are available to MSFWs. Those organizations are, but not limited to National Agricultural Consultants, LLC, Agricultural Workforce Management Association, Youngblood and Associates, Seasonal Hands, Farm Bureau, University of Tennessee Extension, and other organizations that provide services to farmworkers.

1) The top five labor-intensive crops in Tennessee are tobacco, soybean, hay, cotton, and corn. There are also other products such as the harvesting of tomatoes for processing, the cutting of lettuce and spinach, cotton, and strawberries requiring intensive labor. Farmers harvesting these products usually require farm labor. The peak seasons of sowing and harvesting is from February to August. Geographically, Tennessee's prime activity is in Middle Tennessee, with activity also occurring in West and East Tennessee.The geographic areas for prime activity in Tennessee are Northwest, Middle, Southeast, Northeast, and some located in Southwest.

2) Demand for migrant workers has increased in the past two years. The number of seasonal workers request for H-2A visas jumped 28 percent this fiscal year to 8,565. In the US there was 30 percent increase in the number of workers requested through the visa program in the first quarter of 2017. While farmers demand for H-2A visas has been steadily growing, the 2017 growth has outpaced recent annual increases stated the American Farm Bureau Federation Director of Energy and Environment. In Tennessee, there are nearly 70,000 farming operations and the sector contributes more than $52 billion to the state's economy. According to the Tennessee Department of Agriculture and the University of Tennessee's Institute of Agriculture farming and agriculture production employs more than 350,000 Tennesseans.

3) Currently there aren't any economic factors that would have a negative effect on the agricultural workforce, however, weather conditions such as; extreme rain and abnormal spikes in heat could possibly affect crop yields.

B. 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 not a significant H2-B and Migrant Seasonal Farm Worker state, the data requested is not available. The Ethnicity of the farm workers in the state is 97% Caucasian; 1% African American and 2% Mexican. Some of the Migrant Farm workers stay on the farm and continue to work with duties such as feeding farm animals, mending fences and other necessary jobs to keep the far, animals, equipment, etc. in necessary conditions for the production and harvesting season. During peak season approximately 215 MSFW inhabit the state and 35 during low seasons which tend to be mainly Seasonal Farm Workers. (Jobs4TN.gov. (2018 April 15). Retrieved April 16, 2018

2. 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:

The local office's 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:

Much like previous years, because Tennessee is considered a non-significant State, TDLWD has not received allocations for a large array of MSFW-outreach resources. Thus, most of such State- outreach efforts have been implemented by the Tennessee Opportunity Programs (TOPS), 167

National Farmworker Jobs Program (NFJP) grantees. However, TDLWD plans to continue assisting TOPS with outreach services. The following explains the various steps leading to an active enrollment in the TOPS:

- TDLWD State staff will coordinate with local AJC offices to continue training and explanation of services offered
- TOPS case managers reach out to farm communities to identify prospective candidates.
- Once farm workers are identified, and they demonstrate a compelling interest to obtain new skills and pursue different and more productive career tracks, registration can begin and be completed.
- Eligibility documents are sought - including birth certificates, selective service registration documents, drivers’ license, work visa, etc.

- Interviews are held, eligibility is confirmed and skill needs along with ABE and other service needs are identified. Next, an IEP is developed, then training and services are secured.
- Core services are cooperatively arranged and training providers, as well as service providers, are identified.

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 MSFW with the goal of notifying MSFWs of the services provided by Tennessee's American Job Centers (AJCs). TDLWD will also coordinate with TOPS to use the mobile career coach units to bring TDLWD's services to MSFW in their home communities. TDLWD plans to join the Tennessee Migrant Network Council, a coalition established by TOPS, in efforts to provide MSFW with a more comprehensive array of resources and services. The Tennessee Monitor Advocate will collaborate with National Farmworker Jobs Program (NFJP) grantees, public agencies, and agricultural employer organizations and with others in providing services to MSFW for a cohesive continuum of services.

A. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.

Tennessee is collaborating with agricultural organizations such as Farm Bureau, UT Extension, Agricultural Workforce Management Association, National Agricultural Consultants LLC, Youngblood & Ass. PLLC, Seasonal Hands LLC, ALS, Inc. and education organizations that reach out to MSFW's in other ways than normal. Additionally, the State Monitor Advocate (SMA) and the NFJP will begin to share referral information from outreach activities conducted in the field.

B. Providing technical assistance to outreach workers. 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 complaint system, information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

- The SWA will coordinate with local AJC Offices to continue training and explaining services offered. These services involve:
- Availability of Referrals to training: The SWA refers any interested MSFW the appropriate agency that can better serve the MSFW in the needed training.
- Supportive services that include making sure the MSFW knows his/her rights under the law, ensuring that such workers have access to the necessary equipment at the AJCs, and explaining to the MSFW the purpose of Jobs4TN is and how to access and utilize the system.

- Career Services through Jobs4TN enables the participant to apply for any jobs that meet their skill set.
- Employment opportunities: The MSFW can again utilize Jobs4TN. Also, the SWA can refer the
- MSFW to any agent that currently works with employers in the State.
- Other organizations: TOPS, another Tennessee organization serving MSFW in the State empowers migrant and seasonal farmworkers and other disadvantaged Tennesseans to achieve economic self-sufficiency. This is done by providing services that address their individual needs.
- Farmworkers Rights: In terms of employment, MSFW participants have the same rights as any resident of Tennessee, however, acquiring those rights might be more difficult than normal given some barriers. Therefore posters are available at the AJCs in English and Spanish explaining those rights. Posters are also handed out at farms to the employer and employee to ensure that their rights of each the law is known.

C. Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues.

All current UI issues pertaining to worker training and core programs within the Department of Labor and Workforce Development are handled through referrals in Workforce One Touch and addressed by the Division of Employment Security, which has oversight of the Unemployment Insurance program.

D. Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.

Technical assistance is provided on an annual basis to all staff across the State for services and resources available to MSFW. Staff members are also provided with annual training on how to handle complaint issues within the AJC.

E. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

Due to the non-significant status of the state, the majority of outreach is completed by the NFJP grantees.

An MOU is currently in place between both agencies. Needs of MSFW's in the American Job Centers are addressed by helping those individuals register as well as identification and explaining other services to MSFW's. Those services include Vocational Rehab, Adult Education, Supplemental Nutrition Assistance Program and others. Additionally, to meet the needs of MSFW's in Tennessee, collaboration with agricultural organizations (previously stated) both public and private is ongoing. Furthermore, the State Monitor Advocate (SMA) collaborates with agricultural organizations throughout the state concerning training events, outreach efforts, and data sharing.

Tennessee will develop a contact list of various MSFW agencies and organizations like Telamon, TN Department of Education - MSFW, Southern Migrant Legal Services, and other nonprofit farmworker organizations.

3. 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:

cdv. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers;

cdvi. 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:

407. Sector convening to clarify and articulate the education and training pathways into high demand and emerging occupations;

408. Identifying systemic opportunities for improved service delivery so that more youth and adults access and complete the programs; and

409. 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.

C. Marketing the Agricultural Recruitment System to agricultural employers and how it intends to improve such publicity.

Tennessee American Job Centers, Tennessee Colleges of Applied Technology (TCAT), and the mobile Career Coaches actively promote the availability of agricultural openings and encourage U.S. workers to apply for these positions. Agricultural Job orders are posted on the state website JOBS4TN in an effort to meet the recruitment needs of employers. TDLWD provides education and training on agency services to agricultural employers' caseworkers in an effort to meet the needs of MSFW's in Tennessee.

4. Other Requirements

A. Collaboration

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

Per the Memorandum of Understanding between Tennessee Department of Labor and Workforce Development and the Tennessee Opportunity Programs, NFJP grantee, the parties mutually agree to collaborate and complete the following activities:

410. 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.

411. 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.
412. Participants will be entered into Tennessee's job exchange system, Jobs4tn.com, otherwise known as the Virtual One-stop System (VOS) or its successor.
413. 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.
414. 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.
415. Coordinate Emergency Assistance needs for MSFW' s
416. The parties agree to meet quarterly (July-September, October-December, January March and April-June) either in person or by other communication means.
417. The parties will ensure that all and any confidential information shared through the implementations of this MOU is to be protected and only seen by staff. Such information will only be used in conjunction as to a legitimate business purpose as determined by the respective party.

In addition to continuing the collaboration with TOPs, Tennessee works with the Southern Migrant Legal Services and Conexion Americas, and establishing relationships with state agencies and nonprofits that provide services to MSFWs.

B. Review and Public Comment.

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

There were no comments received on the AOP, however, information and suggestions were solicited from:

- Core and Partner Program State Departments
- Local Workforce Development Boards
- Tennessee Opportunities Programs (TOPS)
- NFP grantees

C. Data Assessment.

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

After reviewing the last four (4) years of performance the State has and will continue to meet the goals set. Both MSFWs and non-MSFWs have received the same quantitatively services. Although the goal has been consistently met, we are continuously improving the ways to better serve both non-MSFWs and MSFWs.

D. Assessment of progress

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

The State believes that all goals were reached as laid out in the previous year's AOP. The State used TOPS to outreach to farm communities to identify prospective candidates. After those MSFW the one-stop centers would try to pursue different and productive career tracks for those MSFW. Testing of cognitive abilities was achieved as well as placing the MSFW with the best opportunity for employment. Core services were identified and training was arranged with different providers as needed. Furthermore, if there were additional services needed beyond the scope of what could be offered, the clients were referred to other programs such as Vocational Rehabilitation, Veterans Services, or Senior Corps Programs.

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:

1. The Wagner-Peyser 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. The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers; 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 services, Adult and Dislocated Worker programs and Youth Programs under Title I; and Yes

4. State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations. Yes

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 under title II, the Adult Education and Family Literacy Act (AEFLA).

a. Aligning of Content Standards

Describe how the eligible agency will, by July 1, 2016, align 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)).

Tennessee is a College and Career Readiness Standards in Action State. Tennessee has adopted the College and Career Readiness Standards developed by OCTAE and has provided training to all adult educators across the state in the standards. All AE content has been aligned to these standards as of July 1, 2016. To accomplish this goal, a Curriculum Advisory Team (CAT) has been formed composed of Supervisors and Instructors from the field as well as state staff. The CAT is currently undergoing rigorous training on the College and Career Readiness Standards as part of Tennessee Adult Education's participation in the United States Department of Education sponsored College and Career Readiness Standards in Action Project. Since the development of the CAT team, instructor training has been designed to focus on the incorporation and application of the standards. As well as keeping instructors trained, Tennessee Adult Education purchases curriculum designed to meet College and Career Readiness standards and requirements, and only uses verified literature that aligns with the standards.

For the next two years, Tennessee will focus efforts on training for College and Career Readiness standards, and work to adapt the delivery of the instruction for the greatest benefit to participants. Because of the difference in nature of adult education students and the traditional K-12 student, Tennessee is working towards providing workforce preparation instruction in addition to the College and Career Readiness standards. The

life circumstances of Adult Education participants requires an immediate need to be prepared for jobs, which does not always entail an all-inclusive career pathway, but instead, training and education of what employers expect and how best to improve chances of success on the job. Working towards this goal is based on the realization that not all individuals seeking adult education services desire to go to postsecondary, but may only need instruction for workforce purposes.

b. Local Activities

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

Adult Education and Literacy Activities (Section 203 of WIOA)

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—
    0. 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
    1. Is for the purpose of educational and career advancement.

Please see III.b.5.B.i. Tennessee will be funding the Adult Education and Family Literacy Act, but will not be funding the optional Family Literacy activities. Using the considerations specified in section 231(e) of WIOA, The Division of Adult Education plans to conduct a statewide competitive bid for the term of July 1, 2018-June 30, 2021. The application will be for the duration of three (3) years, with contracts issued yearly. The Division of Adult Education will post a Notice of Funding Opportunity on the Tennessee Adult Education website for each designated Adult Education District. Potential eligible providers shall submit their application to be reviewed and scored by independent reviewers using the Tennessee Adult Education Scoring Rubric. Applications will be evaluated and scored on the basis of thoroughness, completeness, clarity, and merit.

The Division of Adult Education, based upon the recommendation of the reviewer, shall submit to the successful applicant an “Intent to Fund Letter” outlining special terms and the award amounts. The successful eligible provider will adhere to the Scope of Services and Assurances that will delineate approved activities and set forth the terms and

conditions under which to manage the Adult Education grant for the term of July 1, 2018 - June 30, 2021.

All local activities will only be provided to eligible individuals. In Tennessee, eligible individuals are individuals who have attained 17 years of age (16 if emancipated); who are not enrolled or required to be enrolled in secondary school under State law; and who are basic skills deficient; do not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or is an English language learner. Through the grants awarded for the term of July 1, 2018 - June 30, 2021, the Division of Adult Education shall provide the following local activities:

1. *Adult Education (AE)* - Academic instruction and education services below the postsecondary level that increases an individual's ability to read, write, and speak in English and perform mathematics at a level necessary for the attainment of a Tennessee High School Equivalency Diploma. This academic instruction and education service will be targeted to meet the needs of the student based upon an academic functioning level as determined by standardized testing. Services provided will be tailored to meet AE core performance indicators including, but not limited to, the transition to postsecondary education and training or employment. Eligible students will have the opportunity to participate in online classes using approved Distance Education programs.

2. *Workplace Adult Education and Literacy Activities* - Eligible providers will develop partnerships with business, industry and the Local Workforce Investment Board to provide Adult Education and literacy activities concurrently and contextually with both, workforce preparation activities, and workforce training in collaboration with an employer or employee organization designed to improve the productivity of the workforce as well as educational and career advancement for the eligible individual.

3. *English Language Acquisition Activities* - Eligible providers will develop a program of instruction designed to help eligible individuals who are English language learners (ELL) achieve competence in reading, writing, speaking and comprehension of the English language.

4. *Integrated English Literacy and Civics Education (IEL/CE)* - The Integrated English Literacy and Civics Education Programs in Tennessee will provide services to ELL's who are adults, including professionals with degrees and credentials in their native countries that enable them to achieve proficiency necessary to function on the job, in their families, and in society. These services shall include instruction in literacy and English language acquisition as well as instruction on the rights and responsibilities of citizenship and civic participation. Job readiness training will also be included in instruction and will be facilitated by the integration of digital literacy. In addition, students will be instructed in computation and problem-solving at levels of proficiency necessary to promote personal growth and to integrate effectively into their communities. Program must also provide Integrated Education and Training activities.. Information and resources for job advancement and training opportunities will be made available to students.

5. *Workforce Preparation Activities* - Eligible providers will help individuals acquire a combination of basic academic skills and employability skills necessary for successful

transition into and completion of postsecondary education or training or employment. Tennessee is making great efforts to institute software and instruction in the development of participant skills that will advance their goals of employability and self-sustainability. The focus will be on developing soft skills in furthering the marketability of Adult Education participants.

6. *Integrated Education and Training* - Academic instruction and education services below the postsecondary level that increases an individual's ability to read, write, and speak in English and perform mathematics at a level necessary for the attainment of a Tennessee High School Equivalency Diploma. This academic instruction and education service will be targeted to meet the needs of the student based upon an academic functioning level as determined by standardized testing. Services provided will be tailored to meet AE core performance indicators including, but not limited to, the transition to postsecondary education and training or employment. Eligible students will have the opportunity to participate in online classes using approved Distance Education programs. This academic instruction may be provided concurrently and contextually with both, workforce preparation activities as described above, and workforce training for a specific occupation or occupational cluster.

Instruction will be provided and tailored, to the best of the eligible provider's ability, to labor force needs within the region being served. As well as tailored instruction, Tennessee is looking to implement computer modules that provide instruction that will adapt in intensity based on the performance of the individual. Depending on the goals and career that the individual wishes to work towards, the modules have career or industry instruction that will assist in preparing the participant.

Special Rule. The Tennessee Department of Labor and Workforce Development, Division of Adult Education, in awarding any grant or contract under this section will 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 the Tennessee Department of Labor and Workforce Development, Division of Adult Education 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.

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.

c. Corrections Education and other Education of Institutionalized Individuals

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II, subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

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.

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. Funding for corrections education will be a part of the initial competition that takes place for the Adult Basic Education grants. Within the initial competition, all applicants will be informed that up to 20% of the available funding of the grant can be used for corrections education in accordance with section 222(a)(1). Eligible providers will be required to provide a budget for corrections education listing anticipated costs and how funding will be used to provide services under section 225. The funds will be expended to set up classes in corrections institutions and partner with reentry programs to provide services listed in section 225(a) in order to curb the recidivism rate within Tennessee. Classes will focus on academic instruction towards the achievement of high school equivalency diplomas. In addition, projects will be created and are ongoing to provide work skills to

inmates to improve the likelihood of employment upon release. The policy has been implemented to ensure that priority is provided for those that have been sentenced for five (5) years or less as an effort to focus services on those whose emanate release can have the greatest impact on society.

Tennessee will compete Section 225 according to the narrative set forth in (5)(B)(i). The grants awarded may be for up to 20% of the available federal dollars as set forth in section 222(a)(1).

The funds described in section 225(a) shall be used for the cost of educational programs for criminal offenders in correctional institutions and for other institutionalized individuals, including academic programs for 1) adult education and literacy activities; 2) special education, as determined by the agency; 3) secondary school credit; 4) integrated education and training; 5) career pathways; 6) concurrent enrollment; 7) peer tutoring; and 8) transition to re-entry initiatives and other post-release services with the goal of reducing recidivism.

d. Integrated English Literacy and Civics Education Program

1. Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries.

Tennessee will compete Section 243 according to the narrative set forth in (5)(B)(i). The Division of Adult Education will utilize the thirteen considerations set forth in Section 231(e) as evaluative criteria to score eligible providers' application for funding. All eligible providers will be notified by the same grant announcement and will be accountable to the same process to adhere to all direct and equitable provisions. Integrated English Literacy and Civics Education programs will prepare adult English Language Learners (ELLs) to become functional in the four language skills, reading, writing, listening and speaking, so they might gain the proficiency necessary to function on the job, in their families, and in their communities.

Programs will assess the students' educational functioning level using standardized testing instruments approved by the National Reporting System, specifically the CASAS Assessment. Assessment results will be used to identify and address learning deficiencies to assure that ELLs are able to achieve their goals. The student will then be enrolled in a course of instruction designed to meet their language acquisition and academic needs as identified through their initial CASAS Assessment results. Post-Assessments will be administered in accordance with the approved Tennessee Adult Education Assessment Policy in order to measure educational functioning level gains. All instruction for language acquisition or academic skills will incorporate Civics Education to instruct the student in the rights and responsibilities of American citizenship as well as skills necessary to function on the job, in their families, and in their communities. Programs may also provide Integrated Education and Training activities. The course of academic instruction for ELLs must be provided concurrently and contextually with both,

workforce preparation activities as described above and workforce training for a specific occupation or occupational cluster.

Programs will implement job readiness training, which includes job acquisition and retention skills and employability skills. Students will also be connected with other One-Stop partners to provide assistance in identifying in-demand industries in the students' community and connect them to appropriate training designed to lead to unsubsidized employment and economic self-sufficiency. Further, students will be connected to their local Tennessee Career Center to assist them in job searches and other services designed to lead to unsubsidized employment and economic self-sufficiency. These connections to the local workforce development system and its functions may be made through referrals or memoranda of understanding. Tennessee Adult Education will work to form closer relationships with workforce partners and encourage co-enrollment of services and development of skills for employment. Adult education has implemented computer software that will assist in the development of individuals academic skill, but also contains workforce training component where students can build an understanding of desired industry careers with practical application. Tennessee plans to make efforts in tracking the civic improvements of individuals taking part in civics education, whether that be voting registration, sitting for the citizenship exam, or increased community involvement.

Programs will provide instruction that promotes academic success so that ELLs may pursue a secondary diploma or its equivalent and/or post-secondary training. Digital literacy will be an integral part of instruction at all levels.

2. Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program.

Tennessee will compete Section 243 according to the narrative set forth in (5)(B)(i). The Division of Adult Education will utilize the thirteen considerations set forth in Section 231(e) as evaluative criteria to score eligible providers' application for funding. All eligible providers will be notified by the same grant announcement and will be accountable to the same process to adhere to all direct and equitable provisions. Integrated English Literacy and Civics Education programs will prepare adult English Language Learners (ELLs) to become functional in the four language skills, reading and writing, listening and speaking, so they might gain the proficiency necessary to function on the job, in their families, and in their communities.

Programs will assess the students' educational functioning level using standardized testing instruments approved by the National Reporting System, specifically the CASAS Assessment. Assessment results will be used to identify and address learning deficiencies to assure that ELLs are able to achieve their goals. The student will then be enrolled in a course of instruction designed to meet their language acquisition and academic needs as identified through their initial CASAS Assessment results. Post-Assessments will be administered in accordance with the approved Tennessee Adult Education Assessment Policy in order to measure educational functioning level gains. All instruction for language acquisition or academic skills will incorporate Civics Education to instruct the

student in the rights and responsibilities of American citizenship as well as skills necessary to function on the job, in their families, and in their communities.

Programs may also provide Integrated Education and Training activities. The course of academic instruction for ELLs must be provided concurrently and contextually with both, workforce preparation activities as described above and workforce training for a specific occupation or occupational cluster.

Programs will implement job readiness training, which includes job acquisition and retention skills and employability skills. Students will also be connected with other One-Stop partners to provide assistance in identifying in-demand industries in the students' community and connect them to appropriate training designed to lead to unsubsidized employment and economic self-sufficiency. Further, students will be connected to their local Tennessee Career Center to assist them in job searches and other services designed to lead to unsubsidized employment and economic self- sufficiency. These connections to the local workforce development system and its functions may be made through referrals or memoranda of understanding.

Programs will provide instruction that promotes academic success so that ELLs may pursue a secondary diploma or its equivalent and/or post-secondary training. Digital literacy will be an integral part of instruction at all levels.

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.

1. The Division of Adult Education will align adult education and literacy activities with other core programs and one-stop partners. This will be done by having by eligible providers partnering with their local AJC for the referral of potential students; there, students will be assisted in building a resume and creating an account in Jobs4TN. Eligible providers will also refer students completing the program to the Tennessee Career Center for career information and job placement. Eligible providers will refer eligible students completing the program to the Local Workforce Board or Vocational Rehabilitation as set forth in this State Plan; this will include the development of career pathways to provide access to employment and training services for individuals in adult education and literacy activities.

Tennessee has made endeavors to visit comprehensive American Job Centers where colocation is taking place to ensure that staff has sufficient knowledge of partner programs for referral processes and that the present is sufficient to provide a benefit to participants.

2. The Division of Adult Education in conjunction with the Tennessee Department of Human Resources will conduct high-quality professional development programs in the form of Leadership/Management training for District Coordinators. Such programs will assist them in the efficient and effective operation of their District. This training will take place at two Leadership Summits per year as well as at the Academy for Instructional Excellence and on a more individual basis between as needed.

The Division of Adult Education will conduct two Regional Instructional Workshops per year in which instructors will receive professional development training regarding instruction methods for adult learners. Instructors will also receive information about current models and best practices in instruction for adult learners.

The Division of Adult Education will conduct an Academy for Instructional Excellence wherein instructors will receive professional development training regarding instruction methods for adult learners. Instructors will also receive information about current models College and Career Readiness Standards and best practices in instruction for adult learners.

The Division of Adult Education will provide professional development opportunities to individual Districts as needed in instructional methods for adult learners in mathematics and reading or other subjects as needs may arise.

These high-quality professional development programs shall be established and operated to improve the instruction provided pursuant to local activities required under Section 231(b). This will include instruction; incorporating the essential components of reading instruction as such components relate to adults; instruction related to the specific needs of adult learners; provided by volunteers or by personnel; about dissemination of information concerning models and promising practices related to such programs.

Training will be conducted for additional staff that assists with the programmatic operations such as data and office management. This training will focus on the processes for data entry, National Reporting System standards, and proper filing and office management.

The Division of Adult Education will assess the professional development system in several ways. The Division of Adult Education, through regional consultants and other state staff, will conduct systematic site visits along with desktop and onsite monitoring. Based on the results of these visits and monitoring activities, the Division will provide professional development to meet demonstrated needs. Regional consultants and other State staff will also conduct systematic follow-up site visits and desktop and onsite monitoring; this will be done to ensure the efficacy of the professional development offered and to determine if additional professional development is necessary. Further, each professional development training provided will be evaluated by the audience through the use of evaluation forms. Future training and professional development events will be revised or modified for improvement based on the results of the evaluation.

3. (a) The Division of Adult Education, through regional consultants and other State staff, will conduct systematic site visits and desktop and onsite monitoring. Based upon the results of these visits and monitoring activities, the Division will provide technical assistance to eligible providers to develop and disseminate instructional and programmatic practices. These practices will be based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs, distance education and staff training.

b).The Division of Adult Education, through regional consultants and other State staff, will conduct systematic site visits and desktop and onsite monitoring. Based upon the

results of these visits and monitoring activities, the Division will provide technical assistance to eligible providers regarding their role as a one-stop partner to provide access to employment, education and training services.

c).The Division of Adult Education, through regional consultants and other State staff, will conduct systematic site visits and desktop and onsite monitoring. Based upon the results of these visits and monitoring activities, will provide technical assistance to eligible providers in the use of technology.

4. The Division of Adult Education, through regional consultants and other state staff, will conduct systematic site visits and desktop and onsite monitoring. Through these visits and monitoring activities, the Division will monitor and evaluate the quality of, and the improvement in, adult education and literacy activities and the dissemination of information about models and proven or promising practices within the State. Each eligible provider will be monitored for compliance and appropriate technical assistance will be provided as needed.

2. Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable.

1. The Division of Adult Education will partner with State or regional networks of literacy resource centers to provide technical assistance, program support, Integrated English Literacy and Civics Education and curriculum development as may be needed.

2. The Division of Adult Education will develop and implement a distance education program including professional development to support the use of instructional technology.

3. The Division of Adult Education will develop and disseminate curricula, including curricula incorporating the essential components of reading instruction as such components relate to adults.

4. The Division of Adult Education will develop content and models for integrated education and training and career pathways.

5. The Division of Adult Education will provide assistance to eligible providers in developing and implementing programs that achieve the objectives of this title and in measuring the progress of those programs in achieving such objectives, including meeting the State adjusted levels of performance described in Section 116(b)(3).

6. The Division of Adult Education will develop and implement a system to assist in the transition from adult education to postsecondary education, including linkages with postsecondary educational institutions or institutions of higher education.

7. The Division of Adult Education will Integrate literacy and English language instruction with occupational skill training, including promoting linkages with employers.

8. The Division of Adult Education will conduct activities to promote workplace adult education and literacy activities.

9. The Division of Adult Education will identify curriculum frameworks and align rigorous content standards that -

1. Specify what adult learners should know and be able to do in the areas of reading and language arts, mathematics, and English language acquisition; and

2. Take into consideration the following:

- State adopted academic standards.
- The current adult skills and literacy assessments used in the State.
- The primary indicators of performance described in Section 116.
- Standards and academic requirements for enrollment in non-remedial courses, for-credit courses in postsecondary educational institutions or institutions of higher education supported by the State.
- Where appropriate, the content of occupational and industry skill standards widely used by business and industry in the State.

10. The Division of Adult Education will develop and pilot strategies for improving teacher quality and retention.

11. The Division of Adult Education will develop and implement programs and services to meet the needs of adult learners with learning disabilities or English language learners, which may include new and promising assessment tools and strategies that are based on scientifically valid research, where appropriate, and identify the needs and capture the gains of such students at the lowest achievement levels.

12. The Division of Adult Education will conduct outreach to instructors, students, and employers.

13. The Division of Adult Education will conduct other activities of statewide significance that promote the purpose of Title II of WIOA.

f. Assessing Quality

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

Subrecipients will be subject to on-site monitoring, at a minimum, once every three years, depending on their risk assessments (risk assessments, as well as site visits and desktop monitoring, will be conducted once a year). The monitoring cycle will begin after the Monitoring Guide is approved for the State fiscal year starting October 1st. The Monitor will schedule those programs to be monitored for that fiscal year at his/her discretion with priority given to programs identified as a level one risk.

For on-site monitoring, the Monitor will provide a written notice to each entity being monitored 30 days prior to a visit. The written notice will inform the entity of the dates for review, the programs that will be reviewed, the contract numbers that will be examined, and the estimated time of arrival. The Monitor is authorized to examine program records, interview participants, and employees, and enter any site or the premises which receive Adult Education funds. Random sampling techniques will be used to perform the review of program records. The Monitor will hold an exit conference with appropriate officials for each review conducted.

After the Monitor finishes the review, working papers, which include any documents collected during the monitoring of program that will assist the monitor in completing a report of a program's business, shall be established during the review and maintained by the TDLWD. A monitoring report indicating noteworthy practices, non-compliance, and corrective actions as well as recommendations for improvement is issued within 15 working days of the completion of the monitor working papers. A corrective action plan (CAP) will be submitted within 30 calendar days of the publishing of monitoring report that requires corrective action. A progress report will be issued to TDLWD during a designated time period (a minimum of three months) as directed by the Monitor until the corrective action has been accomplished. Finally, a letter of resolution will be sent to the provider stating that all actions have been taken and the CAP is closed.

In addition to on-site monitoring, Desktop Monitoring will take place monthly to review the subrecipient's performance, specifically HSE attainment and level gains. Regional Consultants will also conduct informal site visits to review the operations of the program, provide technical assistance and identify professional development needs. The Regional Consultants will recommend and provide professional development opportunities as necessary.

Tennessee is unique in that many of the partners use an integrated data management system, which will allow monitoring of data as it pertains to the expectations of WIOA. Tennessee Adult Education will begin evaluating subrecipients on co-enrollment, assistance in enrolling in postsecondary and working with employers to better ensure services are being provided as expected.

Certifications

States must provide written and signed certifications that

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. Yes

8. The plan is the basis for State operation and administration of the program. Yes

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.

Applicant’s Organization **Tennessee Department of Labor and Workforce Development**

Full Name of Authorized Representative: **Burns Phillips**

Title of Authorized Representative: **Commissioner**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to OCTAE_MAT@ed.gov

Assurances

The State Plan must include assurances that:

1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding supplement and not supplant provisions). Yes

2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA. Yes

3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA. Yes

4. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities; Yes

5. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) 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 and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and Yes

6. 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

7. 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

Section 427 of the General Education Provisions Act (GEPA)

In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the instructions posted at https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc.

State training, provided align with GEPA

Tennessee provides professional development to its programmatic staff as well as technical assistance when needed and includes talking points concerning the provision of providing services to those with barriers. Subrecipients are required, when applying for the grant, to provide a description and plan to ensure that the program is made available for any participant despite the individual's gender, race, national origin, color, disability, or age. Subrecipients are required to provide classes and services within counties where the need is greatest despite the six elements mentioned above. Classes are made available to all, and are advertised as such through literature and media, so as to reach the population in need of Adult Education services. Equitable access is further insured through the monitoring process (EEO signs are posted in locations where Adult Educaiton services are provided and are a requirement). All services provided are provided with the intent to reach those with barriers and make services available to all who wish to partake.

Program-Specific Requirements for Vocational Rehabilitation

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

_____

* Sec. 102(b)(D)(iii) of WIOA

a. Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

The State Rehabilitation Council (SRC) is established in Section 105 of the Rehabilitation Act of 1973, as amended (Act), and 34 CFR §361.16.17 of its implementing regulations. The SRC gives advice to and works in partnership with the Division of Rehabilitation Services (referred to as "the Division" throughout this report) including input on the state plan.

I. The SRC strongly recommends that the Program develops and implements marketing strategies to increase statewide awareness of VR services for businesses with hiring opportunities for individuals with disabilities.

RESPONSE: As the Division strategically implements WIOA, business will become more of a customer of the Vocational Rehabilitation Program. This will include studying the best marketing practices for new and existing services. The 17 Community Rehabilitation Training Centers and the Training Center at Smyrna will be involved in those strategies.

II. SRC encourages the Division to continue to provide opportunities for education to students, family members, and Local Education Agencies (LEA's) regarding vocational rehabilitation and other services.

RESPONSE: The Division will continue implementation of PETS services through a phased approached beginning phase I with the Jackson/Madison School system. The Division is planning for full statewide implementation following the release of the final Federal Regulations in spring of 2016.

III. SRC encourages the administration to continue reviewing available resources related to Order of Selection and the ability to serve more individuals with disabilities.

RESPONSE: The Division continues its review of all available resources in respect to the order of selection and the new language in the law.

IV. SRC commends the achievement of exceeding the Program's production closure goals.

RESPONSE: The Division remains committed to providing quality services that lead to competitive integrated employment. As one of the core partners in WIOA, the Division is dedicated to assisting Tennessee in having a 21st Century Workforce.

V. SRC recommends that, due to the current vacancy rate of staff in direct client services, the Division move toward fully staffing these positions to ensure continued increases in successful consumer employment outcomes.

RESPONSE: As the Division moves forward with implementation of WIOA, the personnel needs of the Vocational Rehabilitation Program will be continuously evaluated.

VI. SRC commends the Program for the development of the Business Unit and strongly recommends fully staffing this unit and expanding national and statewide business partnerships.

RESPONSE: The Division is continuing the development of the Business Services Unit. WIOA establishes business as a customer of the Vocational Rehabilitation Program, therefore the Business Services Unit will take a larger role in service delivery. The Division continues to participate in the Talent Acquisition Portal (TAP), a searchable database for clients and employers. In addition, Tennessee VR participates in the National Employment Team (NET) sponsored by the Council of Administrators of Vocational Rehabilitation (CSAVR). The NET gives access to national business partnerships. The SENET, is specific to the southeast and increases statewide business partnerships.

VII. Due to council structure and bylaw requirements, the SRC recommends that all SRC membership nominations be reviewed and processed within six (6) months.

RESPONSE: The Division will continue its efforts to work with the SRC to meet both internal and external deadlines. The Division would like to express its appreciation to the council for providing feedback and hopes it too will be mindful of providing information to the Division in a timely manner.

VIII. The VR & SRC FY2015 Annual Report was reviewed and edited by the DHS Communications staff prior to it being forwarded to the Offices of the DHS Commissioner, the Governor and the RSA Commissioner. The SRC recommends that the VR Services Portion of the Tennessee Combined State Plan be formally reviewed and edited as well to ensure a professional quality document is presented for inclusion in the combined state plan.

RESPONSE: The Department of Human Services strives to present all documents that are professional in quality.

Input provided by the Council for the 2018 modification of the combined state plan included continued support for the Council's original recommendations and provided the following new input:

1. As the Division has thus far not achieved the goal established in the 2016 Combined State Plan to increase successful employment outcomes by 2% or more during each of the four years of the plan, the SRC requests that the Division conduct a review of the program to identify potential causes for the decline in successful employment outcomes. The SRC further requests to receive a report from the Division regarding the findings to enable the SRC and the Division to work together to identify methods for meeting or exceeding this goal during the remainder of this Combined State Plan period.

RESPONSE: The Division remains committed to providing quality services that lead to competitive integrated employment. As one of the core partners in WIOA, the Division is dedicated to assisting Tennessee in having a 21st Century Workforce. As a result, the Division has been increasing its focus on looking at where and how human and other resources have traditionally been allocated to determine the best way to make adjustments to increase its community outreach with its partners along with reviewing its overall organizational structure to reach more individuals, including those potentially eligible Pre-ETS participants. It is anticipated that the long term effect will be a program that is agile and more readily responsible to its customers and advocates in support of the needs of both the individuals that it serves and the business that ultimately hire those customers in highly competitive positions in an integrated setting.

2. SRC commends the Division for providing recent joint trainings with stakeholders (TennCare Managed Care Organizations, Community Rehabilitation Providers and VR Staff) to discuss Employment Community First CHOICES program (ECF) and clarify roles and responsibilities.

RESPONSE: Collaborating with other state departments and programs, like the state Medicaid agency, that provide similar services to shared customers is an integral component of the state's strategy to fulfilling its commitment to providing quality services that lead to competitive integrated employment. Further, the Division continues to explore both traditional and non-traditional partnership opportunities that not only allow for a broader base of collaboration, but just as importantly, the blending and

braiding of funding resources to improve the efficiency and effectiveness of service delivery by all partners.

3. SRC commends the Division for the recent implementation of a statewide Pre-Employment Transition Services (Pre-ETS) team comprised of Pre-ETS Specialists and Field Supervisors. As there continues to be somewhat limited participation and ongoing confusion regarding the provision of these services, both for vendors of the services as well as the schools, the SRC encourages the Division to assist this team in providing joint trainings for these services as done with the ECF CHOICES program.

RESPONSE: The Division will continue its efforts in the implementation of the of a statewide Pre-Employment Transition Services (Pre-ETS) team comprised of Pre-ETS Specialists and Field Supervisors. This implementation will include both internal staff training and external training for local education agencies, vendors and other stakeholders. The Division has already completed a joint training for VR and DOE staff on the MOU. The designated staff from VR and DOE developed a joint training to present to staff from both agencies and outside stakeholders. In addition to training and adding new staff, the Division is reaching out to our contract partners to seek input on lessons learned with the hope that we along with our partners and the Local Education Authorities (LEAs) can build upon what is working and develop strategies for what is not meeting our expectations through peer guided information sharing.

4. SRC commends the Division for making changes in the Letters of Agreement (LOA) to improve the ease of use for community providers in applying for the LOA and for streamlining the services reporting process.

RESPONSE: The Division remains committed to providing quality services that lead to competitive integrated employment. Part of that commitment involves a much deeper review of all procurement methods, including LOAs, to make improvement in efficiency. The Division anticipates that the end result will be more streamlined processes, and increased accountability that leads to improved services in support of the mission and ultimately those we serve.

5. The SRC highly recommends that the VR program continue to push toward a method and/or means in receiving customer feedback. Once returned, turn it into actionable steps/initiatives in order to improve client satisfaction.

RESPONSE: Receiving feedback from customers is a critical component of the state’s continuous improvement efforts and committed to providing quality services that lead to competitive integrated employment. The Division will continue to engage the resources of the Quality Improvement and Strategic Solutions unit within the Department of Human Services (DHS) to improve channels and methods for receiving feedback from our customers, advocates, businesses, partners and the communities that we serve as well as explore ways to better analyze that feedback that make it more actionable in order to improve the Division’s agility in the way it provides services.

2. the Designated State unit's response to the Council’s input and recommendations; and

The State unit's response is included with the SRC's input in the response to question 1 in this section.

3. the designated State unit's explanations for rejecting any of the Council's input or recommendations.

The State unit's explanations for rejecting any of the SRC's input is included the response to question 1 in this section.

b. Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

The Division requests a waiver of state wideness in order to maintain thirty Third Party Agreements with thirty-five (LEAs). These Third Party Agreements are designed to provide enhanced and concentrated services to Transition School to Work students/clients covered by the agreements. The Division has a contract with each entity that is consistent with Federal regulations (34 CFR § 361.26) and includes the following provisions:

1. The vocational rehabilitation services to be provided are identified in Section A. Scope of Services in each contract (Each contract has been submitted separately to RSA to provide the written assurances requested for this attachment);

2. The LEA assures that non-Federal funds are made available to the Division by committing to their maintenance of effort in Section E.13 of the contract;

3. The LEA assures that the Division's approval is required before services are provided with the Division's counselor determining eligibility for each client served;

4. The LEA assures, through the Division's vocational rehabilitation counselors, that all other state plan requirements, including the Order of Selection policy, are applied to persons receiving services through the agreement; and

5. The LEA assures that reasonable accommodations will be provided. A list of the LEA contracts is provided below: • Anderson County Schools • Bledsoe County Schools • Blount County Schools • Carter County Schools • Johnson County Schools • Clarksville/Montgomery County Schools • Cocke County Schools • Dyserburg City Schools • Elizabethton City Schools • Greene County/ Greenville City Schools • Hamblen County Schools • Henderson County Schools • Humboldt City, Trenton Special School District, Milan Special District • Jackson/Madison County Schools • Kingsport City Schools • Knox County Schools • Lauderdale County Schools • Loudon County Schools • McMinn County Schools • McNairy County Schools • Metro Nashville Public Schools • Polk County Schools • Putnam County Schools • Sequatchie County Schools • Shelby County Schools • TN School for the Blind • TN School for the Deaf • Tullahoma

City Schools • Unicoi County Schools • Warren County Schools • Washington County Schools

In fiscal year 2014 the division changed the services offered under the TSW agreements. These new agreements provide more innovative services to the LEAs and the students.

While the Division provides transition services to all LEAs throughout the state, these Third Party Agreements enable the provision of an expanded and more intense transition service to students/clients resulting from the inclusion of Transition Case Managers, job coaches, transition coaches, and work place readiness specialists that would not otherwise be available to work with the vocational rehabilitation clients. These agreements enable the Division to have a greater presence within the schools and act as a stronger resource to the LEAs in the provision of transition services. The Division will continue to make efforts to increase the number of Third Party Agreements.

Over the last two years, the Division has expanded contractual arrangements that have increased coverage across the state. These expansions include new LEA contracts in the following areas:

• Germantown Municipal Schools • Chester County Schools • Hardeman County Schools • Haywood County Schools • Grundy County Schools • Williamson County Schools

2. the designated State unit will approve each proposed service before it is put into effect; and

All of the appropriate inforation is included in the response to question 1of this section.

3. All State plan requirements will apply

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

All of the appropriate inforation is included in the response to question 1of this section.

c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. Federal, State, and local agencies and programs;

The Division has interagency cooperation, collaboration, and coordination with other state and local entities that are not components of the Statewide Workforce Investment System. The Division works in cooperation with the following federal, state, and local agencies and programs to provide services for individuals with significant disabilities: 1. The Department of Children’s Services for youth-The Program is currently meeting with DCS state office staff to determine how to blend DCS Independent Living Services with VR program services. DCS state office staff has toured the TRC at Smyrna to learn more about the services provided at the TRC. The DCS Independent Living Coordinators

statewide have an annual meeting. The VR Program has offered to host the 2016 spring meeting of the DCS Independent Living Coordinators. During that meeting, all Independent Living Coordinators will tour the facility in order to assist in a plan for coordination of services. 2. The Department of Health in providing services to individuals with Traumatic Brain Injury (TBI); 3. Post-secondary school systems and their governing bodies; 4. The Department of Education and Local Education Agencies for individuals who are transitioning from school to work. 5. The Department of Corrections for individuals released from state correctional facilities; 6. The Tennessee Board of Probation and Parole for individuals released from state correctional facilities and monitored by the Board. 7. Local city police, county sheriffs and judge's programs for individuals being released from jails or on probation or trial diversion; 8. The Department of Human Services Family Assistance and Child Support Division for individuals participating in services under the Temporary Assistance for Needy Families (TANF) program; 9. The Department of Mental Health and Substance Abuse Services for individuals with mental illness and substance related disorders; 10. The Department of Intellectual and Developmental Disabilities for individuals with intellectual and developmental disabilities; 11. University of Tennessee, Center for Literacy, Education and Employment for marketing to businesses the services provided by the Division, to recruit businesses to hire the Division's clients and to provide staff training and development and consultation services for community supported employment service providers; 12. 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, Special Technology Access Center, East Tennessee Technology Access Center and other collaborative entities of the Division; 13. Tennessee Works for employment partnerships and collaborative efforts to increase access to meaningful work and internet-based information. 14. Community Rehabilitation Agencies of Tennessee which administers the Tennessee State Use Program, directs government procurement toward organizations serving individuals with disabilities. 15. Council on Developmental Disabilities that promotes public policies to increase and support the inclusion of individuals with developmental disabilities in their communities and works with public and private groups across the State to find necessary supports for individuals with disabilities and their families, so that they may have equal access to public education, employment, housing, health care, and all other aspects of community life. 16. Tennessee Council for the Deaf and Hard of Hearing and Centers for the Deaf and Hard of Hearing and Deaf-Blind that operate in six communities and provide interpreter services consultation. 17. Tennessee Technology Access Programs that operate in five communities and provide assistive technology services and evaluations. These programs provided the contracted services with the Program within the Division that administers activities described in section 4 of the Assistive Technology Act. 18. 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. 19. Community Rehabilitation Providers throughout the state that provide rehabilitation services under a Letter of Agreement. 20. In addition to the MOUs listed above, the Division has entered into an MOU with the State Medicaid agency, TennCare. State Medicaid — the Division of TennCare for the Employment and Community First

CHOICES program that provides long-term services and supports, including employment services, to individuals with intellectual and developmental disabilities.

2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

Information regarding this question is included with the response to question 1 in this section.

3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;

Information regarding this question is included with the response to question 1 in this section.

4. Noneducational agencies serving out-of-school youth; and

Information regarding this question is included with the response to question 1 in this section.

5. State use contracting programs.

Information regarding this question is included with the response to question 1 in this section.

d. Coordination with Education Officials

Describe:

1. DSU's plans

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

The Division maintains an ongoing interagency agreement with the Tennessee Department of Education, Tennessee Department of Children’s Services, Tennessee Department of Finance and Administration, Bureau of TennCare, Department of Intellectual and Developmental Disabilities, Tennessee Department of Health, Tennessee Department of Mental Health and Substance Abuse Services and Tennessee Department of Corrections. The agreement, along with the Division’s policy manual and Standard Procedures Directives, outlines the plans, policies and procedures for coordination with education officials to facilitate the participation of the Division staff in transition planning and the referral of students with disabilities to the Division for a determination of eligibility for VR services.

The DSU entered into an exclusive Interagency Agreement with the Department of Education in October, 2017. The Agreement lays out the Purpose of the Agreement, VR responsibilities, DOE responsibilities, and mutual responsibilities. We were aided by WINTAC, an RSA technical assistance contractor. Training has begun across the state at

the Special Education Study Councils and is currently being provided at the Partners in Education Conference, February 6-8, 2018.

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 Division's staff is invited and to the extent possible participates in these IEP meetings.

The Division has been under an Order of Selection since 2001. Under the current Order, the Division is able to provide direct services to those eligible individuals in Priority Category 1 and Priority Category 2. The Division was able to open Priority Category 2 effective September 30, 2012. There was a release of clients from the waiting list in Priority Category 3 on October 1, 2013. From January 2015-March 2015 all PCs were closed for the provision of new services. This was a brief closing and Priority Categories 1 and 2 were re-opened in March 2015. The opening and release of clients from the waiting list allows for the provision of direct services to significantly more students with disabilities. The Division provides information and referral services to help all applicants find services through other agencies and entities. The inclusion of Pre-Employment Transition Services (Pre-ETS) will allow for the provision of the five stated Pre-ETS services for those students with a disability who are eligible or potentially eligible for VR services.

The IEP team, which should include the Division's staff when invited and when available, parent and student, determines that the student should be referred for VR services. The Division's staff should inform the student and parents, preferable at the IEP meeting, the purpose of the vocational rehabilitation program. VR Staff make every effort to attend IEP meetings, however due to staff resources this is not always possible. However information regarding VR Services is made available during IEP meetings.

The Transition School to Work Unit within the VR program is working with the Department of Education on how to incorporate VR services information into the IEP meeting. The Director of the Unit has been trained on Easy IEPs. In the provision of the Pre-Employment Transition Services, students with disabilities and their families will start receiving information on VR services as early as age fourteen. Information will be made available to Middle school staff in order to assist with the beginning the transition.

Beginning in October 2015, these IEP meetings will include information on Pre-Employment Transition Services (Pre-ETS) services that are available at age 14. Pre-ETS services are available to students with disabilities ages 14-22. Pre-ETS services can be provided without an application for VR services. For those individuals that are interested in applying for services, the information should include the application procedures, the eligibility requirements including the Order of Selection, and the potential scope of services that may be available. As soon as possible after referral, the Division takes an application from the student and determines eligibility as well as whether the student is in an open priority category. If the student is in an open priority category, the Division's staff assists in the formulation of the student's IEP and the student's vocational rehabilitation Individualized Plan for Employment as soon as it is determined that the student can benefit from services provided by the Division in preparation for exiting the

school system and transitioning into training and/or employment. Services provided by the Division may include attending job fairs, community vocational adjustment training and pre-employment, vocational skills training, college prep, and job readiness training.

The DSU has chosen to provide Pre-Employment Transition Services through Transition School to Work Contracts, Pre-ETS contracts, LOAs and direct staff contact.

VR is providing application materials to the school for the students to become recipients.

The DSU has hired 9 Pre-Employment Transition Specialists and 3 Pre-employment Transition Supervisors to coordinate services provided in their areas, identify Local Education Agencies (LEAs) who have a need for Pre-Employment Transition Services, and recruit Community Rehabilitation Providers (CRPs). They will 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 will work with the schools to identify students who are of working age who want to become VR clients and make referrals to the VR Counselor assigned to the school.

There are 28 Pre-Employment Transition Community Rehabilitation Providers providing services.

The LEA's involved in the interagency agreement with the Division should cooperate in developing and coordinating services for students and youth with disabilities within each respective agency's legal authority. The ultimate goal of each agency participating in the agreement is to provide, or cause to be provided, a continuum of appropriate services leading to transition from school into employment. The agreement provides for:

1. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including vocational rehabilitation services;

2. Consultation and technical assistance on providing reasonable accommodations;

3. Transition planning by personnel of the Division of Rehabilitation Services and the educational agency for students with disabilities that facilitates the development and completion of their individualized education programs under section 614(d) of the Individuals with Disabilities Education Improvement Act (IDEIA) of 2004 (P.L. 108-446);

4. 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

5. Procedures for outreach and identification of students with disabilities who need transition services.

A VR counselor is assigned to work with each local education agency (LEA) for the purposes of referrals, eligibility determination and the provision of services to eligible students. In twenty-one LEAs, the VR counselor is dedicated to the LEA under a contract with the LEA. VR counselors provide technical assistance to school personnel and LEAs

to help them identify appropriate referrals for vocational rehabilitation services. The VR counselor also provides information and referral to students not eligible for VR services.

In 2014 VR transitioned from VR counselors to TSW grants to work in the school systems. There are currently 38 TSW grants serving 42 LEAs.

It is the Division's policy that the development and approval of the IPE for each student determined eligible for VR services occurs as soon as it is determined that the student can benefit from services provided by the Division. An IPE must be developed before the student leaves the school setting.

The interagency agreement identifies the financial responsibility of the Department of Education (DOE) to ensure that individuals who are IDEIA eligible receive a free appropriate public education (FAPE) in the least restrictive environment. A free appropriate public education means regular and special education and related services which:

1. Are provided at public expense, under public supervision and direction, and without charge to the parent;

2. Meet the standards established by state law, including the requirements of IDEIA Part B and the Rules, Regulations and Minimum Standards for the Governance of Tennessee Public Schools, issued by DOE;

3. Include preschool, elementary school, and secondary school (including appropriate vocational, career or work experience education); and

4. Are provided in conformity with an IEP.

The interagency agreement relates the financial responsibility of the Division to ensure that individuals who are IDEIA eligible and meet the Division's eligibility requirements will receive VR Services. VR Services means any services necessary to determine eligibility and those services described in an IPE necessary to assist an individual with a disability in preparing for, securing, retaining, or regaining an employment outcome that is consistent with the strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of the individual.

The LEA is responsible for the educational costs related to the provision of special education and related services for the individual attending school. The agreement states that if another public agency is obligated under federal or state law or assigned responsibility under state policy to provide or pay for any services that are considered special education or related services and are necessary for ensuring FAPE to students who are IDEIA eligible, the public agency shall fulfill that obligation or responsibility, directly, through contract or by another arrangement. However, failure of that public agency to pay for that service does not relieve the LEA of its obligation to provide that service to an individual with a disability in a timely manner.

The Division is responsible for all costs necessary for eligibility determination and provision of services under an IPE. The Division must take into account 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 Division's staff maintains a working relationship with special education supervisors, vocational education supervisors, directors, secondary school guidance counselors, and LEA administrators for the purpose of providing outreach for students with disabilities and technical assistance to school personnel to assist LEAs in preparing students with disabilities for career opportunities. The Division participates in in-service training programs for LEAs, as well as in statewide special education conferences for the purpose of providing information regarding VR services. The Division also participates in and organizes local community job fairs, job clubs, attends civic club/organization meetings to inform students and parents of the purpose of the VR program, the application procedures, the eligibility requirements, and the potential scope of services that may be available.

Other activities to identify students with physical, mental or emotional disabilities who do not meet the criteria for special education services (commonly referred to as Section 504 services) include completion of student health survey forms coordinated with guidance counselors or general education teachers.

It is the Division's intent to develop relationships with LEA middle or junior high schools to provide consultation for students with disabilities who are about to enter high school.

The Division has two dedicated full-time state office position that coordinate transition services statewide. One position is focused on the provision of the Pre-Employment Transition Services (Pre-ETS) to students with disabilities. The other position serves as liaison with the State Department of Education and other partners in the interagency agreement to provide technical assistance and training related to vocational rehabilitation services. Both positions work with VR counselors and supervisory staff to improve access and services for students with disabilities. In addition, both positions identify, arrange for, or provide training to the Division's counselors, educators, students with disabilities, and families in a variety of areas related to transition services. On a yearly basis, staff in the Transition Unit provides presentation at the Partners in Education that is sponsored by the Department of Education.

The Division currently contracts with forty-four LEAs as part of its transition initiative. The contracts provide for a menu of needed and additional services chosen by the LEA to assist in the transitioning of students from school to work. All services provided under these contracts/agreements have a VR employment focus. All services provided under these contracts/agreements are in keeping with all state plan requirements to include our state's Order of Selection requirements. Services provided under these contracts/agreements are only available to applicants for, or recipients of, services of the Division. The Division will strive to increase the number of contracts with LEAs as allowed by the Division's and LEAs' funding availability.

Although the Division utilizes contracts with LEAs as part of its transition initiative, all decisions affecting eligibility for VR services, the nature and scope of available services, and the provision of these services remain the sole responsibility of the VR counselor

employed by the Division. VR staff is responsible for determinations to close cases and for all allocations of expenditures for services.

The Division in partnership with 6 LEAs and the Council on Developmental Disabilities, operates 6 High School Transition Project Search Sites. Those Sites are located as follows: • Memphis/Shelby County-LeBonheur Children's Hospital • Nashville/Davidson County- Embassy Suites Downtown • Murfreesboro/Rutherford County-Embassy Suites • Blount County -Maryville College • Jackson/Madison County- Jackson Madison Hospital • Clarksville/Montgomery County-County Government offices

Project SEARCH is in the second year of a 3 year state rollout. There are currently 9 programs with 72 interns. 54 of the previous year's interns are employed for a 66% successful employment rate. One site had an employment rate of 100%.

Project SEARCH has added an additional high school transition site at: • Sheraton Downtown in partnership with Shelby County Schools

A two-day Project SEARCH® orientation was held in Knoxville, TN in November, 2017. There were 4 potential programs who participated in the orientation and 3 have chosen to move forward and form a Steering Committee.

2. Information on the formal interagency agreement with the State educational agency with respect to:

A. consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

Information regarding this question is included with the response to question 1 in this section.

B. transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

Information regarding this question is included with the response to question 1 in this section.

C. roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

Information regarding this question is included with the response to question 1 in this section.

D. procedures for outreach to and identification of students with disabilities who need transition services.

Information regarding this question is included with the response to question 1 in this section.

e. Cooperative Agreements with Private Nonprofit Organizations

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

Based on information gathered by continuing statewide studies, the annual facility survey of public and private community rehabilitation programs and the on-going monitoring and annual evaluation of effectiveness, the Division continues to maximize the use of community rehabilitation programs to provide rehabilitation services in the most integrated setting possible consistent with the informed choices of the individual.

The Division is utilizing community rehabilitation programs (CRPs) throughout the state as follows:

I. The Division's Facility Program:

A. The Tennessee Rehabilitation Center (Center) at Smyrna is a state operated comprehensive residential rehabilitation facility that serves individuals with significant disabilities. The facility is accredited by the Commission on Accreditation of Rehabilitation Facilities (CARF) in programs of comprehensive vocational evaluation services, employee development services, and employment skills training services. The Center offers the following program and support services:

i. Program Services

• Comprehensive vocational evaluation and mobile evaluation services

• Employment Readiness Program (ERP) a pre-employment and life skills training program to encourage positive work behaviors and independence.

• Occupational skills training in automotive maintenance/detailing, manufacturing, garden center services, retail, business education, food service, warehouse training, power equipment operations, and pharmacy technician.

• Physical Rehabilitation Services to include: Work Conditioning and Work Hardening, Occupational and Physical Rehabilitation, Spinal Cord Injury Program, Personal Care Attendant training, Vision Rehabilitation, Independent Living Skills, Equipment Operation Screens and Adaptive Equipment Assessments.

• Traumatic brain injury services to include: Case Management, Occupational, Physical, and Speech/Language Pathology to include cognitive therapy; Vision Rehabilitation, Therapeutic Golf Rehabilitation, Vocational Evaluation and Assessments; Behavioral instruction, Job Skills/Readiness training and Community Re-entry training.

• Vision impairment services to include: pre-vocational assessment, training for independent living to include adaptive kitchen skills and home management skills; braille, Orientation & Mobility training, Adaptive communication skills, assistive technology assessments and training; computer training; and prerequisite evaluation and training for entry into Tennessee Business Enterprises.

ii. Support Services

• Campus Life Services (Residential Living) • Student Health Services to include Medical Dormitory • Case management services • Psychiatric and physician services • Recreation therapy and leisure-time skills • Remedial education • Job seeking skills training • Psychological services • Independent living skills training • Autism Support Services • Deaf Service • Behavioral Education

The Center operates at a program capacity of 190 individuals with an annual enrollment ranging from 700 - 1000 Tennesseans with significant disabilities each year.

The Center is a member of the National Consortium of State Operated Comprehensive Rehabilitation Centers. An Advisory Council is utilized to provide valuable feedback used in guiding decision making in Center operations and program development. In addition, the Center conducts exit customer satisfaction surveys on all individuals completing services, and conducts client family surveys, as well as a referring counselor needs assessment and satisfaction survey on an annual basis. Feedback obtained from these survey instruments is also used in guiding decisions about current and future support services and program services operations, as well as accessibility and physical plant operations.

B. A network of 17 Tennessee Rehabilitation Centers (TRCs) is located across the state providing day services to eligible individuals with significant disabilities, seeking competitive integrated employment. All community TRC facilities are accredited by the Commission of Accreditation of Rehabilitation Facilities (CARF) in programs of comprehensive vocational evaluation and employee development services. The TRCs are supported by a combination of appropriated local and Federal funds.

i. Program Services

• Comprehensive vocational evaluation services provide an individualized, timely and systematic process for identifying viable vocational options and developing employment goals and objectives.

An accredited comprehensive vocational evaluation service is used to examine a wide range of employment alternatives using the following techniques:

1. Assessment of functional/occupational performance in real or simulated environments 2. Psychometric testing 3. Preference and interest inventories 4. Personality testing 5. Extensive personal interviews 6. Other appropriate evaluation tests depending on the individual 7. Analysis of prior work experience and transferable skills

ii. Employee Development Services 1. Services are based upon individual needs and can include comprehensive employment services or any individual component. 2. Employee development services and/or job readiness instruction 3. Work skills development through a facility workshop: including the use of contract work, job readiness assessment and training. 4. Community Employment Services include: (job development and placement) 5. Job readiness assessment and instruction includes: interview skills instruction, completing a job application, developing a resume, grooming and hygiene for the work place, self-determination training, developing and using job-finding networks and resources. 6. Job development and placement into competitive employment through the identification of employment opportunities in the local job market 7. Development of

realistic employment goals 8. Establishment of service plans to achieve employment outcomes 9. Identification of resources to achieve and maintain employment.

TRC facilities conduct exit customer satisfaction surveys on individuals completing services from each program of service provided, completes a yearly survey with clients receiving services, referring counselors, contract providers, funding sources, employers, and other identified stakeholders. Feedback obtained from the surveys is used to improve program services.

II. Service Contracts:

A. The Division plans to continue service contracts with the following community rehabilitation providers to ensure quality services statewide provided funding is available:

• Clovernook • Department of Education • National Federation for the Blind • Southeast TN Human Resource Agency • Technology Centers: East Tennessee Technology Access in Knoxville; Signal Centers; Technology Access Center of Middle Tennessee in Nashville; West Tennessee Special Technology Access Resource (STAR) Center in Jackson; and Mid-South ACT in Memphis • Tennessee Disability Coalition Benefits to Work • University of Tennessee, Center for Literacy Education and Employment • Cincinnati Children's Hospital Medical Center • Statewide Independent Living Council • STAR Center • Department of Education • Department of Labor and Workforce Development • Department of Mental Health and Substance Abuse • Department of Intellectual and Developmental Disabilities

B. The Division has two service contracts with community rehabilitation programs (Clovernook and Volunteer Blind Industries, Inc.) serving visually impaired clients in the areas of evaluation, adjustment, activities of daily living, orientation and mobility, training, job development and employment.

The Division has four service contracts with Center for Independent Living (CIL)-IL expanded outreach (Empower TN, Jackson, Memphis, and Training Advocacy Referral and Peer Support (TARP). These services are provided in accordance with the 2017-2019 State Plan for Independent Living. To conduct needs access to identify independent living needs of people with disability in Tennessee.

The Division has five service contracts for deaf services and advocacy services (Frontier Health, Interpreting Services for the Deaf, doing business as DeafConnect of the Mid-South, Jackson Center for Independent Living, Knoxville Center for the Deaf, and Partnership for Families, Children and Adults.) They provided outreach, referral and advocacy, interpreting services to the deaf, deaf/blind, and the hard of hearing individuals.

III. Letters of Agreement

A. Beginning in FFY2013, the Division began a rewrite of the Letters of Understanding (LOU), to change them to Letters of Agreement (LOA). The LOA has the same purpose as the LOU in that it is an agreement between the Division and the Community Rehabilitation Programs and in cooperation with the Department of Finance and Administration. The LOA describes the functions and responsibilities of the Division and the CRP as well as the scope of services and payment methodology agreed upon by both

the Division and CRP in a joint effort of improving and expanding employment opportunities for individuals with disabilities.

Some of the differences in the LOAs from the LOUs are: • Concentrated focus on outcomes rather than services • Different payment schedule based on Priority Category assignment of the client • Bonus for exceptional wages • Streamlined application and approval process

CRP's must apply and be approved for a LOA each year. The application period is in the Fall (October, November). LOAs are effective during the calendar year each year, January thru December.

For State Fiscal Year 2017-2018, the Division has 142 total LOAs with CRPs throughout the state.

• 84 LOAs for Vocational Assessment • 32 LOAs for Vocational Adjustment Services • 83 LOAs for Trial Work Experiences • 115 LOAs for Job Placement Services • 92 LOAs for supported employment services • 12 LOAs for Pre-Employment Transition Services

The Divisions Facility Programs, Service Contracts and Letters of Agreements are used to provide needed services such as but not limited to: • Vocational evaluation • Personal and vocational adjustment training • Transportation and daily meals • Vocational training • Job readiness training • Job development and job placement • Supported employment • Rehabilitation technology • Orientation and mobility • Activities of daily living • Trial work experiences • Follow-up • Pre-Employment Transition Services

The VR Program is finalizing the implementation of Customized Employment Services and extended services to youth with most significant disabilities who require supported employment.

f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

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

1. The Department of Intellectual and Developmental Disabilities for individuals with intellectual and developmental disabilities; 2. The Department of Mental Health and Substance Abuse Services for individuals with mental illness and substance related disorders; 3. The Tennessee Employment Consortium, 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 to provide a forum for all stakeholders to review and discuss state policies and share best practices; 4. University of Tennessee, Center for

Literacy Education and Employment to provide staff training and development and consultation services for community supported employment service providers; and 5. Tennessee Department of Labor and Workforce Development, to provide customized employment services through their system of Career Centers on behalf of VR clients and business and industry. The Department of Mental Health and Substance Abuse Services for individuals with mental illness and substance related disorders. Utilizing an evidence based Individual Placement and Support (IPS) model of supported employment; Tennessee Division of Health Care Finance and Administration, Division of TennCare for provision of employment services for individuals enrolled in Employment and Community First CHOICES. The Department of Education for the provision of Pre-Employment Transition Services.

The Division has encouraged the establishment and development of Community Rehabilitation Providers (CRPs) to improve and expand services through Letters of Agreement. The Letter of Agreement (LOA) is an agreement between the Division and the CRP. The LOA describes the functions and responsibilities of the Division and the CRP as well as the scope of services and payment methodology agreed upon by both the Division and CRP in a joint effort of improving and expanding supported employment and extended services for individuals with disabilities. The Division currently has 92 LOAs for supported employment services. The Division continues its' efforts to increase S.E. providers and anticipates the numbers of providers will increase. VR is actively pursuing a number of other providers for underserved areas across the state.

g. Coordination with Employers

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR services; and

In Tennessee, the Vocational Rehabilitation Program employs Business Employment Consultants (BECs) in order to facilitate the relationships between businesses and the VR Program.

• Role of the State Business Employment Consultant and Business Employment Consultants (BECs): Facilitate employment opportunities for persons with disabilities by providing services and resources to assist Tennessee businesses in recruiting, hiring, returning to work, and retaining employees with disabilities. • Number and location of the BECs: Currently, there are a total of 11 BEC's positons statewide and the positions are located in the following regions: region 1, region 2, region 3, region 4, region 5, region 6, region 7, and region 8. There is also a Statewide Business Employment Consultant located in state office, which assists with statewide participation in the Talent Acquisition Portal (TAP) that is managed by the Consortium of State Agencies of Vocational Rehabilitation (CSAVR).

According to the Tennessee Department of Labor and Workforce Development, the rapid rise of technology, rebounding manufacturing and construction, and large presence of the

healthcare sector are expected to offer numerous jobs for those looking for work. Tennessee's current unemployment rate is at 3.2% and nationwide it is 4.2%.

WIOA expands the VR Program's customer base as Business becomes a recognized partner of the program. As this concept continues to grow, the VR Program is developing more Initiatives with Businesses in order to provide more opportunities for competitive integrated employment and career exploration opportunities. • Business Initiatives: The Division conducts several business initiatives across the state such as Walgreens' REDI programs, Project Search East TN Children's Hospital and UT Medical Center, Kroger/Peyton's distribution centers, AutoZone distribution centers, Vanderbilt University Cummins, Auto Zone, Cracker Barrel, Food City, Allegro, Phoenix Boats, and Veteran's Administration- Johnson City.

• Role of the state agency with 503 Compliance: Tennessee VR BECs work with contacts established through the US Department of Labor's Office of Federal Contract Compliance Programs as a resource to assist federal contractors in addressing the Final Rule of Section503 of the Rehabilitation Act of 1973. The BECs participate in regional/local meetings to provide information about services and job candidates available through Tennessee's VR services. The BECs assist in recruiting efforts by linking businesses with qualified applicants.

• Additional business initiatives for the agency are: The TN Rehabilitation Center at Smyrna has developed customized training partnerships with Schwan Cosmetics, Walgreens, and CVS Caremark to develop curriculums specific to their hiring requirements which build capacities for diversity within companies.

VR has been working with NASA at Marshall Space Flight Center as a resource to assist in their efforts of 503 compliance. TN VR and Alabama VR has been coordinating efforts to assist in their hiring efforts.

TRC continues to develop new partnerships and keep the relationships of its current partners. This makes the training experience for the students available in many different areas. Auto Detail/Lube has had a long relationship with Od's Car Wash and Detail in Murfreesboro, TN and has developed a recent commitment for internships with Nashville's Auto Art Body Shop. Food Service recently signed a partner agreement with Jim N'Nicks Bar-B-Q that will allow students to intern. Another longtime partner is the local ProCharge Company in LaVergne. TRC is also excited about employers such as Publix, Walmart, and Onin staffing who have recognized the great skill sets of our clients and hired recent graduates for their companies.

The Tennessee Rehabilitation Center at Smyrna has also established agreements with local employers to provide career exploration, externships, and internship training opportunities on site. New agreements are being signed on a regular basis.

2. transition services, including pre-employment transition services, for students and youth with disabilities.

Pre-Employment Transition Services (Pre-ETS) is a set of 5 services available to students with a disability ages 14-22 who are eligible or potentially eligible for VR services.

These services should be provided in a collaborative manner with the recipient's educational provider.

Fifteen percent (15%) of the Basic VR grant must be set aside for the provision of Pre-ETS services. TN VR provides the 5 Pre-ETS services through contracts with qualified Community Rehabilitation Partners (CRPs), Local Education Agencies (LEAs) and/or VR staff.

The 5 Pre-Employment Transition Services are: 1. Job Exploration Counseling can be provided in classroom or a work setting of in-demand occupations. Counseling can include completing interest inventories to determine a student's interests, job shadowing, exploration of Career Pathways, and researching local labor market information that apply to the student's interests. 2. Work-Based Learning Experiences, which may include in-school or after-school opportunities, or experiences outside of the traditional school settings (including internships). It is provided in an integrated environment in the community to the maximum extent possible; 3. Counseling on Post-Secondary Opportunities, which may include exploration and preparation for enrollment in comprehensive transition or postsecondary education programs at institutions of higher education; 4. Workplace Readiness Training for the development of social skills and independent living skills necessary for successful employment. This may include skill acquisition as well as opportunities to apply newly acquired knowledge. 5. Instruction in self-Advocacy, which may include Self-Determination, Life Skills Training and peer mentoring from individuals with disabilities working in competitive integrated employment. Recipients learn about their rights, responsibilities, and how to request accommodations for post-secondary education placement as well as employment.

h. Interagency Cooperation

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. the State Medicaid plan under title XIX of the Social Security Act;

Tennessee is an Employment First State, and there is an established Employment First Task Force. The Employment First Task force facilitated the completion of a Memorandum of Understanding for services to youth with disabilities between the following State agencies: • Vocational Rehabilitation • Department of Education • Department of Intellectual and Developmental Disabilities • Department of Labor and Workforce Development • Department of Mental Health and Substance Abuse Services • Council on Developmental Disabilities (Oversees the Implementation of the MOU)

In Tennessee the agency that administers the State Medicaid plan is the Bureau of TennCare. The VR Program is developing a Memorandum of Understanding with the Bureau of TennCare. The VR Program has developed a Memorandum of Understanding with the Department of Developmental and Intellectual Disabilities.

In conjunction with the Department of Mental Health and Substance Abuse Services, the VR program is providing supported employment to individuals with severe and persistent mental illness under the Individual Placement and Supports Model. In Federal Fiscal

Year 2015 there were 351 total SE cases in Status 26 (VR program only). At least 15.38% or 54, were from IPS. The VR Program plans to expand the IPS program into other areas of the state in Federal Fiscal Year 2016.

2. the State agency responsible for providing services for individuals with developmental disabilities; and

Information regarding this question is included in the response to question 1 in this section.

3. the State agency responsible for providing mental health services.

Information regarding this question is included in the response to question 1 in this section.

i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. Data System on Personnel and Personnel Development

A. Qualified Personnel Needs.

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;
The Division received 7,692 applications for new services in FY2014 and provided services to 21,545 eligible individuals. In FY2015, the division received 6,782 applications and provided services to 19,500 eligible individuals.

The Division currently has 610 allocated positions. Of these 610 positions, 174 are currently vacant (28.5%). Out of the 610 positions 334 positions provide direct client services. 101 of the direct client services positions are currently vacant. All VRC position are filled at the Master’s degree level. The CSPD requirement in Tennessee is eligibility to sit for the Certified Rehabilitation Counselor (C.R.C.) exam. All current counselors will meet the CSPD requirement by January 1, 2018. When new staff are hired at the Master’s degree level, if they do not meet the CSPD at the time of hire, they have 36 months to meet the requirements

As a result of changes regarding personnel in WIOA, TN will we assessing current staffing patterns and staffing needs.

The Tennessee Division of Rehabilitation Services utilizes a department wide on—line computer system known as Edison for collecting and tracking all personnel actions relative to positions being vacated (resignations, terminations, retirement) as well as tracking personnel data relative to filling vacant positions (new hires, position transfers and/or promotions). Job Title-Total positions-Current vacancies-Projected vacancies over the next 5 years: Administrative 17 3 0 Clerical 77 23 0 Rehabilitation Assistants 66 14 0 Supervisors 86 18 0 Support 20 5 0 Instructor 44 5 0 VR Direct Client Services Staff 243 100 0 Medical 28 4 0 BEP Specialist/Consultant 15 0 0

ii. The number of personnel currently needed by the State agency to provide VR services, broken own by personnel category; and Information regarding this question is included with the response to question A in this section.

iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and
Information regarding this question is included with the response to question A in this section.

iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.
Information regarding this question is included with the response to question A in this section.

B. Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;
In Tennessee, there is one university that has Council on Rehabilitation Education (CORE) certified program offering a master’s degree in rehabilitation counseling. It is The University of Memphis, located in the western part of the state.

The University of Tennessee at Knoxville (UTK) has a current enrollment of 17 students in its distance education program, 5 of whom are employees of the Division. Of the 17students currently enrolled, 5 have disabilities and 3 students represent a minority. For the federal fiscal year (10/13 — 9/14), 3students graduated from the program. All 3 graduates met the academic criteria to sit for the Certified Rehabilitation Counselor (CRC) exam.

The University of Memphis currently has 18 graduate students in their on—campus program. None (0%) of these students are employed by the Division.

Institutions-Students enrolled-Employees sponsored by agency and/or RSA-Graduates sponsored by agency and/or RSA-Graduates from the previous year:

University of Memphis 18 0 0 57 University of TN — Knoxville 17 5 5 15

ii. the number of students enrolled at each of those institutions, broken down by type of program; and
Information regarding this question is included in the response to question (i) in this section.

iii. the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.
Information regarding this question is included in the response to question (i) in this section.

2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

Information regarding this question is included in the response to question (i) in this section.

3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

Members of the Division’s leadership team have quarterly contact with the program administrators at the University of Tennessee and the University of Memphis for the purpose of planning and sharing information relative to personnel development activities. The Rehabilitation Services Training Unit staff also meets or corresponds with University of Memphis staff for the purpose of gathering information regarding the number of students enrolled in their respective rehabilitation counselor education programs, as well as the number who graduated from their programs during the past year.

To advance recruitment activities, the Division has dedicated a program specialist position. This program specialist is actively seeking out other masters level programs across the nation; primarily those with RSA funded slots, to increase the number of

incumbent staff in masters programs. Other duties of the program specialist include developing/distributing recruiting brochures at job fairs, speaking to graduate level programs to promote state employment in the rehabilitation field and encouraging incumbent staff to take advantage of graduate level training opportunities in rehabilitation counseling distance learning programs. The Division recognizes that recruitment activities are also the responsibility of counseling, supervisory and management level staff across the state with these personnel involved in recruitment activities in their regional and local communities.

The Tennessee Excellence, Accountability and Management (TEAM) Act of 2012 is designed to establish methods for attracting, selecting, retaining and promoting the best applicants and employees based on performance and equal opportunity, free from coercive political influence, and to provide technically competent employees to render impartial service to the public at all times.

The TEAM Act will give agencies greater flexibility in personnel management and increase customer focused effectiveness and efficiency in a best practice environment, and by doing so, will allow the Division to strengthen its efforts to hire and retain top quality counselors.

The division has had over twelve (12) interns serve in a variety of capacities at regional offices and community rehabilitation centers during the past two (2) years. Five (5) of them have been rehabilitation counseling graduate students completing their practicum and 600-hour internships, of those three (3) have been hired as master VR counselors. One intern chose to work for Veterans Administration and the other went to work for a non-profit agency.

Current incentives for incumbent staff to participate in a Master's degree program include financial assistance with tuition, books, fees, and minimal educational leave. Funding for a pay incentive based upon successful completion of a Master's Degree program was approved in January 2005 for graduates and has been requested and approved for each successive graduate.

The Division continues to explore retention strategies for qualified staff. Exemplary counselors are given priority for attendance at various out-service training events in recognition of their hard work, dedication and commitment to assisting individuals with disabilities in achieving their employment goals.

In WIOA the definition of qualified personnel has undergone some changes. The Vocational Rehabilitation Program will be assessing its current staffing patterns to ensure qualified personnel are available.

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.

Information regarding this question is included with the response to question A in this section.

4. Staff Development.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. System of staff development

a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

The Office of Professional Development (OLPD), is a section of the Office of General Counsel (OGC) - Human Resources and Professional Development (HRPD) division of the Department of Human Services (DHS). OLPD provides staff development and training for DHS employees, and in so doing, conducts training needs assessments and provides training opportunities (mandatory and elective) to enhance staff competencies and skill sets. OLPD has dedicated staff to provide support for Rehabilitation Services and works in conjunction with the Rehabilitation Services division in the development of training necessary to ensure effective, outcome driven results. The development of core competencies for effective service delivery is an integral focus of Rehabilitation Services training. Additionally, HRPD provides performance management support to all DHS employees in alignment with the goals and priorities established by the Governor and the Commissioner of DHS. HRPD has processes in place to create individual performance plans and on-going evaluations of employees' performance in each division, including rehabilitation services.

Additional data is collected relative to training needs through the following methods: 1. Input from staff in all job classifications compiled into a statewide training needs report; 2. State rehabilitation management and administrative staff input; 3. State Human Resources Department training division mandates; 4. Rehabilitation Services Administration guidelines; 5. Recommendations of the State Rehabilitation Council and the Statewide Independent Living Council;

Program case reviews conducted by the Department's Performance Management Unit (QUISS) division of DHS are also utilized to identify strengths and deficiencies among staff and related training needs.

Staff was encouraged to give feedback on what they thought were their training needs. Outcomes of this internal review yielded the following training related recommendations:

OLPD sends out a training effectiveness survey that asks respondents of training needs.

1. Additional human resources to meet statewide need for new and incumbent staff training; 2. More timely delivery of training for new counselors; The OLPD standard is to provide (or at least begin) new employee training within 90 days of hire. 3. Expand the new counselor curriculum to be more comprehensive /incorporate more hands- on activities to reinforce knowledge and skill sets; The comprehensive NCI 6 week training

curriculum was presented to learners in 2013 and has continued ensuring current policy by completing revisions prior to each new session. 4. Provide refresher training for incumbent staff relative to the Division's policy and other disability related topics; and Counselor policy Refresher training was developed and was scheduled for quarterly or semi-annual facilitation. To this point, only one statewide refresher training consisting of three sessions was approved and was held in September of 2014. 5. Additional/follow up training regarding the new online case management system.

As a result of these staff recommendations, the Rehabilitation Services Training Unit, under Division of Human Resources and Professional Development is implementing the following strategies: 1. There are four VR training positions and one program coordinator. Of the four VR/ OLPD trainers, in addition to maintaining current policy and TRIMS knowledge to facilitate segments of NCI and Counselor Refresher training, each trainer is assigned a specific area of focus based on specialized training and/or experience. Currently, one trainer is assigned to work specifically with sensory loss units; one is assigned to work with community TRC; one with Smyrna TRC; and one with TSW program in light of all the WIOA policy implications. 2. All new counselors will be expected to participate in the new counselor training within the first 3 months of employment. 3. The previous two one-week training sessions for new counselors has been significantly expanded (2012/2013) to a new curriculum. The curriculum is an intensive, hands-on training, utilizing a variety of training modalities to include navigation of the new online case management system, case studies/scenarios, and individual and group discussions. Additionally, PowerPoint presentations, facilitator guides, participant guides, handouts, assessment questions and related materials are being revised to include recent policy revisions and updates as changes occur. 4. OLPD staff has provided regional and district policy trainings per contacts with regional and district supervisors to determine and address training needs. 5. OLPD has had in place for several years a training website entitled the Training Resource Website (TRW) whereby all training materials will be posted to enable trainers and supervisors to access training modules for disability related training topics. 6. Following implementation of the online case management system, follow up regional training sessions were conducted to further illustrate how to navigate the system and provide answers to staff questions. A new state office position was also added in recent years to serve as a resource to field staff in providing guidance in navigating/utilizing the new online case management system. TRIMS is being updated to include forms and processes that are consistent with the recent policy revisions.

VR Program contracted for online course system offered by the VR Development Group (VRDG). All courses are designed for the field of VR. VRDG is the only organization offering accessible, interactive multimedia courses in the VR field. VRDG information is continuously updated and includes changes from WIOA and the 2017 CRC Code of Ethics. Course topics include: Effectively Managing VR Caseloads, Autism Spectrum Disorders and Employment, Introduction to VR, Comprehensive Assessment, and Job Development and Employment Acquisition (to name a few). These trainings are available 24/7. Supervisors choose the sessions for their staff. At the end of each session there is a quiz to check for learning and comprehension.

As part of the new Performance and Quality Improvement process, focus groups were formed to identify new employee specific training needs relative to each job position/classification. These focus groups laid the foundation for the development of a progressive training curriculum to include standards for measuring performance at three, six and nine month increments during the probationary process. Utilizing this process to identify specific training needs and a subsequent training curriculum relative to each job position/classification has proven to be a more effective means of identifying and addressing training needs than staff surveys conducted in the past.

Below are the top 5 training priorities based on staff and management feedback: 1. Leadership/supervisory training provided through the New Supervisor Academy (NSA); All new supervisors must attend a three week New Supervisor Academy session, delivered by the Department's OLPD division, to enhance and develop their leadership skills. 2. Caseload management (moving a case through the VR process, critical casework activities such as eligibility determination, plan development, budgeting, etc.). This training is provided as part of the New Counselor Institute (NCI) and as needed to incumbent VR counselor staff. 3. Communication skills/customer service (interviewing skills, effective communication, how to deal with difficult people, cultural diversity) VR/OLPD staff has information included in the NCI, counselor refresher and community TRC staff training modules regarding appropriate and professional communication, interviewing, and cultural awareness. TN Department of Human Resources, DoHR has courses available which are currently being delivered to management staff by OLPD staff members, who have become DoHR certified trainers, on topics of Customer Service, Respectful Workplace, and Civil Rights. 4. Employment / placement training (including disability disclosure) NCI covers some on disability disclosure. The module recently developed on job development and placement for sensory loss staff could be modified for delivery to all counseling staff as well as Business Employment Consultants. 5. General on-boarding for new employees (vision/values, people first language, respectful workplace, customer service, ethics, and departmental and division organization).On boarding training has been revised and is being reviewed by DOHR. NCI addresses vision and values and people first language as well as Departmental and divisional organization. As is noted above Customer Service and Respectful Workplace are provided by certified facilitators as part of the onboarding training.

Based on the recommendations VR has provided VRDG training on effective case management to improve counselors understanding and implementation of VR case management.

The Tennessee Rehabilitation Center at Smyrna also holds staff in-service two times per year and includes training and workshops designed to improve the effectiveness and efficiency of vocational training programs offered.

The Division continues to provide on-going training and technical assistance regarding the Americans with Disabilities Act to staff and the general public, including business and industry. As part of the on-boarding process, counselors also receive training relative to the Rehabilitation Act of 1973 and subsequent amendments.

The Division continues to contract with technology centers across the state for training and technical assistance in rehabilitation technology services. Rehabilitation technology

contracts are in place with the East Tennessee Technology Access Center (Knoxville), Technology Access Center of Middle Tennessee (Nashville), West Tennessee STAR Center (Jackson), Signal Center (Chattanooga), and Mid-South Access Center for Technology (Memphis).

The Divisions employees continue to receive specialized training in assessment and vocational evaluation activities. Through a partnership with the University of Memphis, vocational evaluators receive extensive instruction in the appropriate selection of assessment tools, interviewing skills, evaluation techniques and report writing. The contract with the University of Memphis has expired. Current training on Vocational assessment and evaluation is being provided by Tami Long, the OLPD/RS training director who has nine years of experience as an evaluator, and maintains both the CRC and the Vocational Evaluation Specialist certification (CVE) through The Commission on Rehabilitation Counselor Certification. Statewide Vocational Evaluator training was provided in September 2015 for all community TRC evaluators and mangers. Training covered interviewing skills, scheduling, evaluation techniques, choosing assessments, and report writing.

Evaluators complete a competency examination with subsequent training provided based on the individualized needs of each employee. New counselors receive, via a new counselor training program, training relative to assessments, vocational evaluation and interpreting medical and psychological reports to assist them in acquiring skills to identify the specific strengths and weaknesses of individuals with disabilities. Training in the areas of vocational counseling, job placement and other topics relevant to client service delivery continue to be focal areas for the Division. The training noted above was delivered to incumbent staff as the pilot for the new VE training. This training will become the new employee training and will be provided within 90 days of hire as approved by program. All evaluators will be expected to submit reports for review and will receive training based on individual needs.

Division employees are encouraged to participate in web-based training events as offered through the Department and other Agencies, as appropriate. The Vocational Rehabilitation Program was approved for a one-time no cost extension to the training grant funds offered from RSA. These funds will allow the program to continue to provide training to staff.

While dedicated funding is no longer available, the Division has begun exploring other cost affected means of providing staff development through the purchase of modular web-based training that allows the Division to purchase high quality training as needed through contractual partnerships.

The Office of Learning and Professional Development (OLPD) is currently examining the existing structure of collecting personnel and training data. A new database for collection of personnel, professional, and training data is currently being developed.

The new system will provide a more effective way to track and report the staff data for TDRS. Edison’s Enterprise Learning Management has been in place for several years. It is the system that allows for documenting available courses, learner enrollment, and

learner participation in various classes. Each learner has a “My Learning” page that documents all sessions of training (classroom or online) attended and completed.

The Division has posted information memoranda on its intranet website to provide staff with an easily accessible means of acquiring information on current research, resources and related activities in the vocational rehabilitation field. Leadership staff also disseminates new information (such as the latest Institute on Rehabilitation Issues publications) through electronic conveyance. Employees, particularly those with specialized job responsibilities, are encouraged to attend conferences, seminars and training workshops relative to their specialty areas. Local, regional and statewide meetings provide an additional avenue for keeping employees informed of new developments in the vocational rehabilitation field.

B. Acquisition and dissemination of significant knowledge

procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

Information regarding this question is included with the response to question A in this section.

5. Personnel to Address Individual Communication Needs

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

The Division 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; 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 communicate with limited English speaking individuals. Telephonic translation services are available through Avaza Language Services. All regions have received orientation packages to be used to train all of their staff in the use of this service.

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, Blind or Deaf-Blind. The Divisions policy addresses the (1) significance of such services, (2) the selection of service

providers, (3) the scheduling and payment for services, and (4) an evaluation process for such services.

6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

The Individuals Disabilities Education Act provides renewed emphasis on the planning for service delivery and collaboration of the various divisions and programs designated to serve students and youth with disabilities.

The Division has an interagency agreement with the Division of Special Education, state Department of Education in providing administrative support for a coordinated, collaborative effort of service delivery. The Blind and Visually Impaired Services/Deaf and Hard of Hearing unit continues an agreement with the Tennessee School for the Blind and the Tennessee School for the Deaf. Networking of the two divisions relative to transition services has provided a means for coordinating and sharing information regarding personnel development under IDEIA. There is ongoing communication between the two divisions and each division has responsibility for providing input into personnel development activities.

An interagency agreement was developed to fulfill the requirements of IDEIA. The most recent version of this agreement was signed July 1, 2012. The purpose of this agreement is to identify and define the financial responsibility of each state agency for providing services under IDEIA and to facilitate the provision and coordination of services for all children with disabilities. The following state agencies are participating in this agreement: Tennessee Department of Education; Tennessee Department of Children’s Services; Tennessee Department of Finance and Administration; Bureau of TennCare; Department of Developmental Services; Tennessee Department of Health; Tennessee Department of Human Services; Tennessee Department of Intellectual and Developmental Disabilities; and Tennessee Department of Correction.

In 2013, Governor Bill Haslam signed an Employment First Executive Order. This Executive Order established the Employment First Taskforce. In 2014, the Employment First Taskforce sign and executed a Youth Memorandum of Understanding (MOU). The agencies involved in the MOU are: • Department of Education • Vocational Rehabilitation • Department of Labor and Workforce Development • Department of Intellectual and Developmental Disabilities • Department of Mental Health and Substance Abuse Services • Council on Developmental Disabilities (this agency oversees the implementation of the MOU.

The purpose of this MOU, is to state how these agencies will work together to provide transition school to work services to students and youth with disabilities.

The Division continues to recognize the value of the involvement of its State Rehabilitation Council in personnel development activities. It is the policy of the

Division to give the Council ongoing review and input on the development of issues associated with the Comprehensive System of Personnel Development.

The Council continues to be involved with CSPD issues associated with the recruitment and retention of staff, such as; counselor salaries and pay incentives for the successful attainment of counselors with a Master's degree in Rehabilitation and also training for existing staff to obtain a Master's Degree in Rehabilitation.

j. Statewide Assessment

(Formerly known as Attachment 4.11(a)).

1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

A. with the most significant disabilities, including their need for supported employment services;

The Tennessee Division of Rehabilitation Services (Division), in collaboration with the State Rehabilitation Council (SRC), completed a comprehensive assessment of the vocational rehabilitation needs of Tennesseans with disabilities in the summer of 2013 and is conducting needs assessments on a three-year cycle. The VR program is conducting a new Comprehensive Needs Assessment to be completed in the summer of 2016. As required in 34 CFR § 29, the information obtained from a number of sources was assessed and analyzed to determine the needs as stated above.

Methodology Five surveys were developed, one for each category of participant. The surveys have some questions in common. The five surveys were administered in mid-August 2013. Survey participants included vocational rehabilitation clients and/or their caregivers, staff, workforce investment system personnel, community resource partners, and vocational rehabilitation stakeholders. All five surveys were administered through an anonymous web-based (Survey Monkey) process. In addition, five interviewers attempted to administer the client/caregiver survey to a beginning list of 1,000 (750 active and 250 closed) clients. In all, there were 907 completed surveys evaluated and analyzed for this Vocational Rehabilitation Needs Assessment. There were 6,291 e-mail requests sent and 616 calls made. These 6,907 contacts yielded a response rate of 13%. Earlier during this Needs Assessment, Focus Groups of VR Staff and VR Clients were conducted in six Regions (1, 2, 5, 7, 8, and 9). These Focus Groups aided in the low response rate of the Client/Caregiver survey.

Survey Overview Five surveys were developed, one for each category of participant. The surveys have some questions in common. The five surveys were administered in mid-August 2013. Survey participants included vocational rehabilitation clients and/or their caregivers, staff, workforce investment system personnel, community resource partners, and vocational rehabilitation stakeholders. All five surveys were administered through an anonymous web-based (Survey Monkey) process. In addition, five interviewers attempted to administer the client/caregiver survey to a beginning list of 1,000 (750 active and 250 closed) clients.

The client/caregiver sample was obtained from active cases and case closures from October 2011 to March 2013. The list of 19,689 clients included active cases (Status 10 and 18), successful outcome closures (Status 26), and closures without a successful outcome (Status 28). Of the 15,965 active cases on the list, 5,521 provided an e-mail address for contact information. In addition, of the 3,724 closed cases on the list, 1,158 provided an e-mail address for contact information. Therefore, the client/caregiver survey link was sent to 6,679 participants. Of the 5,521 active case participants with an e-mail, 598 e-mails bounced back undeliverable. Therefore, 4,923 active Vocational Rehabilitation clients received the survey link. Of the 1,158 closed case participants with an e-mail, 617 e-mails bounced back undeliverable. Therefore, 541 closed case Vocational Rehabilitation clients received the survey link. Of the 541 total participants, 495 began the survey process and 469 completed the client/caregiver survey. The survey completion rate was 94.7%.

So that customers without access to the Internet could also have an opportunity to provide their opinions, five interviewers contacted 1,000 (750 active and 250 closed) clients by phone. The 1,000 clients were chosen randomly in SPSS from the customers without e-mail addresses. Of the 1,000 customers contacted by phone, there were 384 wrong numbers or disconnected numbers. Of the remaining 616, 151 were contacted and agreed to complete the client/caregiver survey. These 151 participants fully completed 146 surveys for a completion rate of 96.7%. Approximately 25% of the 1,000 clients called completed the client/caregiver survey. Combined, the web-based survey link and the telephone survey of clients' response rate totaled approximately 10%.

The Staff survey link was sent by e-mail to 537 staff members and 45 supervisors for a total of 582 staff members. Of these 582 staff members, 123 started a staff survey and 106 or 86.2% completed the survey questions. Therefore, 21% of Vocational Rehabilitation Staff responded to the staff survey.

The Workforce Investment Act System (WIAs) personnel were sent their survey link in 92 e-mails. However, 128 WIA surveys were completed. Therefore, the survey link e-mail sent out by the Research and Planning Unit was shared with at least 36 other individuals. The completion rate for these 128 surveys was 91.4% for the 117 surveys completed. The response rate for the WIAs survey equaled 79%.

Community Resources Partners (CRPs) were sent 118 e-mail requesting respondents complete the CRP survey. There were 46 surveys started by the CRPs and 43 surveys finished. This is a completion rate of 93.5%. This places the return rate much lower at approximately 39%.

Vocational Rehabilitation Stakeholders were sent 35 e-mails for the Stakeholder survey link. Twenty- nine started the survey and 26 completed all questions on the survey. This is a survey completion rate of 89.7%. However, this particular surveys return rate was 83% much higher than were the others.

In all, there were 907 completed evaluated and analyzed for this Vocational Rehabilitation Needs Assessment. There were 6,291 e-mail requests sent and 616 calls made. These 6,907 contacts yielded a response rate of 13%. Earlier during this Needs Assessment, Focus Groups of VR Staff and VR Clients were conducted in six Regions (1,

2, 5, 7, 8, and 9). These Focus Groups aided in the low response rate of this particular survey. The five surveys shared several like items, but also differed on distinct issues for each group.

From these five survey instruments, this Needs Assessment will attempt to identify the needs of individuals with the most significant disabilities in Tennessee, to discover the unmet needs of minority groups (including the not served and the underserved) in Tennessee, and to recognize which population(s) of individuals with disabilities are those not served and/or the underserved in Tennessee.

Survey Results & Analysis

Vocational Rehabilitation Stakeholders Overall, respondents (38%) are sometimes satisfied with the services VR clients receive from TN Rehabilitation Services. Twenty-four percent are satisfied and 21% are dissatisfied. Two respondents listed not applicable, two were very dissatisfied, and one person stated that they were very satisfied with the services VR clients receive. One stakeholder praised VR's improvements made in "Working on developing relationships with future clients before they leave high school; actively participating in meaningful IEP transition meetings."

According to survey results, 48% of stakeholders straddled the fence in their belief that VR Counselors fully understand how and why a client's disability affects their chances of employment. Twenty-four percent agree and 17% percent disagree that VR Counselors understand the impact a disability has on employment. Eleven of the Stakeholders felt that employment opportunities were an unmet need of individuals with disabilities. One respondent shared that "There seems to be a lack of creativity to find positions that are compatible with their disabilities."

Slightly over one third of stakeholder respondents agree that VR Client chances of getting a job increased because of training and services received through Vocational Rehabilitation. One third feel training and services sometimes assist in increased job probability for clients. In addition, 30% disagreed with the statement. Qualitatively, 18 Stakeholder respondents felt that potential employers are looking for the following four types of skills from individuals with disabilities: 1) Entry level (55%), 2) Timeliness/Good Work Ethic (16%), 3) Behavior/Soft Skills (16%), and 4) Basic Computer Skills (11%). From comments on this survey, most employers seek "Reliability, job pride, honesty and friendliness."

Of the 29 Stakeholder respondents, an overwhelming 72% do not feel that VR Counselors help secure employment for VR Clients. Fifty-five percent of respondents feel the majority of clients find jobs themselves. Only 10, 34.5% feel clients do not secure their own employment. Three people did not respond to the survey question.

Forty-one percent of responding Stakeholders feel VR Counselors sometimes invite VR Clients to be part of developing their vocational goals. Thirty-eight percent agree that VR Counselors involve Clients in the development of their goals and 17% disagree, while one person chose to skip the question. The 17% that disagree may feel that clients are being judged by their behavioral choices. One respondent stated an unmet need as "The effects of their disabilities are often confused with behavioral choices, making them often appear to be resistant to services."

Of those who responded, 55% feel that VR Counselors do inform their clients of the available jobs of interest that also match their skills. Twenty-one percent agree that counselors do make clients aware of possible jobs, while 17% disagree. Two people skipped this question.

One Stakeholder suggested the "need for job carving for some individuals on spectrum."

More stakeholders disagreed (31%) than agreed (24%) that VR Counselors are strong advocates for VR clients' mental, physical, and vocational needs. However, the majority, 41%, is unsure if Counselors are strong advocates or not. One responder did not answer. The lack of communication was a constant theme in this survey. One respondent made the following comment concerning communication: "Placing information on the VR web site and keeping it updated, be a highly visible collaborative partner with disability related organizations and efforts geared toward employment, and positive outreaches and advertising to the community."

Community Resource Partners (CRP) On average TN Vocational Rehabilitation Community Resource Partners, service more than 100 individuals with disabilities. CRP qualitative comments state that the more clients are provided one- on-one interaction time with various jobs and receive personal individualized attention or job site assessments they are better able to provide or suggest a more suitable work environment and with greater success. In addition to interpreter services, Community Resource Partners also listed computers as a big need in their agency to accommodate people with disabilities. According to respondents, the most successful element of CRP soft skills training is Individualized attention and Job Readiness. CRP sees the underserved and the not served population to be those with severe disabilities, autism, deaf and hard of hearing, along with cognitive functions. Unmet needs of the not served population include counseling and guidance as well as communication, outreach. To serve these clients CRP suggest developing better partnerships and changing eligibility to be more inclusive and flexible.

CRP believes that potential employers are most interested in employees who have appropriate behavior, work ethic, and timeliness in respective job settings. Survey response state the most beneficial agency partnerships for CRP have been other non-profits agency. The majority of CRP survey respondents are interested in documentation training. Many CPR responders report constant policy and procedure changes in VR are confusing.

CRPs provided information about successful pieces to their assessment process and successful soft skills. For both the job readiness category garnered the most responses. For assessment one provider stated "Providing a concise report that includes realistic vocational options based on interests, aptitudes, transferrable skills, and labor market information" as the successful piece of their assessment process. Another provider stated "Job Shadowing Job Sampling Working Interviews" were a successful soft skill teaching tool for clients.

CRPs reported the unserved and underserved to be individuals with developmental disabilities (Autism Spectrum Disorder and Asperger's), Veterans in category 3 or category 4, and individuals with felony charges and/or chronic or recent drug addictions. These unmet needs were reported by CRPs to be met by education and training 24% of

the time. For instance, “employment specialist needs to help stabilize client’s job”. “They have the skills to GET job but have no skills to KEEP the job.” The barriers reported by minorities with disabilities were VR knowledge/awareness (20%) and language barriers (14%).

CRPs requested better training in job development and job placement. They praised the opening of Priority 2 category as a significant positive. In order to improve communication, they requested weekly or bi-weekly meetings with VR Counselors and Supported Employment staff to review caseloads.

Workforce Investment Systems (WIS) On average Workforce Investment Systems service more than 100 individuals with disabilities. Services that WIS felt was most helpful include job readiness, Support services, and education.

Computer hardware topped the list in most needed accommodations for people with disabilities. The majority of qualitative comments requested updated staff computers as well as updated computers for clients. WIS is also asking for laptops they can carry between sites and visits. The most helpful element of their assessment is the staff’s knowledgebase of the client, disability, and job market. Interviewing skills, communication, and job readiness were the number one soft skills WIS felt helped clients obtain and maintain employment. The suggestions for underserved or unserved clients included opening the priority categories, blind and visually impaired along with clients who have autism. Suggested ways to reach this group include expand outreach, improve resources, and communication. Stated barriers to reaching this group include cultural competence, educating VR staff and employers on various barriers. Respondents also suggested building the awareness of VR services among the common population, including schools, business, and VR partners.

Five respondents stated that they do not have any clients with disabilities. Another 5 stated they provide services to 1-9 persons with disabilities. Nine respondents service 10-39 clients while 40-59 clients are seen by at least 12 of the Workforce Investment Systems who responded to the survey. Three (8.6%) respondents provide client services to approximately 60-79 clients. Eleven of the 128 WIS see at least 80-99 persons with disabilities while the majority, 56.3%, of survey respondents provides supportive services to over 100 persons with disabilities.

In addition to non-VR clients, the majority, 54.7%, of surveyed Workforce Investment Systems provide services for more than 100 Vocational Rehabilitation clients. Five respondents stated that they do not have any VR clients. Seven stated they provide services to 1-9 Vocational Rehabilitation Clients. Ten respondents service 10-39 clients while 40-59 clients are seen by at least nine of the Workforce Investment Systems who responded to the survey. Fifteen (11.7%) respondents provide client services to approximately 60-79 clients, while only 10 of the 128 WIS see at least 80-99 VR Clients.

Of the services available through WIS, Job Development (50%), Job Search (44%), On-the-Job Training (35%), and Assessments (32%) are the most successful components in obtaining and maintaining employment for individuals with disabilities.

Vocational Rehabilitation Staff VR Staff would like more training in New Counselor Training, Job Development, Case Management, and Disabilities. Many feel they are

adequately aware of the job market but would like a more thorough understanding of connecting their clients with the right employment match based on need and client skills. From focus groups conducted in February Staff feel they would do a much better job if they are able to build relationships with businesses in their surrounding areas. Unserved clients are those who are elderly, economically unqualified, those with learning disorders, and high school students ranked as the most mentioned unserved group. Most underserved group include middle aged working age people, and those with less severe and more severe disabilities (autism and learning disabilities were listed) Support Services such as technology access, job training, were listed as unmet needs. Barriers to reaching out to the unserved and underserved include cultural competence in understanding various cultures and disabilities on the part of employers and some staff.

Job Readiness and basic computer skills topped the list in expected training and skills most potential employers are looking from VR clients. VR Staff feel that the DHS Vocational Rehabilitation is most successful in providing assistance to clients, conducting assessments and making changes to serve them more effectively.

Forty-nine percent of VR Staff agrees that the current accommodations their clients receive meet their employment needs. Four people did not respond.

Forty-six percent of VR Staff agrees that the job training their clients received or are still receiving adequately prepares them for employment. Five people did not respond.

Fifty-four percent of VR Staff agrees that they are well informed and understand how and why clients' disabilities impact their chances of getting or keeping a job. Four people did not respond.

Sixty-one percent of VR Staff stated yes, they often help clients obtain jobs. Eighteen people did not respond.

Seventy percent of VR Staff respondents stated, no, the majority of their clients do not find jobs themselves. Ten people did not respond.

Eighty-one percent of VR Staff respondents agree that they do invite clients to participate in developing vocational goals and they are involved in selecting the services of the preferred providers. Staff feels clients are unaware of the available providers, there are not enough providers, and some clients do not like to be told their ideas or plans for a career will not be supported by VR. Clients feel VR should support whatever career choice and path they decide.

Twenty-five percent of respondents agreed that on average, clients use VR services approximately 3 times to obtain employment. Fourteen staff did not respond.

Thirty-nine percent of respondents sometimes agree that the VR assessment process correctly identifies clients' strengths and their physical, mental and emotional needs. Fourteen people did not respond.

Thirty-six percent of responding VR staff stated that placement agencies are most effective method or practice that often leads to the best employment outcomes for their clients. Non-profit agencies were the second most helpful followed by family and friends.

Two-thirds of responding VR Staff feels they are adequately informed of the developing labor market and how to better advise their clients in developing skill sets that will be in demand.

At the time of the survey, 71% of VR Staff stated that their clients were not employed. Only 10 of the 122 responded that their clients were currently employed.

Of the 34 responding VR Staff, 9 agreed that clients are employed 1-3 months on average, followed by 7 who stated 1-2 years and another 7 stated 6-12 months. The time span varied practically even from 3 months - more than 2 years. There wasn't a great variation.

Of the 92 who responded, 48 stated that few clients have jobs when they leave the VR program. Forty-two (42%) stated that most clients have jobs and only 2 stated none of their clients have jobs when they leave the program.

Most clients, 60-79%, currently receive checks from the government such as SSI or SSDI, according to 30% of the VR Staff respondents. Another 28% stated that 80-90% of their clients receive SSI or SSDI.

Half of the staff who responded has Master's degrees. Another fourth have a bachelor's degree. Twenty-six people skipped this question. Most respondents are between the age of 45-64 years of age.

VR Client/Caregivers Fifty-nine percent of the respondents are satisfied with the services they received or are still receiving from VR. However there were suggestions regarding education and training. VR Clients repeatedly want education expenses paid for college and perhaps graduate level courses. VR Clients continue to be thoroughly uninformed of the policy, procedures, and stipulations for funding school or training programs. One responded stated, "Explaining how the money is dispersed would be helpful in the beginning of the person's acceptance into the program and how it works with the available financial aid the client receives." Other suggestions for improvement include basic computer skills training, additional options for job training and improved and increased employment prospects. Clients voiced concern about too many jobs being geared towards janitorial, cooking, and cleaning.

Over 50% agree that the job training they received or are still receiving prepares them for employment.

Sixty-three percent of surveyed Clients agree that their counselor understands how and why their disability impacts their chances of getting or keeping a job.

Fifty-three percent of respondents agree that their chances of getting a job increased because of VR training and services. Only 185 (29%) disagreed with this statement. The remaining 94 selected "sometimes". Twenty-four respondents elected to skip this question.

Of the 639 who responded, only 12% stated that their counselor helped them secure a job. Forty- four percent selected N/A and the remaining 43% did not feel counselors helped them secure employment.

Twenty-three percent of responding clients stated that they found their own job, while 27% stated they did not find their job on their own and 50% selected N/A meaning they currently did not have or job or they have never had a job while working with VR.

Fifty-five percent of VR clients who responded agreed that their counselor invites them to be a part of developing their vocational goals and involved in selecting services and training. Seventeen percent of those who responded selected 'sometimes' and another 28% state that they disagree or strongly disagree that the counselor invites them to participate in the development of goal setting and training.

The majority of respondents, 43%, stated that their counselor informs them of available jobs of interest and skill match. Thirty-eight percent disagreed with this statement. Eighteen percent were felt counselors sometimes informed them and sometimes did not inform them of suitable jobs.

Only 1/8 of the responding VR Clients had a job when they left the VR program. Thirty-two percent stated they did not have a job when leaving the program.

Over half (55%) of the VR Client's responding to the survey stated they have not used VR services to secure employment. More than 20% used VR services at least once to secure employment. The remaining respondents, 112, secured employment via VR services 2-5 times.

Only 18% of those who received placement were satisfied with their current job situation. Eight percent are unsatisfied and 40 of the 631 responding were on the fence of satisfied and not satisfied. They selected 'sometimes'.

Fifty-seven percent of respondents agree that their counselor is a strong advocated for their mental, emotional, and vocational needs. Twenty-eight percent disagree, 14% sometimes feel the counselors are strong advocates. The remaining 4% of the 646 skipped this question.

In 2016, the Department of Human Services, Vocational Rehabilitation conducted their triennial statewide needs assessment. The Research and Data Analysis unit monitored and collected surveys from the following groups: VR Staff, VR Community Resource Partners, VR Clients/Caretakers, VR Stakeholders, and Workforce Innovation and Opportunity Partners.

Participants had 2 weeks (July 25-August 8, 2016) to complete their respective survey.

In addition to the VR Management team, the State Rehabilitation Council (SRC) consulted and validated the creation and distribution of the surveys.

Vocational Rehabilitation staff, clients, caregivers, community partners and stakeholders were asked for guidance from their perspective. The results of the 2016 Needs Assessment identified that the Vocational Rehabilitation Program in Tennessee should focus efforts, over the next three years, in the areas of program knowledge for employees, community partners and the general public.

Specifically, the assessment identified the following primary needs for the program:

• Outreach materials to increase awareness and knowledge about the VR program and services to communities and local businesses. VR's outreach activities are woven throughout the state plan. See sections a, d, e, j, l, o, p, and q. • Training to VR employees and Community Resource Partners covering policy changes and Letters of Agreement (LOA). The state plan includes numerous training initiatives and strategies for both VR staff and CRPs in sections a, c, d, f, i, j, l, n, o, p, and q. • Training to VR employees covering medical impairments and how they impact limitations with work. As noted above, the state plan includes numerous training initiatives and strategies in sections a, c, d, f, i, j, l, n, o, p, and q. • Transportation for clients. Meeting the transportation needs of clients continues to be an identified need in Tennessee. Transportation was a need identified in 2010, 2013, and 2016. Transportation is a major support service provided by VR either directly to an individual or through area transportation providers. The needs assessments identified needs in rural areas that do not have the transportation opportunities available in urban areas. To the extent possible, VR works with each individual to address transportation needs through rural transportation agencies or family members until an individual can afford his or her own transportation following employment. DHS continues to work with rural transportation providers and Human Resource Agencies to address rural transportation needs for individuals participating in work programs. • Improved communication with Community Resource Partners (CRP). The state plan includes information on communication with CRPs through contracts, letters of agreement, training, and monitoring as outlined in sections a, c, d, e, f, l, m, o, p, and q. • Increase in Pre-Employment Transition Services. The state plan includes several updates to the pre-employment transition service activities occurring throughout the state in sections a, d, e, f, g, l, and m. • Increase in Local Education Association (LEA). The state plan includes several updates to its work with local education agencies in sections a, d, g, l, o, and p. Most notably, the number of LEAs served by the Transition School to Work program has increased.

B. who are minorities;

Information regarding this question is included with the response to question A in this section.

C. who have been unserved or underserved by the VR program;

Information regarding this question is included with the response to question A in this section.

D. who have been served through other components of the statewide workforce development system; and

Information regarding this question is included with the response to question A in this section.

E. who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

Information regarding this question is included with the response to question A in this section.

2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

Information regarding this question is included with the response to question 1 in this section.

3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act .

Information regarding this question is included with the response to question 1 in this section.

k. Annual Estimates

Describe:

1. The number of individuals in the State who are eligible for services;

As of Sept 30, 2017, 8,010 individuals in the state are eligible for services under an IPE. Of this number and in compliance with our Order of Selection, 7,255 are receiving services provided with Title I, Part B funds and 755 are receiving services provided with Title VI, Part B funds and with Title I, Part B funds.

For Fiscal Year 2018, it is projected that there will be 5,499 new applicants and that 12,754 individuals in the state will be eligible for services under an IPE. Of this number, 12,013 will receive services under an IPE provided with Title I, Part B funds and 741 will receive services under an IPE provided with Title VI, Part B funds and with Title I, Part B funds. It is estimated that the number of individuals to be served under Title I, Part B and Title VI, Part B under an IPE during Fiscal Year 2018 under each priority category within our Order of Selection will be:

• Priority Category 1 - 8,928 (Includes Title VI, Part B) • Priority Category 2 - 3,826

Total 12,754

Note: Estimates for eligible individuals and those who will be provided services under our Order of Selection in Fiscal Year 2018 is based on current trends and adjustments to utilization of Title VI, Part B funds.

It is estimated that the cost of Title I, Part B and Title VI, Part B services for the projected 12,754 individuals who will be eligible for services under an IPE will be approximately $25,150,000 and that the service cost for each priority category within the Order of Selection for the individuals served will be:

• Priority Category 1 - $17,605,128 (Includes Title VI, Part B)

• Priority Category 2 - $7,544,872

Total $25,250,000

Note: Estimated cost for services is based on the total available funding approved by the State's Department of Finance and Administration for our Delegated Purchase Authority.

Category Title 1 or Title VI- Estimated Funds Est to Be Served Under IPE Average and Total Cost of Services

1 and 2 N/A $25,150,000 12,754 $1,972/per case

Category Title 1 or Title VI- Estimated Funds Est to Be Served Under IPE Average and Total Cost of Services

1 Title VI included 0 8,928 $17,605,128

2 N/A 0 3,826 $ 7,544,872

Totals N/A 0 12,754 $25,150,000

2018 Update: As of April 30, 2018, 8,347 individuals in the state are eligible for services under an IPE. Of this number and in compliance with our Order of Selection, 7,987 are receiving services provided with Title I, Part B funds and 360 are receiving services provided with Title VI, Part B funds and with Title I, Part B funds.

For Fiscal Year 2019, it is projected that there will be 5,797 new applicants and that 13,000 individuals in the state will be eligible for services under an IPE. Of this number, 12,259 will receive services under an IPE provided with Title I, Part B funds and 741 will receive services under an IPE provided with Title VI, Part B funds and with Title I, Part B funds. It is estimated that the number of individuals to be served under Title I, Part B and Title VI, Part B under an IPE during Fiscal Year 2019 under each priority category within our Order of Selection will be:

• Priority Category 1 — 9,100 (Includes Title VI, Part B)

• Priority Category 2 — 3,900

Total 13,000

Note: Estimates for eligible individuals and those who will be provided services under our Order of Selection in Fiscal Year 2019 is based on current trends and adjustments to utilization of Title VI, Part B funds.

It is estimated that the cost of Title I, Part B and Title VI, Part B services for the projected 13,000 individuals who will be eligible for services under an IPE will be approximately $25,623,000 and that the service cost for each priority category within the Order of Selection for the individuals served will be:

• Priority Category 1 - $17,936,100 (Includes Title VI, Part B)

• Priority Category 2 - $7,686,900

Total $25,623,000

Note: Estimated cost for services is based on the total available funding approved by the State's Department of Finance and Administration for our Delegated Purchase Authority.

Category Title 1 or Title VI- Estimated Funds Est to Be Served Under IPE Average and Total Cost of Services

1 and 2 N/A $25,623,000 13,000 $1,971/per case

Category Title 1 or Title VI- Estimated Funds Est to Be Served Under IPE Average and Total Cost of Services

1 Title VI included 0 9,100 $17,936,100

2 N/A 0 3,900 $ 7,686,900

Totals N/A 0 13,000 $25,623,000

2. The number of eligible individuals who will receive services under:

A. The VR Program;

Information regarding this question is included with the response to question 1 in this section.

B. The Supported Employment Program; and

C. each priority category, if under an order of selection;

3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

Priority Category 3 as of Sept 30, 2017 - 82

Priority Category 4 as of Sept 30, 2017 - 138

Priority Category 3 as of April 30, 2018 - 117

Priority Category 4 as of April 30, 2018 - 122

4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

Information regarding this question is included with the response to question 1 in this section.

l. State Goals and Priorities

The designated State unit must:

1. Identify if the goals and priorities were jointly developed

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

The goals and priorities for 2017 are:

Goal 1. Continue Increasing Successful Employment Outcomes

Objective 1.1:

A. Increase Successful Employment Outcomes by 2% or more annually over the next 4 years. The opportunity exists to reinvigorate historical referral sources. This effort will include development of marketing initiatives for use in local areas for community outreach as well as joint efforts for partners listed below but not limited to:

• All agencies as required in the Combined State Plan

• Tennessee's Department of Labor and Workforce Development

• Department of Economic and Community Development

• Department of Intellectual and Developmental Disabilities

• Department of Children's Services and Department of Mental Health and Substance Abuse Services

• Chambers of Commerce

• Tennessee Works Partnership

• TennCare

The Division will develop strategies for increasing referrals of Pre-Employment Transition Services (PRE-ETS) through local education agencies. Special focus will include the identification of any underserved population at the regional level.

B. Action Steps to establish a stronger focus on employment related activities include:

i. Fully staff the Agency: Increase visibility and engagement of the Agency's Business Services Unit for regional and statewide activities;

ii. Building a comprehensive network of employment resources across the state;

iii. Implementing services to employers promoting the value of the Division and the hiring of people with disabilities;

iv. Maintain the current Community Rehabilitation Provider monitoring process to ensure effectiveness and efficiency;

• Develop/disseminate surveys to determine adequate training needs of service providers (new and seasoned staff)

• Maintain the monitoring and expansion of contracts related to Business Initiatives (ex. CLEE)

v. Continue to work collaboratively with and provide greater technical assistance to the Workforce Investment System. The program will continue to have counselors co-located in each of the State's Local Workforce Investment Areas' comprehensive career centers and to provide itinerant counselors to serve all satellite career centers.

Objective 1.2: The Program will continue to monitor expenditures and available resources to determine sufficiency of releasing and/or opening Categories 3 and 4.

Goal 2. Improve Efficiency and Effectiveness in Client Services Delivery System

• Throughout the SFY, Vocational Rehabilitation will achieve a monthly timeliness rating of 92% for the determination of eligibility with the inclusion of extension agreements per policy. Determination of eligibility within 60 days.

• Throughout the SFY, Vocational Rehabilitation will develop the Individualized Plan for Employment within 90 days unless there is an agreed upon extension between the client and counselor. A timeliness rating of 90%.

• Meet with core partners to develop goals around the new federal standards and indicators regarding wages

Objective 2.2:

• Research prevailing wages for various industries

Objective 2.3:

• Research, develop, and implement strategies to increase the awareness and accessibility of client satisfaction surveys

• Achieving an 80%or higher satisfaction rating for the vocational rehabilitation program as reported by the consumer satisfaction survey program for successful outcome closures

• Continue to increase staff knowledge in rehabilitation practices through on-going training.

Objective 2.4: Ensure access to VR documents, materials and training for clients, citizens, and staff:

1. The Program will ensure that all documents and materials are available in alternate formats.

2. The Program will ensure that timely requests are made when qualified interpreters are needed or requested

3. The Program will create VR marketing materials to accommodate individuals with sensory disabilities

4. The Program will research, develop, and implement a marketing plan to educate the community about VR services.

5. Meet with Disability Pathfinder to identify needs and engage diverse populations

2. Identify the goals and priorities in carrying out the VR and Supported Employment programs.

Information regarding this question is included in the response to question 1 in this section.

3. Ensure that the goals and priorities are based on an analysis of the following areas:

Information regarding this question is included in the response to question 1 in this section.

A. The most recent comprehensive statewide assessment, including any updates;

Information regarding this question is included in the response to question 1 in this section.

B. the State's performance under the performance accountability measures of section 116 of WIOA; and

Information regarding this question is included in the response to question 1 in this section.

C. other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

Information regarding this question is included in the response to question 1 in this section.

m. Order of Selection

Describe:

1. Whether the designated State unit will implement and order of selection. If so, describe:

A. The order to be followed in selecting eligible individuals to be provided VR services.

Description of Priority categories

PRIORITY CATEGORY I -- Eligible individuals who have the most significant disabilities

PRIORITY CATEGORY II -- Eligible individuals who have significant disabilities

PRIORITY CATEGORY III -- Eligible individuals who do not have significant disabilities and whose vocational rehabilitation is expected to require multiple vocational rehabilitation services

PRIORITY CATEGORY IV -- Eligible individuals who do not have a significant disability that cannot be classified into a higher priority category

Definitions

"Most Significant Disability" means the individual meets the criteria for having a significant disability but has a physical or mental impairment that seriously limits two or more functional capacities in terms of an employment outcome.

"Significant Disability" means the individual meets the three following criteria:

1. The individual has a severe physical, sensory or mental impairment which seriously limits at least one functional capacity (such as visual/mobility, communication, self-care,

self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome; and

2. The individual has one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, deaf /blind, head injury, heart disease, hemiplegic, hemophilia, respiratory or pulmonary dysfunction, mental retardation, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorders, neurological disorders (including stroke and epilepsy), paraplegia, quadriplegia and other spinal cord conditions, sickle cell anemia, specific learning disability, and end-stage renal disease; or another disability or combination of disabilities determined on the basis of an assessment for determining eligibility, and vocational rehabilitation needs to cause comparable substantial functional limitation; and

3. The individual's vocational rehabilitation program can be expected to require multiple vocational rehabilitation services over an extended period of time.

"Non-Significant Disability" means the individual does not meet the criteria for significant disability or the criteria for most significant disability.

"Multiple Vocational Rehabilitation Services" mean two or more major vocational rehabilitation services, i.e. physical or mental restoration, training, counseling, guidance and placement. Excluded are support services such as transportation, maintenance, and the routine counseling and guidance that should take place in every case.

"Extended Period of Time" means 6 months from the date services begin until the employment objective is achieved.

B. The justification for the order.

The Division's Order of Selection is developed in accordance with 34 CFR § 361.36 of the final regulations. The Order of Selection has four priority categories as defined below in this section.

On August 1, 2001, the Division implemented an Order of Selection due to funding limitations that would not allow the Division to provide services under an IPE to all eligible individuals. Only Priority Category 1 cases (eligible individuals who have the most significant disabilities) were served until 2009.

From 2009 until October 2012 there were numerous releases of Priority Category 2 and 3 cases. Beginning October 1, 2012, the Division opened Priority Category 2 for services. The Division is now serving all Priority Category 1 and 2 cases. Those Priority Category 3 cases that were on the waiting list were released for services on October 1, 2013.

The Division's funds and resources remain inadequate to serve individuals in all four priority categories. The Division expects to have approximately $21,000,000 from the federal grant and state appropriations to spend for assessments for an estimated 5,797 new cases and planned services for approximately 13,000 existing and new cases. Approximately half of this amount must be allocated for pre-employment transition services.

The Division also elects not to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment. The Division expects to serve 13,000 existing and new Priority Category 1 and 2 in 2019. Of this number, the Division expects to provide services for 9,100 Priority Category 1 cases and 3,900 Priority Category 2 cases.

The Division will monitor staffing needs to determine if there is sufficient manpower to schedule releases of Priority Category 3 and 4 cases for services or open all Priority Category 3 cases for services. Therefore, continuation of the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, to determine which eligible individuals will be served under an IPE is still warranted due to staffing deficiencies.

The Division monitors services and expenditures on a continuous basis, allowing the Division to manage available funds and staff to assure sustainability of services for cases placed in an open priority category and receiving services under an Individualized Plan for Employment (IPE). Additionally, adequate funds will continue to be conserved and staffing deficiencies monitored to provide assessment services for all applicants expected to apply throughout the year to determine eligibility and to provide services for those eligible individuals in an open priority category within the Order of Selection.

C. The service and outcome goals.

The Order of Selection priority categories outcome and service goals and time frames are as follows:

1. PRIORITY CATEGORY I -- Eligible individuals who have the most significant disabilities

A. Outcome and Service Goal: Expect to determine eligibility for 3,823 new individuals in this priority category; serve 9,100; and close 1,092 successfully employed.

B. Goal will be achieved by September 30, 2019.

2. PRIORITY CATEGORY II -- Eligible individuals who have significant disabilities

A. Outcome and Service Goal: Expect to determine eligibility for 1,741 new individuals in this priority category; serve 3,900; and close 488 successfully employed.

B. Goal will be achieved by September 30, 2019.

3. PRIORITY CATEGORY III -- Eligible individuals who do not have significant disabilities and whose vocational rehabilitation is expected to require multiple vocational rehabilitation services

A. Outcome and Service Goal: Expect to determine eligibility for 38 new individuals in this priority category and have 120 on the waiting list.

B. Goal will be achieved by September 30, 2019.

4. PRIORITY CATEGORY IV -- Eligible individuals who do not have a significant disability that cannot be classified into a higher priority category

A. Outcome and Service Goal: Expect to determine eligibility for 9 new individuals in this priority category and have 125 on the waiting list.

B. Goal will be achieved by September 30, 2019.

D. The time within which these goals may be achieved for individuals in each priority category within the order.

Cases	Estimated Number of individuals to be served	Estimated number of individuals who will exit with employment after receiving services	Time within which goals are to be achieved	Cost of services	
New	5,797	0	N/A	$1,494,250	
PC 1	9,100	1,092	Sept. 30, 2019	$17,936,100	
PC 2	3,900	488	Sept. 30, 2019	$7,686,900	
PC 3	38 eligibility and PC determination only	0	Sept. 30, 2019	$9,500 Assessments	
PC 4	9 eligibility and PC determination only	0	Sept. 30, 2019	$2,250 Assessments	

E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

The Division is currently serving Priority Category 1 and 2 cases. If the Division cannot continue to serve all Priority Category 1 and 2 cases, then Priority Category 1 cases will continue to be served and services for Priority Category 2 cases will be provided based on the date of application for services. If the Division cannot continue to serve all Priority Category 1 cases, then services will be provided based on the date of application for services.

The Division plans to open Priority Category 3 within the 2015 plan year. If after Priority 3 is opened and the Division cannot continue to serve all Priority 3 cases then services will be provided based on the date of application for services.

The Division continues to monitor resources in order determine if resources would allow the Division to open Priority Category 3 in a sustainable manner. If Priority 3 is opened and the Division cannot continue to serve all Priority 3 cases then services will be provided based on the date of application for services.

Individuals who are determined to be in a closed priority category are referred to other appropriate agencies for services.

2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

n. Goals and Plans for Distribution of title VI Funds.

1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

The Division continues to provide supported employment services to eligible clients with the most significant disabilities who have been determined to require on-going support (extended) services in order to maintain employment.

It is the continued goal of the Division to provide quality supported employment services which are delivered in an effective, efficient and timely manner. Supported employment services are provided through Letters of Agreement with community rehabilitation providers, and in cooperation with the Department of Intellectual and Developmental Disabilities, and the Department of Mental Health and Substance Abuse Services. The community rehabilitation providers must assure that on-going support (extended) services will be provided prior to the implementation of supported employment services or will be developed as natural supports during training. The Division has an excellent supported employment program along with training and support activities to ensure the continued provision of quality supported employment services. These programs are ongoing and are not subject to a specific timeline. Prime examples of these ongoing activities are:

1. Through contract with the University of Tennessee, Center for Literacy, Education and Employment (CLEE), the Division funds three supported employment consultants who are charged with the responsibility of working with our many supported employment community rehabilitation providers in providing training and technical assistance to the staff who provide services to our clients. These same consultants also work with the Division staff on an as needed basis to provide technical assistance.

2. The Division has Program Specialists in the three grand regions of the state who assist in the monitoring of and consultation to the community rehabilitation providers to ensure appropriate services are being provided to our clients.

3. The Division plans to continue the funding of the UT CLEE SE consultants activities as well as continue the provision of in-house monitoring of the services provided to the Division’s clients by the SE community rehabilitation providers.

The Division will continue to seek community rehabilitation providers to provide supported employment services to under-served disability groups with the most significant disabilities who, because of their disability, have not been able to enter traditional competitive employment or whose employment is intermittent or interrupted due to a most significant disability.

The Division expects to continue increasing employment opportunities for those individuals eligible for supported employment with co-occurring disorders of mental illness, and alcohol and drug abuse by expanding more effective partnerships with mental health entities that work with this population and by implementing improved services. The

Division has a Central Office field liaison who works with mental health entities and the Division's staff statewide in developing such partnerships where needed and who provides training and technical assistance to the mental health community rehabilitation providers and our staff.

The Division has a Central Office field liaison who works with service providers statewide that provides supported employment and extended services for individuals with intellectual and developmental disabilities to assist with technical assistance and staff training.

The Division expects to serve in excess of 740 clients through the supported employment program during the Fiscal Year 2018. The Division has consistently closed around 22% of the supported employment clients in successful employment. This would mean around 163 successful outcomes for FY2018.

The Division expects to serve in excess of 741 clients through the supported employment program during the Fiscal Year 2019. The Division has consistently closed around 22% of the supported employment clients in successful employment. This would mean around 163 successful outcomes for FY2019.

The Division has established service codes and defined the extended services that will be provided for up to 4 years for youth with disabilities. The Community Rehabilitation Providers have been notified of these services that can be provided for youth.

In 2013, Governor Bill Haslam signed an Employment First Executive Order. This Executive Order established the Employment First Taskforce. In 2014, the Employment First Taskforce sign and executed a Youth Memorandum of Understanding (MOU). The agencies involved in the MOU are:

• Department of Education

• Vocational Rehabilitation

• Department of Labor and Workforce Development

• Department of Intellectual and Developmental Disabilities

• Department of Mental Health and Substance Abuse Services

• Council on Developmental Disabilities (this agency oversees the implementation of the MOU.

This MOU will assist the Division in leveraging other public funds to increase resources for extended services and extended employment.

2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

A. the provision of extended services for a period not to exceed 4 years; and

Information regarding this question is inclued with the response to question 1 in this section.

B. how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

Information regarding this question is inclued with the response to question 1 in this section.

o. State's Strategies

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. The methods to be used to expand and improve services to individuals with disabilities.

Funds will be utilized in Fiscal Year 2017 for addressing the following priorities that continue to be identified in our needs assessment as they relate to individuals with the most significant disabilities, including those who need supported employment services; individuals with disabilities who are minorities; individuals with disabilities who have been un-served or underserved by the vocational rehabilitation program; and individuals with disabilities served through other components of the statewide workforce investment system and personnel assisting those individuals through the components of the system: Education and Training; Employment Opportunities; Information; Support Services; and Counseling and Guidance.

In addition, as the Division continues to serve Priority Category 1 and 2 cases, more individuals with significant disabilities are able to access vocational rehabilitation services. The Division continues to monitor the budget and the staff capacity in order to determine the ability to serve Priority 3 and 4 cases. It is anticipated this activity will lead to improvement in the number of individuals with disabilities reaching successful rehabilitation outcome statuses by:

1. Continuing the practice of ensuring the availability of appropriate training activities and resources to meet the individualized needs of clients by seeking out and developing partnerships with other private and public entities to provide specialized education and training activities, to include those that can be provided through self-employment, on-the-job- training by employers, and customized employment.

2. Continuing the development and expansion of statewide employer relationships that focus on inclusion of employees with disabilities in the workforce and the value of hiring people with disabilities. The Division will continue its expansion of our activities with Employment Groups across the state and in the local areas with new programs, such as Walgreens REDI and Project Search.

3. Continuing to support expansion of supported employment services by actively seeking out, training, and monitoring community rehabilitation providers; especially in the more rural areas, that are willing to provide supported employment services to vocational rehabilitation clients with the most significant disabilities; and by fostering partnerships with DIDD and chapters of The ARC in Tennessee to implement employment network projects with community rehabilitation providers. The Division is striving to have shared vendors with DIDD in order to access services for shared clients. The Division is expanding participation in the Individual Placement Model of Supported Employment (IPS) statewide.

4. Continue to increase employment opportunities for clients through development, training, and monitoring of community rehabilitation providers providing job coach pools and employment services.

5. Development of the Business Services Unit will increase targeted marketing and education services to employers; and the provision of additional technical support and expertise to Division staff, clients, and employers in the areas of ongoing and emerging disability issues, and supported employment issues.

6. Continuing to support expansion of Transition School-to-Work services by continuing to work with Local Education Agencies (LEA's) in the maintenance of existing partnerships and the creation of additional partnerships to provide vocational rehabilitation services targeted specifically to that LEA's school system. Continuing to work with and educate school personnel on the mission and scope of the Division in order to maximize services from both entities to better serve our mutual clientele to include appropriate qualified interpreters/accommodations for students that are in LEA/School to Work programs. The newly hired Transition School to Work Director will manage this process.

7. Continuing improvement in the service delivery of the Division's 17 community rehabilitation centers and the comprehensive rehabilitation center at Smyrna geared directly toward providing services leading to successful employment of individuals with the most significant disabilities. Pursue the development of additional service delivery entities in metropolitan and rural markets for services including vocational evaluation, personal and work adjustment, job development, job placement, and job coaching. The 17 Community rehabilitation centers are focusing on expansion of the job readiness programs and collaboration with local area businesses. The Smyrna TRC is expanding vocational training programs through partnerships with CVS Caremark and Nissan and continues to research national employment trends to identify needs for new training programs.

8. Continuing support of vocational rehabilitation counselor development by providing opportunities for vocational rehabilitation counselors to obtain Masters Degrees in Rehabilitation Counseling. The Division will pursue all available RSA slots for master's level training available to the Division through outreach and research. The Division will continue utilization of recruiter staff for recruiting vocational rehabilitation counselors who have a Master's Degree in Rehabilitation Counseling. Finally, the Division will continue financial support of counselors seeking master's degrees.

9. Developing and implementing a comprehensive staff development program based on core competencies for all VR Staff. Utilize partnerships through the university programs. There is an Education Development Plan being developed for all staff in order to reinforce and encourage the Division's goals and priorities.

10. Continuing to implement a marketing/outreach plan that targets and reaches un-served or underserved populations to include all minorities, such as Spanish-speaking clients and clients with traumatic brain injury, autism, deaf-blindness, and mental illness. The marketing efforts will target individuals with the most significant disabilities who are seeking employment.

11. Continuing to support the Workforce Investment System by continuing to co-locate vocational rehabilitation counselors in each of the major Workforce Investment Act Service delivery area career centers and ensuring that all career center satellites also have vocational rehabilitation counselors assigned to visit their centers on a regular basis to work with individuals with disabilities that visit each center.

12. Providing cross training to the career center staff in regard to meeting the needs of individuals with disabilities. Continue to provide consultation on career center accessibility and accommodation needs in regard to the accessibility needs in the building(s), and accommodations in terms of appropriate technology needed to serve individuals with the disabilities. Continue to partner with the American Job Centers (AJCs) in employment initiatives such as the summer youth employment project and the DEI grant.

13. Continuing to support the Ticket to Work and Self-Sufficiency Program and use of other Social Security work incentives that benefit clients by continuing contract with the Benefits to Work Company. This company provides Social Security benefits counseling to clients before and after the Individualized Plan for Employment process. Currently the Division contracts with Benefits to Work to provide outreach to communities on how working affects Social Security Benefits, work incentives, and benefits planning. The agency will also continue to promote the most effective use of Ticket to Work Employment Network programs for the Division and our partners.

14. Continuing training for vocational rehabilitation staff on how effective rehabilitation technology options lead to successful employment outcomes. Staff at the Technology centers meeting quarterly with staff to provide training on services.

15. Continuing support of the State Rehabilitation Council. Council members will be reimbursed for reasonable and necessary expenses for attending Council meetings and performing Council duties (including child care, - personal assistance services and qualified interpreters).

16. Continuing support of the Statewide Independent Living Council. Council members will be reimbursed for reasonable and necessary expenses for attending Council meetings and performing Council duties (including child care, personal assistance services and qualified interpreters).

17. Continuing to submit to the Commissioner an annual report of how funds are utilized relative to innovation and expansion activities.

18. Continuing to provide a coordinated, comprehensive and statewide assistive technology delivery system through a network of contracted assistive technology centers. Each of these five centers, strategically located in Memphis, Jackson, Nashville, Chattanooga and Knoxville ensure access to clients from all 95 counties in Tennessee regardless of location. The centers diverse staff includes: Rehabilitation Engineers; Speech and Language Pathologists; Assistive Technologists; Orientation and Mobility Specialists, Therapists and other Professionals who provide clients with evaluation, training, device fabrication and follow up services. By providing clients with access to this highly trained and skilled resource, and by purchasing the required devices, clients have the tools that they need throughout their rehabilitation program to assist them in realizing their IPE goals.

19. Continue implementation of the electronic case management system (TRIMS) utilizing input from agency staff and vendors to enhance the Division's technological infrastructure and client service capabilities.

20. Continue partnerships with the three federal grants that target employment of persons with disabilities. Those grants are Tennessee Works, Employment First, and DEI. Tennessee is one of three states in the country that are receiving all three grants.

21. Revise the self-employment process to streamline the experience for clients seeking the self-employment option. Research other state VR self-employment policies for efficient, consumer oriented strategies; and include successful business owners in the process to produce a successful program that will help individuals with disabilities become successful entrepreneurs.

2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

Information regarding this question is included with the response to question 1 in this section.

3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

Information regarding this question is included with the response to question 1 in this section.

4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

Information regarding this question is included with the response to question 1 in this section.

5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

Information regarding this question is included with the response to question 1 in this section.

6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

Information regarding this question is included with the response to question 1 in this section.

7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

Information regarding this question is included with the response to question 1 in this section.

8. How the agency's strategies will be used to:

A. achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

Information regarding this question is included with the response to question 1 in this section.

B. support innovation and expansion activities; and

Information regarding this question is included with the response to question 1 in this section.

C. overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

Information regarding this question is included with the response to question 1 in this section.

p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals.

The goals and priorities of the Division of Rehabilitation Services for Fiscal Year 2012, as developed and agreed to by the Division of Rehabilitation Services staff and the State Rehabilitation Council, are focused around the Division's strategic plan.

The goals and priorities for 2015 are:

Goal 1. Continue Increasing Successful Employment Outcomes

OBJECTIVE 1.1:

A. Increase Successful Employment Outcomes by 10% or more over Federal Fiscal Year 2014. The opportunity exists to reinvigorate historical referral sources. This effort will include development of marketing initiatives for use in local areas for community outreach as well as joint efforts with the:

a. Workforce Investment System

b. Tennessee's Department of Labor and Workforce Development

c. Department of Economic and Community Development

d. Department of Intellectual and Developmental Disabilities

e. Department of Children's Services and Department of Mental Health and Substance Abuse Services

The Division will develop strategies for increasing referrals of transition school to work clients through local education agencies. Special focus will include the identification of any underserved population at the regional level.

ACHIEVEMENT: In Federal Fiscal Year the Program had 2358 successful employment outcomes. This is a 9% increase over FY2014's successful employment outcomes of 2159. The VR Program continued focused collaborative efforts with numerous state agencies, in addition to collaboration with Universities across the state. In FFY 2015 Transition School to Work contracts were increased.

2018 UPDATE: The Vocational Rehabilitation program continues to strive to increase successful employment outcomes. Despite continuing efforts to market and outreach through the identified partners, FFY 2016 and FFY 2017 saw a decrease in the number of successful closures. As reported in other sections of the report, the Division has continued its work with state partners, including new memorandums of understanding and interagency agreements with TennCare and the Department of Education. Additionally, VR has increased both pre-employment transition services and transition school to work opportunities through grant contracts with local education agencies.

B. Action Steps to establish a stronger focus on employment related activities include:

a. Staffing the Agency's Business Services Unit for regional and statewide activities;

b. Building a comprehensive network of employment resources across the state;

c. Implementing services to employers promoting the value of the Division and the hiring of people with disabilities;

d. Continuing the current Community Rehabilitation Provider monitoring process to ensure effectiveness and efficiency;

e. Continue to work collaboratively with and provide greater technical assistance to the Workforce Investment System. The Division will continue to have counselors co-located in each of the State's Local Workforce Investment Areas' comprehensive career centers and to provide itinerant counselors to serve all satellite career centers.

ACHIEVEMENT: In FFY2015, the VR Program met with the Business Services Coordinator from the VR Program in Alabama to discuss strategies on expansion of the Business Services Unit in Tennessee. The Statewide Business Services Consultant worked with over 130 businesses statewide in FFY2015. The program offered new services to businesses, such as assistance with Section 503 compliance. The Department of Human Services continues to provide monitoring of the CRPs throughout the state.

2018 UPDATE: In 2017, Vocational Rehabilitation centralized the leadership and reporting structure of the Business Service Unit to align with the Workforce Innovation and Opportunity Act. The unit models the dual customer approach, recognizing that VR must serve clients and engage businesses. There is an increased and intentional focus that extends beyond finding job vacancies and sharing them with clients to learning and understanding employer needs and ensuring VR training and clients can meet those needs. The unit's goal is for business to see VR as a source for diversifying their workforce and providing qualified candidates for their vacant positions. Examples of this work can be found in Section G.

In an effort to continue to work collaboratively with and provide greater technical assistance to the Workforce Investment System, the VR program conducted site reviews of the American Job Centers (AJCs) across the state to assist with building and program accessibility. Additionally, Vocational Rehabilitation Counselors are assigned to AJCs 2 to 3 days a week and other counselors rotate and use the space provided by the AJCs regularly.

OBJECTIVE 1.2:

The Division will continue to monitor expenditures and available funding to determine if there is sufficient funding to release Category 3 and 4.

2018 UPDATE: The Division continues to monitor expenditures and available funding to determine if there is sufficient funding to release Category 3 and 4.

Goal 2. Improve Efficiency and Effectiveness in Client Services Delivery System

OBJECTIVE 2.1:

Meet or exceed the Federal rehabilitation success rate of 55.8% for FY 2014 (Success rate is determined by the number of Status 26 rehabilitated case closures divided by the number of Status 26 plus the number of Status 28 non-rehabilitated Case closures).The division is focusing on the Employment Needs Assessment Process in order to write better Individualized Employment Plans. This effort will increase the number of successful closures and decrease the number of unsuccessful closures.

2018 UPDATE: The Division continues to monitor timeliness of eligibility determinations and development of the Individualized Plan for Employment (IPE). Monthly rates have met or exceeded the established performance metrics of 92% and 90% respectively. Additionally, the Division continues to monitor the success rate of case closures. To date, the Division has not achieved its goal of meeting or exceeding the federal rate of 55.8%. The success rate for FFY 2017 was 50.8%.

OBJECTIVE 2.2: Meet or exceed the Federal ratio of the average hourly wage of individuals who achieved competitive employment to the average hourly wage of all employed individuals in the State of 0.520.Fifty-two percent of closures should be working at wages of $10-$11 per hour.

ACHIEVEMENT: The VR Program did not meet this goal. The ratio has consistently been 0.49, meaning Forty-nine percent of the successful closures were work at wages of $10-$11 per hour.

2018 UPDATE: The Average reported hourly wage of clients closed successfully in FFY 2017 was $10.01. The Division continues to strive for meeting or exceeding the federal ratio for wages. To date, the Division has not achieved this goal.

OBJECTIVE 2.3:

Ensure adherence to quality services leading to employment and quality case management practices by:

1. Achieving an 80%or higher satisfaction rating for the vocational rehabilitation program as reported by the consumer satisfaction survey program for successful outcome closures.

2. Continuing with improvements to the Division's electronic case management system (Tennessee Rehabilitation Information and Management System, TRIMS) to enhance efficiency and accuracy.

3. Training- Continue to increase staff knowledge through continuous training.

ACHIEVEMENT: The Program continues to make improvements the TRIMS system that will increase efficiency and effectiveness for the staff.

2018 UPDATE: The Division ensures quality services leading to employment and quality case management through improvements to the electronic case management system and on-going training to staff. The state issued a request for information (RFI) as the initial first step in securing a new electronic case management system. Additionally, the state invested in on-line training and professional development for VR counselors. Staff have completed several modules of training to increase their knowledge of rehabilitation practices.

OBJECTIVE 2.4:

Ensure access to VR documents, materials and training for clients and staff:

1. The Division will ensure that all documents and materials are available in alternate formats, as needed and requested.

ACHIEVEMENT - the Division always ensures that materials are available in alternate formats. This information is always made available.

2. The Division will ensure that timely requests are made when qualified interpreters are needed or requested.

ACHIEVEMENT: The Division makes requests for interpreters as soon as possible.

3. Video ASL for the Deaf

ACHIEVEMENT: The Division continues to research how to best achieve this goal.

2018 UPDATE: The Division ensures that all documents and materials are available in alternate formats as needed and requested, makes timely requests for interpreters as needed or requested, creates marketing materials to accommodate individuals with sensory disabilities, and is working with state and community partners to educate the community about VR services. Through our partnership with TTAP, the VR program works to ensure that all state and vendor materials are accessible. Additionally, the VR program has established a separate delegated authority for providing accommodations to those applicants who have not yet been determined eligible to make providing interpreters much more efficient.

B. Describe the factors that impeded the achievement of the goals and priorities.

Information regarding this question is included with the response to question A in this section.

2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals.

Information regarding this question is included with the response to question 1 in this section.

B. Describe the factors that impeded the achievement of the goals and priorities.

Information regarding this question is included with the response to question 1 in this section.

3. The VR program's performance on the performance accountability indicators under section 116 of WIOA.

Information regarding this question is included with the response to question 1 in this section.

4. How the funds reserved for innovation and expansion (I&E) activities were utilized.

Information regarding this question is included with the response to question 1 in this section.

q. Quality, Scope, and Extent of Supported Employment Services.

Include the following:

1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

The Division continues to provide supported employment services to eligible clients with the most significant disabilities who have been determined to require supported employment services, in accordance with 34 CFR § 361 and 363, in order to obtain and maintain competitive integrated employment.

In FFY 2017, the goal was to serve 1,300 supported employment cases and to close 286 successful rehabilitation outcomes. The agency served approximately 1,527 and closed 369 cases in Status 26. These can be attributed to the improved and stronger alliance with the community rehabilitation providers and with other state agencies.

When the Supported Employment attachment to the Letter of Agreement was introduced on January 2015, one of the staffing qualification requirements for Employment Specialists is to have completed training through the Association of Certified Rehabilitation Education (ACRE) or by obtaining the Certified Employment Support Professional (CESP) certification. Tennessee providers have been proactive in securing the CESP certification and there have been 223 reported individuals that have obtained the certificate since CESP was introduced to the state.

It is the continued goal of the Division to provide quality supported employment services which are delivered in an effective, efficient and timely manner. Supported employment services are provided through Letters of Agreement with community rehabilitation providers and in cooperation with the Department of Intellectual and Developmental Disabilities (DIDD), Department of Mental Health and Substance Abuse Services (DMHSAS), and the Division of TennCare. The VR staff and community rehabilitation providers must assure that extended services will be available prior to the provision of supported employment services or will be developed as natural supports.

During FFY 2017, interagency agreements were signed and implemented that articulated the following collaboration:

• The agreement between the Division and the DMHSAS solidified the use of evidence based supported employment model, Individual Placement & Support (IPS), in assisting individuals with behavioral health and co-occurring diagnoses in their pursuit of competitive integrated employment. The Division has 8 CRPs that have specific IPS LOA with the agency.

• The agreement between the Division and the Department of Intellectual and Development Disabilities created a pilot program for individuals who are in DIDD's Harold Jordan Center. It is a state owned facility for individuals with intensive behavioral issues and will utilize employment as part of the wrap around services.

• The agreement between the Division and the Division of TennCare created provision of employment services for persons enrolled in the Employment and Community First (ECF) CHOICES program. Federal guidance for Medicaid LTSS stipulates employment should be an ongoing part of the delivery of services. Regulations for home and community-based programs requiring provision of opportunities to work in competitive integrated setting. The target populations are individuals with intellectual and/or developmental disabilities. The agreement intends to ensure that services are coordinated, seamless, and efficient. The Division and TennCare coordinated training efforts to implement the agreement requirements.

There is a small pilot supported employment program for individuals with intellectual and development disabilities that have a behavioral health diagnosis. This pilot program is utilizing IPS in providing SE services. IPS is a promising employment service model for non-behavioral health individuals. The Division along with the DIDD, DMHSAS, and the CRP are testing the applicability of the IPS model in serving individuals with said diagnoses.

For FFY 2018, the Office of Disability Employment Policy (ODEP) has selected Tennessee as a Core and Vision Quest state to receive technical assistance under the Employment First State Leadership Mentoring Program (EFSLMP). As a Core state, TN will be assisted in Employer Engagement and Provider Transformation. TN's goal to increase the number of providers undergoing transformation and increasing the people engaged in competitive integrated employment. As a Vision Quest state, TN will receive guidance about funding and expansion of IPS services in partnership with VR, DMHSAS, and TennCare.

The Division coordinates with other state agencies and the community rehabilitation providers to transition clients receiving supported employment services to extended services. An individual is moved to extended services when the client has reached a point where he/she has achieved maximum performance on the job; has achieved minimum necessary supports on the job; the job is not in jeopardy of ending; and individual is maintaining work performance which is acceptable to employer and client. The Division is working with the University of Tennessee, Center for Literacy, Education and Employment to develop training for CRPs on how to develop natural supports to address extended services where funding is not available from another Agency.

The Division will continue to contract for services from the University of Tennessee's Center for Literacy, Education and Employment (CLEE). These programs will provide continuing training to the Division's staff and contracted community rehabilitation providers to assure competency and compliance.

The number of supported employment providers has increased over the past year from 62 to 75 supported employment CRPs. The Division continues its efforts to increase S.E. providers and anticipates the numbers of providers will increase. VR is actively pursuing a number of other providers for underserved areas across the state. While the number of CRPs remains adequate to serve the Division's number of supported employment clients, there remains a shortage of CRPs able to provide supported employment services in more rural areas and under-served communities and under-served populations of the state. The Division will continue to enter into supported employment agreements with appropriate

state agencies, as well as Letters of Agreement with private and/or non-profit agencies which have the capabilities of providing quality service delivery and extended services in multiple counties. The Division will assertively seek those agencies that will provide supported employment services to persons being transitioned from institutional settings to the community and to work in competitive, integrated employment settings.

The Division will continue to seek community rehabilitation providers to provide supported employment services to under-served disability groups with the most significant disabilities.

The Division expects to serve in excess of 1430 clients through the supported employment program during the Fiscal Year 2018. The Division has consistently closed around 22% of the supported employment clients in successful employment. This would mean around 315 successful outcomes for FY2018.

For the provision of extended services to youth with disabilities who received supported employment services, the division will continue to collaborate and find partnership opportunities with DIDD, DMHSA, Department of Education, and other entities to continue outreach to transition students that may need supported employment. As mandated, the Division has set aside applicable VR funds for extended services of youth with most significant disabilities who require supported employment but whose extended services are not funded by other entities or sources. To capture this, the Division has created a specific status code for these cases.

The Division will work with the Department of Education using the PRE-ETS program. These would offer work experiences that can assist transition students to a more positive and encouraging supported employment roadmap.

The Division will continue to work with the Center for Medicare and Medicaid Services (CMMS) in continuing to align policies and funding that would support employment services.

The Division has convened a work group of VR staff, CRPs, managed care organizations (Amerigroup, BlueCare, and United Health Care) and other entities to review policies, training, identify improvements and best practices for the ECF CHOICES program.

The Division will work with disability specific stakeholders and advocacy groups such as the Autism Society and chapters of The ARC in Tennessee in conducting collaborative meetings to help identify sources of support.

The Division will continue to work with the IPS community for expansion and sustainability of the IPS SE services.

The Division will continue to encourage CRPs to become Employment Networks as possible funding source for on-going services. The Division will continue to train CRPs and VR staff to increase usage of SSA PASS plan and other work incentive programs.

The Division will assure that funds are made available will only be used to provide Supported Employment services to individuals who are eligible to receive such services.

The Division's case management system, TRIMS, has the ability to identify cases and expend the funds allotted as required by the RSA.

2. The timing of transition to extended services.

Information regarding this question is included witht he response to question 1 in this section.

Certifications

Name of designated State agency or designated State unit, as appropriate **Vocational Rehabilitation Program**

Name of designated State agency **Tennesssee Department of Human Services**

Full Name of Authorized Representative: **Danielle Barnes**

Title of Authorized Representative: **Commissioner**

States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.** Yes

2. 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 listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan* , the Rehabilitation Act, and all applicable regulations , 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;** Yes

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes

7. The **Authorized Representative listed above** 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; Yes

8. The **Authorized Representative listed above** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes

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. Yes

Footnotes

_____

Certification 1 Footnotes

* Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

Certification 2 Footnotes

* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

** No funds under title 1 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.

*** 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 3485; and the State VR Services Program regulations.

Certification 3 Footnotes

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes

Additional Comments on the Certifications from the State

Certification Regarding Lobbying — Vocational Rehabilitation

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.

Applicant’s Organization **Tennessee Department of Human Services, the Vocational Rehabilitation Program**

Full Name of Authorized Representative: **Danielle Barnes**

Title of Authorized Representative: **Commissioner**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

Certification Regarding Lobbying — Supported Employment

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.

Applicant’s Organization

Full Name of Authorized Representative:

Title of Authorized Representative:

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html).

Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:**The State Plan must provide assurances that:**

1. Public Comment on Policies and Procedures:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. 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:

a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.

b. the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.

The designated State agency or designated State unit, as applicable **(B) has established a State Rehabilitation Council**

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.

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).

e. the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.

The designated State agency allows for the local administration of VR funds **No**

f. the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.

The designated State agency allows for the shared funding and administration of joint programs: **No**

g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. **Yes**

h. the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.

i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act .

j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.

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.

l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.

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:

a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.

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 .

c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act?

Agency will provide the full range of services described above **No**

d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.

e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.

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.

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.

h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act.

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

j. with respect to students with disabilities, the State,

i. has developed and will implement,

. strategies to address the needs identified in the assessments; and

A. 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

ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

5. Program Administration for the Supported Employment Title VI Supplement:

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.

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.

c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

6. Financial Administration of the Supported Employment Program:

a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.

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:

a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.

b. The designated State agency assures that:

- **i. the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act**
- **ii. an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.**

Additional Comments on the Assurances from the State

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 includes 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.* If included, Combined State Plan partner programs are subject to the "common planning elements" in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on www.regulations.gov for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at http://www.regulations.gov by selecting Docket ID number ETA-2015-0006.

---

* 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 and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 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.

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:

a. Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act).

In conformance with Section 402 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193), the Tennessee Department of Human Services (TDHS) shall administer and supervise the Temporary Assistance for Needy Families (TANF) Program, known as the Families First (FF) Program in Tennessee.

Cash assistance payments are made on a monthly basis for all Families First/TANF eligible assistance groups using a standardized budgeting and payment method per assistance group size. TDHS has a gross income test, a consolidated standard of need, and a maximum standard payment amount per assistance group size. The gross income standard is based on one hundred eighty-five (185%) percent of the Consolidated Need Standard (CNS), which is calculated and submitted to the Department yearly by a contract agency. Some assistance groups receive a higher differential maximum payment amount, based on caretaker work exemptions. Disregards include a two hundred fifty dollars ($250.00) earned income disregard, a mandatory household member and income disregard for a three(3)-month period beginning with the month following the month of marriage for new spouses (marriage during receipt policy), and child care disregards of two hundred dollars ($200.00) per month for children under two (2) years of age and one hundred seventy-five dollars ($175.00) per month for children two (2) years of age or older, for parents who choose a deduction rather than having their child care paid directly to the provider by TDHS.

Non-assistance benefits, services or activities aimed to achieve the goals of TANF may be provided to TANF eligible families or other low-income families at risk of receiving TANF.

TDHS will continue to use fill-the-gap budgeting. Current month child support will be paid to the caretaker using the fill-the-gap budgeting method as permitted in Section 302 (e) of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996.

Families First/TANF payments shall be made through Tennessee's Electronic Benefit Transfer (EBT) system to the caretaker, alternate payee, or protective payee. The payment will be made available on the first (1st) of each month for continuously eligible cases. Payments are made from the date the signed Families First/ TANF application is received in the local office for all eligible applicants. Auxiliary payments will be issued to all assistance groups that have been underpaid.

Eligibility

Eligibility for Families First/TANF cash assistance benefits are determined based on the following criteria:

- The Assistance Unit (AU) lives in Tennessee.
- The AU includes either:
  - A child under age eighteen (18);
  - A child under age nineteen (19) who is expected to complete high school or an equivalent vocational/technical training on or before his/her nineteenth (19th) birthday;

        - A pregnant woman in her last trimester; or
        - The otherwise eligible parents or caretakers of a child receiving SSI.
    - The children live in the home of a parent or a relative, within the specified degree of relationship, who maintains care and control of the child.
    - All members of the AU are citizens or qualified aliens and have provided a Social Security Number.
    - Households meet income eligibility, including an income test and a resource test.

All AUs will be subject to a sixty (60)-month lifetime limit of Families First/TANF cash assistance. Months of Families First/TANF -funded assistance received in other States will count toward the lifetime limit. Those AUs that reach their sixty (60)-month limit and are exempt from the Families First/TANF work requirement and otherwise eligible may be considered for an extension. No more than twenty percent (20%) of the caseload can be on an extension at any given time.

b. Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)

AUs with eligible adults who are not exempt must engage in thirty (30) hours a week of countable work or training activities with the exception of those individuals who require a reduction in activity hours due to an Americans with Disabilities Act (ADA) modification. The thirty (30) hours a week work requirement applies to both single parent families, as well as two-parent families. The federally countable work activities being utilized in Tennessee are:

- Unsubsidized employment;
- Subsidized employment in the public or private sector when funding is available;
- Job Search and job readiness assistance;
- Community Service;
- Work Experience;
- Vocational Education Training;
- Job skills training directly related to employment; and
- Adult Education (education directly related to employment).
- Vocational Rehabilitation

Families First/TANF uses the federal definitions for the countable work activities. AUs with a work requirement will receive cash assistance as long as they comply with program requirements or meet the sixty (60)-month time limit.

All provisions of the Fair Labor Standards Act (FLSA) will apply to Work Experience and Community Service activities, including a maximum number of hours and displacement safeguards. Work Experience is limited to six (6) months and Community Services to three (3) in a calendar year, with some exceptions.

Tennessee is divided into (8) Districts that cover all ninety-five (95) counties across the State for the provision of work activities and supportive services. An Employment and Case Management Services (ECMS) Provider is assigned to each district. After eligibility is determined and a referral is received from the TDHS' district's county office, the ECMS Provider completes an assessment and works with the client to develop an Individualized Career Plan (ICP) and/or Family Empowerment Plan (FEP). The ICP/FEP will outline their specific work requirements according to federally countable work activities and provide supportive services if needed. Families First/TANF clients determined to be ready to engage in part or full-time employment will be immediately placed in work or work-related activities for up to thirty (30) hours per week. After a Families First/TANF client receives twenty-four (24) months of cash assistance, the client is required to engage in work activities, if they are not already participating. This excludes a single custodial parent caring for a child under the age of six (6) who refuses to engage in work requirements and is able to demonstrate an inability to obtain needed child care.

Certain AUs will be exempt from the work requirement based on the following criteria:

- The caretaker is sixty-five (65) years old or older;
- The caretaker is disabled;
- The caretaker is temporarily incapacitated;
- The caretaker is caring for an in-home disabled relative;
- The single parent caretaker is caring for an infant less than one (1) year of age;
- The two (2)-parent household is caring for an infant less than sixteen (16) weeks of age.

c. Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act)

The Families First/TANF employs the following strategies to ensure clients are working towards self-sufficiency:

- Families First/TANF clients will have goal-oriented time-limited, Individualized Career Plans (ICP) and or Family Empowerment Plan (FEP) that carry them through logical and productive steps to self-sufficiency;

- Sanctions will be imposed when a family fails to comply with the Individualized Career Plan (ICP) and/or Family Empowerment Plan (FEP) without good cause;
- Cash benefits will be limited to sixty (60) months of eligibility in a lifetime, with some exceptions; and
- Families First/TANF clients who become employed and lose cash benefits may qualify to receive transitional child care assistance and transitional Supplemental Nutrition Assistance Program (SNAP) benefits.

Once the goals are established and the client is assigned to work or work-related activities that support those goals, the ECMS Provider and TDHS staff work together to ensure that clients receive the appropriate services while the client is in the program. Although the Families First/TANF program does not establish a target goal set for transitioning clients off of assistance; the client, TDHS staff, and the ECMS Provider work together to establish timeframes for the achievement of goals during the sixty (60)-month time limit.

The Secretary of State was sent a notification from the Governor of Tennessee opting out of the provision to require a Families First/TANF parent or caretaker receiving assistance for two (2) months who are not exempt and who is not employed to participate in community service activity. The State plan requires all non-exempt Families First/TANF clients to have an Individualized Career Plan (ICP) and/or Family Empowerment Plan (FEP).

Diversion Program

Tennessee will operate a Diversion program to serve families who are not receiving the Families First/TANF cash assistance but could achieve self-sufficiency and economic security through a lump-sum payment.

An Assistance Unit (AU) must meet all of the following criteria to receive a Diversion payment:

- Families First/TANF program eligibility criteria;
- The Assistance Unit has demonstrated residency in Tennessee for six (6) months;
- The primary caretaker has a recent job history;
- The Assistance Unit does not face any major barriers to employment, such as drug/alcohol abuse;
- The primary caretaker has at least a high school diploma or equivalent; and
- The household is facing a one-time financial need, and the Diversion payment would prevent the ongoing need for Families First/TANF cash assistance. The funds can be used for housing, transportation, child care, or job needs.

The Diversion payment will reduce the temporary cash assistance lifetime limit of sixty (60) months eligibility by the number of months the applicant receives a Diversion payment

Those who accept the Diversion payment will be ineligible to receive another Diversion payment or Families First/TANF cash assistance during the diversion months of assistance. Employed Diversion recipients may be eligible for twelve (12) months of subsidized child care.

Sanctions

Sanctions shall be applied to all Families First/TANF cases that are not in compliance with their Personal Responsibility Plans. A sanction may result in a percentage reduction in the Families First/TANF cash assistance for failure to provide immunizations, health checks, attend school, or ensure satisfactory attendance and/or progress of school-aged children. Total assistance group ineligibility will be applied if the family fails to cooperate with child support or comply with their Individualized Career Plan (ICP) and/or Family Empowerment Plan (FEP) activities without good cause, which is determined by the TDHS

Other Program Policies

Families First/TANF AUs have access to child care. AUs with an eligible adult can access Families First/TANF Child Care if they are engaged in countable work and/or training activities and require child care in order to comply with the program's work requirements. In addition, clients who are exempt from a work requirement, but wish to volunteer for work/training activities may have access to child care. There is no co-pay fee.

Certain child-only Families First/TANF cases are eligible for At-Risk Child Only (ARCO) childcare if funding is available.

Former Families First/TANF clients who are employed or participating in an approved work and/or educational activity at least thirty (30) hours a week can receive up to eighteen (18) months of Transitional Child Care (TCC) after their Families First/TANF case is closed. The eligibility period for TCC begins the first (1st) day of the month after the Families First/TANF cash assistance ends. There is a co-pay fee for ARCO and TCC.

Families First/TANF AUs will be reviewed annually for continued eligibility.

If a single parent marries during the receipt of Families First/TANF cash assistance, he/she may choose to exclude the new spouse from the AU for three (3) full months, regardless of income. Following the three (3) months, the AU must meet Families First/TANF program eligibility requirements to continue to receive cash assistance.

A Family Cap will be applied when a child is conceived and born during a period of eligibility. It may also be applied to a child born after or during a period of ineligibility, but within ten (10) months of a reapplication month. Exceptions are granted when the birth is the result of rape or incest or when the birth is the first (1st) child born to a minor in an assistance unit.

d. Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to

funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)

Privacy Provisions

The rules of the Families First/TANF program regarding the use and disclosure of information about clients and families receiving assistance are consistent with the rules that guided the program under Title IV-A of the Social Security Act prior to the enactment of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, thus protecting the rights of individuals and permitting the release of information to programs operating in connection with the Families First/TANF program; i.e., federally funded or federally assisted programs providing cash assistance on the basis of need, appropriate audit, and appropriate local, State, and federal law enforcement officials.

All TDHS staff will have mandatory requirements to participate in the Data Security Awareness Training every year. This training discusses the safeguarding of confidential case file information. Each staff member will be required to view an interactive training presentation, complete a short quiz regarding the training material, and sign an agreement to abide by the rules and protocols as described in the training material. Failure to participate in the training will result in the user being revoked access. If the TDHS staff does not abide by the confidentiality agreement, they will face disciplinary action

e. Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)

Efforts to Reduce Out-of-Wedlock Pregnancies

“What’s the Rush?” is a Statewide initiative of the Tennessee District Attorneys (DA) General Conference aimed at raising awareness of the legal, financial, and social consequences of teen pregnancies Statewide. “What’s the Rush: Don’t be a Teen Parent” Campaign, provides informational videos and pamphlets via the DA’s Website. “What’s the Rush?” printed materials and videos were created for the DAs, Assistant District Attorneys (ADAs) or staff members to use when visiting schools and civic organizations to educate Tennessee’s youth about the consequences of becoming teen parents. These materials may also be provided to health departments, the Department of Human Services, courts, and other State-wide partners.

The Tennessee District Attorneys Conference created the campaign in 2008 in response to the number of court cases involving teen parents throughout the State. The following clause is included in the State of Tennessee’s contract with the DAs:

“A.39 The grantee shall conduct a teen pregnancy prevention campaign with a goal of decreasing the number of child support cases. This program shall target and provide resource materials to every high school and health department in the State. Further, the program shall be promoted, and readily assessable to teens through various means including, but not limited to, a website, billboards, and other outreach efforts.”

f. Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)

Efforts to Reduce Statutory Rape

The Tennessee Department of Human Services (TDHS) recognizes the correlation between teenage pregnancy and the possible occurrence of statutory rape by men.

- In Tennessee, statutory rape is defined as the unlawful sexual penetration of a victim by the defendant or of the defendant by the victim when:
  - The victim is at least thirteen (13) but less than fifteen (15) years of age and the defendant is at least four (4) years but less than ten (10) years older than the victim; or
  - The victim is at least fifteen (15) but less than eighteen (18) years of age and the defendant is more than five (5) but less than ten (10) years older than the victim.
- **Statutory Rape** is a class E felony. Punishment for a Class E felony is a prison sentence ranging from 1-6 years.
- **Mitigated Statutory Rape** is the unlawful sexual penetration of a victim by the defendant, or of the defendant by the victim when the victim is at least fifteen (15) but less than eighteen (18) years of age and the defendant is at least four (4) but not more than five (5) years older than the victim. **Mitigated Statutory Rape** is a class E felony.
- Aggravated Statutory Rape is the unlawful sexual penetration of a victim by the defendant or of the defendant by the victim when the victim is at least thirteen (13) but less than eighteen (18) years of age and the defendant is at least ten (10) years older than the victim. **Aggravated Statutory Rape** is a class D felony. Punishment for a class D felony is a prison sentence ranging from 2-12 years.

Local TDHS offices will provide printed material regarding statutory rape to be displayed in TDHS offices; contracted agencies, local schools, and other prominent public places where clients, law enforcement officials, relevant counseling services, and related individuals, including the men who have allegedly committed the crime, can view the material. All Family Assistance staff is required to report knowledge of possible statutory rape and is required to report any kind of child abuse or neglect. TDHS staff will contact the local Department of Children Services (DCS) office and notify a Child Protective Services intake worker of a possible occurrence of statutory rape when an applicant for Families First/TANF program or other programs designed to provide related services is:

- Thirteen (13) years of age but less than eighteen (18) years of age; or

- A parent, legal guardian, or custodian on behalf of such person.

TDHS, in conjunction with the proper authorities, will provide a cooperative effort to develop and implement the plan of action.

g. Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)

TANF Electronic Benefits Transfer (EBT) Restrictions Requirements

Under Tennessee Public Law Chapter No. 312, any Families First/TANF client or caretaker who participates or allows another to use the client's EBT card in an EBT transaction at an ATM machine or Point of Sale (POS) device in any prohibited business location shall be subject to the following penalties:

- Reimburse the department for the amount withdrawn and used subject to any prohibition in federal law.
- Upon a third or subsequent violation, if permitted by federal law, the person shall be permanently disqualified from receiving public assistance benefits by means of direct cash payment or an electronic benefits transfer access card.

A person or entity subject to a penalty or sanction under this section shall have the right to a hearing pursuant to the Uniform Administrative Procedures Act, compiled in title 4, chapter 5.

TDHS shall designate a protective payee to administer the temporary public assistance grant for the benefit of the assistance unit in the event a Families First/TANF client or caretaker is disqualified from receipt of public assistance benefits by means of direct cash payment or an EBT card under this Chapter.

Any person or business entity who allows another to use the client's EBT card in an EBT transaction at an ATM machine or POS device in any prohibited business location shall be subject to the following penalties:

1. One thousand dollars ($1,000) for the first violation;
2. Two thousand five hundred dollars ($2,500) for the second violation within five (5) years;
3. Five thousand dollars ($5,000) for a third or a subsequent violation within five (5) years.

The district attorney general may bring an action to suspend the business licenses and permits of the person or business entity for one (1) year for any violation of this subsection (c). The department is authorized to bring an action to enforce any civil

penalty under this subsection (c) in a complaint filed in the chancery court of the county where the merchant is located.

TDHS' Program Integrity Unit (PIU) contacted the Tennessee Alcohol Beverage Commission and obtained a list of the names, physical, and mailing address of licensed liquor stores across the state on a quarterly basis. To obtain the addresses for adult entertainment businesses that meet the definition of Public Law 112-96, PIU initially contacted each County Sheriff Department across the state to identify the name and location of any adult cabaret business known in that county. PIU maintains this list by performing web searches on a quarterly basis to identify new "adult cabaret" business and/or changes to the established list. Under Tennessee Code Annotated 39-17-501, casinos, gambling casinos, or gaming businesses as defined by Public Law 112-96 are prohibited. Tennessee borders multiple states that have legalized gambling and gaming businesses (i.e. Kentucky, Mississippi, etc.). TDHS' PIU is using recipient EBT transaction data and queries on known businesses and keyword(s) (i.e. casino, gaming, etc.) to identify recipients who have used their EBT card in an out of state restricted business. Under Tennessee Code Annotated 71-3-126, Public Law 312, a recipient cannot use their benefits at a retail store that derives its largest category of sales from loose tobacco, cigars, cigarettes, pipes and other smoking accessories. This is monitored via EBT transaction data and queries.

Additionally, TDHS uses a series of monthly reports based on queries on keywords in the EBT store name and the list of established businesses to obtain the name and address of new businesses discovered through the monitoring process. Owner(s) of any new restricted establishments that are discovered as a result of the above efforts will be notified in writing of the State law and penalties for obtaining or using Families First/TANF cash assistance from an EBT card in a restricted business.

TDHS' PIU worked with the Business Intelligence Unit to develop a series of reports to monitor Families First/TANF EBT transactions at restricted locations at liquor stores, adult cabaret, gaming establishments and tobacco stores. These reports are reviewed on a quarterly basis by the TDHS PIU. TDHS' PIU conducts an investigation on locations and recipients that are identified on the quarterly reports. Once investigated, the TDHS' PIU will determine and establish claims in the amount of cash assistance accessed in a restricted location for Families First/TANF clients that have received benefits in a restricted location per State law. TDHS' PIU also assesses penalties on the businesses that violate the federal and state law.

We will work to ensure that our TANF recipients have adequate access to their cash assistance. Business owners will provide the DHS PIU Division with ATM location details. Based on that information, the PIU will assess the restricted locations to determine if there are other nearby unrestricted businesses where benefits can be accessed. If there appears to be an access problem, the DHS PIU will then notify the TANF Program Director concerning locations where a client may not have adequate access to their cash assistance. If determined needed, the DHS TANF team along with PIU will work with businesses in order to purchase POS systems that will be able to be used by clients without being charged a surcharge fee.

The Tennessee EBT Cash Access Location Report is available on Hyperlink to Tennessee EBT Cash Access Location report.

This report provides POS locations throughout the State of Tennessee with and without surcharge fees.

The Families First/TANF client will have the opportunity to appeal any potential claim for using their cash assistance in a restricted location.

Brochures are provided by TDHS' contracted EBT vendor to every recipient who uses an EBT card to access his/her benefits. These brochures thoroughly explain use, fees, and possible surcharges that apply to electronic fund transactions and penalties for illegal use including those for use at restricted businesses.

h. Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)

Information regarding assistance to recipients under the State program is included in the response to question (g) in this section.

i. Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)

Out-of-State Families

TDHS applies the Families First/TANF program policies to all applicant/recipients who are residents, including those families who were past recipients in another state and move to Tennessee. The policies and procedures of the Families First/TANF program will be applied uniformly to current and to new state residents. Families seeking the Diversion payment must demonstrate six (6) months of residency in Tennessee.

j. Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)

Treatment of Non-citizens

TDHS provides assistance to non-citizens using the rules outlined in the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, the Trafficking Victim Protection Act of 2000, and federal rules regarding certain battered women and children. TDHS does not offer state-only funded programs for non-citizens. The current Families

First/TANF program policy allows eligibility for individuals with the following non-citizen status and length of time in the U.S.:

- Refugee (admitted under Section 207) in the U.S. less than five (5) years
- Asylee (admitted under Section 208) in the U.S. less than five (5) years
- Deportation Withheld (under section 243(h)) in the U.S. less than five (5) years
- Honorably Discharged Veterans
- Armed Forces Active Duty
- Spouse/Child/ of Veteran
- Spouse/Child of Armed Forces Active Duty
- Hmong or Highland Laotian
- Spouse of Hmong or Highland Laotian
- Dependent Child of Hmong or Highland Laotian
- Filipinos who are considered US Armed Service Vets
- Legal Permanent Resident (LPR) with forty (40) Qualifying Quarters
- Legal Permanent Resident (LPR) ins US more than five (5) years
- Amerasian Immigrant in U.S. less than five (5) years
- Cuban/Haitian Entrant admitted under Section 21 (h)(5) in the U.S. less than five (5) years
- Conditional Entrant (admitted under INA Section 203 (a)(7) ineligible status for more than five (5) years
- Parolee (status granted under INS Section 212 (d)(5) for 1 or more years - entry date on or after 8/22/96 after in “parolee” status for five (5) or more years
- Trafficking Victims in accordance with 107(b)(1) of the Trafficking Victim Protection Act of 2000
- Certain Women and Children in battered status and in the U.S. less than five (5) years
- Afghan Special Immigrant admitted under 101 (a)(27) effective 12/26/2007
- Afghan Special Immigrant admitted under 101 (a)(27) effective 12/19/2009 (in the U.S. less than five (5) years
- Iraqi Special Immigrant admitted under 101 (a)(27) effective 1/28/2008
- Iraqi Special Immigrant admitted under 101 (a)(27) effective 12/19/2009 (in U.S. less than five (5) years)

k. Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)

Ensuring Program Integrity

Program integrity is twofold. It includes both the provision that benefits must be provided timely and provided correctly and that recipients are provided with an avenue to voice their complaints/concerns through an appeal process.

Appeals are handled by the TDHS' Appeals and Hearings Division, an entity whose only purpose is to fulfill the function of determining whether the correct action was taken on a case when that action has resulted in client dissatisfaction. Any applicant for, or recipient of, Families First/TANF may file an appeal through the county office, district office, State Office, or our Family Assistance Service Center (FASC). Every applicant/recipient is informed of his/her right to appeal if he/she is aggrieved by an action or lack of action by TDHS. Anyone who applies or wants to apply for Families First/TANF cash assistance is given an informational pamphlet that explains the right of Appeal and Fair Hearing, the method by which a hearing may be obtained, and that his/her case may be presented by a household member or a representative. All applicants/recipients are informed about these rights.

Resources that were previously used for quality control purposes in the Aid to Families with Dependent Children (AFDC) program were redirected to monitor and evaluate Families First/TANF program. Focusing on outcomes rather than process will continue to ensure accountability. A method remains in place to ensure that payment accuracy and standards of promptness are achieved. An active case review team will review a statistically valid sample of cases that are actively receiving Families First/TANF (those not slated for closure); to ensure policy and payment accuracy and that appropriate case management services are provided. The results of these reviews are provided to the management team of each area in the state and are used to determine areas where additional training may be needed. Individual errors found in cases are also addressed and corrected.

l. Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—

1. providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or

2. in other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined

appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.

Patient Protection and Affordable Care Act of 2010

The Families First/TANF Program does not intend, at this time, to develop a specific program to assist clients to train for, seek, and maintain employment in:

- Providing direct care in a long-term care facility (as such terms are defined under Section 1397j of Title VI; or
- Other occupations related to elder care determined appropriate by the State for which the State identifies an unmet need for service personnel.

The ECMS Providers currently assist some Families First/TANF clients with work and/or educational training that apply to the above criteria as part of their general work requirement activities based on their needs and abilities.

m. Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Servicecs encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)

MOE Programs

Tennessee has discontinued providing Families First/TANF cash assistance and services to some eligible families under a Separate State Program (SSP), using only State Maintenance of Efforts (MOE) funds. TDHS' MOE funds can be spent in any of the following categories: cash assistance, work/training related activities and associated support services, child support pass-through, Families First/TANF Program Administration, and Families First/TANF MOE Child Care. Families First/TANF eligibility, as outlined in section (a), is a requirement for usage of the TDHS MOE funds. TDHS does not currently have any SSP MOE Programs.

Public Involvement

TDHS continues to uphold efforts to improve the Families First/TANF program through public involvement by meeting with advocates groups to discuss the state of the Families First/TANF program and proposed improvements. TDHS continues to maintain the trust of our clients, partners, and the public by demonstrating excellence in service delivery, results, and effective fiscal stewardship. The Families First/TANF program understands the importance of public-private partnerships and continues to collaborate with other agencies throughout the state.

Americans with Disabilities Act Provisions

The Families First/TANF program, including any contracting agencies providing services to Families First/TANF clients, are required to comply with all ADA provisions in the application of policy and provision of services.

TANF Certifications

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act) Yes

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 Unified or Combined State Plan under title XIX. (section 402(a)(3) of the Social Security Act) Yes

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)—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; Yes

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)—have had at least 45 days to submit comments on the plan and the design of such services Yes

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

Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act) Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals; Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— refer such individuals to counseling and supportive services; Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—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 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

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:

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;

Job Search Training

This training will be conducted in the American Job Center under the One Stop structure designed under WIOA. We will focus this training on the ABAWD participants in order to provide skills to move them to employment quickly. We will also provide this training to other volunteers on a limited basis based on the participant’s needs and available funding for transportation assistance. This training will provide higher touch assistance and case management than self-service job search. Participants will be assessed on the one on one appointment to determine what activities best fit their needs. Based on this assessment and the training available at the AJC, a plan will be developed to include at least four activities completed within six weeks. These activities could include job skills assessments, job clubs, resume writing assistance and workshops, online job search training, interviewing skills workshops and practice session, and other approved training

offered within the One Stop American Job Center. Job search hours performed at the AJC within this training will also count for the ABAWD work requirement hours. Participants will be eligible for transportation assistance in the form of one $25 gas card or bus passes to assist them in being able to attend the AJC for activity completion.

Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Statewide (All 95 counties)	Volunteer Participants in all 95 counties (including ABAWDs)	487	$50,552	AJC Staff (Title I and III)	Number of participants who began the component and those who earned increased wages 1st quarter after completion

Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.

Education Components

Basic Adult Education

Individuals who volunteer for E&T and lack a High School Diploma or Equivalent will be referred to the local Adult Education (Title II) Partners. Adult Education (AE) in Tennessee is divided into a three-level instructional system focusing on reading, writing, and math skills to a bring client's functional level up enabling her/him to pass a High School Equivalency Test (HiSET) and compete in the labor market. Participants who do not speak English as their primary language can receive services through Adult Education through Integrated English Literacy and Civics Education. Under IELCE, those participants can receive additional services to help with preparing to receive their High School Equivalency Diploma. Once prepared, the individual will take the HiSET to obtain their High School Equivalency Diploma. SNAP E&T funding will be spent on the individual to provide transportation assistance ($25 gas card or bus pass) and a $10 voucher for the test if not eligible for the voucher on their own. Success will be measured based on the number of participants who successfully obtain their High School Equivalency.

Target audience (e.g., homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Volunteer Participants in all 95 counties (including ABAWDs) without a High School Diploma or Equivalent	365	$37,914	TN Adult Education Division (WIOA Title II) and contract staff selected to provide these services	% of those that began component and obtained their HSE

*** Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.**

Education Components

Career & Technical Education Training

Description

All who volunteer for SNAP E&T and are determined, through an assessment, to need academic, technical knowledge, and skills necessary for employment will be referred to WIOA Title One or to an established Third Party Partner for assistance. Services offered will assist the individual in obtaining a degree/certificate to allow them to better compete in the job market. Training programs that participants are sent through are determined based on Labor Market Information. Through WIOA Adult and WIOA Youth, participants are also eligible to receive case management, work readiness services, and job readiness workshops that include resume and interviewing assistance. If eligible for enrollment with Title I, the participant will be co-enrolled with SNAP E&T and WIOA to ensure that all reasonable and necessary costs are covered for successful program completion.

Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Statewide (All 95 counties)	Volunteer Participants in all 95 counties (including ABAWDs)	1211	125,551	AJC Staff (Title I and III) & Goodwill Knoxville	% of participants that began component obtained a recognized credential

*** Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.**

Education Components

Work Readiness Training

Activities will focus on developing the knowledge, skills, attitudes, and aspirations to help participants successfully pursue, obtain, and maintain employment or specialized training leading to employment in the local labor market. Work Readiness Training will focus on Personal Effectiveness Competencies (i.e. soft skills) such as interpersonal skills, integrity, professionalism, initiative, and dependability, and reliability, along with communication skills and teamwork. Job search training activities will also be used in support. E&T coordinators will determine the need for Work Readiness after conducting a thorough assessment of the participant's needs and barriers.

Geographic area	Target audience (e.g., population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Statewide (All 95 counties)	Volunteer Participants in all 95 counties (including ABAWDs)	365	$24003	UT Extensions	Number of participants who began the component and those who earned increased wages 1st quarter after completion

*** Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.**

Work Component

Work experience

This component will be offered to those that fall into the Title I Adult & Youth eligibility. After an assessment that determines they would benefit from work experience, the participant will be referred to Title I Services. If determined they are eligible for those services, the participant will be co-enrolled with Title I and SNAP E&T.

Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Statewide (All 95 counties)	Volunteer Participants in all 95 counties (including ABAWDs)	8	$829	Title I &Title III Staff	N/A

*** Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.**

2. An operating budget for the Federal fiscal year with an estimate of the cost of operation for each Federal fiscal year covered by the Combined Plan. Any State agency that requests 50 percent Federal reimbursement for State agency E&T administrative costs, other than for participant reimbursements, must include in its plan, or amendments to its plan, an itemized list of all activities and costs for which those Federal funds will be claimed, including the costs for case management and casework to facilitate the transition from economic dependency to self-sufficiency through work. Costs in excess of the Federal grant will be allowed only with the prior approval of FNS and must be adequately documented to assure that they are necessary, reasonable and properly allocated. A State must submit a plan amendment to request budget adjustments at least 30 days prior to planned implementation;

	State cost	Federal cost	Total
I.Direct Costs:			
a) Salary/Wages	$0	$1,641,600	$1,641,600

	State cost	Federal cost	Total
b) Fringe Benefits* Approved Fringe Benefit Rate Used 32%			
c) Contractual Costs (Admin Only)	$586,597	$1,713,618	$2,300,215
d) Non-capital Equipment and Supplies	$0	$120,000	$120,000
e) Materials	$0	$10,000	$10,000
f) Travel	$0	$39,000	$39,000
g) Building/Space	$0	$45,497	$45,497
h) Equipment & Other Capital Expenditures	$0	$50,000	$50,000
Total Direct Costs	$586,597	$3,619,715	$4,206,312
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, and III)	$586,597	$3,619,715	$4,206,312
100 Percent Federal E&T Grant		$3,033,118	$3,033,118
50 percent Additional Administrative Expenditure	$586,597	$586,597	$1,173,194
IV. Participant Reimbursement (State plus Federal):			
a) Dependent Care (including contractual costs)	$0	$0	$0
b) Transportation & Other Costs (including contractual costs)	$293,429	$293,429	$586,857
c) State Agency Cost for Dependent Care Services	$0		$0
Total 50 percent Participant Reimbursement Expenses	$293,429	$293,429	$586,857
V. Total Costs	$880,026	$3,913,143	$4,793,169
			Section J: Budget Narrative and Justification
Item	**Narrative**		
I.Direct Costs**:**			
a) Salary/Wages	Average salary + fringe+ shared costs+ indirect costs= $72,000 22.8 FTE's x $72,000 staff cost = $1,641,600		
b) Fringe Benefits* Approved Fringe Benefit Rate Used _____%	See attached indirect cost agreement.		

	State cost	Federal cost	Total
c) Contractual Costs	$1 Million of the SNAP E&T 100% funds will be allocated to all local workforce development areas that provide Title I services under WIOA for co-enrollment of SNAP E&T participants. Each area's allocation was based on the anticipated percentage of work registrants in that area. $586,597 Partner costs/ $586,597 Federal Reimbursement been requested for additional 50/50 Funds for our Third Party Partners. $72,000 will be allocated for continued seed funding for UT Extension that will allow them to continue through the first quarter of FY18 on 100% funding. Beginning 2nd Quarter, we will be switching to a 50/50 partnership. $55,021 will be allocated for seed funding for Third Party Partners. A convening will be held to identify potential partners for FY18. Goodwill Middle, Goodwill Memphis, TCATs, Tennessee Prison Outreach Ministry, and Knoxville Area Rescue Mission are potential partners for FY 18.		
d) Non-capital Equipment and Supplies	$80,000 has been allocated to cover the cost of our annual SNAP E&T training for all partners involved in the program. $30,000 has been allocated to cover the cost of a convening for Third Party Partners. $10,000 has been allocated for postage to mail orientation letters after referrals are received.		

	State cost	Federal cost	Total
e) Materials	$10,000 has been allocated for marketing material. The need for technological promotion, to include YouTube videos and social media, has been identified. The continued need for promotional items, such as handouts and posters, will be utilized. We will utilize the SNAP Outreach marketing guidelines.		
f) Travel	Per local area, there is 1-2 staff that travels to their respective counties to provide SNAP E&T services to ensure all 95 counties are being served. A total of $30,000 has been allocated for daily travel expenses. Funds will be allocated to the Grants and Program Manager and Director, as well as, 2 Regional staff members to attend the annual Employment and Training Conference by SERO. $1000 x 4 staff = $4000 $5,000 has been allocated for the Grants and Program Manager and Regional Staff to conduct Auditing and Technical assistance visits to several of the offices providing SNAP E&T services across Tennessee's 95 counties.		

	State cost	Federal cost		Total
g) Building/Space	SNAP E&T is a partner in the Combined State Plan and is required to share in the operational costs of the American Job Centers. In order to match other WIOA partners, 1.5% of the total budget will be allocated to infrastructure. That total equals $45,497. The allocation methodology for shared costs varies by LWDA. All partners must determine and agree upon the infrastructure and additional costs; determine reasonable and acceptable allocation methodologies; select the appropriate methodology to apply to each cost category, and must ensure methodologies result in cost allocations based upon proportionate use and relative benefit received by the partners (TEGL 17-16).			
h) Equipment & Other Capital Expenditures	$50,000 has been allocated for VOS System Maintenance/upgrade costs for the SNAP E&T module. All maintenance costs are cost allocated to all programs managed by the system based on the number of accounts within each module and specific change orders submitted during that billing cycle. Some examples include the maintenance of the automated referral process, document retention, and implementation and tracking requirements of an Online Orientation process, data extracts, data matches, and reporting requirements.			
II. Indirect Costs:				
III. State In-kind Contribution				

	State cost	Federal cost	Total
IV. Participant Reimbursements			
a) Dependent Care	Due to the cost, Dependent Care reimbursements are not offered as participant reimbursements for SNAP E&T participants during FFY 2018. We are working to identify Third Party Partners to provide these needed services. This partnership would not impact the limited 50/50 allocation for FFY 2018.		

	State cost	Federal cost	Total
b) Transportation & Other Costs	○ $135,000 state funds / $135,000 Federal funds have been allocated for Participant Supportive services. They will only be offered to participants who are enrolled in the Adult Education activity/component and for participants that are not co-enrolled or offered supportive services through their local area. ○ Goodwill Knoxville will spend a total of $242,857 on participants. The 50/50 match will be $121,429. ○ The University of Tennessee Extension will spend a total of $74,000 on participants. The 50/50 match will be $37,000.		
c) State Agency Cost for Dependent Care Services	The state will not reimburse Dependent Care costs in FFY18.		

3. The categories and types of individuals the State agency intends to exempt from E&T participation, the estimated percentage of work registrants the State agency plans to exempt, and the frequency with which the State agency plans to reevaluate the validity of its exemptions;

The 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. (State exemptions DHS has authority). Individual exemptions shall be evaluated at the participant's next recertification unless the client reports a change that requires the worker to make a re-determination.

Currently, the Tennessee Department of Human Services (TDHS) is operating under an ABAWD time waiver, exempting eighty-six (86) counties from ABAWD time counts. However, effective January 31, 2018, the current waiver is ending. At this time, the state will be expanding the number of counties not exempt from ABAWD time counts from nine (9) to seventy-nine (79), leaving only sixteen (16) counties exempt from the ABAWD time counts. We are anticipating an influx in the number of ABAWD individuals. We are exploring Apprenticeship partnerships to assist the ABAWD population, as they are highly disadvantaged. We envision this Apprenticeship Program would give ABAWD's a direct link to employment. This program could potentially assist the participant in obtaining needed credentials and/or job skills for ensuring satisfactory employment upon completion while offering the possibilities of earning wages and benefits.

4. The characteristics of the population the State agency intends to place in E&T;

Tennessee has identified over 285,000 NCP's who are receiving SNAP benefits. By taking the 2 Generational approach TN has targeted non-custodial parents in Knox County in an effort to provide alternatives and solutions that would directly mitigate their barriers. Many of which are causing their hardships in the first place; such as, license revocation, enforcement actions, a need for modifications, etc. By participating in SNAP E&T, NCPs qualify for modifications, license revocation, and all enforcement actions are placed on hold. Beginning January 2017, this initiative has been expanded statewide to serve all NCPs across the State of Tennessee.

5. The estimated number of volunteers the State agency expects to place in E&T;

Tennessee's SNAP E&T program is Voluntary. Anticipated monthly participation is provided in the components section A1.

6. The geographic areas covered and not covered by the E&T Plan and why, and the type and location of services to be offered

Statewide (All 95 counties).

7. The method the State agency uses to count all work registrants as of the first day of the new fiscal year;

Work Registrant Population

1. Number of Work Registrants (as determined by TDHS)
2. The number of Work Registrants expected to be in the state as of October 1, 2017, is 202,343 (This projection is based on last year's prediction)

3. The number of new Registrants to be added between October 1, 2017, and September 30, 2018, is 90,004 (This projection is based on last year's prediction)
4. The total number of Registrants in the state between October 1, 2017, and September 30, 2018, is 292,347

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 FFY, TDHS' system will not count the participant again.

8. The method the State agency uses to report work registrant information on the quarterly Form FNS–583

Method for Obtaining Initial Count of Work Registrants

Federal Reporting Measures Methodology

Data for components and demographics needed for federal reporting is located in the case management system for TN, Jobs4TN. This data will be collected and compiled by running queries through tables located in the Jobs4TN database that contains the needed information.

Wage Data will be collected by matching the Social Security Numbers of participants of SNAP E&T to Tennessee Unemployment Insurance wage records. The Wage Data will be reported as aggregated data.

9. The method the State agency uses to prevent work registrants from being counted twice within a Federal fiscal year. If the State agency universally work registers all SNAP applicants, this method must specify how the State agency excludes those exempt from work registration under 7 C.F.R. §273.7(b)(1). If the State agency work registers nonexempt participants whenever a new application is submitted, this method must also specify how the State agency excludes those participants who may have already been registered within the past 12 months as specified under 7 C.F.R. §273.7(a)(1)(i);

Unduplicated Work Registrant count

The TDHS eligibility determination system calculates an unduplicated Work Registrant count and a snapshot of work registrants in the state as of October 1st. The original referral date for each client is maintained in the eligibility system by the client's social security number, ensuring there will be no duplicative count of Work Registrants. If SNAP benefits are terminated and re-approved within the same FFY, TDHS' system will not count the participant again.

10. The organizational relationship between the units responsible for certification and the units operating the E&T components, including units of the statewide workforce development system, if available. FNS is specifically concerned that the lines of communication be efficient and that noncompliance by the participant be reported to the certification unit within 10 working days after the noncompliance occurs;

1. Narrative Coordination Statements

TDLWD SNAP E&T Central office staff meets with TDHS SNAP Policy staff throughout the year. Issues and mutual concerns are discussed and resolved. Coordination of future on-site reviews are planned and discussed. Suggestions are offered for program improvement from both agencies. The meetings result in a better understanding of problems encountered by each agency. The outcome is that partner agencies pull together for the success of the program and the customers gain.

Program Reviews:

The Grants and Program Manager will monitor programs on an annual basis. TDLWD SNAP Program staff are interviewed at the local office to determine their general understanding of the program. At each location, case files are reviewed. The Individual Employability Plan (IEP) is evaluated for detailed direction, and incremental steps to achieve program goals. The EDP documents each step as the client progresses through the program.

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.

The TDLWD is the administrator of the SNAP E&T Program and is the primary Service provider of E&T services.

2. Information Coordination

A. 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

Tennessee Department of Labor and Workforce Development

- Complete and enter E&T Referrals.
- Invite participants with an offer of services.
- Discuss employment rights and 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, replace lost or stolen reimbursement checks, 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.

3. Coordination Time Frames

The following coordination time frames will be followed, unless unforeseen circumstances prevent them from occurring:

- Once a referral list is provided by TDHS, TDLWD will send an appointment letter within 7-10 working days.
- TDLWD will schedule Orientation within 1- 2 weeks of the referral date to allow sufficient time for the Participant to enroll in a component and limit the possibility of an incurring countable month.
- TDLWD will immediately enter and electronically transmit the data required to authorize the Participant Expense Reimbursement.
- TDLWD will enter computer documents within four working days of action and re-enter rejected documents within four working days.
- TDLWD will notify TDHS within five days of any information that may affect SNAP eligibility, obtaining a job, changes in income, etc.

11. The relationship between the State agency and other organizations it plans to coordinate with for the provision of services, including organizations in the statewide workforce development system, if available. Copies of contracts must be available for inspection;

Partner/Contract Name

Tennessee Department of Labor and Workforce Development

Monitoring and communication with contractor (s)

- TDLWD shall provide written documentation of the monitoring tools, plans, schedules, and other supporting documents used to monitor all sub-recipients' program operations and financials, as well as, processes for addressing observations and/or findings.

- TDLWD shall conduct on-site reviews of their sub-recipients at least once every three (3) years.

- TDLWD shall, based assessment of the risk of noncompliance posed by the sub-recipient, provide the sub-recipients with training and technical assistance on program-related matters.
- TDLWD must obtain a copy of the sub-recipients single audit report and issue management decision on findings, if any, within the single audit report.
- TDLWD must provide a copy of the sub recipient's single audit report and any of TDLWD management decision letter issued.

Role of Contractor

Tennessee Department of Labor and Workforce Development (TDLWD) will be responsible for the operations of the E&T program through an Interagency Grant Agreement (IGA).

Timeline

Start: 10/01/2017

End: 09/30/2018

Description of Activities/Services

TDLWD staff will be responsible for:

1. Creation/Training/Monitoring of policies and procedures for the E&T program for Local Workforce Development Board staff;

A SNAP E&T Manual has been published to outline the SNAP E&T program. Annual training will be conducted prior to the start of each fiscal year. Training is conducted monthly on SNAP E&T and AJC staff as well as LWDB staff are invited and encouraged to participate in these webinars. Daily technical assistance is also available via SNAP.ET@tn.gov. Onsite technical assistance can also be requested. Monitoring on the program side and the fiscal side is accomplished by monthly desktop reviews, an annual review by the Program Accountability Review team, invoice monitoring by the Grants4tn system and TDLWD Central Office fiscal unit. An annual on-site program monitoring by Program Manager and/or Regional SNAP E&T staff will also be conducted.

2. Establishing and monitoring Third Party Partners and other Contractors TDLWD has established partnerships with;

TDLWD will be responsible for contracting with Third Party Partners. SNAP E&T Program Manager, TDLWD Fiscal unit, SNAP E&T Regional Staff and SNAP E&T coordinators in each LWDA, will monitor once the contract in in place, services and invoicing. In addition, the PAR team will conduct an annual review of each contract.

Provide guidance to Local Workforce Development Board staff in the appropriate assignment of components for participants;

LWDB staff will be provided with a copy of the state plan once approved to receive a description of each component. SNAP E&T coordinators in each LWDA will monitor

that the SNAP E&T process of orientation, assessment, and component placement is followed and documented in VOS.

4. Provide guidance to Local Workforce Development Board staff that conduct Orientations and one-on-one assessments

Orientation for SNAP E&T is standardized and is conducted using a PowerPoint that is issued by TDLWD Central Office. We will be transitioning to an online orientation video during the FY. Assessment guidance questions will be provided to all staff involved in conducting the one-on-one assessment.

5. In coordination with TDHS conduct Marketing/Outreach activities for the E&T program.

Desiring to increase the SNAP E&T enrollments, we are encouraging each LWDA to devise a plan to identify outreach locations to go and present the opportunities of SNAP E&T as well incorporate marketing strategies into their local area proposals for SNAP E&T.

6. In coordination with TDHS develop new strategies to target SNAP participants

TDLWD and TDHS will continue to have quarterly meetings to strategize ways to identify and serve more SNAP participants.

Funding

$3,033,118 will be used for 100% administrative funding and $135,000 match funding (50/50). Total funding equals $3,303,118.

Evaluation

The performance will be measured through WIOA reporting measures to track the effectiveness of the services being provided.

Partner/Contract Name

Goodwill Knoxville

Monitoring and communication with contractor (s)

The Department of Labor and Workforce Development 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 andprogram monitoring at least once per year.

Role of Contractor

Goodwill of Knoxville is a Third Party Provider that will provide soft skills training, job readiness training, short-term training, and job placement assistance to SNAP E&T participants.

Timeline

Start10/01/2017

End09/30/2018

Description of Activities/Services

Goodwill Knoxville will offer the following 3 training programs during FFY 2017:

1. **Certified Nursing Assistant Training**
2. **Microsoft Office Computer Training**
3. **Customer Service Training**

   Training is held at two central locations, Hamblen and Knox counties. Participants from these counties may be referred for training: Claiborne, Cocke, Grainger, Greene, Hamblen, Jefferson, Sevier, Union, Knox, Anderson, Blount, and Loudon.

   Funding

   The total budget will equal $566,990. The 50% reimbursement will be equal to $283,495.

   Evaluation

   All participants will be registered in the Job4TN.gov system. Retention and wages will be tracked to report the effectiveness of the services provided by this Partner.

12. The availability, if appropriate, of E&T programs for Indians living on reservations after the State agency has consulted in good faith with appropriate tribal organizations;

There are currently no Tribal Organizations in the state of Tennessee, so there are no specific plans for this population at this time.

13. If a conciliation process is planned, the procedures that will be used when an individual fails to comply with an E&T program requirement. Include the length of the conciliation period

Tennessee's SNAP E&T program is Voluntary for FFY 2018; therefore, the Conciliation policy is not applicable at this time.

14. The payment rates for child care established in accordance with the Child Care and Development Block Grant provisions of 45 CFR 98.43, and based on local market rate surveys.

SNAP E&T program is pursuing childcare assistance for its participants who are participating in eligible components that include Adult Education and WIOA Adult services. Currently, TN is exploring a partnership with the Boys & Girls club to provide childcare for SNAP E&T participants.

15. The combined (Federal/State) State agency reimbursement rate for transportation costs and other expenses reasonably necessary and directly related to participation incurred by E&T participants. If the State agency proposes to provide different reimbursement amounts to account for varying levels of expenses, for instance for greater or lesser costs of transportation in different areas of the State, it must include them here.

The Tennessee State Legislature has appropriated $135,000 in state funds and this plan requests $135,000 in federal funds to provide a total of $270,000 in supportive services to SNAP E&T during FFY 2018. The most common Participant support is for transportation assistance. Reimbursements are issued as gas cards or bus passes. High School Equivalency Test (HISET) fees can be issued because state staff case manages participants enrolled in this activity/component.

TDLWD will issue participant supports as a reimbursement. Participants must provide an attendance sheet confirming they have maintained engagement in their activity at the required level identified in their employment plan if case managed by TDLWD. Adherence to the policy will be reviewed during state monitoring visits and desktop reviews. The electronic case file must show the participant is enrolled in a qualifying activity, an attendance sheet has been uploaded in VOS, and the participant signed the Gas Card or Bus Pass release log.

Participant reimbursement amounts vary based on the type of support requested. Gas Cards will be limited to $25 per month. All other amounts of support will depend on the vendor and 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.

All supportive services for Participants referred to local area staff for Title I services will be issued from WIOA Title I funds, unless they are determined ineligible for training assistance for reasons approved by the local board such as:

- Default on a student loan (no payment plan)
- Certain Felony Convictions
- Unsatisfactory progress previous semester
- Training of interest is not approved by the local area
- Other reasons strictly prohibited by the local board

In these instances, SNAP E&T funds will cover their supportive services for items such as books, uniforms, drug screens, tools, supplies, and transportation. 40 percent of Title I funds must be spent on participants based on the policy approved by TN State Workforce Board (Workforce Services Policy- Minimum Participant Cost Rate (MPCR) TN-WIOA 17-11).

16. Information about expenses the State agency proposes to reimburse. FNS must be afforded the opportunity to review and comment on the proposed reimbursements before they are implemented.

This information is provided in the response above.

b. Able-bodied Adults without Dependents (ABAWD)

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: *7 CFR § 273.7(c)(7)

1. Its pledge to offer a qualifying activity to all at-risk ABAWD applicants and recipients

Its pledge to offer a qualifying activity to all at-risk ABAWD applicants and recipients;

Section D: Pledge to Serve All At-Risk ABAWDs (if applicable)*State agencies wishing to receive pledge funds should identify a desire to pledge and provide the following information:N/A For all SERO states*	
I. Is the State agency pledging to offer qualifying activities to all at-risk ABAWDs?	No. Tennessee does not request to be a pledge state for FFY 2018.
II. Information about the size & needs of ABAWD population	N/A
III. The counties/areas where pledge services will be offered	N/A
IV. Estimated cost to fulfill pledge	N/A
V. Description of State agency capacity to serve at-risk ABAWDs	N/A
VI. Management controls in place to meet pledge requirements	N/A
VII. Description of education, training and workfare components State agency will offer to meet ABAWD work requirements	N/A

2. Estimated costs of fulfilling its pledge

Tennessee will not operate under a “pledge state” status for FFY 2018.

3. A description of management controls in place to meet pledge requirements

Tennessee will not operate under a “pledge state” status for FFY 2018.

4. A discussion of its capacity and ability to serve at-risk ABAWDs.

n/a

5. Information about the size and special needs of its ABAWD population

See question 1.

6. Information about the education, training, and workfare components it will offer to meet the ABAWD work requirement.

ABAWD work requirement is the same as Non-ABAWD participants.

c. Plan Modification

If FNS determines that the performance of a State agency with respect to employment and training outcomes is inadequate, FNS may require the State agency to make modifications to the State E&T plan to improve the outcomes.*

_____

*7 U.S.C. 2025(h)(5)(E) as amended by Agricultural Act of 2014 .

Funding Disclaimer

Funds may not be available when SNAP E&T portions of a Combined State Plan under WIOA are approved. FNS's obligation after approving a SNAP E&T plan submitted as part of a Combined State Plan is contingent upon the availability of an appropriation from which payment can be made. Any FNS funding resulting from an approval of a SNAP E&T plan submitted as part of a Combined State Plan is subject to FNS receiving sufficient funds (in the Program Financial Control System for FNS) to fund this and all prior approved SNAP E&T plans submitted as part of a Combined State Plan in their entirety in the time and date order received. Federal reimbursement to States for 50 percent of State administrative expenditures and for participant reimbursements is subject to the above conditions.

Jobs for Veterans' State Grants

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported (VETS-200 Series Reports) quarterly (using four "rolling quarters") on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a five-year (FY 2015-2019), multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for

Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

a. How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG

Employment Outlook for Veterans

1. The Overall Employment Outlook for Veterans

The employment outlook for Veterans in Tennessee is expected to be above that for their civilian counterparts. Continued technological advances in military equipment and the requisite training to operate and maintain this gear make Veterans highly competitive in a broad spectrum of markets. A lack of required (I.E. Healthcare, CDL, etc.) certification because of “State Mandated” formal educational training remains a challenge for some Veterans in certain career fields. However, programs like the Post 9/11 GI Bill and the Transition Assistance Program along with proposed state legislative action to allow for the use of military schooling to be used in lieu of in-state instruction, are dealing with these difficulties and provide opportunities along with information and training to enhance the accreditation process for recently separated Veterans in a variety of career fields. The “Soft skills” Veterans possess also make them desirable to potential employers and include; leadership, a strong work ethic, teamwork, loyalty and a desire to succeed, just to name a few.

2. Opportunities for Veterans

Areas of growth specifically being promoted by the current administration are jobs in the automotive and healthcare sectors. Hankook manufacturing from Korea has agreed to build a new tire plant in Clarksville Tennessee (Montgomery County) that will employ 1500+ people. One of the deciding factors for them locating in Clarksville was the close proximity of Ft. Campbell and the large pool of available transitioning and residential Veterans. Additionally, the current automotive industry in Tennessee is expanding, with Nissan committed to increasing production of the Nissan Leaf in Smyrna. GM will also continue to produce the Chevy Volt at the Spring Hill plant and Volkswagen is expanding with plans to grow their production facility in Chattanooga. In addition to the specific auto manufacturers, the companies that support those facilities continue to grow as well. As an example, Automotive Energy Supply Corporation (AESC), the company that produces the battery for the Leaf is expanding to meet the higher level of demand through increased production.

Because of the increase in age of the general population, the healthcare sector will continue to expand in Tennessee as well. HealthCare Corporation of America (HCA) continues to grow in Tennessee and is one of the largest employers within the State providing a wide variety of job opportunities for Veterans such as EMT, medical, IT, etc.

To aid in the growth of these industries, Tennessee is making a significant amount of grant money available through the Tennessee Department of Economic Community Development for job development to assist these companies with the training and placement of employees, including Veterans for these highly desired jobs. Programs such as On the Job Training (OJT) and the Incumbent Worker Training Program (IWT) are just two examples of funding assistance available to them.

Some examples of companies that are expected to provide notable opportunities for Veterans:

- Hankook Tires, Montgomery County
- Berretta Firearms, Sumner County
- TVA, Sumner County
- HealthCare Corporation of America

3. Projected Long-Term Employment through 2019

Growth Rates for the Long Term: In the long term, employment is expected to rise through 2019 in most sectors. The top five industries and occupations in the state that will provide employment opportunities in Tennessee are: 1) Education and Health Services, 2) Trade Transportation, and Utilities, 3) Professional and Business Services, 4) Manufacturing, and 5) Government. The growth rate through 2019 is significant at 1.2 percent per annum where healthcare and social assistance, professional and business services, construction, and education sectors are projected to gain the most jobs. Some service sector and truck transportation jobs are likely to show significant growth as well.

4. Promoting the hiring and retention of Veterans

The advantage of hiring Veterans is a topic that needs to be presented to an employer on a consistent basis. Tennessee's American Job Centers (AJCs), through the Business Services Team (BST), will provide an effective conduit to promote Veterans to businesses as a sound and wise investment. Federal contractors and subcontractors are also targeted as companies that not only can benefit from the hiring of Veterans, but they are also informed about their responsibilities under the Office of Federal Contract and Compliance Programs (OFCCP) and Vietnam Era Veterans Readjustment Assistance Act (VEVRAA) guidelines as well. This is done through our BST, which includes the Local Veterans' Employment Representative (LVER), the Local Office Site Leads, Wagner-Peyser (W/P) staff, Local Workforce Development Area (LWDA) staff as well as the Tennessee's Department of Labors' Workforce Development (TDLWD) Marketing Services Team within the Service Delivery System. All provide valuable information about promoting Veterans within a variety of venues including job fair participation, Chamber of Commerce meetings, Society of Human Resource Managers (SHRM) meetings, employer visits, public radio and television service spots and departmental brochures. Besides the benefits of hiring Veterans, employers are also informed about the assistance available to them at the AJC, such as the ability to conduct individual hiring fairs and notification of job opportunities to potential candidates.

Retention of our Veterans who received case managed services is accomplished through follow - up within 30/60/90 days of initial hire between the individual Veteran and the employer by our DVOP staff. This gives both parties an opportunity to discuss potential issues before they escalate.

Targeting Services to Veterans with Significant Barriers to Employment (SBE)

According to the latest Census Data (Census 2010), there are 475,375 Veterans over the age of 18 in Tennessee. There are 275,122 Veterans between the ages of 18-64: male Veterans total 246,498 and female Veterans 28,624. Of these Veterans, 44,369 are classified as disabled. Also, approximately 8,800 Tennessee Reservists and National Guardsman have been called to active duty for service in Iraq and Afghanistan. Many of these service members were not classified initially as Veterans by Title 38 definition but will be eligible for service as a Veteran upon their return. Assisting this group of Veterans is critical to their successful transition back to civilian life.

Additionally, continued outreach within the local community is vital to promote all the services available to our Veterans.

Latest estimates of homeless Veterans by the Veterans Administration's (VA) Point-In-Time Count indicate there are approximately 3,300 homeless Veterans residing in Tennessee. In addition to the groups mentioned above, the Armed Forces are possibly planning a massive drawdown of active duty troops within next three years. The number of servicemen this is projected to affect is estimated at 1.5 million. Disabled Veterans Outreach Program Specialists (DVOPs) within the Tennessee Department of Labor-Workforce Development (TDLWD) will provide services to Veterans who have been identified as having a SBE that requires additional enhanced services through case management, consistent with VPL 03-14 Ch. 1 and VPL 03-14 Ch. 2, and 04-14. These include:

Veterans with a compensable disability; Homeless (As defined by Section 103(a) of the Stewart B. Mckinney Homeless Assistance Act);

- Recently separated service members with 27 or more consecutive weeks of unemployment;
- Veterans who have recently been incarcerated along with incarcerated
- Veterans who are being released soon;
- Veterans needing a high school diploma or equivalent certificate;
- Low income (As defined by WIOA);
- Veterans between the ages of 18-24; and other eligible as defined in the statutes.

DVOPs are required to take an active role in seeking out and assisting these targeted groups by networking with other local, state, and federal government agencies. DVOPs also develop partnerships with Veteran Service Organizations, community service organizations, LWDA partners, faith-based organizations, and any other entities that are dedicated to locating and serving Veterans in need and helping them with the purpose of providing intensive services so they are able to successfully compete in the job market.

TDLWD acknowledges that homeless Veterans are not likely to seek our services on their own and that an “under the bridge” approach is to be taken by DVOPs, encouraging them to go where these individuals can be found. In locations where there is access to organizations such as US DOL Homeless Veterans Reintegration Program (HVRP) grantees (Such as Operation Stand Down Tennessee (OSDTN) and Volunteers of America Knoxville), VA facilities, Warrior Transition Units (WTU) etc., direct partnerships have been established where the DVOP will visit the facility weekly (In the case of OSDTN, a DVOP is available) to provide services as needed.

The goal is to help the Veteran become job ready and gain employment in a field of their interest and/or ability. Veterans who are identified as having SBE through the initial intake process at the AJC, and need specific Intensive Services, will be referred to appropriate DVOP staff for assistance as required. The DVOP and the Veteran will work together to complete a career assessment and document any current or potential SBEs, then monitor them through the Case Management process. The Veteran would then, if required, be referred to an appropriate partner for additional services as needed. In the absence of DVOP staff, the LOFF Manager, or other W/P staff, assumes responsibility for the career assessment of the individual and assures that appropriate referrals and services are provided. DVOPs are a supplement to the AJC staff and should not be a substitute for providing services.

Tennessee will continually monitor and assess the performance data of services provided to ensure that the roles and responsibilities of both the DVOP and the LVER are adhered to and determine if adjustments to the program are needed.

The Quarterly Manager's Reports, along with onsite office validations and desk audits, will be used to ensure compliance with this directive and other guidance as given by DOL-ETA, VETS, and the TDLWD.

There are no designated Tribal Lands within the State of Tennessee. Native American Veterans receive the same services as non-Native Americans.

b. The duties assigned to DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current guidance;

TDLWD has determined that the appropriate placement of DVOP/LVER personnel is paramount to the success of the program.

For DVOPs, careful study of state demographics and associated evidence indicates that targeted veteran subgroups are predominately located in Tennessee’s metropolitan areas. However, many counties outside of the MSAs have sufficient Veteran population to warrant the presence of a DVOP. Most DVOP Specialists will be assigned to a comprehensive Career Center where other supportive services are readily available. In the areas where there are additional organizations such as VA VR&E offices, Homeless Shelters and other Community Partners, a DVOP from the local AJC has a partnership with them to provide Intensive Services to those who require additional assistance to

become job ready. Services will be provided to Veterans who have identified themselves as having an SBE.

LVER staff will be placed throughout the state to reach out to employers and promote the benefits of hiring veterans. One way this promotion process can be accomplished is by introducing employers to the immediate tangible benefits such as the Work Opportunity Tax Credit (WOTC, when funded) that is available to them when they hire Veterans. In addition to the tangible incentives they can get are the short and long-range benefits gained from the intangible "soft skills" Veterans bring to the hiring table, teamwork, trainability, leadership, diversity in the workplace, and a host of others that are inherent to the military experience. By "showcasing" our Veterans, the LVER staff increases job opportunities for them.

Every effort is made to keep vacancies of staff positions down below the 60-day time frame as directed. The Veterans Program Coordinator (VPC) will ensure that Tennessee's Department of Human Resources is aware of the unique funding stream of the JVSG and will keep all vacancies filled within the 60-day mandate.

TDLWD will ensure that all new hires for DVOP and LVER will attend NVTI for mandatory training within the required 18 month time period.

DVOP SPECIALISTS

A. **Primary Duties:** Intensive Services. The DVOPs are assigned to the local AJC for the main purpose of providing intensive services to SBE Veterans and other eligible individuals through case management. This is the key component of the roles and responsibilities of the DVOP.

After the initial assessment of a Veteran in the AJC (Conducted by other than DV/LV staff) and it is determined that they have an SBE and require additional Intensive Services, they will be referred to a DVOP for assistance. To accomplish effective intensive services, the DVOP must, at a minimum:

- Conduct an assessment of individual needs
- If appropriate, develop a documented plan of action for periodic review

These two activities form the core of an effective individual Case Management plan under which most Intensive Services will be delivered.

Upon completion of the assessment, the DVOP can determine the need for additional Intensive Services through case management. These services can take the form of

- Providing vocational guidance and counseling as required, such as; skills assessment, career planning, communications skills, interviewing skills, punctuality, personal maintenance skills and professional conduct.
- Coordination of supportive services by:
  - Providing technical assistance to community - based organizations regarding employment and training services to veterans.

- Developing relationships with VSOs and consulting with other representatives of federal, state, and local programs in order to provide maximum employment assistance
- Job referral for specific employment opportunities. d. Referral to training with other agencies
- **Providing Services:** The DVOP will provide services to Veterans who have been identified as having an SBE that requires additional enhanced services through case management consistent with VPLs, 03-14, 03-14 Ch1, 03-14 Ch. 2 and 04-14. These include Veterans with a compensable disability; Homeless (As defined by Section 103(a) of the Stewart B. Mckinney Homeless Assistance Act); Recently separated service members within the last 12 months with 27 or more consecutive weeks of unemployment; Veterans who have recently been incarcerated along with incarcerated Veterans who are being released soon; Veterans needing a high school diploma or equivalent certificate; Low income (As defined by WIOA); Veterans between the ages of 18-24; and other eligible as defined in the statutes. Under the guidance of the WIOA and the integration of all partners within the AJC, the DVOPS will provide intensive services under a case management strategy to RESEA, SNAP E&T and TAA veteran clients who have been assessed by AJC partner staff and identified as having SBE.
- **Integration into the Workforce System:** Integration of the DVOP via the AJC will be accomplished by utilizing in-place procedures for servicing Veterans with SBEs and combining them with the new policies and processes that will support functional alignment within the AJC. All partners will work together to support our plan for a seamless, customer-driven system. The new policies will enhance the delivery system and reflect the Governor's vision of effective and efficient governance through the alignment of several programs. This process starts at the initial point of entry into the AJC where the first person the Veteran encounters will be an intake specialist who is trained in all aspects of the AJC and the services that are available to the Veteran. TDLWD calls this an "Initial Triage" step. Through the use of a specialized checklist and direct questions, a determination will be made for the level and type of needed service. If the Veteran, or other eligible person, is deemed to have an SBE and has a need for enhanced services, the Veteran will be referred to a DVOP for assistance. If the initial screener decides that the level of service precludes the need to see a DVOP, the person will be referred to a non-JVSG staff member for the required assistance.

Note: Veterans with an SBE, or labeled in a specified category, will have access to all appropriate AJC services and are not limited to receiving services only from DVOP specialists. Once the Veteran is made "Job Ready", the DVOP will coordinate with the BST (this team is responsible for all outreach to employers and includes the LVER) to ensure that these Veterans are promoted within the community as available for immediate job placement.

B. **Outreach:** Time permitting, DVOPs may conduct outreach activities with the intent of locating candidates with SBEs and enroll them in an AJC with the intent of providing them with appropriate intensive services.

They will seek out potential clients within programs and places such as:

1. Veterans Administration facilities

- Vocational Rehabilitation and Employment (VR&E) offices
- Regional Medical Centers
- V.A. sponsored Vet Centers
- Homeless Veterans Reintegration Project (HVRP)
- Homeless Shelters
- Incarcerated Veterans Transition Program (IVTP)
- Civic and Service Organizations
- Local Workforce Development Area (LWDA) partners
- State Vocational Rehabilitation Agencies
- Other service providers as deemed probable locations of Veterans with SBEs

2 **Vocational Rehabilitation and Employment Program referrals:** When a Veteran has participated in VR&E and is considered employment ready, they will be referred to the local AJC and a DVOP for job search assistance and follow - up. VR&E sends the Veteran's information to the TDLWD Intensive Services Coordinator (ISC), who records and sends the information to the nearest local DVOP. The DVOP will establish contact with the Veteran and assist in any way possible to help the Veteran obtain suitable employment. Providing intensive services to the Veteran will be accomplished through the Case Management system where the DVOP will maintain a record of progress the client makes in achieving his/her goal of finding employment. Thus, the DVOP is instrumental in the coordinated efforts of VR&E, the ISC, and the local AJC to ensure that the Veteran is tracked towards gainful employment.

3. **Procedures to ensure the hiring of qualified DVOP Specialists:** Tennessee fills vacant DVOP positions by hiring from a register of qualified applicants. All Veterans that meet the published requirements are offered an opportunity to interview for open positions. Provisions under the JVSG require that the state must fill these positions with eligible Veterans and give preference to those with disabilities as defined in Title 38, USC with priority given to special disabled, disabled and others who are eligible. The proposed staffing plan reflects only full - time DVOPs.

LVER STAFF

1. **Primary Duties:** The LVER will actively advocate for employment and training opportunities with business, industry, and community-based

organizations on behalf of Veterans consistent with VPL 03-14, VPL 03-14 Ch1, VPL 03-14 Ch2, VPL 04-14. LVERs will be assigned duties that promote to employers, employer associations, and business groups the advantages of hiring veterans and will be part of the "Business Services Team" within the AJC that conduct outreach activities to these entities. The following activities will be part of this program:

2. 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.

3. Form effective relationships with the business community and trade unions to enhance the availability of employment and training opportunities for Veterans.

- Encourage businesses to hire Veterans and to provide OJT and Apprenticeship programs geared to the Veteran community.
- Maintain current labor market information on trends and adjust strategies accordingly.

4. Work with training providers and credentialing bodies to promote opportunities for Veterans.

- Encourage employers in professions requiring licensure or certification to develop OJT and/or apprenticeship programs for Veterans.
- Promote the participation of Veterans in programs leading to certification or licensure.
- Advocate with training providers and credentialing agencies for recognition of equivalent military training.

5. Plan and participate in job fairs to provide employment opportunities for Veterans. The LVER will facilitate this by:

- 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.
- Maintaining current information regarding a full range of employment and training options available to Veterans.

6. Work with federal contractors to inform them of the process they can use to recruit and hire Veterans within the TDLWD Labor Exchange System and discuss their responsibilities under the OFCCP and VEVRAA final rule to attain the appropriate percentage of Veteran hires.

The net result of LVER outreach to employers and the community will be an increased awareness of the capabilities of Veterans and their qualifications, along with developing

employers' willingness to utilize the OJT program that is available to them to increase the opportunity for Veterans.

7. **Employer Relations:** The LVER will establish and maintain regular contact with employers in order to maximize the development of employment and training opportunities for the Veteran community.

8. Develop an employer contact plan designed to encourage the employment of Veterans by the use of business and community organizations such as the Chamber of Commerce, Human Resource Groups, and others as determined to be beneficial in the facilitation of hiring Veterans. This can be accomplished by:

- Personal Visits
- Phone Calls
- E-mail Contact
- Internet Connections or other means deemed effective

9. Monitor federal contractor job listings and encourage the hiring of Veterans by federal contractors.

10. Coordinate activities with DVOP specialists, along with other AJC staff and partners to promote Veteran job seekers who have been deemed "job ready" to employers looking to match the specific skill sets of individuals to their needs.

11. Advocating Veterans as a category of job seekers who have highly marketable skills and experience. This can be accomplished by the following: Encouraging employers to develop apprenticeship programs to increase the employment opportunities for Veterans.

12. **Capacity Building of Other Service Providers:** It is essential that the LVER assist other workforce development providers in increasing their ability to recognize and respond to the employment and training needs of Veterans. This will be accomplished through the following activities:

13. Training AJC staff and service delivery system partners in order to enhance their knowledge of Veterans' employment and training issues by:

- Providing technical assistance to the LOFF manager.
- Encouraging participation by raising the awareness of Veterans in the employment and training programs.

14. **Procedures followed to ensure hiring qualified LVERs:** Tennessee fills vacant LVER positions by hiring from a register of qualified applicants. All Veterans that meet the published requirements are offered an opportunity to interview for open positions. Provisions under the JVSG require that the state must fill these positions with eligible Veterans and give preference to those with disabilities as defined in Title 38, USC with priority given to special

disabled, disabled and others eligible. The proposed staffing plan reflects only full - time LVERs.

c. The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or one-stop delivery system partner network;

1. DVOP and LVER Integration

DVOPs and LVERs are fully integrated into the TDLWD Labor Exchange System to form a comprehensive delivery team that provides services to Veterans that address their employment and training needs. All AJCs (with the exception of two located in extremely rural locations) have assigned Veteran staff, with LVERs and DVOPs assigned according to the population of their target groups and the needs of the community. DVOPs are assigned to areas with the highest concentration of Veterans, including disabled, homeless, and other Veterans with SBE. LVER assignments are based on the employer population and the probabilities of economic growth in their areas. Urban areas will normally have both LVER and DVOP staff assigned to ensure effective service to all Veterans. AJC Staff will work together in a comprehensive manner, respective of their roles and responsibilities, to provide assistance to Veterans in need which will foster job developments created with the employers in these highly industrialized and diverse environments. Suburban and rural (agricultural) areas will normally be assigned a LVER or DVOP as indicated by the factors previously mentioned.

Placement of Veteran staff is under constant review by both the State Veterans' Program Coordinator and the Field Operations Section to determine if changes in staffing are warranted. DVOPs will actively seek to establish partnerships in providing services to Veterans with other state and federal agencies, VSO, community service organizations. LVERs will perform outreach to businesses, training providers, and any other entities with the ability to positively impact the employability of Veterans.

2. ISC Coordinator

One DVOP will be designated as the TDLWD ISC and will work with VA VR&E whose Veteran clientele have completed training through their respective programs and are now deemed as employment ready. These Veterans will be assigned to a local DVOP and will receive intensive services through case management and be tracked until they have found suitable employment or they exit the program.

3. Use of services and linkages to other service providers

DVOPs are assigned to AJC where a myriad of services is provided. In addition to the partners located within the AJC (LWDA, National Council on Aging, TN Department of Veterans Affairs, Vocational Rehab, etc.), the DVOP also is tasked with developing relationships with other agencies that provide services to Veterans. These can include;

- Homeless Veterans' Reintegration Programs (Such as Operation Stand Down Tennessee)
- Incarcerated Veterans' Transition Program grantees

- Employer Support of the Guard and Reserve
- Other organizations dedicated to providing employment and training services to Veterans.

To ensure an appropriate partnership, a Memorandum of Understanding (MOU), may be signed between VA VR&E, VETS and TDLWD to describe the roles and responsibilities for each participant to ensure that the Veterans who are receiving services continue to do so in the most effective manner possible.

4. In-Demand Careers

In coordination with the DVOP, and after receiving names of Veterans who have been deemed "job ready", the LVER will work with local industry leaders as well as Tennessee Department of Economic and Community Development (ECD) to identify the requisite skill sets needed for in-demand careers for their area and develop opportunities for training through programs such as OJT through WIOA. Additionally, the LVER will coordinate with state educational facilities such as the Tennessee Technology Centers (TTC) to foster attendance in training programs for those in-demand jobs.

5. Public Outreach to Veterans concerning Employment and Training Opportunities

In addition to the efforts of the DVOP and LVER staff, TDLWD Marketing Services Staff (part of the BST) will promote the available services, including employment and job training opportunities, to veterans in a variety of forums in which they are involved. These can include job fairs, Chamber of Commerce meetings, Society of Human Resources Managers (SHRM) meetings, employer visits, public radio, television spots, and departmental brochures.

d. The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;

TDLWD will participate in the Performance Incentive Awards process.

Annual Veteran's Conference

The TDLWD is planning an annual Veteran Staff Conference for DVOP/LVER staff, to be held annually at a location to be determined with preference given to state facilities at reduced costs. Annual conferences have proven to be extremely beneficial in the training of our Veteran staff and in providing an improvement to the services rendered to the Veterans of Tennessee. The conference covers subjects such as Priority of Service, Vocational Rehabilitation and Education (VR&E), Case Management (DVOPs), Employer Outreach (LVERs), Roles and Responsibilities, Successful Implementation of DVOP/LVER Grant funds, Best Practices, and discussions of any needed changes in policies or procedures.

e. The populations of veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the State Workforce Agency for services from one-stop delivery system

partners (e.g., Native American veterans; veterans in remote rural counties or parishes);

Please see question (a) that addresses the populations of veterans to be served.

f. How the State implements and monitors the administration of priority of service to covered persons;

Priority of Service

A. How Veteran Services are provided by the Public Labor Exchange

Priority of Service (POS) as required by 38 U.S.C. 4215 (b) and 20 CFR parts 1001 and 1010, is an essential element given to covered persons (Veterans and other eligible persons including spouses who meet the criteria for POS) who participate in the Labor Exchange system. 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. Additionally, POS is provided within the AJC interviewing process to include career assessment and counseling, access to job search tools like the Internet, availability of classes to improve marketability such as resume writing and job interviewing programs and referral to all new and existing job training programs offered as a matter of course in the daily operations of the TDLWD Labor Exchange System.

The term "Eligible Veteran" refers to a person who:

B. Served on active duty for a period of more than 180 days and was discharged or released from the service with any classification other than dishonorable;

C. Was discharged or released from active duty because of a service-connected disability; or

D. As a member of a Reserve or Guard component under an order to active duty 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.

E. Also includes VR&E, Chapter 31 participants, Native American Veterans and other such groups as targeted for special consideration.

It is of critical importance that Priority of Service be observed in all employment and training activities within our purview. Priority of Service is the vehicle by which service to Veterans will be carried out. Priority of Service does not mean exclusivity of service. It does mean that if a veteran meets the basic qualifications for any Employment and Training program, he/she will be given priority in referral and enrollment into said program over a non - veteran of equal qualification. A Veteran does not qualify for a program simply because they are a Veteran unless being a Veteran is the basic criteria for the program.

These services are the responsibility of all local office staff members. The Regional

Director/Manager is responsible for ensuring that AJC staff understand and observe these standards of performance. Compliance with these guidelines will be assured by the State Veterans' Program Coordinator, Field Operations management staff, and other state representatives as deemed necessary. Performance measuring tools will include reports generated by the TDLWD data collection system, site visits, periodic reports from field staff, and recommendations made as a result of VETS' technical assistance visits and audits.

F. Procedures for Intake and Referral

Upon entry to a TDLWD facility (AJC or Affiliate Center) and identification as a Veteran, the Veteran will be screened by the initial intake process where an assessment of needed services will be made and the Veteran will then be directed to the appropriate Service Delivery Specialist (this could be a DVOP (Veterans with SBEs only), W/P or LWDA staff person or another partner within the AJC).

POS procedures will then be followed in the manner as described above. It is the responsibility of all AJC personnel to ensure that priority of service is observed.

Since the migration of the Labor Exchange System known as Jobs4TN in 2014, POS will be observed with all new job orders by the use of the Veterans' hold function combined with the "Virtual Recruiter" option within the program. All new job orders will be placed on an automatic "Veteran's Hold" for 24 hours where only registered Veterans will have the ability to access and apply for that particular job. Non-Veterans will be unable to access the job order until the 24 hour period has expired and it is released to the general public. The "Virtual Recruiter" option will replace the Veteran Job Search function. The Virtual Recruiter will automatically notify the Veteran when a new job order is placed within the system that meets their qualifications and needs precluding the necessity of a manual search and notification. The Virtual Recruiter, coupled with the Veteran Hold functionalities within Jobs4TN satisfy the POS requirement noted above and actually improves the old system by alerting the Veteran immediately that a new job order has posted as opposed to having to wait for notification through a manual process. This is especially beneficial on job orders that are posted on the weekend where it would be the next business day before they would receive notification.

If DVOP and LVER become aware of issues detrimental to the efficient implementation of VPL 03-14 Ch1, VPL 03-14 Ch2, VPL 04-14 or related guidance, they may make the Regional Director/Manager aware of areas of concern and provide reasonable solutions to deal with these issues.

G. Processes to Maintain, Monitor, and Report Compliance

Adherence to established standards of service measurements will be evaluated monthly using reports generated by the TDLWD data collection system. At a minimum, the AJC LOFF Manager will provide a Quarterly Report to the VPC detailing the status of program objectives, POS mandates, and progress toward meeting the State's performance goals. The report is due to the State's VPC no later than 10 days following the quarter's end. Due dates are as follows: January 10th, April 10th,

July 10th, and October 10th. After review, the report will be forwarded to the DVET for processing with the state's quarterly reporting. Additionally, JVSG PIRL Reports will be used to evaluate the percentages of actual Staff Assisted Services by DVOPs (Veterans with SBEs only) and non-Vet staff to ensure POS is being followed. Deficiencies discovered during these evaluations will be presented to the Regional Director/Manager for immediate corrective action. These review processes and procedures will be used by the State to maintain, monitor, and assess the progress of Veterans' Services provided relative to the approved State Plan.

H. Annual Agreements with Service Providers concerning Priority of Service

Federally funded WIOA programs provide services to Veterans as well and are subject to the same guidelines previously mentioned concerning Priority of Service. For additional providers, the state would follow guidance from the U.S. Department of Labor Employment and Training Administration (ETA), and/or U.S. Department of Labor Veterans' Employment and Training Service (VETS) on how to proceed with any future agreements.

g. How the State provides or intends to provide and measure, through both the DVOP and one-stop delivery system partner staff:

1. job and job training individualized career services,

Question (b) identifies how TN provides job and job training individualized career services. Services will be measured through Jobs4TN and the approved data matrix reporting.

2. employment placement services, and

Question (b) identifies how TN provides employment placement services. Services will be measured through Jobs4TN and the approved data matrix reporting.

3. job-driven training and subsequent placement service program for eligible veterans and eligible persons;

Question (b) identifies how TN provides job-driven training and subsequent placement services. Services will be measured through Jobs4TN and the approved data matrix reporting.

h. The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff; and

Jobs for Veterans State Grant Staff Directory (Section B - Staffing Information)

*ADAPTED FROM FORM VETS-501

Total FTE Positions	31	22	8	0	4
Fully Funded Positions	31	23	-	-	-
Total Positions Filled	45	-	-	-	-

i. Such additional information as the Secretary may require.

Unemployment Insurance (UI)

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 21-14 for the FY 2015 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.

The State of Tennessee, Department of Labor and Workforce Development and the Regional Office maintains a signed copy of the transmittal letter.

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.

The State of Tennessee, Department of Labor and Workforce Development and the Regional Office maintains a signed copy of the SF 424 and other appropriate budget-related forms.

3. The State Plan Narrative

The 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).

A. **Overview**

1. State priorities and the strategic direction the state has adopted to ensure continuous improvement.

During FY 19 the Tennessee Department of Labor and Workforce Development intend to focus its efforts on the following:

Improving performance on the six **Core Measures** and the six **Secretary Standards** listed below that are currently below the minimum acceptable level of performance (ALP): • Nonmonetary Separations Quality (Core)

- Nonmonetary Non-separations Quality (Core)
- Lower Authority Appeals 30 days and 45 days
- Tax Performance System (TPS) Collections
- Data Validation (Secretary Standards
- Complying with the requirements of UI Data Validation

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
- Facilitate Reemployment of Claimants
- Detection 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, to improve program performance nationally, to emphasize better service delivery for the UI program by improving reemployment services to UI recipients, and to improve the process for detecting misclassified workers, Implementing measures to correct

deficiencies identified during the Tax Performance System (TPS) and Benefit Accuracy Measurement (BAM) program reviews, and Benefit Timeliness and Quality (BTQ)

Implementing a study to identify reasons for incorrect issue detection dates and/or determination dates.

2. Assessment of performance. Tennessee will consistently look to improve process and policy to improve performance in all categories.

Assessment of Tennessee's performance with respect to Core Measures.

Benefits Measures

A. 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 2018 SQSP measurement period Tennessee's performance for the 12 month period ending March 31, 2017 was 88.33%.

B. 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 2018 SQSP measurement period (the 12 month period ending March 31, 2017) was 88.09%.

C. Separations Determination Quality: (% of Separation Determinations with a BTQ Quality Score equal to or greater than 95 points based on the evaluation results of quarterly samples selected from the universe of separation determinations.) The acceptable level of performance (ALP) is that 75% of the Separation determinations achieved a quality score of 95% or greater.

Tennessee's performance for the FY 2018 SQSP measurement period (the 4-quarter period ending March 31, 2017) was 52.85. We have attached a Corrective Action Plan (CAP) outlining the corrective measures we intend to take during FY 2019 to improve performance in this Core Measure.

D. 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 2017 SQSP measurement period (the 4-quarter period ending March 31, 2016) was 62.32. We have attached a Corrective Action Plan (CAP) outlining the corrective measures we intend to take during FY 2019 to improve performance in this Core Measure.

Overpayment Measure

A. Detection of Overpayments: (% of detectable, recoverable overpayments estimated by the Benefit Accuracy Measurement survey that were established for recovery) The acceptable level of performance (ALP) is an overpayment detection rate above 50%. Because states generally cannot detect and establish more than 80%-90% of estimated overpayments, states reporting ratios over 95% are also expected to explain the reasons for the higher than expected ratios.

Tennessee's performance for the most recent three year measurement period was 34.65 % based on BPC data for the period 04/01/2014-03/31/2017 and BAM data for the period 10/01/2015-09/30/2017.

We have attached a Corrective Action Plan (CAP) outlining the corrective measures we intend to take during FY 2019 to improve performance in this Core Measure.

Appeals Measures

A. 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 18.5 days for the FY 2019 SQSP measurement period, (the 12 month period ending March 31, 2018).

We have attached a Corrective Action Plan (CAP) outlining the corrective measures we intend to take during FY 2018 to improve performance in this Core Measure.

B. Average Age of Pending Higher Authority Appeals: (The sum of the ages, in days from filing, of all pending Higher Authority Appeals divided by the number of Higher Authority Appeals) The acceptable level of performance (ALP) for the Average Age of Pending Higher Authority Appeals Core Measure is 40 days.

The average age of Tennessee's pending higher authority appeals was 7 days for the FY 2018 SQSP measurement period (the 12 month period ending March 31, 2017).

C. Lower Authority Appeals Quality: % of Lower Authority Appeals with Quality Scores equal to or greater than 85% of potential points, based on the evaluation results of quarterly samples selected from the universe of lower authority benefit appeal hearings. The acceptable level of performance (ALP) is 80%.

Tennessee's performance was 100% for the FY 2019 SQSP measurement period (the 4-quarter period ending March 31, 2018).

Tax Measures

Four-Year Federal Team Reviews. The Fourth Year Federal Team Review was conducted in November 2017 on the 2016 calendar year. The team review findings stated, "The reviewers analyzed the CY 2016 state report of findings issued by the TDLWD TPS Reviewer in 2017. This report consisted of the findings and recommendations of the State TPS Reviewer. The TDLWD CY 2016 TPS review report was written very well. It was clear, concise and well annotated with appropriate graphs and charts. The Report stated that ten (10) of the thirteen (13) tax functions reviewed

passed the review. This meant that reasonable assurance of accuracy and integrity was established for those tax functions. The report also revealed that Collections, Contributory Debits, and Successor Status determinations failed the sampling review. This was the third failure in a row for Collections; therefore, a Corrective Action Plan (CAP) was required for the 2018 State Quality Service Plan (SQSP). We reviewed the CAP and believe it could be effective."

The Report also confirmed the State's monitoring results in all areas reviewed.

The Area of Concern was SUTA Dumping. See details in the Status section below.

The Review yielded no correctable findings and no official response is required.

The report also concluded that "Tennessee's TPS Reviewer is the most experienced in the Region. Her expertise and vast program knowledge enabled our reviewers to be exposed to an excellent TPS program and an exemplary way in which TPS Reviews should be conducted. "

New Employer Status Determinations Time Lapse: Is defined as the % of New Status Determinations within 90 days of the last day in the quarter in which the business became liable. The acceptable level of performance (ALP) is 70%.

Tennessee's performance was 86.1% for the FY 2017 SQSP measurement period (the 4-quarter period ending March 31, 2018).

Measure of Tax Quality: The Tax Performance System (TPS) assessment of the accuracy and completeness of the tax program is determined by scoring, on a pass/fail basis, samples of the 13 tax functions.

The purpose of the Tax Performance System (TPS) is to measure the quality of State Unemployment Insurance (UI) tax operations, assist State Administrators in improving tax systems, and to help carry out Federal oversight and technical assistance responsibilities. The TPS review evaluates the quality of the UI Tax Operations in each of the major tax functions using the following methodologies.

Computed Measures — UI tax data is reported by the state via the ETA 581 report and automatically computed into measures of timeliness and completeness for Status Determination, Report Delinquency, Collections, and Field Audit.

An internal audit of the State's UI Tax Operations involves two steps, a Systems Review and Acceptance Sampling. Upon completion of each review, a detailed memo is sent to the Director of Employer Accounts (Tax) Operations and the results are discussed with the appropriate staff.

System Reviews: The Systems Review examines the internal controls and quality assurance systems that help ensure accurate and timely operations in each of the major tax functions. This review is conducted once every four years.

Acceptance Samples: Each year random samples are examined from each tax function to confirm that controls and quality assurance systems are working effectively to produce accurate outputs. If as many as three out of sixty cases in a particular tax function fail the TPS review, it means that quality cannot be confirmed for that function. The acceptable

level of performance (ALP) for a measure of tax quality is no more than three failures out of the 13 tax functions reviewed under TPS in a year and no single function failing the TPS review for three consecutive years.

The 2017 TPS Acceptance Sampling Reviews revealed that ten (10) of the thirteen (13) tax functions met the criteria for TPS as established by the USDOL; therefore, reasonable assurance of quality was confirmed for these tax functions. Collections, Taxpayer Reimbursing Debits, and Benefit Charging failed the review.

Systems Review: The most recent Systems Review was conducted in 2014 and, at that time, revealed that the state was doing very well in eleven (11) of the thirteen (13) tax functions that were reviewed. Benefit Charging and Cashiering showed risks. These risks have been corrected. The next Systems Review will be conducted in 2018.

A Systems Review was conducted on Collections for 2016 because this tax function was moved to the U. I. Recovery Unit in 2015 and this tax function has failed the Acceptance Sampling for the last three (3) years. There were Risks identified in Training and Review of Completed Work. A Corrective Action Plan is required.

Due to the implementation of the new GUS System, a Systems Review was conducted on Benefit Charging and Employer Tax Rates for 2017.

Assessment of Major Tax Functions:

Note: The comments used in the below assessment of Major Tax Functions are extracts taken from the **Tax Performance System (TPS) 2017 Annual Report**.

Status (New/Reinstate, Successors and Inactivation/Termination)

SUTA Dumping. The Four-Year Federal Team Reviews stated, "The SUTA Dumping process was not fully utilized. Additionally, the manual process in place was not capturing all appropriate candidates. In addition, the State transferred resources that were originally designated for SUTA Dumping to assist the Status unit. State statistics show that the SUTA Dumping process has not been very effective in TN over the last three (3) years. The SUTA Dumping Detection System (SDDS), which had been supplied by the Federal government, had not been working since 2014. It is important for the State to understand the importance and value of detecting SUTA Dumping and preventing employers from engaging in SUTA Dumping practices."

The recommended actions include providing, to USDOL Regional Office, updates for the status of the SDDS project and submit quarterly reports about the progress of the SUTA dumping operation.

The SUTA Dumping Detection System (SDDS) has been operating effectively since April 2017. All of 2017 wage information is in the process of being updated to the system. The SAS system is in production and functioning, although some tweaks are still being made. The information is current through 2017.

On August 10, 2018, an update was provided stating on 8/3/18 they took SDDS offline to update over the weekend. It was back up on 8/6/18 with 4/16 through 4/17 added to the

system. Employer Accounts Operations verified the data is showing up in SDDS and we can now run new queries to find investigations on the new quarters.

Computed Measures

The Tax Performance result for timeliness of New Status Determinations in 90 days is above the 70% minimum level of performance established by the U. I. Performs for this core measure.

Systems Review

The 2014 Systems Review for Status Determinations revealed that all internal controls were present and operating effectively.

Acceptance Sampling

New/Reinstate Determinations. The 2017 acceptance sampling for New/Reinstate Determinations showed that fifty-nine (59) of sixty (60) cases passed the review; therefore, we can conclude that quality in this tax function was confirmed.

Successor Determinations. Since fifty-nine (59) of sixty (60) cases passed the review, we can conclude that quality in this tax function was confirmed.

Inactivation/Termination Determinations. Since fifty-nine (59) cases passed Accuracy of Inactivated/Terminated Determinations and Accuracy at Time of Review, we can conclude that quality in this tax function was confirmed.

Report Delinquency

Computed Measures. 2017 Computed Measures for Report Delinquency indicate that TN is above the National Average in each category for Contributory and Reimbursing employers.

Systems Review. The 2014 Systems Review revealed no risks and indicates that all internal controls were present and operating effectively.

Acceptance Sampling. The 2017 Acceptance Sampling passed all sixty (60) cases; therefore, we can conclude that quality in this tax function was confirmed.

Collections

Computed Measures. Computed Measures for 2017 reveal that, since 2016, contributory and reimbursing employers have remained fairly steady in all indicators.

Systems Review. The 2016 Systems Review for Collections revealed several risks and indicated that all internal controls were not present and operating effectively. We can conclude that reasonable assurance of quality does not exist in this tax function.

The Collections Unit is under new management and areas where risks were identified are currently being addressed.

There was a “Risk” identified in Training of existing employees in the collections unit. Per the new Director of U. I. Recovery, “UI Integrity Academy course on tax and benefit operations was offered as training to all personnel in the UI Recovery Unit. The

Collection Manual is currently being updated to provide more guidance and procedures for collection activities. TPS training was offered to provide auditors with a better understanding of the review and its importance to the Agency. Weekly classes may be conducted after new processes and procedures are in place."

The Systems Review revealed a "Risk" in Review of Completed Work. The Director stated that, "Required random samplings have been added to the supervisor's job plan. Supervisory approval is required before liens, distress warrants, and injunctions are filed. This change has already proven effective as the supervisor has been able to provide one-on-one training as the need arises."

There were risks found where the employer is not being contacted timely for the most recent quarter of liability. The Director stated, "Modifications to the TRAC program have been put into place. The new queries should be more accurate in detecting accounts with new quarters of liability. Auditors have been given additional training and guidance on the importance of notifying employers before requesting a warrant or filing a lien. The collection timeline was adjusted to allow employers additional time to respond before a warrant is filed. The number of accounts assigned to each auditor was decreased due to increased staffing. This allows auditors to slow down and devote more time to each account.

The Director also states that, "Updates to the auditor's TRAC program and other policies are still ongoing. New reports to quickly identify accounts needing enforced collection actions released are being developed. Reorganization of existing support staff to become experts in a specific enforcement action is in the planning stage. Hopefully, this will increase accuracy and the speed in which actions are released."

Acceptance Sampling. The 2017 Acceptance Sample for Collections passed fifty-six (56) out of sixty (60) cases; therefore, we can conclude that accuracy in this tax function was not confirmed.

I have discussed the above findings with the new Director of U. I. Recovery. The policies and procedures manual is being updated and will include procedures to prevent several of the errors listed above. There will also be training in all areas of U. I. Recovery in the near future. The Collections Tax Function has failed 3 years in a row. A CAP for the SQSP must be submitted to USDOL.

Field Audit

Effective Audit Measures Summary: The Effective Audit Measures for 2017 reveal that Tennessee's total score was 8.5% which exceeds the USDOL minimum score of 7.0%. The percent of contributory employers audited scored 1.0%. This meets the minimum requirement of 1.0%. Additional emphasis focused on the percent of wages changed as a result of the audit which is 2.5%. This is .5% above the minimum requirement of 2.0%. The percent of the state's total wages that were audited is 1.7% which is .7% above the minimum requirement of 1.0%, and the average number of misclassified workers discovered per audit scored 3.3 which are 2.3 above the minimum requirement of 1.0.

Effective Audit Measures 2017			
Factor	**Description**	**Minimum Score**	**TN2017 Score**
1	**Percent of contributory employers audited**	**1.0%**	**1.0%**
2	**Percent of wages changed as a result of the audit**	**2.0%**	**2.5%**
3	**Percent of the state's total wages that were audited**	**1.0%**	**1.7%**
4	**Average number misclassified workers discovered per audit**	**1.0**	**3.3**
-	**Total Score**	**7.0**	**8.5**
-	**Minimum Level of Achievement Score**	**5.0**	**5.0**
-	**Additional Emphasis Requirement**	**2.0**	**3.5**

Systems Review. The 2014 Systems Review for the audit function revealed no risks and indicated that all internal controls were present and operating effectively. We can conclude that reasonable assurance of quality exists in this tax function.

Acceptance Sampling. The scope of the review focused on audits completed in all four quarters of 2017. The Acceptance Sampling confirms that the state is doing a good job in the audit function.

There was one audit that was discarded from the sampling. The audit was conducted in March 2016 on the year 2014 and submitted in March 2017. Wages picked up were out of the base period. The audit was not expanded to include any of 2016 which was in the base period. There was an explanation for being over 120 old; however, this audit is over 360 days old.

Since fifty-eight (58) of the remaining fifty-nine (59) cases passed this review, we can conclude that quality in this tax function was confirmed.

Cashiering

Systems Review. The 2014 Systems Review for Cashiering revealed a "Risk" in Recorded Information and Instructions. The handbook for the Report Audit Unit was not up-to-date. The handbook for the Cashiering Unit was updated; therefore, this is no longer a risk.

Estimation Sampling. Out of a sample size of 225 items, the value to pass is 46.2%. For paper payments received, 225 items or 100% totaling $149,974.82 or 100% of the total dollar amount was deposited timely. At the end of the 2nd quarter, 2016, electronic fund transfers were 77.10% which allows us to reduce the sampling size of paper checks reviewed from 500 checks to 200 checks. When the actual review was conducted, the EFT percentage was 79.8%.

After factoring in electronic fund transfers, 100% of the total dollar amount was deposited within three (3) banking days. Per USDOL ET Handbook 407, since this is equal to or greater than the Value to pass of 46.20%, the reviewer must conclude that a standard of 90% of the dollar amount being deposited timely during the quarter was achieved.

Exemplary Practices. Employers have the option of paying U. I. taxes using either an ACH credit or ACH debit. For the 2nd quarter, 2017, 79.8% of the dollar amount received was electronic funds transfers. This is a 2.7% increase from 2nd quarter 2016. When employers file and pay electronically, it reduces errors; as well as, reduces the amount of staff necessary to process the paper checks.

Account Maintenance

(Contribution Report Processing, Debits/Billings, Credits/Refunds, Benefit Charging, and Tax Rates)

Contribution Report Processing

Systems Review. The 2014 Systems Review for Report Processing revealed no risks and indicated that all internal controls were present and operating effectively. We can conclude that reasonable assurance of quality exists in this tax function.

Acceptance Sampling. Since all sixty (60) cases passed this review, we can conclude that accuracy in this tax function was confirmed. Out of the samples tested, those first quarter 2017reports which were not filed were properly identified on the Master Delinquent Listing.

Contributory Employer Debits/Billings

Systems Review. The 2014 Systems Review for Debits/Billings — Contributory Employers revealed no risks and indicated that all internal controls were present and operating effectively. We can conclude that reasonable assurance of quality exists in this tax function.

Acceptance Sampling. Since all of the sixty (60) cases passed this review, we can conclude that accuracy in this tax function was confirmed.

There were three (3) cases that passed the review but were found to be problematic.

Reimbursing Employer Debits/Billings

Systems Review. The 2014 Systems Review for Debits/Billings — Reimbursing Employers revealed no risks and indicated that all internal controls were present and operating effectively. We can conclude that reasonable assurance of quality exists in this tax function.

Acceptance Sampling. The scope of the review focused on debits issued on 3-14-17 to reimbursing employers for benefits paid during February 2017. These debits remained unpaid after 4-13-17 which was the due date. Billing notices were generated on 4-17-17 for the past due amounts.

Since fifty-two (52) of fifty-six (56) cases passed this review, we can conclude that accuracy in this tax function was not confirmed.

All four cases failed the questions, “Was the debit for the correct dollar amount?” and Question 4 — “Did the billing notice accurately reflect the dollar amount receivable?”

The Director of U. I. Integrity was provided copies of the information on each failed case. He notified Geographic Solutions with the information and they responded that this is a conversion issue. They are working to find a solution and make necessary corrections as soon as possible.

Contributory Employer Credits/Refunds

Systems Review. The 2016 Systems Review for Credits/Refunds revealed a “Risk” in Recorded Information and Instructions and in Systems to Assure Execution of Events. As of 2017 both of the issues have been resolved.

Acceptance Sampling. Since all sixty (60) cases passed this review, we can conclude that accuracy in this tax function was confirmed.

Employer Benefit Charging

Systems Review. Due to the implementation of the new GUS System, a Systems Review was conducted on Benefit Charging for 2017.

A “Risk” was found in Training. Per TPS Operations Handbook 407, training should be provided when needs are identified from reviews of finished work. At present, there are no reviews conducted. The new supervisor will begin reviewing completed work and providing training on any issues identified.

There was no verification process in place to compare information sources to employer account transaction records after a GUS system update; therefore, errors were not detected and corrected. An OPC has been sent to correct these errors and also to correct the cause of the errors in the system.

All benefit checks issued to a claimant should be reconciled with the benefit charges that are charged to the claimant’s employer(s) account(s) or the pool account. Normally, reconciliation is prepared annually before the annual rate run; however, no reports were available to reconcile the accounts. Numerous requests have been made by our agency for these reports. An OPC will be submitted to request queries in order to reconcile the differences found on the Benefits Paid Reconciliation Report. There was a “Risk” assigned to Review of Completed Work.

The new GUS System was supposed to handle every aspect of the Benefit Charging Function except granting non-charging; therefore, no reviews have been conducted. The new Supervisor will begin reviewing all Benefit Charging functions.

Exemplary Practice. An exemplary practice for the Benefit Charging function is the online quarterly charge statement report. This is available to all employers. It gives the employers additional opportunities to question charges. Any errors not discovered in the o original benefit charge process can be reviewed by the employer and corrected by the Benefit Charge Unit. The Benefit Charge Unit provides excellent and responsive

customer service to employers by researching and providing information about questions on a quarterly basis.

Acceptance Sampling. Since fifty-five (55) of sixty (60) cases passed this review, we can conclude that accuracy in this tax function was not confirmed.

All of the errors were a result of GUS system errors. An OPC has been submitted to have the errors corrected.

Tax Rates

Systems Review. Due to the implementation of the new GUS System, a Systems Review was conducted on Tax Rates for 2017. Areas where controls are lacking are identified as "Risk".

The 2017 Systems Review for Employer Tax Rates revealed no risks and indicated that all internal controls were present and operating effectively. We can conclude that reasonable assurance of quality exists in this tax function.

Acceptance Sampling . The next review of Tax Rates was scheduled for 2019; however, since the new benefits system (GUS) was implemented in 2016, which does have an impact on the accuracy of rate computation, an Acceptance Sampling Review was conducted in 2017.

Since fifty-nine (59) of sixty (60) cases passed the review, we can conclude that quality in this tax function was confirmed.

Reemployment Measure

Facilitate Reemployment:

(% of UI claimants who are reemployed within the quarter following the quarter in which they received their first UI payment)

Based on Tennessee's 8.2% TUR for calendar year 2013 and the 57.7% of claimants receiving first payments during the 12-month period ending September 30, 2014 who were not exempt from work search, Tennessee's ALP for FY14 is 57%. For the 12-months ending December 31, 2013, 63.3% of Tennessee's UI claimants were reemployed by the end of the first quarter after the quarter in which they received their first payment.

Assessment of Tennessee's performance with respect to USDOL Secretary Standards which are currently still in federal regulation.

First Payment Time Lapse 14/21 days Intrastate UI full weeks

(% of Intrastate UI 1st Payments (full weeks only) made within 21 days after the week ending date of the first compensable week in the benefit year). The Secretary Standard is 87%. Tennessee's performance was 73.12% for the FY 2017 SQSP measurement period (the 12 month period ending March 31, 2017). We have attached a Corrective Action Plan (CAP) relating to the Core Measure of First Payment Promptness that addresses this Secretary Standard as well.

Reemployment Measure

Facilitate Reemployment:

(% of UI claimants who are reemployed within the quarter following the quarter in which they received their first UI payment)

Based on Tennessee's 6.6% TUR for calendar year 2014 and the 67.3% of claimants receiving first payments during the 12-month period ending September 30, 2014 who were not exempt from work search, Tennessee's ALP for FY14 is 64%. For the 12-months ending December 31, 2014, 64.8% of Tennessee's UI claimants were reemployed by the end of the first quarter after the quarter in which they received their first payment.

Assessment of Tennessee's performance with respect to USDOL Secretary Standards which are currently still in federal regulation.

First Payment Time Lapse 14/21 days Intrastate UI full weeks

(% of Intrastate UI 1st Payments (full weeks only) made within 21 days after the week ending date of the first compensable week in the benefit year). The Secretary Standard is 87%. Tennessee's performance was 88.33% for the FY 2018 SQSP measurement period (the 12 month period ending March 31, 2018). We have attached a Corrective Action Plan (CAP) relating to the Core Measure of First Payment Promptness that addresses this Secretary Standard as well.

First Payment Time Lapse 35 days Intrastate UI full weeks

(% of Intrastate UI 1st Payments (full weeks only) made within 35 days after the week ending date of the first compensable week in the benefit year). The Secretary Standard is 93%. Tennessee's performance was 95.74 % for the FY 2018 SQSP measurement period (the 12 month period ending March 31, 2018) performance in this Measure.

First Payment Time Lapse 14/21 days Interstate UI full weeks

(% of Interstate UI 1st Payments (full weeks only) made within 21 days after the week ending date of the first compensable week in the benefit year). The Secretary Standard is 70%. Tennessee's performance was 89.07% for the FY 2019 SQSP measurement period (the 12 month period ending March 31, 2018).

First Payment Time Lapse 35 days Interstate UI full weeks

(% of Interstate UI 1st Payments (full weeks only) made within 35 days after the week ending date of the first compensable week in the benefit year). The Secretary Standard is 78%. Tennessee's performance was 94.44% for the FY 2018 SQSP measurement period (the 12 month period ending March 31, 2018).

Lower Authority Appeals 30-day Timeliness

(% of Lower Authority Appeals decided within 30 days of filing). The Secretary Standard is 60%. Tennessee's performance was 10.13% for the FY 2018 SQSP measurement period (the 12 month period ending March 31, 2018).

Lower Authority Appeals 45-day Timeliness (% of Lower Authority Appeals decided within 45 days of filing). The Secretary Standard is 80%. Tennessee's performance was

35.20% for the FY 2018 SQSP measurement period (the 12 month period ending March 31, 2018).

3. Coordination with other plans. We realize that the UI program does not stand alone and that it is the wage replacement component of an overarching effort to return a worker to suitable work. Accordingly, we plan to continue working with our Job Service component to develop and maintain a seamless process designed to facilitate the reemployment of UI claimants. (See comments under **"National Direction"** with respect to the "Reemployment of UI Claimants".

B. Federal Emphasis regarding Government Performance and Results Act (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, 2018 was 88.33%.

Detect Benefit Overpayments. Target: Overpayments established will be at least 54.2% of the estimated detectable, recoverable overpayments. For the 12 months ending March 31, 2017, Tennessee established 30.17% 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 SAS Fraud detection and prevention product to improve detection of higher risk claimants through their analytic systems. Tennessee implemented a new claims operating system GUS during this time frame and we have been working with them through their Online Project Communication System (OPC) to correct deficiencies we have in these processes.

Establish Tax Accounts Promptly. Target: 88.9% of status determinations for new employers will be made within 90 days of the end of the first quarter in which liability occurred. Tennessee's performance for the 12 month period ending March 31, 2018 was 86.13%.

Facilitate the Reemployment of Claimants. Target: 64.7% of UI claimants will be reemployed by the end of the first quarter after the quarter in which they received their first payment. For the 12-months ending December 31, 2014, 64.8 % of UI claimants were reemployed by the end of the first quarter after the quarter in which they received their first payment.

2. Actions taken to improve performance in GPRA goals.

Make Timely Benefit Payments.

Facilitate the Reemployment of Claimants. (See comments under **"National Direction"** with respect to the "Reemployment of UI Claimants".

Establish Tax Accounts Promptly. The Employer Services Unit is responsible for establishing and maintaining employer accounts. While the staffing level of the unit has decreased, Tennessee continues to meet the goals established by Tax Performance

System. While Tennessee is below the national average for new status determinations, we have exceeded the desired level of achievement by a wide margin. The statistics show that Tennessee continues to improve in this measure with the most recent data showing 86.13% of employers established within given times, exceeding the goal by 15.0%.

National Direction

Tennessee continues to align its strategies with the below national priorities that have been established for the UI program for FY 2019. The USDOL has also established the following additional priorities for FY 2018:

Improving State Capacity to administer and operate the UI program effectively:

For FY 2019 one of our top priorities will be to continue to improve work processes for the UI program. This is being accomplished by Lean Events and examination of internal work process. SBR money is being requested to improve work process, eliminate back logs, and recover overpayments. Continual training will occur to build staff knowledge in all aspects of UI. We will take advantage of technical assistance offered by USDOL as well as use the UI Integrity Center for Excellence, and continue to use the UI Community of Practice.

Improved Prevention, Detection, and Recovery of UI Improper Payments:

For FY 2019, our top priority continues to be the prevention, detection, and recovery of improper payments. We will continue to examine UI Integrity functions, make recommendations for continuous improvement, and cultivate a sense of ownership for program integrity within the UI system. We have included an updated UI Integrity Strategic Plan with our FY 2019 State Quality Service Plan to address current state-specific root causes of improper payments.

Improving Program Performance Nationally:

We have indicated throughout our State Plan Narrative and associated Corrective Action Plans how we intend to help the USDOL improve program performance nationally.

Re-Employment of UI Claimant:

Tennessee has made a strong and focused effort in the past year to place an emphasis on re-employing unemployment insurance claimants. We ensure that claimants have access to the full continuum of workforce services through One-Stop Career Centers, both virtual and in-person, as well as through Rapid Response and **Re-Employment Services Eligibility Assessment (RESEA) activities**. Tennessee is continuing to implement new software programs that will result in a full integration of UI and workforce programs with the goal of improving employment outcomes for UI claimants. Below is an outline of what we have accomplished in the past year in this regard as well the plans and activities we will be implementing over the next year. U.S. DOL has mandated that UCX claimants be selected for REA in addition to those claimants most likely to exhaust. Tennessee has implemented this process as of August 2015. Tennessee has also expanded RESEA from 23 one stop centers to 54 centers across the state via a partnership with WIOA and Local Workforce Development Area Partners.

1) VOS/JOBS4TN - All unemployment claimants are created a job service application at the moment they file a UI claim. Tennessee is moving forward with the full implementation of its jobs4tn.gov database by launching the Virtual One Stop system (VOS). VOS is essentially a virtual career center/one-stop with workforce service tools and resources available online, similar to the services you could find in a brick and mortar center. All UI claimants will be created VOS accounts/profiles at the time they file their claim.

2) Re-Employment Services Eligibility Assessment (REA) services - Tennessee currently operates the RESEA program in 54 one-stop career centers across the state. RESEA orientations and subsequent RESEA follow ups are conducted 4 days a week across the state. Through the RESEA program UI claimants that are most likely to exhaust receive access to workforce services as well referrals to re-employment services, training, and other supportive services. In addition to these services participants conduct a UI eligibility review, an assessment, and work with a staff member on an employment development plan per each visit. RESEA participants also receive extensive service in regards to job matching and job placement.

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) Mobile Workforce Services Career Coach Units - TDLWD has 3 Mobile Career Coach Units stationed in each grand division of the state. The mobile units are encompassed into a RV type unit that can provide services similar to a One-Stop Career Center. The mobile units are heavily utilized in rural areas to provide the unemployed access to workforce services. The units are also utilized at Rapid Response events.

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:

For the third year in a row, Tennessee surpassed the Effective Audit Measures set forth by the Tax Performance System. Tennessee is one of the five states in the eight-state region to exceed all four factors and achieve a passing score. Tennessee's auditors are well-trained to determine if a worker is properly classified.

Tennessee strives to ensure employers are educated on proper worker classification by participating in New Employer workshops and Business Tax seminars throughout the state. The Handbook for Employers discusses worker classification and the tests and laws used to make such a determination.

Tennessee continues to seek out new methods of identifying improperly classified workers. Tennessee successfully enrolled in the Governmental Liaison Data Exchange Program (GLDEP), and in 2013, received the first 1099-MISC extract from the Internal Revenue Service. This data will be used to select employer accounts for audit. Tennessee expects the factors used in the Effective Audit Measures to increase as we move forward.

C. Program Review Deficiencies

1. Causes for failures to conduct required reviews/activities, e.g., Benefit Accuracy Measure, Benefits, Timeliness, and Quality, Tax Performance System, and Data Validation.

In Tennessee, the Nonmonetary Determinations Quality sample Separations-Non Separations failed validation and we were not able to submit benefit populations, 3, 4, 5, 12, 13 and 14 for validation during VY18

2. Plans to conduct the reviews as required. (See Corrective Action Plan submitted with this SQSP)

D. Program Deficiencies

1. Plans to correct deficiencies identified through required program reviews.

Plans to correct deficiencies identified through Tax Performance System review: (See Measure of Tax Quality)

Plans to correct deficiencies identified through Benefit Accuracy Measure (BAM) reviews.

See corrective action plan with SQSP.

Plans to correct deficiencies identified through Benefits, Timeliness, and Quality (BTQ) reviews.

(See Corrective Action Plans submitted with this SQSP for Nonmonetary Determinations Quality)

Plans to correct deficiencies identified through UI Data Validation (See Corrective Action Plan submitted with this SQSP)

E. Reporting Requirements Deficiencies

TN was late by a few days each quarter on the ETA 207 report because we were working with the vendor Geographic Solutions ensuring the report was picking up the correct non-monetary count. This has been resolved currently and this report has been submitted timely and will continue

F. Customer Service Surveys (optional)

In September of 2012 Tennessee kicked off a new statewide Customer Service Training campaign entitled Customer Focused Government which was designed to change the culture of the entire state and move Tennessee forward by providing G.R.E.A.T. customer service. This campaign stressed the 5 keys to G.R.E.A.T. customer service:

- Greet — Making first impressions count
- Relate — Building trusting relationships
- Exceed — Going above and beyond expectations
- Affirm — Recognizing customers as the most important asset
- Thank — Showing customers appreciation

Below are some of the features of that customer service training which has now been completed statewide:

- Developed specifically for the State of Tennessee
- Captures the essence of customer focused government
- In alignment with Governor Haslam's TNFORWARD initiative
- A collaborative effort with Bruce Loeffler, author of One Minute Service
- Creates agency-specific behaviors for demonstrating G.R.E.A.T. customer service

G. Other (e.g., approach to maintaining solvency, requests for technical assistance)

2018 Summary of Tennessee ES Law Changes Public Chapter 642

Report by Commissioner on the Condition of the UC Trust Fund

Under previous law, the commissioner of labor and workforce development was required to submit a detailed report on the condition of the UC trust fund to the general assembly by February 1 and report the findings as to the balance in the trust fund during the first week of January and July each year. This law removes the requirement to provide the general assembly with the trust fund balance each January and July and imposes a stricter requirement that the commissioner must instead provide the general assembly with the trust fund balance in a monthly statement that is due on or before the last business day of each month.

The law also rearranges the fund reporting provisions by pulling them together into an organized format. The February "requirement to report" provisions, previously § 50-7-506, have now been moved to § 50-7-108. The law made no changes otherwise to the February reporting requirements.

Taxable Wage Base Trigger

The law amends the taxable wage base trigger provisions that adjust the wage base up or down according to the balance in the trust fund. Under previous law, the wage base would be adjusted only if the adjustment was triggered by the fund balance on two consecutive trigger dates. That provision is removed.

Quarterly Wage and Premium Reports Must Be Filed Electronically

Effective January 1, 2019, all employers in the state will be required to file quarterly wage and premium reports electronically. If the electronic filing requirement imposes an undue hardship on the operation of an employer's business, the employer may request an exemption by submitting an affidavit containing a statement to that effect to the commissioner of labor and workforce development. The affidavit must be submitted within the first quarter of each year and exemptions will be granted on year-to-year basis only. Employers who fail to file electronically without prior approval of the commissioner will be assessed a penalty.

H. Assurances:

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 Parts 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: August 24, 2011
- IT Contingency Plan Reviewed/Updated: September 2017
- IT Contingency Plan Tested: November 30 —December 4, 2017

i. Assurance of Conformity and Compliance.

j. Assurance of automated Information Systems Security.

Provide the most recent dates for the following:

- Risk Assessment Conducted: November 2017
- System Security Plan Review/Updated: November 2017

k. Assurance of Confidentiality.

4. Corrective Action Plans (CAPs)

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.

Nonmonetary Determination Quality

State: Tennessee

Federal Fiscal Year: 2019-2020 SQSP Corrective Action Plan & Progress Report

Back to Biennial Overview 2019

Back to Alternate Overview 2020

Instructions

Performance Measures	ALP	CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4	12/31/2019 Quarter 5	3/31/2020 Quarter 6	6/30/2020 Quarter 7	9/30/2020 Quarter 8
Nonmonetary Determination Quality - Separations	≥ 75 %	52.85%	Target	60.00%	65.00%	70.00%	75.00%	80.00%	85.00%	87.00%	90.00%
Nonmonetary Determination Quality - Separations	≥ 75 %	52.85%	Actual	-	-	-	-	-	-	-	-
Nonmonetary Determination Quality - Non Separations	≥ 75 %	62.32%	Target	65.00%	70.00%	75.00%	77.00%	80.00%	85.00%	87.00%	90.00%
Nonmonetary Determination Quality - Non Separations	≥ 75 %	62.32%	Actual	-	-	-	-	-	-	-	-

Regional Office Comments in cell below:

Corrective Action Plan Summary:

The Summary must provide:

A. The Reason for the deficiency.

This deficiency was caused by the implementation of a new claims benefit system. They system was implemented in May of 2016. We had to change our business process in order to process claims properly. This included training of staff on the GUS system, hiring new staff, and promoting staff to new positons. The system created an abundance of issue that overwhelmed the agency at first creating a backlog of claims. This has been resolved. Workforce issues due to turnover, i.e. promotions of experienced Adjudicators to other units that are looking for UI experience. This is also compounded by the fact that those positions have to be filled with new, inexperienced staff that must be trained properly. This is still an ongoing process.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

Will be utilizing NASWA online training for claims staff and adjudication focusing on fact finding and BTQ standards. We hope to begin this within the next 90-120 days

"The agency implemented an action plan to address the issues. First course of action was to create new work units called a BAT team. Each team consisted of a Manager, Supervisor, five adjudicators and ten or more claims agents. The creation of these teams provided more efficient processing of claims from beginning to end. New roles were defined as well for claims agents so processing of work items was more efficient.

Next we are working with the vendor through their OPC system to address ongoing issues, or to change the efficiency of processes with in GUS.

A new unit was developed called Training, Research and Compliance (TRAC) to handle the training needs of the division. This unit will develop modules for claims processing. A quality control component has been added to this unit. The quality control process takes a look at claims from each agent with in the BAT teams. They QC all aspects of the claim including all non mon issues on the claim. The results of the Claims Evaluation Section are recorded on Coaching Acknowledgement form for Claim Center management to use as an additional mentoring tool for its BAT staff members. This will help streamline training and give the division the ability to correct issues quicker.

TRAC Unit Training Plan

Manager/Supervisor Training: Managing Availability	COMPLETED
BAT Training: Obtaining Additional Information / Statement Taking	COMPLETED
BAT Training: First Pay Timeliness	Scheduled for Mid-August
BAT Training: Severance	Fall 2018

BAT Training: Most Recent Work	Winter 2019
Adjudication Training	Scheduled for Early 2019

BTQ Team will continue to work with TRAC team to develop proper training on repeated deficiencies from the BTQ sample. BTQ will continue fast facts process to get information out to newly hired adjudication staff. "

A. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

Previous plan was in place for part of the plan year. We did see an increase in scores although not passing at this time. We fell with more time this plan will improve our overall processing of non mons and improve our quality

B. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

"Mgrs. /Supervisors are required to quality control claims for an hour and half each day. They have a sheet to keep up with the errors and will be giving any and all errors back to the person making the mistakes. We are training, sending instruction guides, making the claim operations put in uniformed comments, creating naming convention for uploads so that we know where all our information is. We are currently working on getting all adjs and claims agents working in the resolve issue by uploading documents there, taking fact finding and 48 hour request all in the same spot under the resolve issue they belong to. We are giving mistakes back to the original person who made the mistake because that is the only way they will learn. Adjudicators are going to get a checklist that they will be required to verify as complete prior to making a decision. We are also creating case studies of claims that we made correct decisions on so that all staff can refer to these cases for examples.

TRAC unit will be involved in quality controlling claims from start to finish.

NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the current fiscal years (the two consecutive fiscal years for which the plan is in effect). Summarize, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.

(Remaining Major Actions in this cell.)

Milestones

1. NASWA online Fact finding and BTQ training Agents and Adjudication Completion Date: 9/30/2019

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

2. Issue training Severance Completion Date: 12/31/2018

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

3. Issue Training Most Recent work Completion Date: 6/30/2019

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

4. Adjudication Training TRAC Team/BTQ Team Completion Date: 6/30/2019

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

5. BTQ Fast Facts to new adjudicators Completion Date: 3/31/2019

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

Lower Authority Appeals Promptness

State: Tennessee

Federal Fiscal Year: 2019-2020 SQSP Corrective Action Plan & Progress Report

Back to Biennial Overview 2019

Back to Alternate Overview 2020

Instructions

Performance Measures	ALP	CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4	12/31/2019 Quarter 5	3/31/2020 Quarter 6	6/30/2020 Quarter 7	9/30/2020 Quarter 8
Average Age of Pending Lower Authority Appeals	≤ 30 days	18.5	Target	-	-	-	-	-	-	-	-
Average Age of Pending Lower Authority Appeals	≤ 30 days	18.5	Actual	-	-	-	-	-	-	-	-

Performance Measures	ALP	CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4	12/31/2019 Quarter 5	3/31/2020 Quarter 6	6/30/2020 Quarter 7	9/30/2020 Quarter 8
Lower Authority Appeals Time Lapse - 30 days	≥ 60 %	10.13%	Target	15.00%	20.00%	25.00%	30.00%	40.00%	60.00%	80.00%	100.00 %
Lower Authority Appeals Time Lapse - 30 days	≥ 60 %	10.13%	Actual	-	-	-	-	-	-	-	-
Lower Authority Appeals Time Lapse - 45 days	≥ 80 %	35.20%	Target	50.00%	60.00%	70.00%	80.00%	85.00%	90.00%	92.00%	95.00%
Lower Authority Appeals Time Lapse - 45 days	≥ 80 %	35.20%	Actual	-	-	-	-	-	-	-	-

Regional Office Comments in cell below:

Corrective Action Plan Summary:

The Summary must provide:

A. The Reason for the deficiency.

1) "the computer system went live in May, 2016. The legacy system was shut off, the data was imported into the new system and the new system was switched on with no overlap.

2) At the time of go-live, the portion of the program that was meant to service Appeals was still under development and did not work.

3) Appeals were effectively unable to hear any cases for a period of about five weeks, causing our caseload to accumulate a large backlog.

4) That backlog has continued to exist on a rolling basis since that time. The Appeals Tribunal has made significant progress as of August 10, 2018, in that the case arrears have been reduced to 1865 cases. This represents a reduction in the arrears from 3200 cases in the previous Corrective Action Plan by 1335 appeals. The usual transactional amount of pending appeals would be expected to be about 1500.

5) The Appeals Tribunal has made gradual and continuous progress in reducing this backlog and is likewise making incremental progress in regaining compliance with federal time lapse standards.

6) The Department is and has continuously been working closely with the software vendor to develop, rewrite and repair the initial version of the program to more closely meet the needs of the Department. Significant progress has been made but more remains to be done.

A temporary increase in appeals was due to a rapid reduction in Agency backlog. The Agency worked through a large number of pending claims since the computer go-live date, which in turn generated a higher than expected number of appeals, further adding to the appeals backlog. This tide of new appeals has since crested and Appeals is working through them per the above.

After this initial progress, however, attrition of 5 Unemployment Hearing Officers has reduced our hearing capacity. The panel of Hearing Officers currently stands at 14 instead of its usual number of between 18 - 24. To compensate for this, we have increased the daily case load of the existing hearing officers to seven hearings per day (from six). We have also opened a hiring register to staff the Hearing Officer panel back up to a normal level. To date, we have interviewed and identified four new suitable candidates for these positions. By next week offers will be made to the successful candidates and their training will begin on or before September 15, 2018.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

"Action plan for lower authority Appeals is to

Continue to hire more support staff when necessary

Continue to hire more hearing officers and utilize attorneys from other units within the agency to work as temporary hearing officers.

Continue to utilize a “triage team” at case intake to pre-screen invalid appeals

Working with Geographic Solutions, our software vendor, and staff to devise more efficient work flows for appeals processes.

Hire additional support staff. Hiring additional support staff will enable the Appeals Tribunal to intake, validate, docket and schedule a greater volume of appeals compared to its present production capacity. Hire additional hearing officers. Hiring additional hearing officers will enable the Appeals Tribunal to hear a larger volume of appeals, making it possible to surmount the appeals backlog and to facilitate compliance with time lapse standards. Utilized attorneys from other units to work as temporary hearing officers. Creation of a ""triage team"" to pre-screen invalid appeals (such as appeals filed from

favorable decisions) before they are docketed. Continuing to devise more efficient work flows under the Department's new computer system.

Conduct periodic and annual training for hearing officers to enhance their knowledge of changes in the law and to address emergent issues with practice and procedure, with an emphasis on the USDOL Quality Appraisal criteria.

We are currently strictly adhering to first-in-first-out in our scheduling practices to avoid the appearance of preferential scheduling at the behest of inquiries from legislators who had received complaints from their constituents. Block scheduling of appeals might be feasible in cases of a mass layoff where all the claimants separated under identical circumstances but that is not a common occurrence. We have implemented the triage unit to identify appeals that were filed in error or which could be resolved much sooner by the withdrawal of the appeal and referral back to the Agency for further investigation and administration. Examples include issues of (apparent) failure to conduct three work searches, failure to report to the Agency with proof of identity and general failure to respond to Agency requests for additional information.

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

Tennessee has lost compliance with the 30 day time lapse standard since the last CAP. We remain in compliance with the 45 day requirement. We have experienced hearing officer and staff attrition which has interfered with our ability to regain compliance with the 30 day time lapse standard.

We are addressing this situation by actively hiring and training new staff and new hearing officers. Our production capacity has suffered only for reduction in personnel. We are actively engaged in hiring and training to staff our unit back up to functional levels.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

Continue to monitor progress in appeals through management reports.

Continue to monitor the individual progress and productivity of new hires and trainees to identify the need for more training and efficiencies.

Alternate Year Plan Updates

NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the current fiscal years (the two consecutive fiscal years for which the plan is in effect). Summarize, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.

NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the current fiscal years (the two consecutive fiscal years for which the plan is in effect). Summarize, below, the major actions remaining to be taken

in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.

(Remaining Major Actions in this cell.)

Milestones

1. Hire appeals referees Completion Date: 12/31/2019

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

2. Continue to utilize a “triage team” at case intake to pre-screen invalid appeals Completion Date: 9/30/2019

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

3. Hire additional support staff Completion Date: 9/30/2019

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

4. Conduct periodic and annual training for hearing officers Completion Date: 9/30/2019

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

5. (Enter next milestone here) Completion Date

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

6. (Enter next milestone here) Completion Date

Quarter 1 status report (12/31/2018):

Quarter 2 status report (3/31/2019):

Quarter 3 status report (6/30/2019):

Quarter 4 status report (9/30/2019):

Quarter 5 status report (12/31/2019):

Quarter 6 status report (3/31/2020):

Quarter 7 status report (6/30/2020):

Quarter 8 status report (9/30/2020):

Tax Quality

State: Tennessee

Federal Fiscal Year: 2019-2020 SQSP Corrective Action Plan & Progress Report

Back to Biennial Overview 2019

Back to Alternate Overview 2020

Instructions

Performance Measures: Tax Quality (Part A)

ALP: No more than 3 tax functions failing TPS in a year

CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4	12/31/2019 Quarter 5	3/31/2020 Quarter 6	6/30/2020 Quarter 7	9/30/2020 Quarter 8
Status New	Target	-	-	-	-	-	-	-	-
Status New	Actual	-	-	-	-	-	-	-	-
Status Successor	Target	-	-	-	-	-	-	-	-
Status Successor	Actual	-	-	-	-	-	-	-	-
Status Inact/Term	Target	-	-	-	-	-	-	-	-
Status Inact/Term	Actual	-	-	-	-	-	-	-	-
Cashiering	Target	-	-	-	-	-	-	-	-
Cashiering	Actual	-	-	-	-	-	-	-	-
Report Delinquency	Target	-	-	-	-	-	-	-	-
Report Delinquency	Actual	-	-	-	-	-	-	--	-
Collections	Target	-	-	-	-	-	-	-	-
Collections	Actual	-	-	-	-	-	-	-	-
Field Audit	Target	-	-	-	-	-	-	-	-
Field Audit	Actual	-	-	-	-	-	-	-	-
Report Processing	Target	-	-	-	-	-	-	-	-
Report Processing	Actual	-	-	-	-	-	-	-	-
Debits/Billing - Contributory	Target	-	-	-	-	-	-	-	-
Debits/Billing - Contributory	Actual	-	-	-	-	-	-	-	-

CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4	12/31/2019 Quarter 5	3/31/2020 Quarter 6	6/30/2020 Quarter 7	9/30/2020 Quarter 8
Debits/Billing - Reimbursing	Target	-	-	-	-	-	-	-	-
Debits/Billing - Reimbursing	Actual	-	-	-	-	-	-	-	-
Credit/Refunds	Target	-	-	-	-	-	-	-	-
Credit/Refunds	Actual	-	-	-	-	-	-	-	-
Benefit Charging	Target	-	-	-	-	-	-	-	-
Benefit Charging	Actual	-	-	-	-	-	-	-	-
Employer Tax Rates	Target	-	-	-	-	-	-	-	-
Employer Tax Rates	Actual	-	-	-	-	-	-	-	-

Performance Measure: Tax Quality (Part B)

ALP: The same tax function cannot fail for 3 consecutive years

CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4	12/31/2019 Quarter 5	3/31/2020 Quarter 6	6/30/2020 Quarter 7	9/30/2020 Quarter 8
Status New	Target	-	-	-	-	-	-	-	-
Status New	Actual	-	-	-	-	-	-	-	-
Status Successor	Target	-	-	-	-	-	-	-	-
Status Successor	Actual	-	-	-	-	-	-	-	-
Status Inact/Term	Target	-	-	-	-	-	-	-	-
Status Inact/Term	Actual	-	-	-	-	-	-	-	-
Cashiering	Target	-	-	-	-	-	-	-	-
Cashiering	Actual	-	-	-	-	-	-	-	-
Report Delinquency	Target	-	-	-	-	--	--	-	-

CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4	12/31/2019 Quarter 5	3/31/2020 Quarter 6	6/30/2020 Quarter 7	9/30/2020 Quarter 8
Report Delinquency	Actual	-	-	-	-	-	-	-	-
Collections	Target	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
Collections	Actual	-	-	-	-	-	-	-	-
Field Audit	Target	-	-	-	-	-	-	-	-
Field Audit	Actual	-	-	-	-	-	-	-	-
Report Processing	Target	-	-	-	-	-	-	-	-
Report Processing	Actual	-	-	-	-	-	-	-	-
Debits/Billing - Contributory	Target	-	-	-	-	-	-	-	--
Debits/Billing - Contributory	Actual	-	-	-	-	-	-	-	-
Debits/Billing - Reimbursing	Target	-	-	-	-	-	-	-	-
Debits/Billing - Reimbursing	Actual	-	-	-	-	-	-	-	-
Credit/Refunds	Target	-	-	-	-	-	-	-	-
Credit/Refunds	Actual	-	-	-	-	-	-	-	-
Benefit Charging	Target	-	-	-	-	-	-	-	-
Benefit Charging	Actual	-	-	-	-	-	-	-	-
Employer Tax Rates	Target	-	-	-	-	-	-	-	-
Employer Tax Rates	Actual	-	-	-	-	-	-	-	-

Performance Measure: TPS Sample Reviews

ALP: Pass

CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4	12/31/2019 Quarter 5	3/31/2020 Quarter 6	6/30/2020 Quarter 7	9/30/2020 Quarter 8
Status New	Target	-	-	-	-	-	-	-	-
Status New	Actual	-	-	-	-	-	-	-	-
Status Successor	Target	-	-	-	-	-	-	-	-
Status Successor	Actual	-	-	-	-	-	-	-	-
Status Inact/Term	Target	-	-	-	-	-	-	-	-
Status Inact/Term	Actual	-	-	-	-	-	-	-	-
Cashiering	Target	-	-	-	-	-	-	-	-
Cashiering	Actual	-	-	-	-	-	-	-	-
Report Delinquency	Target	-	-	-	-	-	-	-	-
Report Delinquency	Actual	-	-	-	-	-	-	-	-
Collections	Target	-	-	-	-	-	-	-	-
Collections	Actual	-	-	-	-	-	-	-	-
Field Audit	Target	-	-	-	-	-	-	-	-
Field Audit	Actual	-	-	-	-	-	-	-	-
Report Processing	Target	-	-	-	-	-	-	-	-
Report Processing	Actual	-	-	-	-	-	-	-	-
Debits/Billing - Contributory	Target	-	-	--	-	-	-	-	-

CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4	12/31/2019 Quarter 5	3/31/2020 Quarter 6	6/30/2020 Quarter 7	9/30/2020 Quarter 8
Debits/Billing - Contributory	Actual	-	-	-	-	-	-	-	-
Debits/Billing - Reimbursing	Target	-	-	-	-	-	-	-	-
Debits/Billing - Reimbursing	Actual	-	-	-	-	-	-	-	-
Credit/Refunds	Target	-	-	-	-	-	-	-	-
Credit/Refunds	Actual	-	-	-	-	-	-	-	-
Benefit Charging	Target	-	-	-	-	-	-	-	-
Benefit Charging	Actual	-	-	-	-	-	-	-	-
Employer Tax Rates	Target	-	-	-	-	-	-	-	-
Employer Tax Rates	Actual	-	-	-	-	-	-	-	-

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.

UI Integrity Action Plan (IAP)

State: Tennessee

Federal Fiscal Year: 2019

Accountable Agency Official(s):

- Commissioner - Burns Phillips
- Deputy Commissioner - Dustin Swayne
- Employment Security Assistant Commissioner - Rusty Felts

- Assistant Administrator - Jason Cecil
- Director of Claim Operations - Jeremy Colbert
- Director of Recovery - Robin Betts
- Director of Employer Accounts Operations - Mark Howell
- Director of Appeals - John Trentes
- Director of REA/RESA - Nicholas Bishop
- Director of UI Integrity - Chris Russ

Top Three Root Causes (Calendar Year 2017) https://www.dol.gov/general/maps/data	Calendar Year 2016 (% of $ Overpaid)	Calendar Year 2017 (% of $ Overpaid)
Root Cause 1: Separation Issues	12.99%	31.57%
Root Cause 2: Benefit Year Earnings	18.81%	26.98%
Root Cause 3: Work Search	47.21%	24.59%

State: Tennessee

Federal Fiscal Year: 2020

Accountable Agency Official(s): (Enter the name and title of the staff person who is accountable for reducing UI improper payments.)

Top Three Root Causes (Calendar Year 2018) https://www.dol.gov/general/maps/data	Calendar Year 2017 (% of $ Overpaid)	Calendar Year 2018 (% of $ Overpaid)
Root Cause Alternate Year 1:	-	-
Root Cause Alternate Year 2:	-	-
Root Cause Alternate Year 3:	-	-

Summary: (Provide a summary of the plan that the state has designed. The summary should include outreach efforts planned by the agency to inform all UI and workforce staff, and employers of the strategic plan to ensure everyone understands the importance of maintaining program integrity.)

Tennessee has developed a UI Integrity Strategic Plan for FY 2019-2020 that includes the following strategies:

Tennessee implemented the Training, Research and Compliance Unit (TRAC) in April of 2017. This unit is continuing to develop system wide training for Unemployment Division. This unit will ensure that the Division is receiving proper training including detection of improper payments. This unit will ensure the Division is compliant with

State and USDOL policy and procedures. This unit will prepare refresher training for Claim Operations personnel to include topics on how to identify and document overpayments and educating claimants on reporting wages and separations. A need has been identified to provide consistent instructions and messaging to claimants to ensure wages and separations are reported properly during the claimants benefit year. Periodically onsite training or webinar will be conducted for claim center personnel as well as provide training documentation. The Unit is reaching out to all employers in TN to register them in the GUS system. This will increase efficiency in processing of claims information including accurate and timely separation information. We follow up this outreach by sending via mail and e-mail a copy of the Employer's Unemployment Guide for JOBS4TN.GOV. TN is currently discussing plans to add more SIDES third party employers. We are currently adding several employers to our claims system GUS that utilize SIDES. The GUS system provides the ability to process correspondence and receive responses from SIDES employer.

Continue to cultivate a sense of ownership for program integrity within the entire UI system by continuing to enhance the state's cross-functional UI Integrity process to assess the state's UI integrity functions and make recommendations for continuous improvement. The agency will conduct this through continued communication through the directors of each unit. Tennessee had a task force in the past but previous management discontinued the task force. Currently TN has re-established the Integrity Task Force. Current plans are to meet quarterly to discuss areas of improvement and alternatives solutions to improve improper payment rate. Task Force consists of UI Assistant Administrator, TRAC team managers, BAM manager, Claims Center Director, and UI Integrity Director. The team will report solutions to the Assistant Commissioner over UI.

Continue to use e-mails, electronic newsletters and staff meetings to encourage all UI and workforce staff to understand how their jobs connect to UI integrity and to solicit their recommendations for solutions to address UI improper payments. We will also promote the use of the UI Integrity Community of Practice web site and UI Integrity Center of Excellence. TN has identified a need to continue training of staff for a better understanding of processes that affect improper payments. We will be sending BPC auditors to training through the Integrity Center in September 2018 to improve knowledge and functionality of our auditors and will also consult them for future training for UI staff. TRAC team will continue training on issues related to the improper payments. This will include detection of separation issue, advising claimants on proper certification process and improving non-monetary statement taking.

Tennessee marketing team and Claims Operation Director attends Workforce Employer Outreach Committee Meetings as well as meeting with employers who have mass layoffs. At these meetings the representatives discuss the process of unemployment to employers. Tennessee also uses the website to guide employer to the SIDES system. We also have instructions on our website for GUS registration. This give them better access to their claims and will enhance their ability to get better and timely information to the agency. The TRAC team is calling EVERY employer within the state of Tennessee to explain our Jobs4TN.gov website and the benefits of them activating their account. A Jobs4TN.gov User Guide is sent by mail (hard copy) and e-mail (electronic copy) to each

employer that is contacted. Tennessee will look to increase outreach to employer targeting programs that target the improper payment rate and also would be open to suggestions from USDOL.

Main root cause for work search was claimant inability to produce adequate job searches or produce them at all. Claimants were allowed to certify and did not have to provide the work search prior to payment. Currently the GUS system required the claimant to either be exempt from the work search, have a reportable service through workforce services or provides three work searches prior to certification. If claimant cannot provide this an issue is created and determination issued denying the claim until it is provided.

Main issue and root causes of separation issues were because of the backlog of UI claims work load through the spring of 2017. Tennessee had to pay first adjudicate later per the Java ruling which increased the number of claims that were paid improperly. We no longer had this backlog and hope to see a decrease in the separation category. We reorganized our BPC work flow to utilize the BAT team concept in the spring of 2018 to increase productivity with the new hire crossmatches. This will enable us to work more and work them quicker. This plan we hope will decrease the number of weeks a claimant will receive improper payments. Agency will also be participating on 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. Anticipated completion of this is December of 2018. The agency also provides online videos and instruction on reporting separations from employment. Claimants must also read and acknowledge they understand they must report separations before they can proceed to the certification process.

Main issues and root causes of benefit year earnings is related to the current certification questions. The earnings question is not separate from the work question. If a claimant answers no to working then they are not presented the wage question. TN will be working with Geographic Solutions to improve the certification questions. Each question will state the dates in which the certification applies. The questions will be stand alone on different screens to focus is just on that one question. New hire data will be cross matched and presented at the time of certification if the claimant has a new hire date with in that week of certification. The anticipated completion date of this is June of 2019. Agency also provides online videos to educate claimants on certification process. There is also written instructions certifications and reporting your earnings. Claimants must also read and acknowledge they understand they must report earnings before they can proceed to the certification process.

Continue to conduct analysis of quarterly BAM data to identify trends in root causes and continue to keep management aware of possible trends in improper payments through the periodic reporting of BAM data. BAM manager supplies Director of Integrity with monthly reports on paid case errors. This enables the agency to pinpoint increases in a root causes as well as detect or determine what is causing the improper payments.

Engage in a business process analysis know as Lean events to identify areas of weakness and to set the stage for reengineering processes that will improve program integrity and

performance. BPC support staff held an event in the May of 2018 which is showing an improvement to processes. BPC will continue to utilize this process going forward to increase efficiencies

Continue the Eligibility Review Interview (ERI) program in which claimants will be more accurately assigned Claimant Characteristic Codes based upon a review of work and layoff history from the same employer. This program will flag claimants who have reached their return to work date and verify the continuing eligibility of all claimants.

Examine SBR opportunities as well as penalty and interest collections for fraud detection and prevention solutions.

Continue to use the Treasury Offset Program (TOP) to recover improper payments.

Continues use of standalone Recovery unit poised to addresses the recovery of overpaid benefits. Unit will utilize multiple strategies such as liens, garnishments, correspondence, and out bound telephone calls to those that have an outstanding debt to the agency. There are also utilizing a change to write off law that allows us more time to collect the debt. Recovery unit will also partner with Lexis Nexis to implement Business Data Enrichment Solution. This process will help with recovery of benefits by searching for alternative addresses and contact information. It will also look at assets to determine the claimant ability to pay back benefits. This process will give us another tool to go after those claimants that have not updated contact information as well it will determine their ability to pay back the benefits based on assets.

The Tennessee Department of Labor and Workforce Development plans to continue existing UI Integrity related projects towards more integrated system enhancements which will not only provide the same functionality and achieve the same intended results of better enabling us to prevent, detect and recover improper payments but which will also address many UI performance issues as well.

Enhanced Employment Service Registration

Enhanced Job Service/UI Systems interface

Implementing State-Specific Solutions

SAS Fraud Prevention/Detection Solution Software

Lexis Nexis Fraud prevention system

Tennessee will be participating in a Lexis Nexis pilot program called 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. We hope to begin this pilot by the end of the fourth quarter 2018.

Continue improving the new benefits systems GUS from Geographic solutions. This will increase early detection, prevention, and recovery of improper payments. The Agency along with Geographic Solutions will be upgrading certification process in during fiscal year 2019. This will improve questions for claimants. Each question will be in a single page format instead of having all questions on one page. If an issue is detected they

system will present fact finding questions at that time. Each question will have the date range pertaining to that question in the body of the question. Increase notifications prior to certification, thought popup windows, to report separations and wages earned during the week. Certifications will be cross matched with new hire information and present new hire information at the time of certification to address. This will display the new hire employer as well as the hire date of the employer. The system will ask of this information is correct and expect a yes or no answer. If the claimant answers no they will be asked to provide an explanation on why there were not hired and working there at this time.

Because of the different strategies and multitude of actions included in this UI Integrity Strategic Plan and the varying implementation timelines involved, it is extremely difficult to establish precise performance targets for any given point in time. Our overall goal is to reduce improper payments due to BYE and Separation issues by 50% within one year of the implementation of this plan and we expect to be able to measure our success along the way based on a continuous and sustained decrease in the quarterly improper payment rates by cause as measured from our BAM sample data.

Instructions for the following section: In each individual section below, enter a Root Cause, from above, and the top three focused Strategies that will be employed to correct or reduce this cause of overpayments. An additional line is available in each section to include other significant strategies that target the root cause.

Root Cause 1: Separation Issues

Strategies	Actions	Targets & Milestones	Resources
1. Develop continued training strategies from the TRAC unit. Unit will focus on identification of issues, establishing the correct separating employer, and establishing the correct detection date.	Continuing to develop training for all UI staff concentrating on detecting correct issues	Continuous	TRAC team

Strategies	Actions	Targets & Milestones	Resources
2. Utilize state and national directory of new hire to detect hiring and separations from employers. BPC unit revamped support staff processing work items in BAT team concept. This concept allow them to process front end of the new hire (employer letter, claimant letter) for the auditor allowing the auditor to focus on processing rebuttals and decisions. This adds efficiencies to our process. We also use mini lean events to revamp the process because it is new and evolving.	Continual improvement of operating procedures for BPC processes.	Continuous	BPC staff, and management
3. Improve Certification process. TN will be working with GSI to improve certification process in 2019. Claimant will get pop up notifications/reminders to report earnings and separations. The date of the certification will appear with in each question. One question will be asked per screen and if disqualifying answers are given a fact finding will be presented. New hires will be cross-matched during certification process and present information to the claimant if a new hire falls in the week of the certification.	Agency and GSI will work to improve certification process beginning with design process over the third and fourth quarter 2018. This will improve root causes because questions will be asked one per page instead of multiple at a time. If there is an answer that is potentially disqualifying the system will present fact finding questions to the claimant and create an issue to be addressed.	Implementation by June 2019	Geographic Solutions and TN Dept of Labor UI division
Additional:			
Claimants are required to acknowledge benefits rights prior to submitting claim. Reporting separations is part of the acknowledgement process.	Continue to present acknowledgments at time of certifications	Continuous	GSI claims system certification process
Utilize online training for claims agents and adjudication from NASWA integrity center. Focus on fact finding and identifying correct issues.	Use NASWA Integrity Center online training for UI staff during 2019.	Complete this by December 2019 for current staff and also conduct this for new staff as hired	UI claims staff, NASWA Integrity center

Root Cause 3: Work Search

Strategies	Actions	Targets and Milestones	Resources
1. Continue use of automatic denial when claimant fails to meet the parameters of job search. System will automatically deny the week if claimant does not provide three job searches or has not had a reported service at an American Job Center.	Automatically deny claim if work search is not adequate meaning claimant did not provide three work searches or did not have reportable service. They system will also deny the work search issue if the work search is not completed.	Continuous	GUS claims system, Claims Operations
2. Continue use of GUS claims system. Continue to display check list of eligibility requirements and require claimant acknowledge they have read the requirements. This includes reporting of wages when claimant is working.	Currently Implemented	Continuous	GUS claims system, UI Staff
3. Eligibility Review Process. Continue eligibility review process each week during certifications. Review aspects of continued job attachment, and evolving into job search requirements. After 16 weeks claimants are required to begin job search.	Ask ERI questions each week during certification process.	Continuous	GUS claims system, UI Staff
Additional:			
Improve Certification process. TN will be working with GSI to improve certification process in 2019. Claimant will get pop up notifications/reminders to report earnings and separations. The date of the certification will appear with in each question. One question will be asked per screen and if disqualifying answers are given a fact finding will be presented. New hires will be cross-matched during certification process and present information to the claimant if a new hire falls in the week of the certification. Completion date if forecasted for June 2019.	Agency and GSI will work to improve certification process beginning with design process over the third and fourth quarter 2018. This will improve root causes because questions will be asked one per page instead of multiple at a time. If there is an answer that is potentially disqualifying the system will present fact finding questions to the claimant and create an issue to be addressed.	Jun-19	TN UI staff, Geographic Solutions

Root Cause 2: Benefit Year Earnings

Strategies	Actions	Targets & Milestones	Resources
1. Improve Certification process. TN will be working with GSI to improve certification process in 2019. Claimant will get pop up notifications/reminders to report earnings and separations. The date of the certification will appear with in each question. One question will be asked per screen and if disqualifying answers are given a fact finding will be presented. New hires will be cross-matched during certification process and present information to the claimant if a new hire falls in the week of the certification. Design process will take place over third and fourth quarter 2018 and implementation should be done by June of 2019	Agency and GSI will work to improve certification process beginning with design process over the third and fourth quarter 2018. This will improve root causes because questions will be asked one per page instead of multiple at a time. If there is an answer that is potentially disqualifying the system will present fact finding questions to the claimant and create an issue to be addressed.	Implementation by June 2019	Geographic Solutions and TN Dept of Labor UI division

Strategies	Actions	Targets & Milestones	Resources
2. Utilize state and national directory of new hire to detect hiring and separations from employers. BPC unit revamped support staff processing work items in BAT team concept. This concept allow them to process front end of the new hire (employer letter, claimant letter) for the auditor allowing the auditor to focus on processing rebuttals and decisions. This adds efficiencies to our process. We also use mini lean events to revamp the process because it is new and evolving.	Continual improvement of operating procedures for BPC processes.	Continuous	BPC staff, and management
3. Continued training by TRAC unit for claims staff. This training will include how to advise claimants on the process of reporting earnings as well as detection procedures when a claimant contacts the agency with issues.	Continuing to develop training for all UI staff concentrating on detecting correct issues	Continuous	TRAC team
Additional:			
Monitor BAM paid cases to determine trends in improper payments	BAM Manager will submit monthly report to Director UI Integrity. This will then be examined by Integrity Task force for improvement.	Continuous	BAM Manager, Integrity Director, Task Force

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.

The contents of the organizational chart could not be converted into a format acceptible by this database. The State of Tennessee, Department of Labor and Workforce Development and the Regional Office maintains a signed copy of the organizational chart.

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.

The State of Tennessee, Department of Labor and Workforce Development and the Regional Office maintains a signed copy of the SQSP signature page.

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, a complete SQSP package must be submitted. 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.

Tennessee is in its second year of the 2-year cycle and has included the appropriate information in our responses above.

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 is in its second year of the 2-year cycle and has included the appropriate information in our responses above.

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 is in its second year of the 2-year cycle and has included the appropriate information in our responses above.

Senior Community Service Employment Program (SCSEP)

At minimum, in the SCSEP stand-alone submission and the SCSEP portion of the Combined State Plan, States should comprehensively cover the following elements.

a. Economic Projections and Impact

States must:

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.)

In accordance with the Governor's Jobs and Economic Development Goal, Tennessee has taken a position to help seniors continue maintaining a sustainable life. One way the state is doing this is by providing useful community services and employment opportunities through the Senior Community Service Employment Program (SCSEP) for seniors across the state. SCSEP fosters economic self- sufficiency through training, job placement, and guidance in unsubsidized jobs.

Tennessee's SCSEP plan serves as the roadmap for the implementation of the program among its stakeholders; this ensures compliance with the U.S. Department of Labor (USDOL) rules and regulation. In addition, the plan will serve as a means of accountability to our participants, community, and funders. The SCSEP Plan will account for PY 2016-2020.

The Older Americans Act (OAA) is the primary funding vehicle for organizing, coordinating, and providing community-based services and opportunities for older Americans and their families in the United States. The OAA set out specific objectives for maintaining the dignity and welfare of older people. Listed below are two parts of Tennessee's infrastructure for administering the OAA and opening avenues to help leverage and maintain the health, lifestyle, and independence of seniors in the state:

Tennessee Commissioner of Aging and Disabilities or TCAD (a TDLWD partner) administers a system of services for those age 60 and over in their respective Planning and Service Areas (PSA). TCAD oversees multi-purpose senior center activities. This comprehensive and coordinated system of services is described in the Area Agencies on Aging and Disability's Plans. These services include Information and Assistance, Senior Centers, Nutrition Program for the Elderly, Disease Prevention and Health Promotion, National Family Caregiver Support Program, Aging, and Disability Resource Center (ADRC), Elder Rights, Long-Term Care Ombudsman.

Tennessee Department of Labor and Workforce Development's Senior Community Service Employment Program (SCSEP) is the only federally-sponsored, job creation program targeted to low-income older Americans, which promotes the Governor's initiative to engage and educate employers on the value of hiring older workers. The program subsidizes part-time community service work base training for low-income individuals age 55 years and older, who have poor employment prospects. The participants are often placed in schools, hospitals, economic development initiatives, weatherization activities, law offices, conservation programs, and other sites. These sites translate into positions such as nurse's aides, and teacher's aides, library clerks, clerical workers, adult and child daycare assistants, campground recreational coordinators, maintenance workers, and many more occupations.

The U.S. Department of Labor (USDOL) funds and monitors SCSEP through the Older American's Act Title V Program. Currently, there are three (3) administrators or grantees—Tennessee Department of Labor and Workforce Development (TDLWD),

National Council of Aging (NCOA), and Senior Service of America, Inc. (SSAI), in Tennessee. TDLWD currently has six (6) sub-grantees that implement the SCSEP program. They are located in part of West, and East Tennessee. NCOA and SSAI are assigned several counties and co-manage the program with the state in several counties. Tennessee SCSEP grantees are represented on state and local business-led boards (Workforce Boards) that provide strategic planning and oversight of workforce development activities.

According to the 2010-2014 (American Community Survey Census) employment status of the civilian non-institutional population for Tennessee, the labor force participation rate of the 55+ population has increased from a low of 34.1% in 2009 to 39% in 2011. During the same period, the overall labor force participation rate increased less than one (1) percentage point. Data also shows that this population will continue to grow as the baby-boom generation reaches age 55.

In 2010-2014, Census estimated that 17.8% (over 1,000,000 individuals) of Tennessee's population had income levels below poverty. There were 60 of the 95 counties in the state that recorded higher poverty levels than the state average. Forty-five counties have poverty levels at 20% or higher. Thirteen of these are rural counties. Lake County has the highest poverty level at 41.9%. The 5 highest poverty level counties are as follows:

- Lake 41.9%
- Hancock 29.5%
- Bledsoe,28.5%
- Fentress 28.1%
- Cocke 27.8%

Statewide, the age 55+ group had 10.9% (169,400 individuals) below poverty in 2010. There were 67 counties with higher poverty rates than the state average for this group. Six counties had poverty rates of 20% or higher and Hancock County had the highest poverty rate for age 55+ at 28%.

As the baby-boom generation ages, as the economy continues on the verge of improvement and as older workers postpone retirement, the demand for employment and training services, as well as income support for low-income older people, will increase.

Tennessee continues to increase employer engagement and will also increase exploration of on-the-job-experience (OJE) as a method of expanding employer engagement. While OJE has not been widely utilized by our sub-grantees in the past, Tennessee will actively promote OJE as a tool for sub-grantees to use in future program years to gain more unsubsidized jobs for participant job seekers.

LOCALITIES AND POPULATIONS WHERE SERVICES ARE MOST NEEDED

SCSEP services are helpful to all Tennesseans who are eligible for the program, especially individuals who are forced to retire or who continue to face age discrimination. SCSEP participants bring the following to the program when they start: dependability, loyalty, a strong work ethic, transferable skills, childcare skills, customer-service skills, a

desire to learn and contribute, and maturity. In exchange, SCSEP provides these participants with updated job-skills training and work experience as well as much-needed income from part-time work-base training at community service assignments with local government or 501(c) (3) nonprofit agencies. SCSEP also helps participants, with low literacy skills and low organizational skills, through referrals and through work experience, respectively. SCSEP tries to provide participants with skills needed to obtain an unsubsidized job helping them maintain self-sufficiency and engagement in their community.

As noted in the Economic and Workforce Analysis (Appendix 2), the industries and occupations in the state that may provide employment opportunities in Tennessee through 2022 are:

- Administrative and Support Services
- Health Care services
- Educational Services
- Professional and Technical Services
- Food Services
- Professional and business services and construction, and Administrative and Support Services sectors are projected to gain the most jobs

Education, and Professional and Business Services are the two industries in which older workers are expected to gain employment. Several occupations are prominent in Tennessee; however, the occupations that are the most prevalent among seniors in Tennessee are office and administrative support, education, training, and library support, community and social service occupations. During 2014, the state received calls from several governmental agencies requesting information about being a Host Agency for SCSEP. In addition, due to the high demands of older workers requesting employment, unmatched education levels, and interest to venture into a new trade, the state is determined to work closely with the Workforce System to make sure that adequate resources are available for seniors.

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))

I-A According to the TDLWD's Occupational Data Unit, the industries, and occupations in the state that may provide employment opportunities in Tennessee through 2022 are: 1) Administrative and Support Services, 2) Health Care services, 3) Educational Services, 4) Professional and Technical Services, 5) Food Services, 6) professional and business services and construction, and Administrative and Support Services sectors are projected to gain the most jobs. (Source: TDLWD Labor Market Information Section.) Education, and Professional and Business Services are the two industries in which older workers are expected to gain employment. Several occupations are prominent in Tennessee; however,

the occupations that are the most prevalent among seniors in Tennessee are office and administrative support, education, training, and library support, community and social Service occupations. During 2014, the state received calls from several governmental agencies requesting information about being a Host Agency for SCSEP. In addition, due to the high demands of older workers requesting employment, unmatched education levels, and interest to venture into a new trade, the state is determined to work closely with the workforce system to make sure that adequate resources are available for seniors.

I-B As stated, healthcare and the business services sectors are projected to have the fastest job growth between 2014 and 2022. This could translate into career opportunities for SCSEP participants. Tennessee understands the importance of creating an atmosphere where participants have multiple, career-sector opportunities and training opportunities needed to enter into attractive sectors, along with supporting the workforce system's employment goals for low-income older workers by building sustainable business relationships with industries across the state (Governor's Jobs and Economic Development Goal: Objective III, Increase employer engagement with the workforce development system; Objective V, Increase work-integrated learning.)

Any participant of SCSEP is required to develop an Individual Employment Plan (IEP) at the time of enrollment. The IEP serves as a personal road-map to success and is designed to specifically assist the participant in meeting both personal and program goals. Each participant receives specialized training that fits under his or her IEP and is assigned to a host agency to develop or improve skills. The plan also determines if the Host Agency has met the participant's requirements. In addition, the Host Agency provides services to low-income older persons, to the economically disadvantaged, and to organizations offering services which provide positive contributions to the welfare of the general community. Opportunities to serve other groups will also be provided through placement in schools, day-care programs, health and hospital programs, and agencies serving individuals with physical and developmental disabilities.

I-C According to labor market information that was developed by the Tennessee Department of Labor, 553,000 older workers were reflected in the 2008 Labor Force population compared to 661,000 (or a 16% increase) in 2011.With the projection of continued growth of the population 55+ entering the workforce, the labor force will place added strain on workforce investment resources and on the Workforce system. The current job opportunities or occupational trends in Tennessee have shifted to the service industry in recent years according to the Non-Agricultural Employment Report provided by TDLWD. This includes healthcare, social assistance, leisure and hospitality jobs. In 2016, the projected occupation for individuals who are 55 and older will be in the professional and service occupations.

SCSEP is designed for those who are not job-ready but are low-skilled and have a family income that falls under 125% of the Federal Poverty Guidelines. Individuals enrolling in the SCSEP program have a need for further education and/or training to perform work that is available in the local Tennessee labor market. Example of the skill level of eligible individuals upon enrollment includes limited or no computer skills, outdated clerical and bookkeeping skills, basic custodial and homemaker skills, heavy-equipment operators, no advanced manufacturing skills, or no job skills. Often, the participant can no longer

physically do the same type of job that he or she has done in the past. Health and medical issues eliminate jobs that require tasks such as standing and/or sitting too long, lifting, bending, and walking. TDLWD, National Council on Aging, and Senior Services of America, Inc. collaborate with their respective host agencies (or work sites) to ensure that participants' and employers' needs and access to services are met. In addition, the One-Stop Center system, under the WIOA, is a single point of contact for job seekers and employers seeking information about local workforce development activities. This integration will not only support SCSEP's innovative approaches but will help the workforce system prepare for a greater number of older workers it will serve outside of SCSEP. SCSEP participants are mandated to develop an Individual Employment Plan or IEP with the guidance of their Project Director. This plan serves as

- a personal road-map to success
- assistance to the participant in assessing barriers and skill gaps to generate detailed IEPs with tasks and timelines
- an aid to meet program and personal goals

IEPs are referred to often throughout participation to ensure goals are being met. In addition, any IEP identifies the need for vocational, high school equivalency (HSE), or computer training. All of these require attendance in a "classroom" environment where the participant may have workbooks, exercises, and reading assignments. Tennessee believes that it is vital to strengthen initial assessments of participant skills, knowledge, interests, aptitudes, and qualities to assist participants with defining career objectives that are relevant and which meet employer needs.

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))

Due to the projected growth of the 55+ population entering the workforce, the labor force will place added strain on workforce investment resources and on the Workforce System. The current job opportunities or occupational trends in Tennessee have shifted to the service industry in recent years according to the Non-Agricultural Employment Report provided by TDLWD. This includes healthcare, social assistance, leisure and hospitality jobs. In 2016, the projected occupation for individuals who are 55 and older will be in the professional and service occupations.

SCSEP is designed for those who are not job-ready but are low-skilled and have a family income that falls under 125% of the Federal Poverty Guidelines. Individuals enrolling in the SCSEP program have a need for further education and/or training to perform work that is available in the local Tennessee labor market. Example of the skill level of eligible individuals upon enrollment includes limited or no computer skills, outdated clerical and bookkeeping skills, basic custodial and homemaker skills, heavy-equipment operators, no advanced manufacturing skills, or no job skills. Often, the participant can no longer physically do the same type of job that he or she has done in the past. Health and medical issues eliminate jobs that require tasks such as standing and/or sitting too long, lifting,

bending, and walking. TDLWD, National Council on Aging, and Senior Services of America, Inc. collaborate with their respective host agencies (or work sites) to ensure that participants' and employers' needs and access to services are met.

b. Service Delivery and Coordination

States must:

1. Provide 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. 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 each local Workforce system and to enter into a Memorandum of Understanding, describing how services will be provided with the Local Workforce Investment Board. In Tennessee, the U.S. Department of Labor allocates funds (to operate SCSEP through TDLWD and two national organizations. The national organizations are NCOA and SSAI. Tennessee is divided into 13 Local Workforce Development Areas (LWDAs). SCSEP participants are referred to one of the fifteen one-stop Career Centers, across the state, providing comprehensive, workforce development-related activities, including updating interviewing skills, resume preparation, and job placement services.

In rural areas, SCSEP participants and other individuals 55 and older may also access services from one of TDLWD's Mobile Centers with services similar to those found in the American Job Centers. These vehicles provide a mobile computer lab with Internet access, and they create a venue for workshops including résumé assistance and interviewing skills; the vehicle also serves as a recruitment center for employers. SCSEP Project Directors represent the Title V Program on each of the LWDAs. The cooperation of grantees on local boards has resulted in improved coordination between workforce agencies and has reduced "turfism." One of Tennessee's grantees has developed a presentation on how to navigate a job fair that can be used at a participant meeting. Topics may vary and can include interviewing techniques, resume writing tips, approaching the hidden job market, using social media in a job search and completing online job applications.

B. Actions to coordinate activities of SCSEP grantees with the activities to be carried out in the State under the other titles of the OAA. (20 CFR 641.302(h))

SCSEP grantees reach out to organizations that administer programs, under other titles of the Older Americans Act, to offer them the opportunity to become host agencies. SCSEP participants and other older workers will be directed to one of the local information and referral hotlines (administered by the Tennessee Areas Agencies on Aging and Disabilities offices) when these workers are seeking services or information. In addition,

referrals will be made to congregate nutrition programs, transportation services, health and wellness programs, etc.

C. 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))

Tennessee prides itself on being engaged in actionable partnerships to leverage resources across agencies and enhance customer performance outcomes. Governor's Jobs and Economic Development Goal: Objective II, to establish cost-effective co-investment models, across government funding streams and other funding streams. These partnerships include:

- Coordinating with American Job Centers, Vocational Rehabilitation Services and other members of the local disability community regarding activities, resources, and services for seniors with disabilities
- Participating in meetings, as appropriate, with senior service providers, both public and private
- Coordinating with local service providers and community stakeholders to assess needs and develop solutions for local transportation services
- Using 2-1-1 and other directories of service and supporting organizations to identify entities and programs in the community that provides referrals and support services to seniors. These directories are especially helpful for transition services when a participant's durational limit is approaching and project staff is working with him/her to develop a Transition Assessment & IEP.
- Networking with area faith-based organizations to conduct outreach to SCSEP-eligible individuals

Outreach and education of AJC and partner staff will be increased with training on basic competencies when servicing those with disabilities. If assistance is needed for training and employment services with the deaf and hard of hearing, interpreters and other communication-access services will be scheduled. Other partnerships include organizations providing assistance with subsidized housing, healthcare and medical services, transportation, the law, food, personal and financial counseling, interviewing, clothes, etc.

D. Actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))

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 will be an active member of the local business service teams.

E. Actions the State will take to ensure that SCSEP is an active partner in the one-stop delivery system and the steps the State will take to encourage and improve coordination with the one-stop delivery system. (20 CFR 641.335)

The partnership with SCSEP and the American Job Center system is essential to the success of SCSEP in Tennessee. A Memorandum of Understanding (MOU) is developed to coordinate activities between SCSEP and the Workforce delivery system. The state will encourage One-Stop American Job Centers to hold regular partner meetings that include all SCSEP grantees operating in each local area to improve coordination with the Workforce delivery system. Sub-grantee strategies include:

- Listing all participant and staff openings with the American Job Centers
- Encouraging co-enrollment in WIOA, where possible, for participants seeking full-time employment
- Where feasible, requesting that the AJC in a given service areas serves as host agencies for SCSEP participants so that participants can provide administrative support to these offices while learning valuable job skills
- Requesting guidance from the American Job Centers on relevant skills required by local employers
- Participating in American Job Center offices' partner meetings
- Collaborating appropriately with AJC offices on employer outreach on behalf of senior Tennesseans and collaborating on continuous improvement of senior-service strategies
- Providing brief updates to Board staff and American Job Center offices' staff on SCSEP activities in the local workforce development area
- Where applicable, attending local board meetings regularly.
- Using local labor market information and staff information to identify occupations and industries with the most promise for older job seekers, employers that are hiring or will soon be hiring, and employers moving to the local area
- Referring participants who are ineligible for SCSEP to the closest American Job Center for job search assistance

F. Efforts the State will make to work with local economic development offices in rural locations.

Grantees or local projects will collaborate with local the local workforce system and economic development councils in both urban and rural areas in order to provide education on the exceptional qualities that older adults bring to the workplace, to learn about potential employment growth opportunities, to discuss where older workers could add value to growth areas, and to increase job opportunities. SCSEP priority of service requires outreach to rural communities. Local project staff uses 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. Describe the 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)) (Alternately, the State may discuss this in the State strategies section of strategic plan if submitting a Combined Plan.)

High performance is a priority for the state on every level—grantee, sub-grantees, host agencies, and employers. Several efforts are necessary for achieving these goals:

- Grantees will provide well-established partnerships with local Chambers of Commerce and employer organizations.
- Encouraging Tennessee grantees to establish relationships with their local, county and state economic development councils and accessing their press releases of future or growing business announcements.
- Provision of tools on each grantee's website for sub-grantees and older worker jobseekers. Tools may include resources and supportive services targeted for older Americans, resume help (tips, templates), information on starting a business, interviewing aids, job-search strategies for older workers (highlighting employers who hire older workers), etc.
- Continuous training of sub-grantees, with topics including performance measures, data validation, budget management, Most-In-Need barriers, job search strategies, etc.
- Encouragement of AJCs to hold job fairs targeted for older workers during Hire Older Worker Week in September
- Encouragement of SCSEP sub-grantees to reach out to employers to educate them on the value of hiring older workers
- Encouraging the use of sector strategies to assist lower-skilled workers with skill attainment and job placement
- Encouraging further education, such as HSE, higher education, and technical training
- Encouraging SCSEP sub-grantees to form local employer advisory boards
- Promoting OJE as a tool for sub-grantees to use in future program years to gain more unsubsidized jobs for participant job seekers

3. Describe the long-term strategy for serving minorities under SCSEP. (20 CFR 641.302 (c))

According to the PY 2013 SCSEP Minority Report that was released by the Charter Oak Group, LLC., in 2015, Tennessee overall exceeded the Census minimum expectation for

the African American serving 41.5% with the census percent being 21.8% and American Indian serving 0.7% with the census percent being 0.3%; however, there is room for growth in serving the Hispanic and Asian populations; several strategies will be put in place to increase the awareness of SCSEP for these two populations. These include:

1. Monitoring of minority participation to assure performance negotiated goals are met.
2. Reaching out to the 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 the Hispanic and Asian population,
    - Determining the cause(s) for the minority group's lower enrollment.
    - Setting specific targets for the number of minority enrollees expected.
    - Identifying the steps that will be taken to increase the enrollment of each minority group.
    - Beginning monitoring minority enrollments on a quarterly basis.
    - Prioritizing bilingual service delivery whenever possible to encourage full participation.

4. List needed community services and the exact places where these services are most needed. Specifically, the plan must address the needs and location(s) of those individuals most in need of community services and the groups working to meet their needs. (20 CFR 641.330)

SCSEP participants across Tennessee need a wide range of community services to meet their needs. Because they are economically insecure, they struggle with issues such as having enough food to eat, paying for medicine and out-of-pocket health expenses, housing, transportation, legal issues, and daily living expenses. Participants in need of assistance are referred to organizations such as food stamp offices, the Salvation Army, the Legal Aid Society, senior centers, and food banks. There are limited organizations with funding to provide these resources in rural areas. Therefore, SCSEP staff research and provide community service information available in both rural and urban areas for SCSEP participants.

In addition, TDLWD engages in partnerships with Tennessee Human Resource Agencies. These agencies produce community-needs assessments as well as use other assessments produced by groups such as the local United Way office or Community Action Agencies. These assessments are used to identify priority community needs.

5. Describe the 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))

Tennessee seeks to be the top-performing state in the nation, and it understands that there are necessary steps that need to be taken to achieve this goal. These steps include:

1. Work with new and existing host agencies in an effort to improve and increase in-demand training opportunities.

2. Increase partnerships with community colleges in the development of programs to meet the needs of participants.

3. Increase opportunities to meet participants needs through supportive services.

4. Increase awareness of the SCSEP to unsubsidized employers in an effort to promote employment opportunities for participants.

5. Expand economic opportunities through utilizing On the Job Experience (OJE) for participants.

6. Describe a 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))

High performance is a priority for the state on every level—grantee, sub-grantees, host agencies, and employers. Several efforts are necessary for achieving these goals:

- Grantees will provide well-established partnerships with local Chambers of Commerce and employer organizations.
- Encouraging Tennessee grantees to establish relationships with their local, county and state economic development councils and accessing their press releases of future or growing business announcements.
- Provision of tools on each grantee's Web site for sub-grantees and older worker jobseekers.
- Tools may include resources and supportive services targeted for older Americans, resume help (tips, templates), information on starting a business, interviewing aids, job-search strategies for older workers (highlighting employers who hire older workers), etc.
- Continuous training of sub-grantees, with topics including performance measures, data validation, budget management, Most-In-Need barriers, job search strategies, etc.
- Encouragement of AJCs to hold job fairs targeted for older workers during Hire Older Worker Week in September.

- Encouragement of SCSEP sub-grantees to reach out to employers to educate them on the value of hiring older workers.
- Encouraging the use of sector strategies to assist lower-skilled workers with skill attainment and job placement.
- Encouraging further education, such as HSE, higher education, and technical training.
- Encouraging SCSEP sub-grantees to form local employer advisory boards.
- Promoting OJE as a tool for sub-grantees to use in future program years to gain more unsubsidized jobs for participant job seekers

c. Location and Population Served, including Equitable Distribution

States must:

1. Describe the localities and populations for which projects of the type authorized by title V are most needed. (20 CFR 641.325 (d))

- Coordination with the nine regional Tennessee Area Agencies on Aging organizations that provide curb-to-curb transportation for older Americans (60 and older) is vital in the rural areas to provide access to individuals to participate in SCSEP.
- Partnerships with various community and faith-based organizations that provide food to older Americans to ensure SCSEP participants have access to proper nutrition such as Second Harvest Foodbanks, Senior Centers for congregate meals and local Help Centers is ongoing.
- Coordination with the 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 2-1-1 and other 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 a 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 Hyperlink to Jobs4TN
- Assist job-ready participants to register on Hyperlink to 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 SCSEP project will take place. Include the number of SCSEP authorized positions and indicate if and where the positions changed from the prior year.

Title V of the Older Americans Act promotes geographical distribution of SCSEP positions so that all eligible persons have reasonable access to SCSEP. For Program Year (PY) 2014-2015, the U.S. Department of Labor allocates 20% of SCSEP funding to the TDLWD's 182 positions with the remaining 80% going to two national organizations—National Council on Aging (163 positions) and Senior Service America, Inc. (548 positions).

To measure the collective progress made by these state grantees toward an equitable distribution of program positions, an annual Equitable Distribution (ED) Report is developed in collaboration with all state grantees and subgrantees. Each grantee operating in the state was contacted and asked to help develop the report. Telephone conversations provided a venue for the group to affirm a return to the regular practice of annual, Equitable Distribution meetings to achieve equality as indicated in the OAA Amendments. In addition, state operators meet on the national level to alleviate the disproportion noted.

Movement of positions from over-served to underserved locations within Tennessee

MOVEMENT OF POSITIONS FROM OVER-SERVED TO UNDERSERVED LOCATIONS WITHIN TENNESSEE

County	State	NCOA	SSAI	Totals
Anderson	--	--	10	**10**
Bedford	--	--	6	**6**
Benton	--	--	4	**4**
Bledsoe	--	--	3	**3**
Blount	--	--	16	**16**
Bradley	--	--	14	**14**
Campbell	10	--	--	**10**
Cannon	--	2	--	**2**
Carroll	--	--	6	**6**
Carter	5	--	6	**11**
Cheatham	4	--	--	**4**
Chester	4	--	--	**4**
Claiborne	7	--	--	**7**
Clay	--	--	3	**3**
Cocke	--	--	9	**9**
Coffee	--	--	8	**8**
Crockett	--	--	3	**3**
Cumberland	5	--	6	**11**
Davidson	--	58	--	**58**
Decatur	--	--	3	**3**
DeKalb	--	4	--	**4**
Dickson	--	6	--	**6**
Dyer	3	--	3	**6**
Fayette	--	--	5	**5**
Fentress	5	--	--	**5**
Franklin	--	--	6	**6**
Gibson	--	--	7	**7**

County	State	NCOA	SSAI	Totals
Giles	--	--	5	**5**
Grainger	--	--	5	**5**
Greene	--	--	14	**14**
Grundy	--	--	4	**4**
Hamblen	--	--	10	**10**
Hamilton	--	--	38	**38**
Hancock	--	--	2	**2**
Hardeman	5	--	--	**5**
Hardin	6	--	--	**6**
Hawkins	--	--	10	**10**
Haywood	--	--	4	**4**
Henderson	--	--	5	**5**
Henry	4	--	1	**5**
Hickman	--	5	--	**5**
Houston	2	--	--	**2**
Humphreys	2	--	--	**2**
Jackson	3	--	--	**3**
Jefferson	--	--	7	**7**
Johnson	3	--	2	**5**
Knox	--	--	43	**43**
Lake	--	--	1	**1**
Lauderdale	--	--	5	**5**
Lawrence	--	--	8	**8**
Lewis	--	--	3	**3**
Lincoln	--	--	5	**5**
Loudon	--	--	5	**5**
Macon	2	3	--	**5**
Madison	--	--	12	**12**
Marion	--	--	5	**5**
Marshall	--	--	4	**4**

County	State	NCOA	SSAI	Totals
Maury	--	--	11	**11**
McMinn	--	--	8	**8**
McNairy	5	--	--	**5**
Meigs	--	--	2	**2**
Monroe	--	--	8	**8**
Montgomery	4	7	--	**11**
Moore	--	--	1	**1**
Morgan	4	--	--	**4**
Obion	2	--	4	**6**
Overton	--	--	5	**5**
Perry	--	--	2	**2**
Pickett	--	--	1	**1**
Polk	--	--	4	**4**
Putnam	5	--	6	**11**
Rhea	--	--	5	**5**
Roane	--	--	8	**8**
Robertson	--	5	--	**5**
Rutherford	--	16	--	**16**
Scott	5	--	--	**5**
Sequatchie	--	--	3	**3**
Sevier	--	--	13	**13**
Shelby	45	--	58	**103**
Smith	--	3	--	**3**
Stewart	3	--	--	**3**
Sullivan	7	--	19	**26**
Sumner	--	13	--	**13**
Tipton	--	--	5	**5**
Trousdale	--	2	--	**2**
Unicoi	--	--	4	**4**
Union	4	--	--	**4**

County	State	NCOA	SSAI	Totals
Van Buren	--	--	--	--
Warren	--	7	--	**7**
Washington	8	--	8	**16**
Wayne	--	--	4	**4**
Weakley	4	--	2	**6**
White	--	--	5	**5**
Williamson	--	8	--	**8**
Wilson	--	10	--	**10**
TOTALS:	**166**	**149**	**502**	**817**

3. Describe any current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

Equitable Distribution for PY 2015 Q 2 reflects the following:

	Approved Slots	Enrolled	Variance	Counties
Tennessee	182	175	-7	29
National Grantees	711	690	-21	80
Total ED Grantees	893	865	-28	95

Tennessee had 19 out of 95 counties with more than two vacancies. To address these variances under and over-enrollment Tennessee will implement the following strategies:

- Review EDR monthly and address variances with subgrantee during conference calls and scheduled meetings.
- Review EDR semi-annually with national grantee partners and develop strategies needed to achieve equitable distribution

4. Explain 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.

Tennessee has 95 counties. According to the 2013-2015 USDOL's SCSEP Persistent Unemployment Report, 55 out of the 95 counties were reported as poor employment

attainment counties. The majority of these counties are located in rural areas; therefore, the population tends to have low-literacy and low-skilled workers. Tennessee is working toward:

• Identifying the inequities in resources to equitably serve SCSEP participants in both rural and urban counties across the state.

• Identifying those inequities, specific to rural areas, that can be changed or addressed, and those that promote the development of new training sites and employment opportunities for participants. Identifying tools and resources to rally communities in helping with the needs of the eligible population.

Rural areas that have inadequate resources will have access to the WIOA services. Rural-area employers with SCSEP training include custodial, food service, lawn care, department store greeters, librarian assistants, and childcare providers. In order to develop the types of jobs listed above, sub-grantees will make connections with businesses, local employers, schools, childcare facilities, nursing homes, and healthcare facilities. After rapport has been established with these entities, host agencies will be determined. Sub-grantees will maintain a relationship in an effort to supply host agencies with SCSEP participants as needed.

Like the rural population, Tennessee's urban population has its shares of challenges, which includes low skills, background, health, access, transportation and other barriers to employment. For example, Shelby County's challenges are similar to other urban counties in the state. Many of the state's older workers lack a sufficient work history and/or experience in industries relevant to today's labor market. This can be attributed to the tradition of retiring from one company, which means a participant would only be employable for that particular position that they held for 15 to 20 years. The realization is that the individual may no longer be physically fit or because of technological advancements possess the knowledge or skills to use advanced machinery and/or equipment. For this reason, many of SCSEP participants' lack relevant skill set(s) for other industries including high growth industries for which they have not worked or have received training. Another consequence that stems from the age-old tradition of maintaining loyalty to one company or job is the lack of education required for that job. The majority of Shelby County SCSEP participants' only have a high school diploma or less. All of these issues, including others that will be mentioned, comprise the older population in Shelby County that is eligible for SCSEP.

Second, criminal background and/or credit check significantly impacts the number of participants that program staff is able to move into employment. There are applicants living in the large urban— Davidson and Shelby— areas are ex-offenders. This results in limited host agencies and employers that will agree to work with ex-offenders thus limiting the ability to offer services to these individuals. At best, these are the participants that are most likely to be promoted and encouraged by Host Agencies to hire.

In addition, although many of the SCSEP participants need or want to work they may be long-term consumers of government assistance programs for income or other supports. The finding is recipients of these government assistance programs such as Supplemental Security Income (SSI), Disability Insurance or Housing and Urban Development (HUD)

never leaves, especially for employment, once on these programs. Even when there is an opportunity for the individual to move off government assistance into economic self-sufficiency, there is fear that if government assistance is needed again the process is so long and tedious it will not be available. SCSEP then becomes just a program to supplement the income of those participants receiving benefits from these programs.

Thirdly, another issue that is prevalent in both rural and urban areas is persons with health and mental illness, some undiagnosed. There have been a number of participants enrolled in Shelby County suffering from serious health or mental illness. While the two are grouped in this narrative they are very different, one more recognizable than the other. Both consequently, prove to be a trial for job retention.

Lastly, Davidson County like Shelby County still faces many issues with public transportation. Although public transportation is available in the large urban areas, there are still challenges to successfully overcome when assisting participants who use this method of transportation. These challenges include rising costs of bus tickets, finding appropriate host agencies for assignment on the bus route, the length of time it takes to get to and from the host agency, the cost and time it takes to job search and finding employers located on the bus route once the participant becomes job ready. One way Davidson County is dealing with this issue is by having staff rides the bus routes to become familiar with non-profits, public entities, and businesses located on the public transportation routes located in the participants' neighborhoods. Once research has been completed, new relationships can be formed to meet the needs of the participants.

B. equitably serves both rural and urban areas.

Information regarding the equitable services in both rural and urban areas is provided in the response to part A of this section.

C. serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)

Priority for Service

Several participants are given priority status under the SCSEP program. SCSEP sub-grantees work to continue enrolling older workers using this priority of service: first, individuals who are veterans and their qualified spouses; next, individuals, who are 65 and older, or:

- Have a disability
- Have limited English proficiency or low literacy skills
- Reside in a rural area
- Have low employment prospects
- Have failed to find employment after using services under Title I of WIA
- Are homeless or at risk of homelessness

Outreach to local organizations, serving individuals with barriers (such as veterans and the homeless), will be used to recruit individuals 55 years old or older meeting SCSEP guidelines.

These statutory preferences apply to the following individuals:

- Those that have incomes below the poverty line;
- Those who have poor employment prospects and who have the greatest social and/or economic need; and
- Those who are eligible minorities, Limited-English speakers, or Native Americans

These preferences should be considered within the context of statutory priorities. For example, among eligible veterans and qualified spouses age 60 and over, to the extent practicable, preference should be given to individuals within these three categories.

Also, the Quarterly Progress Report indicators include the number of SCSEP persons served along with the demographics and characteristics of those participants. This U.S. Department of Labor-required report is another vehicle to track the number served, the distribution, the employment situation, and the population where community service projects are located.

5. Provide the ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))

Throughout the inception of Tennessee's SCSEP program, the demand has been greater than the supply. See table below that shows the poverty rate of individuals 55+ by its LWDA population.

LWDA 7, commonly known as the Upper Cumberland area had the highest poverty level for the total population at 20.2%. Seven of the thirteen LWDAs have poverty levels for the total population that is higher than the state average.

For the age 55+ group, LWDA 11 has the highest percentage below poverty at 16.2%. LWDA 7 ranked second with 15.6% of age 55+ below poverty.

LWDA 13 has the greatest number of age 55+ individuals below the poverty level. There are 23,181 aged 55+ below poverty in this LWDA and represents 13.7% of the total statewide. LWDA 9 has 10.1% of the statewide total with 17,128 of age 55+ below poverty. These two LWDAs include the two largest cities in Tennessee.

LWDA	Total population	below poverty level	% below poverty	% of State total	Total population Age 55+	55+ below poverty	% 55+ below poverty	% of State total
1	369,740	64,279	17.4%	6.4%	111,393	12,327	11.1%	7.3%

LWDA	Total population	below poverty level	% below poverty	% of State total	Total population Age 55+	55+ below poverty	% 55+ below poverty	% of State total
2	440,361	79,924	18.1%	8.0%	127,371	16,327	12.8%	9.6%
3	423,748	55,989	13.2%	5.6%	103,496	7,887	7.6%	4.7%
4	480,105	74,801	15.6%	7.5%	150,514	16,114	10.7%	9.5%
5	592,596	93,707	15.8%	9.3%	162,243	16,850	10.4%	9.9%
6	230,170	42,133	18.3%	4.2%	63,221	7,485	11.8%	4.4%
7	238,707	48,179	20.2%	4.8%	67,270	10,515	15.6%	6.2%
8	685,158	71,802	10.5%	7.2%	147,544	11,977	8.1%	7.1%
9	980,715	142,248	14.5%	14.2%	197,276	17,128	8.7%	10.1%
10	241,111	37,210	15.4%	3.7%	64,192	6,885	10.7%	4.1%
11	251,825	47,168	18.7%	4.7%	67,489	10,935	16.2%	6.5%
12	340,578	62,187	18.3%	6.2%	93,570	11,810	12.6%	7.0%
13	960,154	182,840	19.0%	18.2%	201,079	23,181	11.5%	13.7%

Comparing urban and rural areas shows non-metro counties have almost 38% of the total population age 55+ below the poverty level. The Nashville area has 16.8% of the statewide total.

6. Provide the relative distribution of eligible individuals who:

Provide the relative distribution of eligible individuals who:

A. Reside in urban and rural areas within the State

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 2010 Census Data, 1,639,177 people account for the age group 55+; TDLWD estimates that 188,505 are eligible for SCSEP services. To be eligible for SCSEP, an individual must be 55 years old or older, have a total family income of less than 125 percent of the Federal poverty level and be unemployed. For Tennessee, 11.5% of the individual's 65+ fall at or below 125% of the poverty level, according to the Census ACS. Likewise, 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. In Tennessee, approximately 121 or 13% of the eligible individuals were identified as having a disability at the end of PY 2012. This indicates that Tennessee SCSEP is reaching out and serving eligible older residents with disabilities.

The Most-In-Need outreach includes services from WIOA, community outreach, assistance in providing transportation, workforce system referrals, promoting area

businesses in an effort to increase host agency assignments. Subgrantees are encouraged to participate in the local board that includes members of the community, business owners, representatives, and those from other state agencies. The subgrantee is assigned to the American Job Center for at least four hours week to recruit participants qualified to participate in the program. The state's objective to improve these resources is an ongoing effort.

Overall, recruitment endeavors in Tennessee have been successful in reaching and serving the SCSEP-targeted special populations. The use of Disability Program Navigators throughout the Career Center system is a great resource. Navigators assist individuals, with special needs, with Career Center staff in the recruitment and selection process. Navigators bridge the gap between the business and human service communities by organizing forums for discussion, etc.

Below is a chart of recruitment strategies:

Most-In-Need Population Group	Subgrantee Recruitment Method
Are age 65 or older	Senior centers, aging agencies, build local community-based partnerships and collaborations
Have a disability	Senior centers, aging agencies, disability service providers, build local community-based partnerships and collaborations
Have limited English proficiency	Have access to Spanish speakers; utilized local community partnerships
Have low literacy skills	Partner with high school equivalency (HSE) and ABE providers; work with seniors who present this barrier
Live in a rural area	Focus on the 48 counties in Tennessee that are classified as rural
Are veterans or their spouses eligible	Partner with agencies that serve veterans
Have low employment prospects	Promote SCSEP with safety net organizations (like food banks) and other types of host agencies to get the word out
Have failed to find jobs after using Title I services	Partner with local American Job Centers
Are homeless or at risk of homelessness	Partner with agencies that serve the homeless
Have income at or below the poverty level	Do not recruit for this specifically other than ensuring that participants are income-eligible for SCSEP
Are minorities	Have access to Spanish speakers and other members of minority community. Build local partnerships to address this.
Are socially isolated-have physical and mental disabilities, language barriers, and cultural, social or geographic isolation including isolation caused by race and ethnicity	Some territory in TN yields pockets of isolation; also subgrantees partner with disability organizations for supportive services and other referrals

B. Have the greatest economic need

Information regarding economic need is addressed in question A in this section.

C. Are minorities

Information regarding minorities is addressed in question A in this section.

D. Are limited English proficient.

Information regarding limited English proficient is addressed in question A in this section.

E. Have the greatest social need. (20 CFR 641.325(b))

Information regarding greatest social need is addressed in question A in this section.

7. Describe the steps taken to avoid disruptions to service for participants to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365; when new Census or other reliable data becomes available; or when there is over-enrollment for any other reason. (20 CFR 641.325(i), 641.302(b))

When a new census or other reliable data becomes available or when there is over-enrollment for any other reason, every effort is made to ensure that there is no disruption in service by ceasing new enrollments until authorized levels are met. Individual Employment Plans are reviewed and any remaining barriers to employment are addressed; also an aggressive job placement strategy is put in place to achieve authorized levels.

In the case of any transition of positions, whether caused by a shifting in census data and the location of SCSEP positions or sub-grantees moving within the state, the grantee designated point of contact will serve as the team leader whose responsibilities will include: serving as a coordination point of contact for participants, host agencies, other grantees, state SCSEP Offices and USDOL. The Federal Project Officer will be consulted and will subsequently approve any movements of positions. No movement or transfer of positions will be initiated until the State Agency is notified.

After approval, the file transfer process begins. Records include, but are not limited to: most-recent eligibility; contact information; assessments or latest IEP review; current community service work-based training description; host agency contact information; safety record of most-recent monitoring; and the most recent offer of a physical examination.

Sub-grantees ensure that files are kept confidential in several ways: (1) contact will be made with sub-grantees about the confidential treatment of files; (2) participant files will be kept in a secure location accessible only to authorized persons; (3) sub-grantee will monitor onsite file security; (4) neither grantees nor their sub-grantees will use volunteers for any transition activities that require access to records; (5) grantees will transfer only encrypted files to maintain confidentiality of electronic data; and, (6) at the time of enrollment, each participant will sign the Privacy Act Statement based on the Privacy Act of 1974, which allows release of specific confidential information, including Social Security numbers.

In a case where there are new offices, SCSEP grantees and their sub-grantees will use existing offices and staff for immediate startup and they will ensure seamless services during the transition. If grantees are awarded funds to serve counties not included in their current grant, they will identify and train staff of a new sub-grantee, or if necessary, will operate in these counties with their own staff on an interim basis. Through any transition process, grantees will ensure that participants are paid. Grantees will convene meetings with affected participants, the incumbent and new providers, to process participant payroll information. As part of the sub-grantee sponsor agreement, all subgrantees have acknowledged in writing that they “agree to assist grantees in transitioning SCSEP participants and related files to the new SCSEP sponsor with minimum disruption.”

To ease the transition, participants will be encouraged to take advantage of other available assistance programs. Onsite help will be available as needed. Since necessary financial information will be transferred, there should be no interruption in payroll. Final payroll payments will be made according to a payment schedule agreed upon by the two grantee agencies.

SCSEP Assurances

The State Plan must include assurances that where SCSEP is included in the Combined Workforce Plan, the State has established a written policy and procedure to obtain advice and recommendations on the State Plan from:

Representatives of the State and area agencies on aging; Yes

State and local boards under WIOA; Yes

Public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State, except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b); Yes

Social service organizations providing services to older individuals; Yes

Grantees under Title III of OAA; Yes

Affected Communities; Yes

Unemployed older individuals; Yes

Community-based organizations serving older individuals; Yes

Business organizations; and Yes

Labor organizations. Yes

State Comments on SCSEP Assurances

Appendix 1. Performance Goals for the Core Programs

Each State submitting a Unified or Combined Plan is required to identify expected levels of performance for each of the primary indicators of performance for the 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 adjusted levels of performance for the indicators for each of the two years of the plan. States will only have one year of data available under the performance accountability system in Section 116 of the WIOA; therefore, the Departments will continue to use the transition authority under WIOA sec. 503(a) to designate certain primary indicators of performance as "baseline" indicators in the first plan submission. A "baseline" indicator is one for which States will not propose an expected level of performance in the plan submission and will not come to agreement with the Departments on negotiated levels of performance. "Baseline" indicators will not be used in the end of the year performance calculations and will not be used to determine failure to achieve adjusted levels of performance for purposes of sanctions. The selection of primary indicators for the designation as a baseline indicator is made based on the likelihood of a state having adequate data on which to make a reasonable determination of an expected level of performance and such a designation will vary across core programs.

States are expected to collect and report on all indicators, including those that that have been designated as "baseline". The actual performance data reported by States for indicators designated as "baseline" in the first two years of the Unified or Combined Plan will serve as baseline data in future years.

Each core program must submit an expected level of performance for each indicator, except for those indicators that are listed as "baseline" indicators below.

For this Plan, the Departments will work with States during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for the core programs.

Baseline Indicators for the First Two Years of the Plan

Title I programs (Adult, Dislocated Workers, and Youth):

- Measurable Skill Gains
- Effectiveness in Serving Employers

Title II programs (Adult Education):

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median Earnings
- Credential Attainment
- Effectiveness in Serving Employers

Title III programs (Wagner-Peyser):

- Effectiveness in Serving Employers

Title IV programs (Vocational Rehabilitation):

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median Earnings
- Credential Attainment
- Measurable Skill Gains
- Effectiveness in Serving Employers

States may identify additional indicators in the State 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.

Table 1. Employment (Second Quarter after Exit)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	74.00	83.00	74.00	83.50
Dislocated Workers	81.00	81.00	81.00	82.00
Youth	75.00	79.00	75.00	79.50
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	69.00	65.00	69.00	66.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 1

The PY18 and PY19 expected level for Adult Education and Vocational Rehabilitation is baseline.

7/24/18 - Updated the PY18 and PY19 negotiated levels.

Table 2. Employment (Fourth Quarter after Exit)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	74.00	83.00	74.00	83.50
Dislocated Workers	81.00	81.00	81.00	82.00
Youth	75.00	75.00	75.00	76.00
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	69.00	65.00	69.00	66.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 2

The PY18 and PY19 expected level for Adult Education and Vocational Rehabilitation is baseline.

7/24/18 - Updated the PY18 and PY19 negotiated levels.

Table 3. Median Earnings (Second Quarter after Exit)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	4,300.00	6,633.00	4,300.00	6,650.00
Dislocated Workers	7,300.00	6,900.00	7,300.00	7,000.00
Youth	2,700.00	0.00	2,700.00	0.00
Adult Education	0.00	0.00	0.00	0.00
Wagner-Peyser	4,713.00	4,587.00	4,713.00	4,700.00
Vocational Rehabilitation	0.00	0.00	0.00	0.00

User remarks on Table 3

The PY18 and PY19 expected level for Adult Education and Vocational Rehabilitation is baseline.

7/24/18 - Updated the PY18 and PY19 negotiated levels.

Table 4. Credential Attainment Rate

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	73.00	58.00	73.00	59.00

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Dislocated Workers	77.00	68.50	77.00	69.00
Youth	65.00	70.00	65.00	72.00
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 4

The PY18 and PY19 expected level for Adult Education and Vocational Rehabilitation is baseline.

7/24/18 - Updated the PY18 and PY19 negotiated levels.

Table 5. Measureable Skill Gains

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	37.00	38.00	40.00	40.00
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 5

The PY18 and PY19 expected level for Adults, Dislocated Worker, Youth, and Vocational Rehabilitation is baseline.

7/24/18 - The negotiated performance for Adult Education program year 18 is 38% MSG, and 40% for program year 19.

Table 6. Effectiveness in Serving Employers

Measure	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Line 1 (enter the measure information in the comments below)	Baseline	Baseline	Baseline	Baseline
Line 2	Baseline	Baseline	Baseline	Baseline
Line 3	Baseline	Baseline	Baseline	Baseline

Measure	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Line 4	Baseline	Baseline	Baseline	Baseline
Line 5	Baseline	Baseline	Baseline	Baseline
Line 6	Baseline	Baseline	Baseline	Baseline

User remarks on Table 6

Baseline for PY18 and PY19 Expected and Negotiated Levels.

Table 7. Additional Indicators of Performance

Measure	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level

User remarks on Table 7

Appendix 2. Other State Attachments (Optional)

Tennessee State Plan for Career and Technical Education

Submitted and Approved, 2008

Revisions, 2017

April 26, 2017

TABLE OF CONTENTS

PART A: STATE PLAN NARRATIVE..... 3

Planning, Coordination, and Collaboration Prior to Plan Submission..... 4

Program Administration..... 9

Provision of Services for Special Populations..... 44

Accountability and Evaluation..... 49

Tech Prep Programs..... 65

Financial Requirements..... 66

EDGAR Certifications and Other Assurances..... 69

PART B: BUDGET FORMS..... 1

PART C: ACCOUNTABILITY FORMS..... 1

I. Student Definitions..... 5

A. Secondary Level..... 5

B. Postsecondary/Adult Level..... 5

II. Performance Levels (FAUPL) Form..... 6

A. Secondary Level..... 6

B. Postsecondary/Adult Level..... 11

ATTACHMENTS FOLDER TO STATE PLAN

PART A: STATE PLAN NARRATIVE

I. PLANNING, COORDINATION, AND COLLABORATION PRIOR TO PLAN SUBMISSION

States that submit a transition plan do not need to address the items in this section until they prepare their five-year plan prior to the second program year (July 1, 2008 - June 30, 2009). States that submit a six-year State plan must complete this entire section.

A. Statutory Requirements

1. You must conduct public hearings in the State, after appropriate and sufficient notice, for the purpose of affording all segments of the public and interested organizations and groups (including charter school authorizers and organizers consistent with State law, employers, labor organizations, parents, students, and community organizations), an opportunity to present their views and make recommendations regarding the State plan. [Sec. 122(a)(3)]

In compliance with Section [122(a) (3), Tennessee conducts an annual public hearing focused on the delivery of Career and Technical Education to students in Tennessee at the local and postsecondary level. The TN Council for Career and Technical Education (TCCTE) conducts an annual public hearing on the delivery of CTE and uses the information gained to develop commendations and recommendations to the TN Department of Education, Division of College, Career and Technical Education (CCTE).

The 2015-16 Public Forum was held as a roundtable luncheon on February 8, 2016 in an effort to increase attendance among key stakeholders and foster more direct information-sharing between stakeholders and council members. Findings from this meeting were captured in the 2015-16 Winter Meeting Minutes and helped form the council's 2015-16 key priorities, which are reflected in 2016 Biennial Report. Recommendations made by the council go to the Department of Education, the General Assembly, the Board of Regents, the State Board of Education, and are available publicly online.

2. You must include a summary of the above recommendations and the eligible agency's response to such recommendations in the State plan. [Sec. 122(a)(3)]

The Tennessee Council for Career and Technical Education holds an annual public forum to receive feedback and public input on the effectiveness of CTE in Tennessee. Past

Public Forum minutes may be found on the TCCTE Resources and Minutes page. The 2015-16 Public Forum was held as a roundtable luncheon on February 8, 2016 in an effort to increase attendance among key stakeholders and foster more direct information-sharing between stakeholders and council members. Findings from this meeting were captured in the 2015-16 Winter Meeting Minutes and helped form the council's 2015-16 key priorities, which are reflected in 2016 Biennial Report. Recommendations made by the council go to the Department of Education, the General Assembly, the Board of Regents, the State Board of Education, and are available publicly online.

3. You must develop the State plan in consultation with academic and career and technical education teachers, faculty, and administrators; career guidance and academic counselors; eligible recipients; charter school authorizers and organizers consistent with State law; parents and students; institutions of higher education; the State tech prep coordinator and representatives of tech prep consortia (if applicable); entities participating in activities described in section 111 of Public Law 105-220; interested community members (including parents and community organizations); representatives of special populations; representatives of business and industry (including representatives of small business); and representatives of labor organizations in the State. You also must consult the Governor of the State with respect to development of the State plan. [Sec. 122(b)(1)(A)-(B)]

The State Plan has been developed in consultation with all entities described in [Section 111(f)] Public Law 105-220 and in consultation with the Governor and his policy staff. [Section 122(b)(1)(A)-(B)]

The Career and Technical Education Division (as known at the time) formed the Perkins IV Committee to provide direction and input into the State Plan. This committee has met throughout the year to provide guidance and input in the development. Members of the committee and sample minutes of each meeting are available at www.tennessee.gov/education/cte, Perkins IV link.

The committee is composed of local administrators, secondary and postsecondary, TDOE staff, teachers and counselors. In addition, local career and technical administrators have provided input through their teachers, administrators, guidance and academic counselors, their respective business, and community advisory council partnerships

In 2013, the CCTE division solicited applications and selected members for a newly formed CTE Leadership Council to provide consultation on CTE programming in an effort to raise the rigor and the relevance of CTE-related courses and the instructional practices of educator within the State's larger commitment to truly prepare each of our students for postsecondary and career success. The CTE Leadership Council began meeting in February of 2013 and has met regularly to provide the required and desired input on CTE programming.

4. You must develop effective activities and procedures, including access to information needed to use such procedures, to allow the individuals and entities listed in item 3 above to participate in State and local decisions that relate to development of the State plan. [Sec. 122(b)(2)]

The Division's website at www.tn.gov/education/cte/ includes access to the Plan development process, minutes of all meetings, related to the Plan and related publications that allow interested individuals and institutions to participate and review state and local decisions related to development of the State Plan. As of the 2013-14 school year, the website allows all members of the general public to makes comments regarding changes to CTE standards, courses and programs of study.

5. You must develop the portion of the State plan relating to the amount and uses of any funds proposed to be reserved for adult career and technical education, postsecondary career and technical education, tech prep education, and secondary career and technical education after consultation with the State agency responsible for supervision of community colleges, technical institutes, or other 2-year postsecondary institutions primarily engaged in providing postsecondary career and technical education, and the State agency responsible for secondary education. If a State agency finds that a portion of the final State plan is objectionable, the State agency must file its objections with you. You must respond to any objections you receive in the State plan that you submit to the Secretary. [Sec. 122(e)(3)]

Tennessee has chosen to combine the Title I and Title II basic grants. The flow chart presented on page 6, Part B, Budget Forms, represents the fund distribution to postsecondary. The Tennessee Board of Regents has been granted, through a Memorandum of Understanding (MOU), responsibility for distribution and utilization of these funds. In addition, Tennessee has chosen to use the Reserve option, [Section 112 (c)]. These funds are equitably distributed between secondary and postsecondary.

B. Procedural Suggestions and Planning Reminders

- You should maintain a record of the public hearings that includes copies of the notices for the hearings, what media were used to publicize the hearings, mailing lists used for notification, where the hearings were held, and attendance levels. See section 122(a)(3).
- You should develop and implement policies and procedures for the framework of consultations required by section 122(b)(1)(A-B) and section 122(b)(2) of the Act; moreover, you should maintain appropriate records for these mandated consultations.
- Postsecondary career and technical education programs assisted under Perkins IV are mandatory partners in the one-stop career center delivery system established by WIA. You are encouraged to collaborate with your State Workforce Investment Board and other one-stop partners as you plan for the participation of postsecondary career and technical programs in your State's one-stop career center delivery system.
- Public hearings and other consultation activities should address all aspects of the State plan, including the reservation of funds under section 112(c) of the Act, if any, and the amount and uses of funds reserved for services that prepare individuals for non-traditional training and employment under section 112(a)(2)(B) of the Act.

PROGRAM ADMINISTRATION

A. Statutory Requirements

Section II, Part A, Subpart (1): You must prepare and submit to the Secretary a State plan for a 6-year period; or you may prepare and submit a transition plan for the first year of operation of programs under the Act. [Sec. 122(a)(1)]

Tennessee submitted a transition plan for the first year of operation of programs. Tennessee is submitting its Five-Year Plan incorporating all required sections, as detailed in the State Plan Guide document.

Section II, Part A, Subpart (2): You must describe the career and technical education activities to be assisted that are designed to meet or exceed the State adjusted levels of performance, including a description of—

a. The CTE programs of study, that may be adopted by local educational agencies and postsecondary institutions to be offered as an option to students (and their parents as appropriate) when planning for and completing future coursework, for career and technical content areas that—

2a(i). Incorporate secondary education and postsecondary education elements

Tennessee's secondary CTE system has adopted the national Career Clusters Model of 16 career clusters and programs of study. Tennessee previously had seven program areas: Arts and Communication; Business and Marketing; Health Care; Hospitality and Tourism; Human Services; Manufacturing, Construction and Transportation; and Science and Technology. Planning meetings were held with Workforce Development staff, teacher educators, CTE and academic teachers, school counselors, Tech Prep directors, college and university deans, director of school counseling, academic and CTE consultants, CTE directors, and business and industry representatives to align course standards with the 16 career clusters and to develop programs of study that transition into postsecondary have been developed at the secondary level. The CTE transition plan for clusters/programs of study implementation is complete. CTE staff developed a transition plan for cluster implementation. The clusters are aligned with the state's major economic areas that better prepare students for success after high school into postsecondary education and high-skill, high-wage, or high-demand careers. The clusters focus on student performance relative to helping LEA's meet or exceed negotiated levels of performance.

Attachment (A) represents a sample offered to Tennessee students.

On-going meetings were held with postsecondary Tennessee Colleges of Applied Technology (TCATs), formerly referred to as Tennessee Technology Centers (TTCs) for the purpose of this plan. In May 2013, Public Chapter 473 officially changed the name of these institutions and all references to these institutions have been changed for the purpose of the TN State Plan for Career and Technical Education. In addition to the TCATs, the community colleges and four-year institutions are also involved in aligning programs of study beginning at the eighth grade and transitioning to postsecondary certifications, diplomas, and associate or baccalaureate degrees. Information regarding the Programs of Study and their development may be found on the following web site:

http://www.tennessee.gov/education/topic/career-clusters

Progression of courses through programs of study can be found on each of the career cluster websites linked on our cluster page, in addition to being published in a yearly POS description document:

http://www.tennessee.gov/education/cte/clusters/cte_std_pos_2015-16.pdf

Linkages were electronically formatted for each program of study to promote a smooth transition from secondary to postsecondary. This assisted in the development of new articulation and dual credit opportunities.

The programs of study documents have been presented to the Tennessee State Board of Education (TSBE) for information purposes. Programs of study must lead to a concentrator focus with three or more earned credits or in a single CTE Career Cluster. Additionally, articulated courses must be approved by the postsecondary institution as meeting the requirements of that institution for transition credit. Statewide technical skill assessments based upon Career Clusters, or programs of study, are being evaluated for possible adoption.

Programs of study rollout sessions were presented in the nine CORE regions, which have since been consolidated to eight CORE regions. Those in attendance included directors of schools, principals, CTE administrators, counselors and local system supervisory staff. In addition, technical assistance was provided to local systems on a needs basis.

As a requirement for Perkins funding, all local districts must submit at least one state approved or locally developed - but state approved - program of study. A program of study is defined as a comprehensive, structured approach for delivering general and career and technical education offerings to prepare students for postsecondary education and career success. The submission deadline for local school district to select programs of study was February 23, 2017.

Beginning the fall of 2012, the CCTE Division embarked on a three-phase approach to thoroughly evaluate its current programs of study and accompanying courses and to implement specific recommended changes for the 2013-14, 2014-15 and 2015-16 school years. The first phase effort accomplished four overarching objectives:

- Eliminate redundancy and misalignment of Programs of Study that DOE offers to local education agencies (LEAs).
- Provide more flexibility for LEAs in the sequencing of courses, particularly for smaller, more rural LEAs.
- Simplify the annual programs of study selection process for LEAs.
- Align remaining programs of study and accompanying courses with the state's various postsecondary opportunities and its economic and labor market needs and trends, extending the student's academic/career pathway, allowing a higher likelihood of long-term success and stability.

Our approach was to evaluate and ensure that promoted programs of study and accompanying courses are rigorous, relevant, and learner focused. The first phase focused on the four overarching objectives mentioned above, and the following were the results:

- The evaluative process led to the identification of 139 duplicative programs of study across 16 career clusters. These duplicative programs of study lead to confusion and frustration on the part of the LEAs over the years.
- For the 2016-17 school year, LEAs chose from 59 programs of study.
- Common themes include (a) drastically reduced number of promoted programs of study, (b) flexibility in course choices, (c) the removal of non-academic "foundational" courses, and (d) the insertion of cross-cluster and general education courses into certain program of study choices.

The second phase began the spring of 2013 and included a thorough review of curriculum resulting in the creation of new courses and the elimination or revision of weak courses. This two-year process was concluded with final reading of the final course standards by the Tennessee State Board of Education (SBE) during their April 2015 meeting, with full implementation during the 2015-16 school year. The results of this full-scale revision of all CTE course standards has included:

- Retirement of courses identified as lacking rigor or not aligned to economic needs of the state.
- Adoption of new courses to fill gap areas identified through review process to ensure adequate pathways are available to students to high-wage, high-demand careers.
- Revision of courses to increase rigor, embed general education content—especially literacy—and ensure alignment to postsecondary and industry knowledge and skills.
- Addition of "course equivalencies" between general education courses and career and technical education courses for credits such as laboratory science, fine arts, personal finance, and wellness.

Phase three began in the summer of 2015 to develop assessments related to CTE courses and programs of study that will provide educators and administrators with student achievement and/or growth data specific to CTE content areas. This has included guidance provided to LEAs on choosing promoted capstone industry certifications to enhance college and career readiness. The 2017-18 school year will also see the piloting of level one, two and three statewide assessments on two Programs of Study, Horticulture Science and Mechatronics.

New approved programs of study implementation began with the 2008-09 school year. The CCTE Division closely monitors the implementation phase for alignment to existing recommended course sequences, new recommended sequences, new approved courses and any suggested revisions based on local school district implementation input. All programs of study have been refined and implemented. A status report is presented to SBE for informational purposes.

2a(ii). Include coherent and rigorous content, aligned with challenging academic standards, and relevant career and technical content in a coordinated, non-duplicative progression of courses that align secondary education with postsecondary education to adequately prepare students to succeed in postsecondary education

With *One Common Culture*, *One Common Vision* and *One Common Approach*, the Division of College, Career & Technical Education shall be responsive, relevant and innovative in the promotion of the nationally recognized 16 Career Clusters and the state's corresponding Programs of Study across Tennessee.

In doing so, our efforts will be actionable, measurable and ambitious and will complement the department's overarching core values and the larger belief that all students can achieve academically and be prepared appropriately for success at the postsecondary level and in their chosen careers.

All students have access to a rigorous core curriculum which emphasizes depth rather than breadth of coverage, stress critical thinking, problem solving, and promote responsible citizenship and lifelong learning. The curriculum is tied to the vision of the high school graduate and to the *Tennessee Diploma Project*. Schools shall communicate high expectations for all students by raising graduation requirements. Students entering ninth grade FY 2009 are required to earn a minimum of 22 units for graduation. All students entering high school FY 2009 must meet the following core curriculum requirements: English - 4 units, Mathematics - 4 units, Science - 3 units, Social Studies - 3 units, Health, Physical Fitness, Wellness - 1 unit, and Personal Finance - ½ unit. All students are required to complete 3 units of a focus program of study that may include Career and Technical Education. In addition, all students entering four-year colleges or universities are required to have one unit in Fine Arts and two units in the same foreign language.

Career and technical concentrators are required to earn at least three CTE credits in a single Career Cluster (or state approved program of study). Each program of study identifies the core academic courses needed for that specific program of study. Secondary career cluster consultants along with postsecondary and business partners have aligned course requirements and curriculum standards within each program of study to articulate from secondary to postsecondary institutions.

The end-of-course exams have been developed to align the new academic standards approved through the Tennessee Diploma Project (TDP). Tennessee adopted new standards under the TDP, which requires new state assessments. All Tennessee students, starting with the spring of 2009, are administered state assessments. Revisions to the end of course assessment began in 2015-16 in order to reflect the higher rigor of the new Tennessee standards for Math/ELA.

The career clusters consist of programs of study which allow students to focus on areas of career interest with attention to labor market needs. Students can plan and complete programs of study based on academic graduation requirements, postsecondary entrance requirements and sequential courses based on the student's respective career interest. The development of high-skill, high-demand, or high-wage programs of study is a collaborative venture between the Tennessee Department of Education (TDOE), Tennessee Department of Labor and Workforce Development (TDLWD), and the Tennessee Board of Regents (TBR). The secondary/postsecondary partnership helps students define a clear pathway from their secondary studies into their postsecondary education and, ultimately, into a career. The career clusters' focuses may result in the development of new courses based on high-skill, high-wage, or high-demand jobs, as

well as new and emerging occupations. All courses are reviewed annually to ensure alignment with state and regional business/industry needs and use of national standards (where applicable).

The CCTE Division works cooperatively with the academic Division of Content and Assessment Design to build a strong academic foundation for students. A number of initiatives support this activity—joint planning in course content, training for the end-of-course exams, and integration of subject matter.

One part of Tennessee's work to better prepare students for college and the workforce is to raise expectations by raising academic standards, which determine the knowledge and skills that students are expected to learn in each grade and subject. Tennessee took the first step to raise standards in 2009 and now, we raised the bar again in 2016 with the implementation of new Tennessee standards in Math/ELA.

The standards are a set of standards in Math and English that were developed by state and community leaders to ensure that every student graduates high school prepared for the future.

CCTE's approach to curriculum encourages rigor in student learning by making academic content relevant to career interests of a student. This is accomplished through a variety of integration strategies, including courses that closely connect academic content with related careers. For the 2016-17 school year, CTE will have 23 courses that meet standards for core academic courses.

All programs of study developed and approved include secondary and postsecondary linkages between curriculum standards, where appropriate. Programs of study uses an academic base and identifies the articulation, dual credit, and industry credential/certification available upon completion at the secondary or postsecondary level, if any, and further education or apprenticeship opportunities after high school.

The community colleges, under the TBR, offer career and technical programs that allow students the opportunity to prepare for careers relevant to the local, state, regional, and global economies. In accordance with accreditation standards of the Southern Association of Colleges and Schools (SACS) and in accordance with program specific program accreditation agencies, when appropriate, the eligible institution will provide curriculum that includes coherent and rigorous content and access to appropriate technology.

2a(iii). May include the opportunity for secondary education students to participate in dual or concurrent enrollment programs or other ways to acquire postsecondary education credits

Many CTE programs at the local school districts have articulation agreements with postsecondary institutions within their respective service area. The Tennessee Colleges of Applied Technology (TCATs) provide postsecondary competency-based clock-hour programs with defined certificate and diploma exit levels; the community colleges provide associate degrees in CTE. The TCATs have collaborated with secondary schools to develop articulated programs of study; the TBR has a policy that allows TCAT diploma graduates to articulate clock hour coursework to the Associate of Applied Sciences General Technology Degree at any public community college.

A Memorandum of Understanding (MOU) between secondary and postsecondary that promotes transition activities has been implemented. As a result of this MOU, twenty percent of reserve funds is set aside for eligible postsecondary recipients for transition activities.

Tennessee chose to merge Tech Prep into the basic grant beginning July 1, 2007 and continuing through June 30, 2016 and shall be reviewed by both parties at least every two years. A guide to new articulation procedures is in the development process. The new guide will include a section for teachers and counselors on how to develop an articulation dual credit/dual enrollment agreement as well as recommendations to maintain successful agreements.

Tennessee has increased high school graduation requirements and upgraded standards, which has been heralded as raising the bar to adequately prepare Tennessee students with 21st century knowledge and skills. The Tennessee State Board of Education, at its January 25, 2008 meeting, approved the new graduation requirements dubbed, 'The Ready Core' and increased the number of credits needed to graduate to 22 for all students. Students must now earn four credits in math, an additional health/P.E./wellness, an additional half credit in personal finance, and an additional three credits specific to a planned focus of study, which may be a CTE focused program of study. These new diploma requirements went into effect for the graduating class of 2013.

In addition, revised standards have been developed as part of the Tennessee Diploma Project to align academic standards and student testing with postsecondary and workplace expectations. This massive revision was designed with guidance from Achieve, Inc., National Assessment of Educational Progress (NAEP), and ACT college readiness benchmarks. The new standards and new statewide assessments were implemented in 2009, which meant that students were taking an assessment with higher standards than they had been prepared for over the last few years.

The High School Transition Policy will impact the redesign of Tennessee's high schools by holding schools accountable for graduating students who are college and/or workforce ready. The Policy also addresses middle school redesign with the aim to improve academic achievement to ready students for the newly revised high school math, science and English standards.

Each eligible postsecondary institution will develop a procedure for establishing, expanding or maintaining transition agreements with participating secondary and technology institutions. Articulation and dual/joint enrollment procedures are being written to be distributed to the secondary institutions. In coordination with the postsecondary eligible institutions, both TDOE and TBR will provide technical assistance and best practices concerning transition activities.

The Tennessee Legislature passed legislation that impacts secondary and postsecondary transition opportunities. Public Chapter Number 459 (PC 459) Tennessee Code Annotated Title 49 §15 calls for the establishment of transition opportunities between secondary schools and all public postsecondary institutions to include the TCATs, community colleges and universities. It also calls for the expansion of statewide transition opportunities to include dual enrollment, credit by assessment and articulation

started under Tech Prep. The legislation calls for the establishment of early college credit opportunities in both academic and career and technical education courses.

As enacted by the Tennessee General Assembly effective July 1, 2012 through

new legislation, Public Chapter 967, Tennessee defines dual credit programs and provides that a student's score on the exam shall be used by postsecondary institutions to determine the granting of a credit. This law supersedes the aforementioned PC 459. The law establishes a consortium for cooperative innovative education consisting of K-12 and higher education officials. The work of the consortium has resulted in the development of several new dual credit programs that have been offered statewide since 2014 and increase each year in the number of offerings.

2a(iv). Lead to an industry-recognized credential or certificate at the postsecondary level, or an associate or baccalaureate degree

National industry certifications are encouraged for teachers in all CTE areas. A Project Management Oversight Committee (PMOC) was formed to evaluate the feasibility of all CTE Career Clusters meeting some type of certification. Plans are ongoing to meet that goal. Currently, teacher industry certifications are required in the Health Science and Trade & Industry Career Clusters, where available. In addition to requiring program teachers to be industry certified in T&I, programs may also be certified to allow students to obtain certifications and credentials (where appropriate) at secondary and postsecondary levels.

Industry-certified instructors and programs allow students to obtain certifications upon

program completion at the secondary level and articulation with postsecondary institutions.

The curriculum standards of the 27 TCATs that relate to secondary trade and industry (currently moved to multiple career clusters) are aligned with the trade and industry secondary standards, allowing a secondary program of study to culminate with a certificate at the TCAT or beyond. Tennessee encourages high school students to participate in dual enrollment programs that provide credentials and certifications while in high school.

The Tennessee Diploma Project and state legislation seek to raise the relevance and rigor of both academic and career and technical education courses at the secondary level. The new secondary pathways at the secondary level are designed to prepare students to be better prepared to ensure degree-granting institutions, including community colleges and universities. Programs of study include, in many cases, the opportunity for secondary students to earn early college credit.

In 2015, the Division of CCTE issued a policy brief on Student-Industry Certifications and a promoted list of capstone industry certifications to help LEAs offer certifications that were transferable and fully aligned to the state's programs of study.

b. How you, in consultation with eligible recipients, will develop and implement the

career and technical programs of study described in (a) above;

The development of the high-skill, high-wage, or high-demand programs of study is the collective responsibility of the Tennessee Department of Labor and Workforce Development (TDLWD) (the state's Labor Market Information agency), the TDOE, the TBR, and local education agencies. A committee composed of individuals from each of these organizations used crosswalks to match the occupational data to the programs of study.

High demand occupations in Tennessee are in TDLWD occupational clusters that have the following characteristics:

- The growth rate for the occupational cluster in the Local Workforce Investment Area (LWIA) region is positive; the individual occupations have positive growth rates.
- For all occupations in the TDLWD occupational cluster, the ratio of program completers (supply) to the number of annual average openings for the occupations (demand) is no more than 1.5. Exception: If the available placement rates for program completers are 95% or above (program completers placed in jobs related to their training), then the occupations in the TDLWD occupational cluster are considered "in demand."
- The average annual number of openings in the TDLWD occupational cluster is equal to or greater than 10.

High-wage occupations are those with wages 20% greater than a median wage to be determined by each LEA using workforce development information from their respective LWIA region. Occupations can be selected in many TDLWD occupational clusters that are higher wage.

High skill occupations are those which require long term training and lead to a certificate, diploma, apprenticeship or degree. Occupations can be selected in many TDLWD occupational clusters which are higher skill.

CTE programming at both the secondary and postsecondary levels use labor market research data to plan programs and services that are relevant to today's changing economic picture. Data are derived from the TDLWD via "The Source," a data tool for program planners and labor market projections. All CTE programs and special support programs have available labor market data by their respective region's LWIA in Tennessee for program planning and implementation. Occupations are grouped into clusters of training programs and the related occupations for which they train.

In May 2012, Tennessee implemented an enhanced addition to "The Source". Jobs4TN Online is a virtual recruiter, automatically notifying job seekers when jobs they may qualify for are posted and notifying employers when candidates who fit their needs register. The online database contains positions from job orders placed directly by Tennessee employers, from corporate Internet sites, and from major job search engines. The previous site included only job orders placed through the Tennessee Career Centers. The new site uses a more robust search that provides first run jobs from newspapers, government sites and private job boards resulting in the amount of jobs listed being increased from 30,000 to 85,000 at any given time. This enhancement to the Source

provides for enhanced information for use in CTE programs relative to high demand, high wage and high skill occupations.

To be eligible to receive Perkins funding, each secondary and postsecondary institution will offer the appropriate courses of at least one state approved career and technical program of study described in section 122(c)(1)(A). Postsecondary education institutions may provide postsecondary credit based upon equivalent learning outcomes from coherent and rigorous curriculum at the secondary level. When appropriate, postsecondary institutions will jointly work with secondary education to assist schools in providing secondary students with adequate preparation to enter and complete workforce education programs of study at the postsecondary level. The postsecondary workforce development education opportunities include opportunities for secondary students to participate in dual and concurrent enrollment programs, or other programs that lead to the acquisition of postsecondary credits, including articulation and assessment. The programs of study at the postsecondary level should lead to an industry recognized credential or certificate, or an associate or baccalaureate degree. Each eligible institution will individually determine the career and technical programs of study in which they participate with secondary and postsecondary institutions. The determination of the programs by the individual institution reflects the local workforce and economic needs of the region that is served.

The TDOE provides training on programs of study implementation via rollout meetings in the eight state regions and WebEx conferencing. Each Career Cluster consultant provides implementation training to instructors during the summer conferences. In addition to summer conference trainings for instructors and CTE directors, there were WebEx conferences for counselors. The Counselor Institute provides sessions on how to work with school counselors and career guidance resources to implement the new career clusters and programs of study as part of the student's educational plan. The TDOE, in conjunction with the TDLWD and the TBR, has conducted three Programs of Study Implementation Workshops in each grand division (East, Middle, and West Tennessee). Resources from these trainings are accessible through the web for those unable to attend. These trainings are part of the state and regional school counselors' conferences. WebEx seminars are archived to inform late hires and individual teacher training on the programs of study, and are archived to allow for continual review by counselors, administrators, and faculty members.

Since 2012, the CCTE division partnered with the Tennessee Higher Education Commission to offer enhanced career planning information through the College4TN website. This website offers a more comprehensive approach to career planning, high school planning, college planning and career resources for parents, students, teachers and others.

c. How you will support eligible recipients in developing and implementing articulation agreements between secondary education and postsecondary education institutions;

The goal for articulation is to strengthen current agreements and have more statewide agreements in place, in addition to local articulation agreements. Each eligible postsecondary institution has developed a procedure for the establishment, expansion or maintenance of articulation agreements with participating secondary and postsecondary

institutions. Articulation and dual/joint enrollment opportunity procedures were written and distributed. In coordination with the postsecondary eligible institutions, the TDOE, TBR, and the University of Tennessee system have the responsibility to provide technical assistance and examples of best practices concerning transition activities for participating secondary and postsecondary students.

The P-16 State Council is working with the secondary and postsecondary state systems to implement expanded early college opportunities for secondary students, based upon the PC 459 and PC 967 Tennessee Code Annotated Title 49 §15 legislation and other initiatives.

As enacted by the Tennessee General Assembly effective July 1, 2012 through

new legislation, Public Chapter 967, Tennessee defines dual credit programs and provides that a student's score on the exam shall be used by postsecondary institutions to determine the granting of a credit. The new law establishes a consortium for cooperative innovative education consisting of K-12 and higher education officials. The work of the consortium has resulted in the development of several new dual credit programs that will be offered statewide.

The state P-16 Initiative is now focused on a P-20 approach with the implementation of a comprehensive data warehouse in 2013 by the Tennessee Higher Education Commission.

c. How programs at the secondary level will make available information about career and technical programs of study offered by eligible recipients;

Tennessee requires the parents or guardians of each student, with involvement of counselors, to develop a four or six-year plan prior to entering high school. Students may review the plan annually for possible updates and changes. Parents serve on the CTE Advisory Council in each eligible LEA in the state. Additionally, each parent has the opportunity to review the competencies a student is to master at the beginning of each CTE course in which they are enrolled. Counselors provided sessions to assist in student placement for enhancement of realizing career goals.

Since 2012, the CCTE division has partnered with the Tennessee Higher Education Commission to offer enhanced career planning information through the College4TN website. This website offers a more comprehensive approach to career planning, high school planning, college planning and career resources for parents, students, teachers and others.

d. The secondary and postsecondary career and technical education programs to be carried out, including programs that will be carried out by you, to develop, improve, and expand access to appropriate technology in career and technical education programs;

Tennessee was the first state in the nation to establish Internet connections in all schools. Ongoing technical assistance is provided to personnel in charge of technology with the understanding that professional development will be provided to all teachers in the school. This system provides a mechanism that insures technology is a tool for teaching and learning.

Building on this statewide technology initiative for K-12 education, LEAs provide every CTE teacher with an up-to-date computer, printer, Internet access and an email address. This allows the state to communicate more quickly and efficiently with CTE teachers, giving them a means to collect the required Perkins reporting data, and a resource for student learning through the World Wide Web (www). In addition, each CTE Career Cluster has a website that contains information for students, parents, counselors, and administrators.

Training for computer application is provided at the local level. Professional development for teachers is held at the annual Institute for CTE Educators and through teacher education contracts for specific skills training. Multiple sessions are designed to expand the use of technologies as a tool for teaching and learning in the areas such as automated manufacturing, digital cameras, distance learning, video conferencing, video streaming, virtual field trips, virtual enterprise, and computer applications.

The division supports departmental initiatives to ensure computer literacy for all students. Technology is used in school presentations, professional development, conferences and student projects.

Course standards are designed to incorporate and encourage students to obtain industry certification. Examples include MOUS, A+, Cisco, CIW, and ASE.

All eligible LEAs must complete the Perkins Local Plan Application online. A secured system is utilized to transmit the application electronically. Professional development technical training is provided state-wide within the eight CORE offices to instruct CTE administrators on electronic transmission of local plans and component requirements.

Tennessee utilizes a fully integrated online student data reporting system called *eTIGER*, *(*Timely Information Gathering Examination and Reporting*)*. Local systems report enrollment data via a secured *eTIGER* website that are pre-populated from the state's Education Information System (EIS). All CTE data are included in the state's EIS database for Perkins reporting.

TCAT activities are designed to assess the postsecondary technical programs and use of funds under the Perkins Act to improve the quality of the programs and ensure instruction is relevant to business and industry. Through state leadership, institutions are informed that CTE programs must keep pace with changes in industry, and this cannot be done without continually upgrading equipment. The availability of high tech, state-of-the-art equipment is necessary to ensure that programs teach competencies for high-skill, high-demand, or high-wage occupations.

Community colleges under the TBR provide CTE program information that allows students the opportunity to prepare for careers relevant to the local, state, regional and global economies. In accordance with accreditation standards of the Southern Association of Colleges and Schools and in accordance with program specific program accreditation agencies, when appropriate, the eligible institution provides curriculum that includes coherent and rigorous content and access to appropriate technology. In partnership with local schools and school systems, community colleges have trained secondary faculty, provided new or updated equipment, and have provided articulation or dual enrollment opportunities. Examples of this include the development of CISCO academies in the

upper Delta region of the state. In other regions, program startups or improvements included technical areas such as fiber optics, process control technology, and web design. At the postsecondary level, the effective use of technology in the classroom and for online instruction will continue.

e. The criteria that you will use to approve eligible recipients for funds under the Act, including criteria to assess the extent to which the local plan will—

i. Promote continuous improvement in academic achievement;

ii. Promote continuous improvement of technical skill attainment; and

iii. Identify and address current or emerging occupational opportunities;

Past program performance is considered extensively when evaluating program quality. Yearly, each LEA is provided a Perkins Report Card with their levels of performance on core indicators as compared to statewide performance indicators. Within the Tennessee Comprehensive Systemwide Planning Process (TCSPP) approval guidelines, each LEA must analyze its own data and establish benchmarks for systematic improvements on each core indicator. Required levels of performance and actual levels of performance data are analyzed in terms of adequate yearly progress (continuous improvement), improving status and meeting federal benchmarks. Activities supported through Perkins funding must be targeted to improve deficient levels of performance or support programs that exceed proficient levels of performance. Systems must target funds toward staff development and provide additional support of targeted resources to low performing areas. Within the budget summary explanation, LEAs must specifically identify targeted activities and resources in the nine Perkins required activities and in other permissive use categories. The local plan action steps outline how any specific expenditure will improve one or more of the performance indicators. Funds must first be used to target low indicators of performance based on disaggregated data. The Perkins report card is online and accessible as a career and technical folder of the State School System Report Card. Data are disaggregated for each school and LEA.

The Division has taken a very important step in developing an online student management reporting system. LEAs are able to access current year's data from a secured website. This assists LEAs in program planning using current data for analysis.

A process for reviewing local Perkins plans has been developed. Local plans are reviewed by a team of regional consultants in the eight CORE offices. All submitted information is reviewed for appropriate planning which includes goal setting and assessment methods using available data for determining the impact of projects/activities on the CTE students. Perkins Report card indicators are used to review the local plan for the inclusion of areas of need as indicated by the Core Indicators of Performance for a LEA. The budget is reviewed for a correlation between the TCSPP, Perkins Report Card, and the local plan action steps. The action step explanation requires specific information for each line item as well as address targeting funds to Core Indicators of Performance including a timeline, evaluation and expected outcomes. Necessary revisions are requested from the LEA before final local approval is given. Locally approved plans are reviewed by the executive director of accountability as well as the executive director of

talent development prior to being given final approval by the Assistant Commissioner of the Division of CCTE.

Risk-based monitoring was implemented in 2007-08 and updated in the summer of 2015 to identify LEAs for on-site monitoring based on risk factors that including programmatic, accountability, and fiscal indicators. A risk rubric is used for the onsite monitoring to identify the degree of technical assistance or on-site visits to LEAs based on a point values system. The risk factors consist of areas in CTE director qualifications, local plan/addenda/TCSPP accomplishments of goals, fiscal monitoring findings, spending of funds as indicated in local plan, professional development for teachers and CTE director, quality program development, purchasing procedures, data reporting, physical inventory, draw-down of funds, volume of funds, core indicators of performance, and other grants such as HSTW, Incentive and Reserve Grants. (All references to the Jobs for Tennessee Graduates Program (JTG) have been removed since the state will no longer be funding this activity after June 30, 2013. The courses will still be offered at the discretion of the LEA but the state level support is being discontinued).

Quality program indicators have been identified that support the quality program development section of the risk factors. To be eligible for Perkins funding, a program must meet all quality program indicators.

<u>Quality program indicators:</u>

Indicator 1

Programs of such size that offer a sequence of three or more earned credits

*1.1 - Master schedule of classes to include all program of study course offerings

*1.2 - Student handbook/course guide listing program of study course offerings and descriptions

Indicator 2

Programs of such scope that are aligned with state approved program of study within career clusters

*2.1 - Copy of Program(s) of Study for program area (CTE Director Attested List from website)

Indicator 3

Programs having a certified and appropriately endorsed teacher *(Note: A teacher who teaches a CTE course that substitutes for a core academic course must be highly qualified.)*

*3.1 - Teaching certificate verifying proper endorsement(s)

*3.2 - Highly qualified status verification (as applicable)

*3.3 - Industry certification certificate (as applicable) verifying up-to-date training/testing

*3.4 - Work-Based Learning (WBL) certificate (as applicable) verifying training

Indicator 4

Programs teaching the state approved curriculum standards

*4.1 - State standards for all courses taught in all programs of study

*4.2 - Perkins inventory lists indicating opportunity for teaching of all standards (as applicable)

Indicator 5

Programs having a state approved articulation agreement for a program of study or an approved articulation agreement approved by the lead administrators of secondary and postsecondary institutions (where available)

*5.1 - Current dual credit, dual enrollment and/or articulation agreements and materials demonstrating linkage to postsecondary through a program of study

Indicator 6

Programs being supported by current labor market data to support high skill, high wage, or high demand jobs

*6.1 - JobsforTN (Department of Labor) data indicating job outlook reports for region specific to program of study, OR

*6.1 - Local chamber of commerce data indicating job outlook specific to program of study

Indicator 7

Programs that teach all aspects of an industry

Note: All Aspects of Industry include 1) Business Planning, 2) Management, 3) Health, Safety and Environment, 4) Finance, 5) Community Issues, 6) Principles of Technology, 7) Personal Work Habits, 8) Labor, and 9) Technical and Production Skills.

*7.1 - Field trip, business/industry guest speaker, and/or lesson plans documenting teaching of all 9 aspects of industry

Indicator 8

Programs having an active advisory panel

*8.1 - Roster of advisory panel members (by program, school or system wide advisory panel) indicating program areas represented, place of employment and responsibilities or title

*8.2 - Meeting agenda, sign-sheets and minutes including advisory committee recommendations for at least two meetings annually (prior year)

Indicator 9

Programs having a career and technical student organization as a support for the instructional program

*9.1 - Lesson plans indicating the integration of CTSO leadership skills and activities

*9.2 - Activities demonstrating classroom, school, and/or community based competitions

Indicator 10

Programs promote CTE and academic curriculum integration

*10.1 - Lesson plans (two per year) indicating integration activities in Math, Science, English, and/or Social Studies

The quality program indicators require each program to have an active advisory committee which consists of a minimum of 50 percent business and industry representation. Business and industry recommendations assist with program improvement.

Each LEA, in order to receive Perkins Funding, must submit a Local Plan for the upcoming fiscal year and an annual budget application that describes exactly how the funds for

that fiscal year will be expended. Starting in 2015-16 and continuing forward, CTE goals are tied directly to the LEAs student level performance data in conjunction with their basic education program in order to strengthen CTE's impact on overall student performance.

Local Plan Timeline

By May	One Five-Year Local Plan - annual budget with assurances and Annual One-Year Local Plans
August - October Annually	Secondary negotiate targets for remaining indicators. Postsecondary will negotiate targets for all indicators.
By June 30 Annually	LEA's are notified of Local Plan approvals.

How programs at the secondary level will prepare career and technical education students, including special populations, to graduate from secondary school with a diploma;

The Division is supporting departmental initiatives to ensure computer literacy for all students. Reading standards have been incorporated into each CTE course and reading lists have been developed for all Career Clusters using technical context to stimulate interest in reading. CTSOs continue to take a leadership role in the state's reading initiative by providing books to preschoolers, reading to children, tutoring their peers and encouraging more reading by all students. Reading Across Career and Technical Education is a yearly division project for each Career Cluster. A Reading Strategies

Manual has been developed by the Division of Teaching and Learning, and professional development is provided to CTE teachers in the use of the manual, as well as other ways to implement. A reading initiative in CTE was developed and initial work has begun on implementing a reading skills resource manual that the Division of Teaching and Learning constructed to be modified and used by CTE teachers. Presentations were made by systems that have shown academic improvement with specific projects such as: Write Right; Reading and Creating; ORBIT, Passing Literacy Onward (PLOW - an agriculture reading program), and activities for integrating math and English into business courses; math, science, and language arts in health science.

High Schools That Work (HSTW) is an effort-based school improvement initiative founded on the premise that most students can master rigorous academic and CTE studies if school leaders and teachers create an environment that motivates students to make the effort to succeed.

Special population students have equal access to all CTE courses and use the same curriculum and assessment as other students. One of the successes observed through the use of competency profiles as a measurement approach for occupational attainment has been the value they have for CTE and special education teachers working together to develop students' IEPs. After the review of the required competencies, support is given special education students through educational assistants for success in the classroom. Modification of curriculum, equipment, and teaching methodologies are offered, when needed, for success in the course. Several regional offices offer in-service training for teachers to use competency profiles in the development of IEPs.

A resource guide was developed in partnership with the divisions of Special Education, and CCTE to assist special education teachers, counselors, and IEP teams to develop a relevant and appropriate individual education plan for all students entering CTE programs. Workshops on using this guide continue to be given at the local, regional, and state level. This guide is posted on the department's website.

B. Other Department Requirements

1. You must submit a copy of your local applications or plans for secondary and postsecondary eligible recipients, which will meet the requirements in section 134(b) of the Act.

2. You must provide a description of your state's governance structure for vocational and technical education, including the approximate number of eligible recipients at both secondary and postsecondary levels.

3. You must provide a description of the role of postsecondary CTE in the one-stop career center delivery system established by Title I of WIA.

C. Procedural Suggestions and Planning Reminders

P Program memorandum OVAE/DVTE 99-11 may be helpful to you in understanding the responsibilities for one-stop participation that are established by Title I of WIA and its implementing regulations.

Section II, Part A, Subpart (8): You must describe how you will provide local educational agencies, area career and technical education schools, and eligible institutions in the State with technical assistance. [Sec. 122(c)(15)]

At the secondary level, technical assistance is provided annually to CTE Directors, administrators and teachers during onsite visits and statewide meetings. A findings report is provided to the director of schools. Two multi-day workshops are held annually for postsecondary coordinators and administrators. New coordinator training is provided annually to all coordinators with less than three years experience with the Perkins program. The postsecondary Perkins website provides an array of resources for program development, performance measurement, and professional development opportunities. A coordinator handbook was published in 2006 and is provided to all coordinators in hardcopy and is available online.

Technical assistance is given during onsite visits to 25% of the LEAs per year, with 100% desk audited each year through review of sequence taught, CTSO, technical assessments, completers reported, etc. There is professional development for all new CTE teachers. Nine state funded consultants (three each region) provide a regional assistance contact which is posted on the TDOE website.

Other department requirements:

Section II, Part B, Part (1): You must submit a copy of your local applications or plans for secondary and postsecondary eligible recipients, which will meet the requirements in section 134(b) of the Act.

See Attachment (E)

Section II, Part B, Subpart (2): You must provide a description of your State's governance structure for vocational and technical education.

The SBE is the sole state agency authorized and empowered to accept on behalf of the State any and all acts of Congress pertaining to secondary career and technical education. By statute, the SBE has the authority to accept federal funding for the Carl D. Perkins Career and Technical Education Act of 2006. The TSBE has statutory authority to cooperate with the United States Department of Education, Office of Vocational and Adult Education, on the administration of the Five-Year State Plan for CTE in Tennessee.

The Governor of the state appoints the Commissioner of Education who has the authority given by SBE to manage funding and programs of the Perkins Act of 2006. This management includes the funding between secondary and postsecondary education. The Commissioner of Education appoints the professional and support staff in the TDOE and manages multiple divisions within the Department.

The TBR is the designated agency of the state for administering postsecondary career and technical programs through Tennessee's community colleges and technology centers. TBR is allotted Perkins funding from the eligible agency, TDOE, for postsecondary technology center and community college programs.

The Tennessee Council for Career and Technical Education Council (TCCTE) serves as an advisory board to review and make recommendations on career and technical

education to the Tennessee Legislature, TBR and TSBE. The 13-member council is comprised of six members representing CTE areas in postsecondary (2), secondary (4), and members representing private business/industry and labor (7). The Governor appoints all the members.

CCTE is managed by an Assistant Commissioner appointed by the Commissioner of Education. There are sixteen secondary career and technical Career Clusters led by the Assistant Commissioner, respective program consultants, central office support staff and eight CTE CORE consultants who operate from the nine regional field service centers (FSC). All sixteen Career Clusters have a program consultant and a CTSO consultant (state staff). Additionally, the division monitors Pathways Tennessee Initiative, Work-Based Learning and Early Postsecondary for the department.

CCTE's mission is to provide Tennessee students the opportunity to participate in a rigorous and relevant career and technical education program that leads to academic achievement and successful employment in a global economy. A 2020 Vision Committee was formed to prepare and propel CTE forward through a visioning process for future student career and education opportunities in Tennessee. The goal of this committee is to present a working plan for where Tennessee should be by the year 2020. The committee is comprised of local secondary and postsecondary educators and administrators; SBE staff and board members; state legislators; business and industry leaders; and state academic, school counseling, and CTE staff. The committee initially identified the challenges for CTE and looked at ways to address those challenges. The committee created a coordinated plan that concentrated on four pillars supporting the vision. Academic achievement, articulation, communication, and professional development and teacher certification are the four pillars of this plan. Each pillar has an action plan with specific goals and timelines outlined. This plan is a living document to be continuously reviewed and updated to reflect changes in the state, regional, and global economies, and how career and technical education must meet those changes.

Attachment (B) is a listing of all acronyms used in the state plan.

Attachment (C) is an organizational chart of key agencies involved.

The TBR is the governing body for six state universities, 13 public two-year colleges, and 27 TN Colleges of Applied Technology (TCATs). TBR oversees postsecondary and adult CTE programs and is administratively divided into two elements: the Office of Community Colleges which oversees the 13 degree-granting community colleges and the Office of TCATs that directs the 27 diploma-and-certificate-granting technology centers.

Through a MOU, the TDOE has delegated the appropriate responsibility for the administration and leadership of Perkins activities in institutions of higher education to the Office of TCATs and Office of Community Colleges through the TBR.

The leadership funds that are available to the state are divided between the TDOE and TBR through the MOU. The two staffs work closely together to ensure coordination between the secondary and postsecondary programs as defined by the Perkins Act.

Attachment (D) is the Memorandum of Understanding between TDOE and TBR.

Students enrolled in for-credit CTE programs at the postsecondary level may receive either a technical certificate, a technical diploma, or an associate degree. In Tennessee, the 13 community colleges and 27 TCATs offering these programs are eligible to receive Perkins funding.

There were 128 Local Education Agencies (LEAs) in the state and three state supported institutions eligible for Perkins funding during 2006-07. Of these, three received less than the $15,000 minimum required under current funding levels.

Attachment (E) is the Secondary and Postsecondary Local Plans.

Attachment (F) is the Secondary and Postsecondary Reserve Grant Applications.

PROVISION OF SERVICES FOR SPECIAL POPULATIONS

States that submit a one-year transition plan must address, at a minimum, its plans or the State's planning process for the following items: A1(a-c). States that submit a six-year State plan must address all of the items below.

A. Statutory Requirements

Section III, Part A, Subpart (1):

(1) You must describe your program strategies for special populations listed in Section 3(29) of the Act, including a description of how individuals who are members of the special populations—

a) Will be provided with equal access to activities assisted under the Act.

Equal access to CTE programs is demonstrated in a number of ways:

- program enrollment has approximately the same make-up as enrollment of the total student body;
- entry requirements do not adversely affect access for members of special populations to the programs; and
- special population students are enrolled in all types of education programs including CTE-specific courses, work-based learning, internships and apprenticeships.

Special populations have access to all CTE courses and use the same curriculum and assessment as other students. One of the successes observed through the use of competency profiles as a measurement approach for occupational attainment has been the value they have for CTE teachers and special education teachers working together to develop students' IEPs. After the review of the required competencies, support is given to special education students through educational assistants for success in the classroom. Modification of curriculum, equipment, and teaching methodologies are offered, when needed, for success in the course. Several regional offices offered in-service training for teachers on the use of competency profiles in the development of IEPs. Counselors were provided sessions to assist in student placement for enhancement of realizing career goals.

b) Will not be discriminated against on the basis of their status as members of special populations; and

Secondary - The TDOE and TBR conduct Office of Civil Rights (OCR) on-site visits. The assurance of nondiscrimination is required of eligible recipients through the development and submission of their local application for funding. The TDOE and TBR have staff members who serve as the MOA coordinators. Technical assistance and professional development activities will also be provided by state staff and through leadership development activities in the area of nondiscrimination. TDOE has developed an online OCR monitoring guide to assist LEAs. All systems must document that they are OCR compliant.

Postsecondary -- Each eligible postsecondary institution will make available those programs that comply with Titles VI and VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, Executive Order 11,246, the Americans With Disabilities Act of 1990, and the related regulations to each. Programs will not discriminate against any individual including, but not limited to, employees or applicants for employment or students because of race, religion, creed, color, sex, age, disability, veteran status or national origin. The TBR has established policies and procedures to assure that discriminatory factors do not exist and to assure compliance with Title VI, Title IX, and Section 504 of the Rehabilitation Act. In addition, an MOA coordinator conducts on-site reviews of targeted institutions to ensure that admission requirements and overall administration of CTE programs maintain compliance with the OCR. Criteria utilized for awarding competitive grants will include assurances on non-discrimination of special populations.

c) Will be provided with programs designed to enable the special populations to meet or exceed State adjusted levels of performance, and how you will prepare special populations for further learning and for high-skill, high-wage, or high-demand occupations. [Sec. 122(c)(9)(A)-(C)]

Tennessee is committed to meeting the educational needs of <u>all</u> students.

Students who are identified as special populations must have access to and be able to successfully participate in the state's CTE programs. To assure that such students have the opportunity to meet or exceed the state adjusted levels of performance, it is critical that strategies and services are in place to achieve success.

Special populations are defined by the Act as:

- individuals with disabilities;
- individuals from economically disadvantaged families, including foster children;
- individuals preparing for non-traditional fields;
- single parents, including single pregnant women;
- displaced homemakers; and
- individuals with limited English proficiency.

Strategies for assuring access to and success in CTE programs for special population students include the following:

- promoting outreach and recruitment information regarding career opportunities with an emphasis on non-traditional opportunities;
- identification of special population students;
- utilizing assessment tools/individualized education plans for special population students enrolled in CTE programs to determine their special needs;
- planning and coordinating supplemental services for special population students enrolled in CTE programs;
- facilitating the identification of appropriate adaptive equipment, assistive devices and new technology for students with disabilities, as funding is available;
- providing professional development activities for CTE teachers, counselors and administrators; and
- identifying or developing special instructional materials or adapting existing instructional materials for CTE programs.

Within the local application process, each LEA must review and analyze data on their addendum to their system's report card which disaggregates data for "special populations" served by CTE programs and their performance on core indicators. Using the disaggregated data from their report card and addendum, local systems are required to design programs and services that enable "special populations" to improve performance and overcome barriers. This comprehensive review includes reviewing each targeted subgroup, identifying activities to improve performances on core indicators, developing strategies and timelines to overcome these barriers, and documenting the expected outcomes.

In addition to the strategies already identified above for all special population students, strategies to enable identified students to prepare for further learning and for high-skill, high-wage, or high-demand careers may include the following:

- exploration of career areas that focus on expanding career options, educational planning, and CTE training that is free of gender bias;
- comprehensive career counseling and guidance including labor market information on a broad range of occupations, career testing, placement services for part-time and summer employment, internships, and cooperative programs;
- access to options for specialization in a variety of areas with access to work-based learning opportunities;
- career development activities which lead to mastery of workplace readiness skills;
- high quality, paid work-based learning experiences to provide career exploration, enhancement of personal and interpersonal skills, and development of occupational skills;
- access to programs which encourage learning all aspects of the industry including planning, management, finances, technical production, and principles of technology; and
- provide information on non-traditional jobs that are in high-demand, require high-skill or offer high-wages with opportunities for advancement and benefits.

Special populations have access to all CTE courses and use the same curriculum and assessment as other students. One of the successes observed through the use of

competency profiles as a measurement approach for occupational attainment has been the value they have for CTE teachers and special education teachers working together to develop students' IEPs. After the review of the required competencies, support is given to special education students through educational assistants for success in the classroom. Modification of curriculum, equipment, and teaching methodologies are offered, when needed, for success in the course. Several regional offices provided in-service training for teachers in the use of competency profiles in the development of IEPs.

A resource guide was developed by CTE in partnership with the DTL and Division of Special Education (DSE) to assist special education teachers, counselors and IEP teams to develop relevant and appropriate IEPs for all students.

To ensure that all CTE teachers are equipped to work with special population students, staff development activities will again be provided at the Institute for CTE Educators. Workshops will be provided through the year to assist teachers, administrators, and school counselors in analyzing data to differentiate instruction, develop programs of study for high-skill, high-wage or high-demand occupations, and develop intervention strategies for specialized support services to special populations.

The community colleges, in cooperation with the Tennessee Association of Higher Education and Disabilities (TNAHEAD), has developed a curriculum to assist secondary personnel to more efficiently assist special and exceptional secondary education students and parents with transition issues between secondary and postsecondary education. Training has occurred during the 2006 - 2007 school year and will continue on a periodic basis.

(2) You must describe how you will adequately address the needs of students in alternative education programs, if you have such programs. [Sec. 122(c)(14)]

The Division of CCTE does not have an alternative education program that provides career and technical education. The TDOE does provide financial support through its Basic Education Program for LEAs to provide alternative schools at their discretion. Determination of programs and services for students in alternative education programs is a local decision.

Most students in high school alternative education environments are enrolled in regular CTE programs; however, students do not graduate from the alternative school. They receive support for CTE programs from their assigned high school.

(3) You must describe how funds will be used to promote preparation for high-skill, high-wage, or high-demand occupations and non-traditional fields. [Sec. 122(c)(18)]

Non-traditional courses are identified by using the TDLWD data and national data from the Bureau of Labor Statistics (BLS) found in the crosswalks on the National Alliance for Partnerships in Equity website that identify occupations with less than 25% of either gender employed. Tennessee's non-traditional courses are aligned to these crosswalks.

State leadership funds in the minimum amount of $60,000 will be reserved and used to support professional development, recruitment efforts, curriculum development, or other services deemed effective in promoting participation in non-traditional training and employment. CTE will support on an online resource: www.collegeforTN.org. The

website includes information on high-skill, high-wage, or high-demand occupations, non-traditional careers and classroom resources.

Additionally, CTE sponsors the School Counselor Institute where the delivery of high-skill, high-wage, or high-demand career information is highlighted with non-traditional careers being heavily emphasized. .

CTE has developed a non-traditional awards program. This program is designed to recognize outstanding students that have excelled in non-traditional programs of study. This non-traditional awards program provides an avenue to recognize and highlight student achievement in non-traditional career training and to provide role models for other students considering a non-traditional career. In addition to student awards, non-traditional program awards will be given to LEAs that have new and innovative programs designed to promote non-traditional career options.

(4) You must describe how funds will be used to serve individuals in State correctional institutions. [Sec. 122(c)(19)]

Tennessee supports institutions with disabilities, specifically, (Tennessee School for the Blind was removed for 2013, at their request) Tennessee School for the Deaf and the TN Department of Children's Services. Each institution receiving funds is required to complete a Local Career and Technical Action Plan Application which addresses issues required in Perkins IV. Each institution that receives funds must identify program specific goals, timelines for achieving them, expected outcomes and evaluation strategies. They must also include professional development to support their plan as well as technology and equipment needs. All activities are directed toward Required Uses of Funds allowable under Perkins IV.

The Department of Corrections and the Department of Children Services continue to be served through professional development, technical assistance with curriculum, and program evaluation. CTE course standards are implemented in state prison facilities and private licensed correctional facilities. All correctional instructors who teach career and technical courses receive Tennessee department of education occupational teaching license and attend new teacher training provided by the CCTE division at no cost.

(5) You must describe how you will require each applicant for funds to include in its application a description of the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs as contained in section 427(b) of the General Education Provisions Act as amended. For further guidance and examples, see the Notice to All Applicants at
http://www.ed.gov/fund/grant/apply/appforms/gepa427.doc

Tennessee requires each applicant for funds an assurance that students are ensured equitable access to career and technical programs as contained in Section 427(b) of the General Education Provision Act, as amended.

A. Other Department Requirements

There are no other Department requirements for this section of the state plan narrative.

C. Procedural Suggestions and Planning Reminders

- Be sure that your local applications or forms seek complete information from eligible recipients on their proposed programs, services, and activities for special populations. See section 134(b)(8)(A)-(C), and 134(b)(9)-(10).
- The Act eliminated "individuals with other barriers to educational achievement" from the definition of special populations. See section 3(29).
- You may wish to refer to Program Memorandum OVAE/DVTE 99-13 for additional background information concerning the reservation and use of state leadership funds for activities related to non-traditional training and employment.
- Your accountability system must be able to disaggregate data for each of the core indicators of performance under section 113(b)(2) of the Act for the categories of students described in section 1111(h)(1)(C)(i) of the Elementary and Secondary Education Act of 1965, as amended, and section 3(29) of the Act that are served under the Act. See section 113(c)(2)(A).

IV. ACCOUNTABILITY AND EVALUATION

States that submit a one-year transition plan must submit all items in this section, except as noted in the box below. States that submit a six-year State plan must complete all items in this section.

States that submit a one-year transition plan, along with their eligible recipients, are required to reach agreement on performance levels for the first two program years (July 1, 2007 - June 30, 2008 and July 1, 2008 - June 30, 2009) only for the core indicators under section 113(b) of the Act as provided below:

Secondary Level - 7 Indicators

Indicators		Transition Plan	Six-Year Plan
1S1	Academic Attainment - Reading/Language Arts	X	X
1S2	Academic Attainment - Mathematics	X	X
2S1	Technical Skill Attainment	Not required	X
3S1	Secondary School Completion	Not required	X
4S1	Student Graduation Rates	X	X
5S1	Secondary Placement	Not required	X

Indicators		Transition Plan	Six-Year Plan
6S1	Non-traditional Participation and Completion	Not required	X

Post-secondary/Adult Level - 5 Indicators

Indicators		Transition Plan	Six-Year Plan
1P1	Technical Skill Attainment	Not required	X
2P1	Credential, Certificate, or Degree	Not required	X
3P1	Student Retention and Transfer	Not required	X
4P1	Student Placement	Not required	X
5P1	Non-traditional Participation and Completion	Not required	X

States that submit a one-year transition plan must submit a five-year plan prior to the second program year. At that time, the Department will reach agreement on performance levels for program year two (July 1, 2008 - June 30, 2009) for the indicators that were not initially required for program year one (July 1, 2007 - June 30, 2008). The Department will issue further guidance to States prior to the required submission of the five-year plan.

States that submit a transition plan, along with their eligible recipients, will not be subject to sanctions under sections 123(a) and (b) of the Act for the first program year for the core indicators that are not required as specified in the chart above.

A. Statutory Requirements

Section IV, Part A, Subpart (1): You must describe procedures you will use to obtain input from eligible recipients in establishing measurement definitions and approaches for the core indicators of performance for career and technical education students at the secondary and postsecondary levels, as well as for any other additional indicators of performance identified by the eligible agency. [Sec. 113(b)(1)(A)-(B), sec. 113(b)(2)(A)-(C)]

The TDOE and the TBR will work closely with eligible recipients at the secondary and postsecondary levels to establish measurement definitions and approaches for the core indicators of performance. [Sec. 113(b)(1)(A)-(B), Sec. 113(b)(2)(A)-(C)]

The Perkins IV committee, comprised of secondary and postsecondary local recipients, has met five times to address new Perkins requirements including discussions of measurement definitions and levels of performance. In addition, TDOE has established through the Project Management Oversight Committee (PMOC), respective core members who are specifically addressing academic attainment, technical skill attainment and non-traditional benchmarks and measures. Through this collaborative approval, measurements, definitions and approaches were agreed upon.

Both agencies responsible for oversight of the Perkins funds have worked with the local coordinators, administrators, and data staff on the measurement definitions and methods of determining performance and data collection. At the secondary level, the TDOE had a series of meetings, using the PMOC process, with a core team of consortia including LEA representatives and state staff members. The discussions at the meetings included a full discussion of the indicators and the measurement of performance. After these meetings, the staff took the recommendations and began the data analysis using the parameters and definitions to determine impact upon performance levels. Prior year data will be used to provide performance trends in such areas as graduation, completion and non-traditional. This feedback was provided to the division team members and was shared with all recipients.

Section IV, Part A, Subpart (2): You must describe the procedures you will use to obtain input from eligible recipients in establishing a State adjusted level of performance for each of the core indicators of performance for career and technical education students at the secondary and postsecondary levels, as well as State levels of performance for any additional indicators of performance identified by the eligible agency. [Sec. 122(c)(10)(A), sec. 113(b)(3)(B)]

Secondary, for 1S1 and 1S2 -Based on Tennessee's waiver of NCLB, this is no longer applicable.

The percentage of mastery for each program concentrator at proficient levels will be determined by the completed course assessment document established for each student enrolled in a CTE program. Tennessee created a CTE Knowledge and Skills Attainment Rubric that teachers use to assess student performance on the course competency assessment with third-party assistance from the Southern Regional Education Board and REL-Appalachia. The CTE Rubric is based on four levels of performance and is aligned with workplace and postsecondary readiness standards. The rubric will change the approach teachers use in assessing student knowledge and skill attainment from a binary approach, master and non-mastery, to assessing four levels of performance. Developing a common definition of proficiency and a common understanding of how to look at student work will raise the level of rigor across the state in CTE. Raising expectations in CTE positions CTE as a leader in the Tennessee Diploma Project (TDP) and will help our students meet the TDP with greater success.

In 2012-2013, technical skill attainment data will be collected from the CTE Competency Attainment Rubric. Data will be analyzed to determine the number of students who score proficient in course competencies.

Validated standards, which must be SBE approved, are established for each program along with individual competencies identified to determine course completion levels. The competencies are aligned to business and industry standards. As curriculum standards are revised using the DACUM process, competency assessments are also revised to align with the standards. The profiles must incorporate national and industry standards, where available, and reflect current labor market trends and required validation process by business and industry representatives. This is to assure that the competencies and standards meet current labor market needs. The competencies and percent of mastery of each concentrator enrolled in the CTE programs are reported and attested by each LEA via an electronic data reporting system. Data derived from the competencies and assessments are analyzed for program improvement planning within the local application. In programs where mastery percentages are not at acceptable levels, resources must be directed toward correcting these deficiencies and detailed in the local application. Protocols and tools will be delivered through professional development to assist Local Education Agencies (LEAs) for monitoring the CTE Knowledge and Skills Attainment Rubric use at the local level.

The TBR Office of Academic Affairs, i.e. community colleges, held conversations for the last several months with the colleges and specifically with the deans of technology, institutional research personnel and chief academic officers to discuss the process of establishing benchmarks and annual improvement goals. After a series of conversations, presentations and workshops, the Office of Academic Affairs has come to agreement with each community college on benchmark data and adjusted levels of performance. The colleges have set goals based upon historical data and on goals endorsed by the Governor. With the general population of the Tennessee community colleges graduating at a rate less than 30%, the Governor has called for colleges to seek a 50% graduation rate. It was found through data analysis that colleges that had a retention rate of approximately 75% of CTE concentrators were more likely to reach that level of graduation. Placement goals were established based upon the THEC's performance funding process.

Section IV, Part A, Subpart (3): You must identify, on the forms in Part C of this guide, the valid and reliable measurement definitions and approaches that you will use for each of the core indicators of performance for career and technical education students at the secondary and postsecondary/adult levels, as well as any additional indicators of performance identified by the eligible agency, that are valid and reliable. You must describe how your proposed definitions and measures are valid and reliable. [Sec. 113(b)(2)(A)-(B)]

See Part C for definitions (page 5)

<u>Secondary</u>

1S1 - 1S2 Academic achievement -Based on Tennessee's waiver of NCLB, this is no longer applicable.

2S1 -Technical Skill Assessment - Course competency proficiency assessment will be used as the measurement approach for technical skill attainment. This core indicator for

concentrators will determine mastery at proficient and advanced levels and is measured by:

Numerator: The number of secondary concentrators who have mastered industry validated career and technical proficiency standards in the reporting year.

Denominator: The total number of secondary concentrators in the reporting year who have left the system.

Measurement -

The percentage of mastery for each program concentrator at proficient levels will be determined by the completed course competency assessment document established for each student enrolled in a CTE program. Within the transition year, Tennessee will identify valid and reliable program assessments to determine competency in technical skills.

Validated standards, which must be SBE approved, are established for each program along with individual competencies identified to determine course completion levels. The competencies are aligned to business and industry standards. As curriculum standards are revised using the DACUM process, competency assessments are also revised to align with the standards. The profiles must incorporate national and industry standards, where available, and reflect current labor market trends and required validation process by business and industry representatives. This is to assure that the competencies and standards meet current labor market needs. The competencies and percent of mastery of each concentrator enrolled in the CTE programs are reported and attested by each LEA via an electronic data reporting system. Data derived from the competencies and assessments are analyzed for program improvement planning within the local application. In programs where mastery percentages are not at acceptable levels, a plan for action must be addressed. Protocols and tools will be delivered through professional development to assist Local Education Agencies (LEAs) for monitoring the CTE Knowledge and Skills Attainment Rubric use at the local level.

3S1 - Secondary School Completion

Numerator: the number of CTE concentrators who attained a Tennessee high school diploma, a state certificate, or a GED.

Denominator: The number of CTE concentrators who have left the system (graduates and dropouts) in the reporting year.

Measurement -

Graduation data is submitted by LEAs to the state's data warehouse via Educational Information System Reporting (EIS). Since graduation data are used for NCLB benchmarks, the validity and reliability of the data are proven. Local systems must review the graduation data they have reported to TDOE and accept the graduation results that are posted on the state's report card or make a formal appeal to correct and add data omissions or errors.

The Division is working closely to identify those students who have left the system and have earned their GED. Since GED testing does not fall within the TDOE but rather TDLWFD, a tracking system is being created to have LEAs report GED attainment and work with the TDLWFD to build a database of GED completers.

4S1 - Graduation

5S1 - Secondary Placement

Numerator: The number of CTE concentrators who graduated (regular and special ed. diploma) in the reporting year and who were placed in postsecondary or advanced training, in military service, or had employment within one year of graduation.

Denominator: The number of CTE concentrators who graduated (regular and special education diploma) in the same reporting year as numerator of 5S1.

Tennessee follows up its concentrators for 5S1 in the second quarter after graduation. The follow-up data entry is part of the Division of CCTE secure web reporting. Concentrator lists are generated for each local system based on approved and attested data through eTIGER, the CTE data reporting program. It becomes local system responsibility to follow-up on all concentrators. LEAs must document the mail out phone contact process and then report the results via secure web reporting. This follow-up system was used under Perkins III; however, it has moved from a paper reporting system to an electronic database system reporting that requires attestation by the CTE administrator to ensure reliability and validity of data integrity.

6S1 - Nontraditional Participation

Numerator: The number of CTE participants from underrepresented gender groups who enrolled in a course (a nontraditional CTE course) that leads to employment in nontraditional fields in the reporting year.

Denominator: The number of CTE participants who enrolled in a course (a nontraditional CTE course) that leads to employment in nontraditional fields in the reporting year.

6S2 - Nontraditional Completion

Numerator: The number of CTE participants from underrepresented gender groups who enrolled in a course (a nontraditional CTE course) that leads to employment in nontraditional fields in the reporting year.

Denominator: The number of CTE concentrators who enrolled in a course (a nontraditional CTE course) that leads to employment in nontraditional fields in the reporting year.

Nontraditional participation and completion is reported to the state via eTIGER secured student database. Tennessee has applied the “Nontraditional Occupation for Male/Female” list from the BLS data prepared by the National Alliance for Partnerships in Equity. CTE program consultants have identified those CTE courses that contribute to clusters/pathways which prepares students for nontraditional occupations identified by the NAPE crosswalk. More identified nontraditional occupations for both gender groups

may be applied after a review of CTE enrollment data and Tennessee job market demands for nontraditional occupations

Postsecondary, degree-granting

The definitions for participant and concentrator generally comply with OVAE suggested definitions while better defining verifiable, valid and reliable data already being collected at the state level by TBR.

1P1 -Due to the diverse methods for the colleges to assess the relevance and rigor of postsecondary programs of study, and due to the diversity of programs of study among the colleges, and due to the academic freedom of the faculty to determine appropriate assessment within the parameters of their accreditation agencies, and due to cost of development of state assessments or the cost of third-party assessments, and due to the lack of accessibility to certification scores paid by students; and finally, due to the state legislative limitation of the Board of Regents to require assessments other than those required as part of the degree, the community colleges will utilize the percentage of students passing state licensing or certification examinations in the allied health, as they are "available and appropriate" within the Tennessee community college context.

Numerator: During the reporting year, the number of CTE completers who passed, on the first administration, allied health assessments that are aligned with industry-recognized standards, if available and appropriate.

Denominator: Number of CTE completers who took allied health assessments for the first time during the reporting year.

2P1 -Graduation is parallel to the IPEDS notion of graduation within 150% of the programs length of study. Community colleges face a paradox under the current U.S. economy - more students but fewer graduates. Many community colleges are seeing an increase in enrollments as individuals being laid off work seek new job skill sets. Most are returning to class with time limited funds provided by the federal and state programs. Second, some already have degrees and are returning to gain specific skill sets only. Additionally, community college students working to pay their way through college have been laid off from full- and part-time jobs utilized to support themselves and/or their families while they study. It is projected with the economic downturn that many community college students will fail to complete their college education within the IPEDS parameter of 150% of program of study completion expectancy.

Numerator: Number of CTE concentrators who received an industry-recognized degree or other award by the end of two years, subsequent to the fall of the sophomore cohort year.

Denominator: Number of CTE concentrators in the fall of the sophomore cohort year.

3P1 - Retention is an indicator already being collected for all students and the data collection system is in the process of being modified to identify CTE student concentrators specifically. Like graduation, it is expected due to the downturn of the economy that the number of students that will be retained will diminish for at least two to three years.

Numerator: Number of CTE concentrators who remained enrolled in their original community college, completed a degree or award at their original community college, or transferred to another 2-or 4-year postsecondary institution at the time of the subsequent fall after the sophomore concentrator year.

Denominator: Number of CTE concentrators in the fall of the sophomore cohort year.

4P1 -Through conversations with the colleges' institutional research specialists and with the Tennessee Higher Education Commission, it was decided to adopt the State's performance funding requirements for identification of placement of graduates. The procedure requires contact with a larger population of graduates and assures the identification of individuals in small businesses, agriculture, federal jobs, railroad positions and other situations that are not collected under the Unemployment Insurance process. Due to the economic downturn fewer job situations are available to college graduates. Placement numbers are expected to be diminished for the next three to five years.

Numerator: Number of CTE concentrators who received an industry-recognized degree or award, and reported according to THEC's performance measures reporting requirements were placed in employment, enrolled in postsecondary education, or serves in the military.

Denominator: Number of CTE concentrators who graduated from the community colleges at the end of the reporting year.

5P1 - Gender nontraditional participation continues to be collected through the TBR electronic central data collection system and reflect the NAPE crosswalks for nontraditional occupations as published on the Peer Collaborative Resource Network, June 1, 2007.

Numerator: Number of CTE participants from under-represented gender groups who participated in a program that leads to employment in nontraditional fields during the reporting year.

Denominator: Number of CTE participants who participated in a program that leads to employment in nontraditional fields during the reporting year.

5P2 - The definition of a nontraditional student for collecting and reporting this data will align with the stated OVAE definitions and reflect the NAPE crosswalks for nontraditional occupations as published on the Peer Collaborative Resource Network, June 1, 2007. The process for determining graduates will parallel 2P1.

Numerator: Number of CTE concentrators from underrepresented gender groups who completed a program that leads to employment in nontraditional fields by the end of two years subsequent to the fall of the sophomore cohort year.

Denominator:Number of CTE concentrators from underrepresented gender groups who participated in a program that leads to employment in nontraditional fields in the fall of the sophomore cohort year.

<u>Postsecondary, certificate/diploma programs:</u>

1A1 - Technical Attainment:

Technical attainment will be determined by the number of students who complete a job proficiency level within a program of study in a technology center within the reporting period and who pass a licensure or certification exam as reported by the certifying or licensing agency. Data must be consistent with Licensure Pass Rate data reported in the COE accreditation Annual Report for the same reporting period.

Numerator: Number of student completers within the reporting year who passed a licensure or certification exam.

Denominator: Number of student completers within the reporting year who took a certification or licensure exam

2A1 - Credential or Certificate (Completion):

This core indicator will measure the completion rate for the Perkins recipient. To be considered a completer in a technology center, the student must have completed all requirements in a program of study necessary to receive a preparatory certificate or diploma. In order to be considered a completer, the award must actually be conferred. Data must be consistent with Completion Rate data reported in the COE accreditation Annual Report for the same reporting period.

Numerator: Number of students who receive a certificate or diploma within the reporting year.

Denominator: Number of students who enrolled during the reporting year minus the number of students who continued into the next reporting year, known as calculated enrollment

3A1 - Retention:

Data must be consistent with TBR Enrollment Report data submitted to TBR Office of Data and Statistics for the same reporting period.

Numerator: Number of students who remained enrolled in the institution or transferred to another 2- or 4-year postsecondary institution during the reporting year and who were enrolled in postsecondary education in the previous reporting year.

Denominator: Number of students who were enrolled in the previous reporting year and who did not earn an industry-recognized credential, a certificate, or diploma in the previous reporting year.

4A1 - Placement:

Positive placement of completers will be determined by those students who are placed in gainful employment, who enter the military, or who continue their education. Data must be consistent with Placement Rate data reported in the COE accreditation Annual Report for the same reporting period. Data will be collected from the institution’s Exit Interview and Placement Status reporting systems.

Numerator: Number of completers during the reporting year who were placed in gainful employment, entered the military, or continued their education in postsecondary advanced studies.

Denominator: Number of completers during the reporting year who are available for placement

5A1 - Nontraditional Participation:

A “nontraditional student” is a student enrolled in a technology center which prepares students for employment in an occupation for which individuals from one gender comprise less than 25 percent of the individuals employed in each occupation or field of work as determined by the U.S. Department of Labor, Bureau of Labor Statistics. Local recipients are instructed to compare each student’s program of study against spreadsheets for nontraditional occupations for males and females accessible through the Peer Collaborative Resource Network website at: http://www.edcountability.net/

Due to curriculum changes that have resulted in fewer programs being classified as “non-traditional” this percentage is anticipated to decrease dramatically.

Numerator: Number of students in under-represented gender groups who participate in nontraditional programs during the year.

Denominator: Total number of students who participate in nontraditional programs during the year.

5A2 - Nontraditional Completion:

A TCAT student who completed a nontraditional program of study and received a certificate or diploma. In order to be considered a completer, the award must actually be conferred.

The graduation of nontraditional students parallels those for the general CTE population in 2A1.

Numerator: Number of students in under-represented gender groups who completed a nontraditional program during the report year

Denominator: Total number of nontraditional students who were enrolled in during the report year.

Section IV, Part A, Subpart (4): You must describe how, in the course of developing core indicators of performance and additional indicators of performance, you will align the indicators, to the greatest extent possible, so that information substantially similar to that gathered for other State and Federal programs, or for any other purpose, is used to meet the Act’s accountability requirements. [Sec. 113(b)(2)(F)]

The secondary indicators for academic attainment and graduation rates will be aligned to the extent possible with the assessments and methodology used for determining AYP for NCLB. The same academic assessments will be used. However, due to the requirement to report on CTE students at the time they leave the secondary system, the timing of the measurement will not be aligned to NCLB. AYP is measured each year for the student

cohort population of that year. For example, the state's literacy assessment, given to all eleventh graders during the spring of 2007 will be used to determine the school's 2007 AYP score. CTE will report those scores when the eleventh graders that are CTE concentrators leave the system.

The state's economic development agency, workforce services/investment agency, educational agencies, and other groups involved in using the state's labor market information on wages will be working together during the next year to reach consensus on the definition of high-wage. High-demand was already established and has been in place many years - except that the data has not previously been aggregated to a program of study/cluster level.

Postsecondary degree granting and certificate-and-diploma granting institutions data for graduation parallels, and retention aligns, with the Integrated Postsecondary Education Data System (IPEDS) and with the current Higher Education Act data to the extent possible. In addition, the allied health assessments and placement reporting procedures are tools currently utilized by the THEC to determine outcomes of each Career Cluster of concentration for performance funding.

Section IV, Part A, Subpart (5): You must provide, for the first two years covered by the State plan, performance levels for each of the core indicators of performance, except that States submitting one-year transition plans are only required to submit performance levels for part of the indicators as discussed above. For performance levels that are required, the States' performance levels, at a minimum, must be expressed in a percentage or numerical form, so as to be objective, quantifiable, and measurable; and require the State to continually make progress toward improving the performance of career and technical education students. [Sec. 113(b)(3)(A)(i)-(II)]

See Part C performance levels (page 77).

Section IV, Part A, Subpart (6): You must describe your process for reaching agreement on local adjusted levels of performance if an eligible recipient does not accept the State adjusted levels of performance under section 113(b)(3) of the Act. [Sec. 113(b)(4)(A)(i); sec. 122(c)(10)(B)]

Secondary - The department has implemented a web based program reporting system for providing baseline and performance data and the requests for negotiating local adjusted levels of performance with all eligible recipients. The negotiation model requires the state to determine the negotiated performance measures for 2007-13, the final year of the Perkins IV authorization. If a recipient is performing below 90 percent of the state negotiated performance measures, local negotiations will be conducted. If a recipient is already performing at or above the state negotiated measures, then the recipient may accept the state negotiated measures. Continuous improvement dictates that even high performing recipients must continue to improve.

Local Negotiations

The TDOE must report performance data on three academic indicators beginning with PY 2007-08. Data that are reported reflects an average percentage of all local school districts performance. Each year, Tennessee must negotiate with the Office of Vocational

and Adult Education (OVAE) for percentages of increase in performance. Tennessee has been able to meet its performance levels due to the fact that many local school districts each year exceed the states agreed upon performance levels, thus off setting any low performance by districts. Under the Carl D. Perkins Act of 2006, a negotiation process must be in place. Any system that does not meet 90.00% of its agreed upon performance level must develop an improvement plan. The same requirement applies to the state's performance as well. Tennessee's performance levels are determined by the performance of all 128 systems that receive Perkins Funding in Tennessee. Therefore, TDOE has developed the following performance level negotiation rules.

Negotiation Rules

Systems that are performing BELOW the state's performance level on any indicator

If most recent performance data indicate that a system is performing below the state's agreed upon performance levels for an indicator, the baseline performance percentage is the system's current performance for that indicator based on the most recent data.

Example: System X has a 60.00% graduation rate. The state's agreed-upon level is 79.50%. The system's baseline could be 60.00% for graduation rate percentage or higher if the systems chooses, but not lower than the most current data indicate.

Each year to make Annual Yearly Progress (AYP), the system must maintain the same incremental increase that the state negotiates with OVAE. Example: Graduation rate incremental increase may be .5 percent. So, System X that increases from a negotiated performance level of 60.00% to 60.50% will be considered as making AYP.

Improving Status is any increase over System X's negotiated performance level. Example: System X improves from 60.00% - 60.10%, not making AYP, but still improving performance.

Meets Federal Standards - Between 54.00%- 60.00 % is below System X's negotiated performance level, but within the required 90.00% of the negotiated performance level.

Corrective Action Year 1 - During the first year after a recipient is identified as not meeting an adjusted level of performance, the recipient must file an improvement plan that addresses each indicator in which 90% of the target was not achieved. Targeted resources through Perkins funds will be identified to support improvement action items. In the subsequent year, if an LEA meets the 90% level for each indicator, no improvement plan will be required for the next year.

Corrective Action Year 2 - During the second year after a recipient is identified as not meeting an adjusted level of performance, the recipient must file an improvement plan that addresses each indicator in which 90% of the target was not achieved for the same core indicator for two consecutive years. Targeted resources through Perkins funds will be identified to support improvement action items. TDOE staff will continue to provide technical assistance toward meeting the indicators that are not in compliance. In the subsequent year, if an LEA meets the 90% level for each indicator, no improvement plan will be required for the next year.

Corrective Action Year 3 - During the third yearafter a recipient is identified as failing to implement the improvement plan, failing to make improvement in meeting the negotiated levels of performance within the first program year of implementation of the improvement plan, or failing to meet the 90% of the negotiated level of performance; the Department may request that a portion of the recipient's Perkins funds be withheld for the following year and use a third party to manage those funds to provide service to the CTE students served by the recipient or require an improvement plan that target an increasing percentage of Perkins funds toward the area(s) of deficiency. In the subsequent year, if an LEA meets the 90% level for each indicator, no improvement plan will be required for the next year.

Corrective Action Year 4 - By the fourth year of the improvement plan, if the recipient has implemented their plan but still has failed to meet 90% of the adjusted performance level or the state negotiated level on any indicator for three consecutive years, the DOE will negotiate a state partnership to address performance improvement changes or may withhold a percentage of their Perkins funds to be managed by a third party to target the areas of deficiency.

Systems that are performing ABOVE the state's performance level on any indicator

If data indicate that a system is above the state's performance levels for an indicator the local baseline will be an average of the LEAs most current performance level and the state's level for NCLB. A higher baseline can be negotiated, but in order to maintain the state's composite performance levels, the minimum local baseline level will be the lowest percentage of performance a system will be allowed to negotiate.

- Example: System X has an actual performance level of 91.00% for graduation rate, which is above the state level of 79.50%.
  - 91.00% + 79.50% = 170.50%
  - 170.50% divided by 2 = 85.25%
  - System X's baseline will be 85.25% or System X can negotiate for a higher level, but not lower than the average baseline.

Continuous Improvement:

Each subsequent year, systems must show continuous improvement ----continuous improvement is measured beginning with Year 1 performance 2007-08 based on negotiated increments with OVAE.

The state has established a Safe Harbor clause for those "high flyer" systems that perform above the ninety-fifth percentile on state and NCLB benchmarks.

Safe Harbor -If a system's baseline value is equal to, or above, the 90.00% threshold, the continuous improvement increment is constant and will apply to Year 1 and Year 2 Negotiation Performance Levels.

Example:

A system's baseline is at 90.00%. Continuous performance increments are 90.00% PY 1 and 90.00% PY2.

Appeals Process:

After negotiation levels are established, the system may chose to accept or appeal the negotiated performance levels. A formal request must be made online and a letter sent to the Assistant Commissioner for College, Career and Technical Education stating this appeal request. This request must be made within 15 days of the online appeal date with a deadline of October 30, 2007.

Rule

In order for a system to appeal their baseline performance percentages on any indicator, the following rule(s) applies:

Substantially incorrect data - The LEA must provide a new data set and provide a report of why the data set is different and should be accepted as the correct data

OR

Longitudinal - If the system has spikes in data that are not typical performance.

Sanctions:

After a system does not meet their negotiated performance level (within 90%) for two consecutive years, the system will be required to submit an improvement plan to TDOE and apply Perkins funds toward improvement targets.

Corrective Action Year 1 - During the first year after a recipient is identified as not meeting an adjusted level of performance, the recipient must file an improvement plan that addresses each indicator in which 90% of the target was not achieved. Targeted resources through Perkins funds will be identified to support improvement action items. In the subsequent year, if an LEA meets the 90% level for each indicator, no improvement plan will be required for the next year.

Corrective Action Year 2 - During the second year after a recipient is identified as not meeting an adjusted level of performance, the recipient must file an improvement plan that addresses each indicator in which 90% of the target was not achieved for the same core indicator for two consecutive years. Targeted resources through Perkins funds will be identified to support improvement action items. TDOE staff will continue to provide technical assistance toward meeting the indicators that are not in compliance. In the subsequent year, if an LEA meets the 90% level for each indicator, no improvement plan will be required for the next year.

Corrective Action Year 3 - During the third yearafter a recipient is identified as failing to implement the improvement plan, failing to make improvement in meeting the negotiated levels of performance within the first program year of implementation of the improvement plan, or failing to meet the 90% of the negotiated level of performance; the Department may request that a portion of the recipient's Perkins funds be withheld for the following year and use a third party to manage those funds to provide service to the CTE students served by the recipient or require an improvement plan that target an increasing percentage of Perkins funds toward the area(s) of deficiency. In the subsequent year, if an

LEA meets the 90% level for each indicator, no improvement plan will be required for the next year.

VII. EDGAR CERTIFICATIONS AND OTHER ASSURANCES

All States must complete this entire section.

A. EDGAR Certifications and Other Assurances

Section VII, Part A, Subpart (1), (a-h):

Other Assurances

Section VII, Part B, Subpart (1): You must submit a copy of the State plan to the State office responsible for the Intergovernmental Review Process if your State implements that review process under Executive Order 12372. [See 34 CFR Part 79]

Tennessee does not implement the Intergovernmental Review Process.

Section VII, Part B, Subpart (2): You must provide a complete and signed ED Form 80-0013 for certifications regarding lobbying; [See 34 CFR Part 82. To download ED Form 80-0013, and the SF LLL Form (Disclosure of Lobbying Activities) referred therein,

See: http://www.ed.gov/fund/grant/apply/appforms/appforms.html]

See signed ED Form 80-0013.

Section VII, Part B, Subpart (3): You must provide a complete and signed Assurance for Non-Construction Programs Form.

[See http://www.ed.gov/fund/grant/apply/appforms/appforms.html]

See signed assurance nonconstruction programs form.

The linked image cannot be displayed. The file may have been moved, renamed, or deleted. Verify that the link points to the correct file and location.

The linked image cannot be displayed. The file may have been moved, renamed, or deleted. Verify that the link points to the correct file and location.

Section VII, Part B, Subpart (4): You must provide a signed assurance that you will comply with the requirements of the Act and the provisions of the State plan, including the provision of a financial audit of funds received under the Act which may be included as part of an audit of other Federal or State programs. [Sec. 122(c)(11)]

See signed EDGAR certification and assurances document.

Section VII, Part B, Subpart (5): You must provide a signed assurance that none of the funds expended under the Act will be used to acquire equipment (including computer software) in any instance in which such acquisition results in a direct financial benefit to any organization representing the interests of the acquiring entity or the employees of the acquiring entity, or any affiliate of such an organization. [Sec. 122(c)(12)]

See signed EDGAR certification and assurances document.

Section VII, Part B, Subpart (6): You must provide a signed assurance that your State will waive the minimum allocation as required in section 131(c)(1) in any case in which the local educational agency is located in a rural, sparsely populated area <u>or</u> is a public charter school operating secondary school career and technical education programs <u>and</u> demonstrates that it is unable to enter into a consortium for purposes of providing services under the Act. [Section 131(c)(2)]

See signed EDGAR certification and assurances document.

Section VII, Part B, Subpart (7): You must provide a signed assurance that your State will provide, from non-Federal sources for the costs the eligible agency incurs for the administration of programs under this Act, an amount that is not less than the amount provided by the eligible agency from non-Federal sources for such costs for the preceding fiscal year. [Sec. 323(a)]

See signed EDGAR certification and assurances document.

Section VII, Part B, Subpart (8): You must provide a signed assurance that your State and eligible recipients that use funds under this Act for in-service and preservice career and technical education professional development programs for career and technical education teachers, administrators, and other personnel shall, to the extent practicable, upon written request, permit the participation in such programs of career and technical education secondary school teachers, administrators, and other personnel in nonprofit private schools offering career and technical secondary education programs located in the geographical area served by such eligible agency or eligible recipient. [Sec. 317(a)]

See signed EDGAR certification and assurances document.

Section VII, Part B, Subpart (9): You must provide a signed assurance that, except as prohibited by State or local law, that an eligible recipient may, upon written request, use funds made available under this Act to provide for the meaningful participation, in career and technical education programs and activities receiving funds under this Act, of secondary school students attending nonprofit private schools who reside in the geographical area served by the eligible recipient. [Sec. 317(b)(1)]

See signed EDGAR certification and assurances document.

Section VII, Part B, Subpart (10): You must provide a signed assurance that eligible recipients that receive an allotment under this Act will consult, upon written request, in a timely and meaningful manner with representatives of nonprofit private schools in the geographical area served by the eligible recipient regarding the meaningful participation, in career and technical education programs and activities receiving funding under this Act, of secondary school students attending nonprofit private schools. [Sec. 317(b)(2)]

See signed EDGAR certification and assurances document.

C. Procedural Suggestions and Planning Reminders

- EDGAR regulations implementing the Drug-Free Workplace Act of 1988 (41 U.S.C. 701 et seq., as amended) are provided in 34 CFR Part 84, "Government-wide Requirements for Drug-Free Workplace (Financial Assistance)." Changes in this Government-wide requirement (adopted in the November 26, 2003 Federal Register Notice) now implement this as a condition of the award. See 34 CFR 84.400.
- EDGAR regulations implementing Executive Orders 12549 and 12689 and Section. 2455 of the Federal Acquisition Regulation are provided in 34 CFR Part 85, "Government-wide Debarment and Suspension (Nonprocurement)." Changes in this Government-wide requirement (adopted in the November 26, 2003 Federal Register Notice) now implement this as a condition of the award. See 34 CFR 85.440. You are also responsible for including a condition in any subgrant and contract that meets the definition for a covered transaction a condition that the lower tier participant must comply with the regulations in part 85. See 34 CFR 85.330.
- Under EDGAR regulations at 34CFR 85.320, your State is responsible for determining whether any of your principals of your covered transactions (i.e. subgrants or contracts) is excluded or disqualified from participating in the transaction. See 34 CFR 85.320. You may decide the method and frequency by which you do so. You may, but are not required to, check the Excluded Parties List System at the following site: http://www.epls.gov/.

PART B: BUDGET FORMS

Section VI, Part B, Subpart (1) ..... Detailed Project Budget

Section VI, Part B, Subpart (2) ..... Flow Chart

Section VI, Part B, Subpart (3) ..... Perkins Funds Distribution

Section VI, Part B, Subpart (4) ..... Reserve Grant Applications

Section VI, Part B, Subpart (5) ..... Reserve Grant Applications

Section VI, Part B, Subpart (6) ..... Reserve Grant Applications

INSTRUCTIONS

On the attached budget tables, you must identify:

I. Title I: Career and Technical Education Assistance to States

Line I.A The amount of Title I funds available under section 112(a).

Line I.B The amount of Title II funds, if any, to be consolidated with Title I funds as described in section 202(a) and (b).

Line I.C The total amount of combined Title I and Title II funds.

Line I.D The percent and amount, if any, slated for eligible recipients under section 112(a)(1).

Line I.D.1 The amount, if any, to be reserved under section 112(c).

Line I.D.1.a The percent and amount reserved for secondary recipients.

Line I.D.1.b The percent and amount reserved for postsecondary recipients.

Line I.D.2 The amount to be made available for eligible recipients for under section 112(a)(1) by the allocation formulas addressed in sections 131 and 132.

Line I.D.2.a The percent and amount slated for secondary recipients.

Line I.D.2.b The percent and amount slated for postsecondary recipients.

Line I.E. The percent and amount to be made available for State leadership under section 112(a)(2).

Line I.E.1 The amount to be made available for services to prepare individuals for non-traditional fields under section 112(a)(2)(B).

Line I.E.2 The amount to be made available to serve individuals in State institutions, as described in section 112(a)(2)(A).

Line I.F The percent and amount to be expended for State administration under section 112(a)(3).

Line I.G The amount to be expended for matching of Federal expenditures for State administration under sections 112(b) and 323.

II. Title II: Tech Prep Programs

Line II.A The amount of funds available under section 201(a).

Line II.B The amount of Title II funds, if any, to be consolidated with Title I funds as described in section 202(a).

Line II.C The total amount of funds to be used for Title II tech-prep programs.

Line II.D The amount of funds to be made available for tech-prep consortia under section 203.

Line II.D.1 The percent of funds to be made available for tech-prep consortia under section 203.

Line II.D.2 The number of tech-prep consortia to be funded.

Line II.E The amount to be expended for State administration under Title II.

Line II.E.1 The percent of funds to be expended for State administration under Title II.

PERKINS IV BUDGET TABLE - PROGRAM YEAR 1

(For Federal Funds to Become Available Beginning on July 1, 2008)

I. TITLE I: CAREER AND TECHNICAL EDUCATION ASSISTANCE TO STATES

Column 1	Column 2
Description	Amount
A. Total Title I Allocation to the State	$ 23,882,364
B. Amount of Title II Tech Prep Funds to Be Consolidated with Title I Fund	$ 2,231,641
C. Total Amount of Combined Title I and Title II Funds to be distributed under section 112 (*Line A + Line B*)	$ 26,114,005
D. Local Formula Distribution (*not less than 85%*) (*Line C x 85%*)	$ 22,196,904
1. Reserve(*not more than 10% of Line D*)	$ 2,219,690
a. Secondary Programs (80% of *Line D*)	$ 1,775,752
b. Postsecondary Programs (20% of *Line D*)	$ 443,938
2. Available for formula allocations (*Line D minus Line D.1)*	$ 19,977,214
a. Secondary Programs (85% of *Line D.2*)	$ 16,980,632
b. Postsecondary Programs (15% of *Line D.2*)	$ 2,996,582
E. Leadership (not more than 10%) (*Line C x 10%)*	$ 2,611,401
a. Nontraditional Training and Employment	($150,000)

Column 1	Column 2
b. Corrections or Institutions	($76,000)
F. State Administration (not more than 5%) (*Line C x 5%*)	$ 1,305,700
G. State Match (from non-federal funds)[1]	$ 1,305,700

PERKINS IV BUDGET TABLE - PROGRAM YEAR 1

(For Federal Funds to Become Available Beginning on July 1, 2008)

II. TITLE II: TECH PREP PROGRAMS

Column 1	Column 2
Description	Amount
A. Total Title II Allocation to the State	$2,231,641
B. Amount of Title II Tech Prep Funds to Be Consolidated with Title I Funds	$2,231,641
1. Did you consolidate Title II funds last year?	We did consolidate
C. Amount of Title II Funds to Be Made Available For Tech-Prep (Line A less Line B)	$0.00
D. Tech-Prep Funds Earmarked for Consortia	$0.00
a. Percent for Consortia (Line D divided by Line C)	0.00%
b. Number of Consortia	0
c. Method of Distribution (check one):	N/A
Formula	N/A
Competitive	N/A
E. Tech-Prep Administration	$0.00
a. Percent for Administration (Line E divided by Line C)	0.00%

NOTE: TENNESSEE HAS CHOSEN TO CONSOLIDATE ALL TECH PREP TITLE II FUNDS INTO TITLE I BASIC GRANT

PROGRAM IMPROVEMENT ALLOCATIONS 2008 - 2009

4/16/2007

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
---	---	---	(Basic Grant times	(Basic Grant times	(Basic Grant times	---	---

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
2008-2009 FY	5-17, TITLE I	2000 CENSUS	85% minus TNBOR)	85% minus TNBOR)	85% minus TNBOR)	GRAND	---
SECONDARY SYSTEM	2000 CENSUS	2005 UPDATE	70%	30%	---	TOTAL FOR	LAST YEAR
TOTAL MONIES	2005 UPDATE	17-May	2000 CENSUS	2000 CENSUS	2008-2009 LEA SHARE	COMBINE	LEA 2007-2008
$16,661,870	5-17 POVERTY	POPULATION	5-17 POVERTY	5-17 POPULATION	OF BASIC GRANT	SYSTEMS	ALLOCATION
--	--	--	$11,663,309	$4,998,561	$16,661,870	2008-2009	$17,079,404
ANDERSON CO	1,326	7,038	$79,671.68	$34,076.34	$113,748	$129,501	$114,751
CLINTON CITY	199	784	$11,956.76	$3,795.94	$15,753	--	$15,831
OAK RIDGE CITY	718	4,082	$43,140.47	$19,764.09	$62,905	--	$63,484
BEDFORD CO	1,430	7,596	$85,920.44	$36,778.05	$122,698	--	$124,734
BENTON CO	687	2,599	$41,277.86	$12,583.75	$53,862	--	$52,611
BLEDSOE CO	545	2,151	$32,745.90	$10,414.64	$43,161	--	$40,497
BLOUNT CO	2,129	13,041	$127,919.31	$63,141.46	$191,061	--	$185,014

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
ALCOA CITY	278	1,247	$16,703.41	$6,037.68	$22,741	--	$21,849
MARYVILLE CITY	645	4,364	$38,754.32	$21,129.46	$59,884	--	$58,064
BRADLEY CO	1,331	9,398	$79,972.10	$45,502.91	$125,475	--	$131,267
CLEVELAND CITY	1,283	5,865	$77,088.06	$28,396.95	$105,485	--	$110,501
CAMPBELL CO	1,943	6,492	$116,743.64	$31,432.74	$148,176	--	$152,018
CANNON CO	416	2,385	$24,995.04	$11,547.61	$36,543	--	$37,180
CARROLL CO	0	0	$0.00	$0.00	$0	CONSORTIUM	$0
HUNTINGDON SSD	266	1,276	$15,982.40	$6,178.09	$22,160	--	$23,469
MCKENZIE SSD	223	1,053	$13,398.78	$5,098.38	$18,497	--	$17,797
HOLLOW ROCK/Bruceton SSD	141	712	$8,471.88	$3,447.34	$11,919	WITH S. CARROLL	$11,327
SO CARROLL CO SSD	72	436	$4,326.06	$2,111.01	$6,437	CONSORTIUM	$6,030
WEST CARROLL CO SSD	319	1,240	$19,166.87	$6,003.79	$25,171	--	$26,585
CARTER CO	1,543	6,618	$92,709.96	$32,042.80	$124,753	--	$119,529
ELIZABETHTON CITY	595	2,019	$35,750.11	$9,775.52	$45,526	--	$43,442

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
CHEATHAM CO	908	7,368	$54,556.47	$35,674.13	$90,231	--	$88,294
CHESTER CO	530	2,713	$31,844.64	$13,135.71	$44,980	--	$44,186
CLAIBORNE CO	1,402	5,157	$84,238.08	$24,968.98	$109,207	--	$106,066
CLAY CO	341	1,229	$20,488.72	$5,950.53	$26,439	--	$24,943
COCKE CO	1,383	4,683	$83,096.48	$22,673.99	$105,770	$127,234	$109,603
NEWPORT CITY	288	859	$17,304.26	$4,159.08	$21,463	--	$22,249
COFFEE CO	759	4,637	$45,603.93	$22,451.27	$68,055	$88,689	$58,264
MANCHESTER CITY	253	1,122	$15,201.31	$5,432.46	$20,634	--	$21,861
TULLAHOMA CITY	760	3,203	$45,664.01	$15,508.17	$61,172	--	$65,054
CROCKETT CO	399	1,954	$23,973.60	$9,460.81	$33,434	$45,557	$33,288
ALAMO	90	406	$5,407.58	$1,965.76	$7,373	--	$7,338
BELLS	61	224	$3,665.14	$1,084.56	$4,750	--	$4,685
CUMBERLAND CO	1,842	7,650	$110,675.14	$37,039.50	$147,715	--	$141,751
DAVIDSON CO	18,674	90,700	$1,122,012.78	$439,148.11	$1,561,161	--	$1,665,678
DECATUR CO	511	1,805	$30,703.04	$8,739.39	$39,442	--	$33,309
DEKALB CO	678	2,960	$40,737.10	$14,331.63	$55,069	--	$54,596

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
DICKSON CO	1,288	8,473	$77,388.48	$41,024.28	$118,413	--	$125,656
DYER CO	584	3,663	$35,089.19	$17,735.39	$52,825	--	$50,660
DYERSBURG CITY	877	3,199	$52,693.86	$15,488.81	$68,183	--	$73,231
FAYETTE CO	979	6,033	$58,822.45	$29,210.37	$88,033	--	$90,419
FENTRESS CO	944	2,911	$56,719.51	$14,094.38	$70,814	--	$52,386
FRANKLIN CO	1,063	6,528	$63,869.53	$31,607.04	$95,477	--	$97,679
GIBSON COUNTY	0	0	$0.00	$0.00	$0	--	$0
GIBSON CO SSD	351	2,655	$21,089.56	$12,854.89	$33,944	--	$37,495
HUMBOLDT CITY	385	1,589	$23,132.43	$7,693.57	$30,826	--	$34,489
MILAN SSD	308	1,769	$18,505.94	$8,565.08	$27,071	--	$29,495
TRENTON SSD	257	1,480	$15,441.65	$7,165.81	$22,607	CONSORTIUM	$22,379
BRADFORD SSD	132	638	$7,931.12	$3,089.05	$11,020	CONSORTIUM	$12,290
GILES CO	931	5,064	$55,938.41	$24,518.70	$80,457	--	$82,815
GRAINGER CO	859	3,583	$51,612.35	$17,348.04	$68,960	--	$68,395
GREENE CO	1,431	7,961	$85,980.52	$38,545.29	$124,526	--	$126,877
GREENEVILLE CITY	630	2,422	$37,853.06	$11,726.76	$49,580	--	$50,369

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
GRUNDY CO	798	2,518	$47,947.21	$12,191.56	$60,139	--	$57,106
Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
---	---	---	(Basic Grant times	(Basic Grant times	(Basic Grant times	---	---
2008-2009 FY	5-17, TITLE I	2000 CENSUS	85% minus TNBOR)	85% minus TNBOR)	85% minus TNBOR)	GRAND	---
SECONDARY SYSTEM	2000 CENSUS	2005 UPDATE	70%	30%	---	TOTAL FOR	LAST YEAR
TOTAL MONIES	2005 UPDATE	17-May	2000 CENSUS	2000 CENSUS	2008-2009 LEA SHARE	COMBINE	LEA 2007-2008
$16,661,870	5-17 POVERTY	POPULATION	5-17 POVERTY	5-17 POPULATION	OF BASIC GRANT	SYSTEMS	ALLOCATION
--	--	--	$11,663,309	$4,998,561	$16,661,870	2008-2009	$17,079,404
ANDERSON CO	1,326	7,038	$79,671.68	$34,076.34	$113,748	$129,501	$114,751
CLINTON CITY	199	784	$11,956.76	$3,795.94	$15,753	--	$15,831

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
OAK RIDGE CITY	718	4,082	$43,140.47	$19,764.09	$62,905	--	$63,484
BEDFORD CO	1,430	7,596	$85,920.44	$36,778.05	$122,698	--	$124,734
BENTON CO	687	2,599	$41,277.86	$12,583.75	$53,862	--	$52,611
BLEDSOE CO	545	2,151	$32,745.90	$10,414.64	$43,161	--	$40,497
BLOUNT CO	2,129	13,041	$127,919.31	$63,141.46	$191,061	--	$185,014
ALCOA CITY	278	1,247	$16,703.41	$6,037.68	$22,741	--	$21,849
MARYVILLE CITY	645	4,364	$38,754.32	$21,129.46	$59,884	--	$58,064
BRADLEY CO	1,331	9,398	$79,972.10	$45,502.91	$125,475	--	$131,267
CLEVELAND CITY	1,283	5,865	$77,088.06	$28,396.95	$105,485	--	$110,501
CAMPBELL CO	1,943	6,492	$116,743.64	$31,432.74	$148,176	--	$152,018
CANNON CO	416	2,385	$24,995.04	$11,547.61	$36,543	--	$37,180
CARROLL CO	0	0	$0.00	$0.00	$0	CONSORTIUM	$0
HUNTINGDON SSD	266	1,276	$15,982.40	$6,178.09	$22,160	--	$23,469
MCKENZIE SSD	223	1,053	$13,398.78	$5,098.38	$18,497	--	$17,797
HOLLOW ROCK/Bruceton SSD	141	712	$8,471.88	$3,447.34	$11,919	WITH S. CARROLL	$11,327

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
SO CARROLL CO SSD	72	436	$4,326.06	$2,111.01	$6,437	CONSORTIUM	$6,030
WEST CARROLL CO SSD	319	1,240	$19,166.87	$6,003.79	$25,171	--	$26,585
CARTER CO	1,543	6,618	$92,709.96	$32,042.80	$124,753	--	$119,529
ELIZABETHTON CITY	595	2,019	$35,750.11	$9,775.52	$45,526	--	$43,442
CHEATHAM CO	908	7,368	$54,556.47	$35,674.13	$90,231	--	$88,294
CHESTER CO	530	2,713	$31,844.64	$13,135.71	$44,980	--	$44,186
CLAIBORNE CO	1,402	5,157	$84,238.08	$24,968.98	$109,207	--	$106,066
CLAY CO	341	1,229	$20,488.72	$5,950.53	$26,439	--	$24,943
COCKE CO	1,383	4,683	$83,096.48	$22,673.99	$105,770	$127,234	$109,603
NEWPORT CITY	288	859	$17,304.26	$4,159.08	$21,463	--	$22,249
COFFEE CO	759	4,637	$45,603.93	$22,451.27	$68,055	$88,689	$58,264
MANCHESTER CITY	253	1,122	$15,201.31	$5,432.46	$20,634	--	$21,861
TULLAHOMA CITY	760	3,203	$45,664.01	$15,508.17	$61,172	--	$65,054
CROCKETT CO	399	1,954	$23,973.60	$9,460.81	$33,434	$45,557	$33,288
ALAMO	90	406	$5,407.58	$1,965.76	$7,373	--	$7,338

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
BELLS	61	224	$3,665.14	$1,084.56	$4,750	--	$4,685
CUMBERLAND CO	1,842	7,650	$110,675.14	$37,039.50	$147,715	--	$141,751
DAVIDSON CO	18,674	90,700	$1,122,012.78	$439,148.11	$1,561,161	--	$1,665,678
DECATUR CO	511	1,805	$30,703.04	$8,739.39	$39,442	--	$33,309
DEKALB CO	678	2,960	$40,737.10	$14,331.63	$55,069	--	$54,596
DICKSON CO	1,288	8,473	$77,388.48	$41,024.28	$118,413	--	$125,656
DYER CO	584	3,663	$35,089.19	$17,735.39	$52,825	--	$50,660
DYERSBURG CITY	877	3,199	$52,693.86	$15,488.81	$68,183	--	$73,231
FAYETTE CO	979	6,033	$58,822.45	$29,210.37	$88,033	--	$90,419
FENTRESS CO	944	2,911	$56,719.51	$14,094.38	$70,814	--	$52,386
FRANKLIN CO	1,063	6,528	$63,869.53	$31,607.04	$95,477	--	$97,679
GIBSON COUNTY	0	0	$0.00	$0.00	$0	--	$0
GIBSON CO SSD	351	2,655	$21,089.56	$12,854.89	$33,944	--	$37,495
HUMBOLDT CITY	385	1,589	$23,132.43	$7,693.57	$30,826	--	$34,489
MILAN SSD	308	1,769	$18,505.94	$8,565.08	$27,071	--	$29,495
TRENTON SSD	257	1,480	$15,441.65	$7,165.81	$22,607	CONSORTIUM	$22,379

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
BRADFORD SSD	132	638	$7,931.12	$3,089.05	$11,020	CONSORTIUM	$12,290
GILES CO	931	5,064	$55,938.41	$24,518.70	$80,457	--	$82,815
GRAINGER CO	859	3,583	$51,612.35	$17,348.04	$68,960	--	$68,395
GREENE CO	1,431	7,961	$85,980.52	$38,545.29	$124,526	--	$126,877
GREENEVILLE CITY	630	2,422	$37,853.06	$11,726.76	$49,580	--	$50,369
GRUNDY CO	798	2,518	$47,947.21	$12,191.56	$60,139	--	$57,106

Definitions of Student Populations

On page 43, you must provide the career and technical education (CTE) student definitions that you will use for the secondary and postsecondary/adult core indicators of performance, e.g., “CTE participants” and “CTE concentrators.” These are the students on which you will report data annually to the Secretary under section 113(c)(1)-(2) of the Act.

Identification of Measurement Definitions/Approaches

In Columns 2 and 3 of the Final Agreed Upon Performance Levels (FAUPL) forms on pages 44-48, you must provide your valid and reliablemeasurement definitions and approaches, respectively, for each of the core indicators of performance required under section 113(b) of the Act. Each definition must contain a description of the numerator (the number of individuals achieving an outcome) and a denominator (the number of individuals seeking to achieve an outcome). As discussed above in Part A, Section IV, A.3, based on our non-regulatory guidance, we have pre-populated the FAUPL form with the measurement definitions and approaches for the core indicators to measure student attainment of challenging academic content standards and student academic achievement standards in reading/language arts and mathematics under the ESEA (1S1 and 1S2, respectively) and student graduation rates under the ESEA (4S1). A State may choose to propose other student definitions and measurement approaches, but it would have to describe in its new State plan how it’s proposed definitions and measures would be valid and reliable.

Baseline Data

In Column 4 of the FAUPL forms, you must provide baseline data, using data for the most recently completed program year (July 1, 2005 - June 30, 2006), on the performance of career and technical education students on each of the core indicators of performance, except that, for the indicators for which your State must use your State's standards, assessments, and graduation rates adopted under Title I of the ESEA, if your State chooses to use its AMOs and targets under the ESEA, you will not need to submit baseline data. The Department will use your baseline data as a starting point for reaching agreement with you on the core indicators of performance for the first two program years under section 113(b)(3)(iii) of the Act, except that States that submit a one-year transition plan need to provide baseline data only for the core indicators of performance as provided below:

Secondary Level - 8 Indicators

Indicators	Indicators Description	Transition Plan	Six-Year Plan
1S1	Academic Attainment - Reading/Language Arts	X	X
1S2	Academic Attainment - Mathematics	X	X
2S1	Technical Skill Attainment	Not required	X
3S1	Secondary School Completion	Not required	X
4S1	Student Graduation Rates	X	X
5S1	Secondary Placement	Not required	X
6S1	Nontraditional Participation	Not required	X
6S2	Nontraditional Completion	Not required	X

Postsecondary/Adult Level - 6 Indicators

jtsIndicators	Indicators Description	Transition Plan	Six-Year Plan
1P1	Technical Skill Attainment	Not required	X
2P1	Credential, Certificate, or Diploma	Not required	X
3P1	Student Retention or Transfer	Not required	X
4P1	Student Placement	Not required	X
5P1	Nontraditional Participation	Not required	X

jtsIndicators	Indicators Description	Transition Plan	Six-Year Plan
5P2	Nontraditional Completion	Not required	X

Performance Levels

In Columns 5 and 6 of the FAUPL forms, you must provide proposed levels of performance for each of the core indicators of performance for the first two program years (July 1, 2007 - June 30, 2008 and July 1, 2008 - June 30, 2009) as required under section 113(b)(3)(ii) of the Perkins Act, except that, for the indicators for which the State must use its State's standards, assessments, and graduation rates adopted under Title I of the ESEA, a State that chooses to use its AMOs or targets under the ESEA will only have to confirm this information with its OVAE Regional Accountability Specialist. At a State's request, the Regional Accountability Specialist will pre-populate the forms in Part C with the State's AMOs or targets for the 2007-08 and 2008-09 program years before sending the forms to you to finish completing. States that submit a one-year transition plan need to provide performance levels only for the core indicators of performance listed in the chart above.

State Confirmation of Final Agreed Upon Performance Levels

After you reach agreement with the Department on your State's final agreed upon adjusted performance levels for the first two program years, you will be asked to confirm these levels via e-mail submission of your State's FAUPL form. Your State's final agreed upon performance levels for the first two program years for the ESEA indicators will be incorporated into your State plan and your July 1, 2007 Perkins grant award. Your State's final agreed upon performance levels for the first two program years for all other for all other indicators will be incorporated into your State plan and your July 1, 2008 Perkins grant award.

I. Student Definitions

A. Secondary Level

Participant: A secondary student who has earned one (1) or more credits in any career and technical (CTE) Career Cluster.

Concentrator: A secondary student who completes three (3) or more courses in a single program of study.

B. Postsecondary

Postsecondary - degree granting institutions

Participant- A postsecondary/adult student who is enrolled on the fourteenth day of the freshman fall term in any CTE Career Cluster.

Completer - A postsecondary student who gains an industry-recognized associate degree or other award within two years beyond the concentrator cohort year.

Concentrator -A postsecondary student who is designated as a sophomore, with 30 college-level credits, during the fall semester of the cohort year in a defined CTE program of study that terminates in an industry-recognized associate degree or other award.

Postsecondary - Certificate/Diploma programs

The Tennessee Colleges of Applied Technology only offer CTE programs that are designed to prepare the student for a job-specific proficiency level and the opportunity to earn an industry-recognized credential, certificate or diploma. All academic instruction is integrated within the occupational training program. Summarily, all students who enroll in the preparatory CTE programs in a Technology Center are considered "participants" and "concentrators". All 27 Tennessee Technology Centers are clock-hour based institutions; students earn clock hours rather than credit hours. The modified definition for the Tennessee Technology Centers is as follows:

Participant- A postsecondary/adult student enrolled in a preparatory program of study offered by the Tennessee College of Applied Technology.

Completer - A student who demonstrates competencies for a specific job proficiency level and receives a preparatory certificate or diploma conferred by the institution.

Concentrator - A postsecondary/adult student enrolled in a TCAT program of study leading to an industry-recognized credential, a preparatory certificate or diploma who completes more than 20% of scheduled hours in the first term.

STATE LEVELS OF PERFORMANCE FOR THE PERKINS IV CORE INDICATORS:

SECONDARY LEVEL

STATE NAME: TENNESSEE

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10
Core Indicator	Measurement Definition	Measurement Approach	Final Agreed Upon Baseline	Year 4 7/1/10 - 6/30/11	Year 5 7/1/11- 6/30/12	Year 6 7/1/12- 6/30/13	Year 7 7/1/13- 6/30/14	Year 8 7/1/14- 6/30/15	Year 9 7/1/15- 6/30/16

1S1 Academic Attainment in Reading/ Language Arts	Numerator: Number of CTE concentrators who have met the proficient or advanced level on the Statewide high school reading/language arts assessment administered by the State under Section 1111(b)(3) of the Elementary and Secondary Education Act (ESEA) as amended by the No Child Left behind Act based on the scores that were included in the State's computation of adequate yearly progress (AYP) and who, in the reporting year, left secondary education.Denominator: Number of CTE concentrators who took the ESEA assessment in reading/language arts whose scores were included in the State's computation of	State and Local Administrative Records	91% (AY: 10-11, 09-10, 08-09, 07-08) 71 (AY: 12-13, 11-12)	L: 89.37 %	*P: 74.00%*	*P: 80.00%*	*L: 70.00%*	*P: 61.45*	*P: 63.00*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10
	AYP and who, in the reporting year, left secondary education.								

1S2 Academic Attainment in Mathematics	Numerator: Number of CTE concentrators who have met the proficient or advanced level on the Statewide high school mathematics assessment administered by the State under Section 1111(b)(3) of the Elementary and Secondary Education Act (ESEA) as amended by the No Child Left behind Act based on the scores that were included in the State's computation of adequate yearly progress (AYP) and who, in the reporting year, left secondary education.Denominator: Number of CTE concentrators who took the ESEA assessment in mathematics whose scores were included in the State's computation of AYP and who, in the reporting	State and Local Administrative Records	83% (AY: 10-11, 09-10, 08-09, 07-08) 61(AY: 12-13, 11-12)	L: 85.00 %	*P: 63.00%*	*P: 70.00%*	*L: 54.55%*	*L: 58.00%*	*P: 58.00*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10
	year, left secondary education.								
2S1 Technical Skill Attainment	Numerator: Number of 12th grade concentrators who have mastered industry validated career and technical proficiency standards in the reporting year.Denominator: Total number of12th grade concentrators who have left the system in the reporting year.	State and Local Administrative Records	85% (AY: 10-11, 09-10, 08-09, 07-08) 75(AY: 12-13, 11-12)	L: 88.37 %	*P: 78.00%*	*P: 78.50%*	*L: 89.96%*	*L: 94.00%*	*P: 93.00*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10
3S1 School Completion	Numerator: Number of 12th grade concentrators who attained a Tennessee high school diploma, a state certificate, or a GED. 91%Denominator: Number of 12th grade concentrators who have left the system in the reporting year.	State and Local Administrative Records	87.42 %	L: 88.47 %	*P: 89.00%*	*P: 89.50%*	*L: 91.00%*	*L: 97.00%*	*P: 95.50*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10
4S1 Student Graduation Rates	Numerator: Number of CTE concentrators who, in the reporting year, were included as graduated in the State's computation of its graduation rate as described in Section 111(b)(2)(C)(vi) of the ESEA.Denominator: Number of CTE concentrators who, in the reporting year, were included in the State's computation of its graduation rate as defined in the State's Consolidated Accountability Plan pursuant to Section 1111(b)(2)(C)(vi) of the ESEA.	State and Local Administrative Records	79.50 %	L: 81.50 %	*P: 90.00%*	*P: 90.00%*	*L: 90.93%*	*L: 96.00%*	*P: 95.00*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10
5S1 Placement	Numerator: Number of concentrators who graduated in the reporting year and who were placed in postsecondary or advanced training, employment or military within one year of graduation.Denominator: Number of concentrators who graduated in the reporting year.	State and Local Administrative Records	87.30 %	L:90.00%	*P: 90.00%*	*P: 90.00%*	*L: 90.00%*	*L: 91.00%*	*P: 91.00*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10
6S1 Nontraditional Participation	Numerator: Number of CTE participants from underrepresented gender groups who participated in a course that leads to employment in nontraditional fields in the reporting year.Denominator: Number of CTE participants who participated in a course that leads to employment in nontraditional fields in the reporting year.	State and Local Administrative Records	18.35 %	L:18.55%	*P: 25.00%*	*P: 25.00%*	*L: 27.00%*	*L: 32.00%*	*P: 32.00*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10
6S2 Nontraditional Completion	Numerator: Number of CTE concentrators from underrepresented gender groups who participated in a course that leads to employment in nontraditional fields in the reporting year.Denominator: Number of CTE concentrators who participated in a course that leads to employment in nontraditional fields in the reporting year.	State and Local Administrative Records	21.77%	L:21.97%	*P: 25.00%*	*P: 25.00%*	*L: 27.00%*	*L: 32.00%*	*P: 50.00*

*Key:*B = initial baseline; L = State-adjusted performance level; A = actual performance; P = proposed performance

STATE LEVELS OF PERFORMANCE FOR THE PERKINS IV CORE INDICATORS:

POSTSECONDARY LEVEL

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11
Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9				
Core Indicator	Measurement Definition	Measurement Approach	Final Agreed Upon Baseline	7/1/09-6/30/10	7/1/10-6/30/11	7/1/11-6/30/12	7/1/12-6/30/13	7/1/13-6/30/14	7/1/14-6/30/15	7/1/15-6/30/16
1P1 Technical Skill Attainment	Numerator: During the reporting year, the number of CTE completers who passed, on the first administration, major field assessments that are aligned with industry-recognized standards, if available and appropriate.Denominator: Number of CTE concentrators	State and Local Administrative Records	84.00%	L: 85.00%	L: 85.25%	*P: 85.50%*	*P: 85.75%*	*L: 90.00*	*L: 90.00*	*P: 90.00*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11
2P1 Credential. Certificate, or Degree	Numerator: Number of CTE concentrators Denominator: Number of CTE completers who took major field assessments for the first time during the reporting year.	State and Local Administrative Records	40.32%	L:40.57%	L:40.82%	*P:41.82%*	*P:42.82%*	*L:42.82*	*L:42.82*	*P:43.00*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11
3P1 Student Retention or Transfer	Numerator: Number of CTE concentrators who remained enrolled in their original community college, completed a degree or award at their original community college, or transferred to another 2- or 4-year postsecondary institution at the time of the subsequent fall after the sophomore concentrator year.Denominator: Number of CTE concentrators in the fall of the sophomore cohort year.	State and Local Administrative Records	63.75%	L:64.30%	L:64.55%	*P:64.80%*	*P:65.05%*	*L:67.00*	*L:67.00*	*P:67.00*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11
4P1 Student Placement	Numerator: Number of CTE concentrators who received an industry-recognized degree or award, and reported according to THEC's performance measures reporting requirements were placed in employment, enrolled in postsecondary education, or serves in the military.Denominator: Number of CTE concentrators who graduated from the community college at the end of the reporting year.	Local Administrative Records	82.75%	L:83.00%	L:83.25%	*P:83.50%*	*P:83.75%*	*L:86.00*	*L:86.00*	*P:86.00*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11
5P1 Nontraditional Participation	Numerator: Number of CTE participants from underrepresented gender groups who participated in a program that leads to employment in nontraditional fields during the reporting year.Denominator: Number of CTE participants who participated in a program that leads to employment in nontraditional fields during the reporting year.	State and Local Administrative Records	24.53%	L:24.78%	L:25.03%	*P:25.28%*	*P:25.53%*	*L:26.00*	*L:26.00*	*P:26.00*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11
5P2 Nontraditional Completion	Numerator: Number of CTE concentrators from underrepresented gender groups who completed a program that leads to employment in nontraditional fields by the end of two years subsequent to the fall of the sophomore cohort year.Denominator: Number of CTE concentrators from underrepresented gender groups who participated in a program that leads to employment in nontraditional fields in the fall of the sophomore cohort year.	State and Local Administrative Records	44.75%	L:45.00%	L:45.25%	*P:45.50%*	*P:45.75%*	*L:45.75*	*L:45.75*	*P:45.75*

STATE NAME: TENNESSEE

STATE LEVELS OF PERFORMANCE FOR THE PERKINS IV CORE INDICATORS: ADULT LEVEL

STATE NAME: TENESSEE

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11
Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9				
Core Indicator	Measurement Definition	Measurement Approach	Final Agreed Upon Baseline	7/1/09-6/30/10	7/1/10-6/30/11	7/1/11-6/30/12	7/1/12-6/30/13	7/1/13-6/30/14	7/1/14-6/30/15	7/1/15-6/30/16

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11
1A1 Technical Skill Attainment	Numerator: Number of student completers within the reporting year who passed a licensure or certification exam. Denominator: Number of student completers within the reporting year who took a certification or licensure exam.	COE Accreditation Annual Report for Licensure Pass Rates (Third Party Conferred)	84.75%	L:85.00%	L:85.25%	*P:96.93%*	*P: 97.00%*	*97.05%*	*97.10%*	*97.1*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11
2A1 Credential. Certificate, or Degree	Numerator: Number of students who receive a certificate or diploma within the reporting year.Denominator: Number of students who enrolled during the reporting year minus the number of students who continued into the next reporting year, known as calculated enrollment.	COE Accreditation Annual Report for Completion Rates (Award Conferred)	64.45%	L:64.70%	L:64.95%	*P:71.85%*	*P:72.10%*	*72.35%*	*72.60%*	*72.6*

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11
Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9				

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11
Core Indicator	Measurement Definition	Measurement Approach	Final Agreed Upon Baseline	7/1/09-6/30/10	7/1/10-6/30/11	7/1/11-6/30/12	7/1/12-6/30/13	7/1/13-6/30/14	7/1/14-6/30/15	7/1/15-6/30/16
1A1 Technical Skill Attainment	Numerator: Number of student completers within the reporting year who passed a licensure or certification exam. Denominator: Number of student completers within the reporting year who took a certification or licensure exam.	COE Accreditation Annual Report for Licensure Pass Rates (Third Party Conferred)	84.75%	L:85.00 %	L:85.25 %	*P:96.93 %*	*P: 97.00%*	*97.05%*	*97.10%*	*97.1*

2A1 Credential. Certificate, or Degree	Numerator: Number of students who receive a certificate or diploma within the reporting year.Denominator: Number of students who enrolled during the reporting year minus the number of students who continued into the next reporting year, known as calculated enrollment.	COE Accreditation Annual Report for Completion Rates (Award Conferred)	64.45%	L:64.70 %	L:64.95 %	*P:71.85 %*	*P:72.10 %*	*72.35%*	*72.60%*	*72.6*

3A1 Student Retention or TransferNumerator: Number of students who remained enrolled in the institution or transferred to another 2- or 4-year postsecondary institution during the reporting year and who were enrolled in postsecondary education in the previous reporting year.Denominator: Number of students who were enrolled in the previous reporting year and who did not earn an industry-recognized credential, a certificate, or diploma in the previous reporting year.TBR Enrollment Report data submitted to TBR Office of Data and Statistics53.75%L:54.00%L:54.25%*P:54.50%P:54.75%55.00%55.25%55.25*

4A1 Student PlacementNumerator: Number of CTE completers during the reporting year who were placed in gainful employment, entered the military, or continued their education in postsecondary advanced studies.Denominator: Number of completers during the reporting year who are available for placement.COE Accreditation Annual Report for Placement Rates (Performance Funding Guidelines)80.75%L:81.00%L:81.25%*P:81.50%P: 81.75%82.00%82.25%82.25*

5A1 Nontraditional ParticipationNumerator: Number of students in underrepresented gender groups who participate in nontraditional programs during the year.Denominator: Number of students in underrepresented gender groups who participate in nontraditional programs during the year.S.I.S. Data U.S. Department of Labor Guidelines9.65%L:9.90%L:10.15%*P:10.40%P:10.65%10.90%11.15%11.15*

5A2 Nontraditional CompletionNumerator: Number of students from underrepresented gender groups who completed a program for a nontraditional occupation during the reporting year.Denominator: Number of students from underrepresented gender groups who participate in a program for nontraditional occupations during the reporting year.S.I.S. Data U.S. Department of Labor Guidelines TBR Enrollment Reports44.75%L:45.00%L:45.25%*P:45.50%P:45.75%46.00%46.25%46.25*

*Key:*B = initial baseline; L = State-adjusted performance level; A = actual performance; P = proposed performance levels

---

[1] The eligible agency must provide non-Federal funds for State administration of its Title I grant in an amount not less than the amount it provided in the preceding year.

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

* Sec. 102(b)(D)(iii) of WIOA

A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

The State Rehabilitation Council (SRC) is established in Section 105 of the Rehabilitation Act of 1973, as amended (Act), and 34 CFR §361.16.17 of its implementing regulations. The SRC gives advice to and works in partnership with the Division of Rehabilitation Services (referred to as "the Division" throughout this report) including input on the state plan.

I. The SRC strongly recommends that the Program develops and implements marketing strategies to increase statewide awareness of VR services for businesses with hiring opportunities for individuals with disabilities.

RESPONSE: As the Division strategically implements WIOA, business will become more of a customer of the Vocational Rehabilitation Program. This will include studying the best marketing practices for new and existing services. The 17 Community Rehabilitation Training Centers and the Training Center at Smyrna will be involved in those strategies.

II. SRC encourages the Division to continue to provide opportunities for education to students, family members, and Local Education Agencies (LEA's) regarding vocational rehabilitation and other services.

RESPONSE: The Division will continue implementation of PETS services through a phased approached beginning phase I with the Jackson/Madison School system. The Division is planning for full statewide implementation following the release of the final Federal Regulations in spring of 2016.

III. SRC encourages the administration to continue reviewing available resources related to Order of Selection and the ability to serve more individuals with disabilities.

RESPONSE: The Division continues its review of all available resources in respect to the order of selection and the new language in the law.

IV. SRC commends the achievement of exceeding the Program's production closure goals.

RESPONSE: The Division remains committed to providing quality services that lead to competitive integrated employment. As one of the core partners in WIOA, the Division is dedicated to assisting Tennessee in having a 21st Century Workforce.

V. SRC recommends that, due to the current vacancy rate of staff in direct client services, the Division move toward fully staffing these positions to ensure continued increases in successful consumer employment outcomes.

RESPONSE:As the Division moves forward with implementation of WIOA, the personnel needs of the Vocational Rehabilitation Program will be continuously evaluated.

VI. SRC commends the Program for the development of the Business Unit and strongly recommends fully staffing this unit and expanding national and statewide business partnerships.

RESPONSE: The Division is continuing the development of the Business Services Unit. WIOA establishes business as a customer of the Vocational Rehabilitation Program, therefore the Business Services Unit will take a larger role in service delivery. The Division continues to participate in the Talent Acquisition Portal (TAP), a searchable database for clients and employers. In addition, Tennessee VR participates in the National Employment Team (NET) sponsored by the Council of Administrators of Vocational Rehabilitation (CSAVR). The NET gives access to national business partnerships. The SENET, is specific to the southeast and increases statewide business partnerships.

VII. Due to council structure and bylaw requirements, the SRC recommends that all SRC membership nominations be reviewed and processed within six (6) months.

RESPONSE:The Division will continue its efforts to work with the SRC to meet both internal and external deadlines. The Division would like to express its appreciation to the council for providing feedback and hopes it too will be mindful of providing information to the Division in a timely manner.

VIII. The VR & SRC FY2015 Annual Report was reviewed and edited by the DHS Communications staff prior to it being forwarded to the Offices of the DHS Commissioner, the Governor and the RSA Commissioner. The SRC recommends that the VR Services Portion of the Tennessee Combined State Plan be formally reviewed and edited as well to ensure a professional quality document is presented for inclusion in the combined state plan.

RESPONSE: The Department of Human Services strives to present all documents that are professional in quality.

Input provided by the Council for the 2018 modification of the combined state plan included continued support for the Council's original recommendations and provided the following new input:

1. As the Division has thus far not achieved the goal established in the 2016 Combined State Plan to increase successful employment outcomes by 2% or more during each of the four years of the plan, the SRC requests that the Division conduct a review of the program to identify potential causes for the decline in successful employment outcomes. The SRC further requests to receive a report from the Division regarding the findings to enable the SRC and the Division to work together to identify methods for meeting or exceeding this goal during the remainder of this Combined State Plan period.

RESPONSE: The Division remains committed to providing quality services that lead to competitive integrated employment. As one of the core partners in WIOA, the Division is dedicated to assisting Tennessee in having a 21st Century Workforce. As a result, the Division has been increasing its focus on looking at where and how human and other resources have traditionally been allocated to determine the best way to make adjustments to increase its community outreach with its partners along with reviewing its

overall organizational structure to reach more individuals, including those potentially eligible Pre-ETS participants. It is anticipated that the long term effect will be a program that is agile and more readily responsible to its customers and advocates in support of the needs of both the individuals that it serves and the business that ultimately hire those customers in highly competitive positions in an integrated setting.

2. SRC commends the Division for providing recent joint trainings with stakeholders (TennCare Managed Care Organizations, Community Rehabilitation Providers and VR Staff) to discuss Employment Community First CHOICES program (ECF) and clarify roles and responsibilities.

RESPONSE: Collaborating with other state departments and programs, like the state Medicaid agency, that provide similar services to shared customers is an integral component of the state's strategy to fulfilling its commitment to providing quality services that lead to competitive integrated employment. Further, the Division continues to explore both traditional and non-traditional partnership opportunities that not only allow for a broader base of collaboration, but just as importantly, the blending and braiding of funding resources to improve the efficiency and effectiveness of service delivery by all partners.

3. SRC commends the Division for the recent implementation of a statewide Pre-Employment Transition Services (Pre-ETS) team comprised of Pre-ETS Specialists and Field Supervisors. As there continues to be somewhat limited participation and ongoing confusion regarding the provision of these services, both for vendors of the services as well as the schools, the SRC encourages the Division to assist this team in providing joint trainings for these services as done with the ECF CHOICES program.

RESPONSE: The Division will continue its efforts in the implementation of the of a statewide Pre-Employment Transition Services (Pre-ETS) team comprised of Pre-ETS Specialists and Field Supervisors. This implementation will include both internal staff training and external training for local education agencies, vendors and other stakeholders. The Division has already completed a joint training for VR and DOE staff on the MOU. The designated staff from VR and DOE developed a joint training to present to staff from both agencies and outside stakeholders. In addition to training and adding new staff, the Division is reaching out to our contract partners to seek input on lessons learned with the hope that we along with our partners and the Local Education Authorities (LEAs) can build upon what is working and develop strategies for what is not meeting our expectations through peer guided information sharing.

4. SRC commends the Division for making changes in the Letters of Agreement (LOA) to improve the ease of use for community providers in applying for the LOA and for streamlining the services reporting process.

RESPONSE: The Division remains committed to providing quality services that lead to competitive integrated employment. Part of that commitment involves a much deeper review of all procurement methods, including LOAs, to make improvement in efficiency. The Division anticipates that the end result will be more streamlined processes, and increased accountability that leads to improved services in support of the mission and ultimately those we serve.

5. The SRC highly recommends that the VR program continue to push toward a method and/or means in receiving customer feedback. Once returned, turn it into actionable steps/initiatives in order to improve client satisfaction.

RESPONSE: Receiving feedback from customers is a critical component of the state's continuous improvement efforts and committed to providing quality services that lead to competitive integrated employment. The Division will continue to engage the resources of the Quality Improvement and Strategic Solutions unit within the Department of Human Services (DHS) to improve channels and methods for receiving feedback from our customers, advocates, businesses, partners and the communities that we serve as well as explore ways to better analyze that feedback that make it more actionable in order to improve the Division's agility in the way it provides services.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

The State unit's response is included with the SRC's input in the response to question 1 in this section.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

The State unit's explanations for rejecting any of the SRC's input is included the response to question 1 in this section.

B. REQUEST FOR W AIVER OF STATEWIDENESS

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. A LOCAL PUBLIC AGENCY W ILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED W ITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE W AIVER REQUEST;

The Division requests a waiver of state wideness in order to maintain thirty Third Party Agreements with thirty-five (LEAs). These Third Party Agreements are designed to provide enhanced and concentrated services to Transition School to Work students/clients covered by the agreements. The Division has a contract with each entity that is consistent with Federal regulations (34 CFR § 361.26) and includes the following provisions:

1. The vocational rehabilitation services to be provided are identified in Section A. Scope of Services in each contract (Each contract has been submitted separately to RSA to provide the written assurances requested for this attachment);

2. The LEA assures that non-Federal funds are made available to the Division by committing to their maintenance of effort in Section E.13 of the contract;

3. The LEA assures that the Division's approval is required before services are provided with the Division's counselor determining eligibility for each client served;

4. The LEA assures, through the Division's vocational rehabilitation counselors, that all other state plan requirements, including the Order of Selection policy, are applied to persons receiving services through the agreement; and

5. The LEA assures that reasonable accommodations will be provided. A list of the LEA contracts is provided below:

• Anderson County Schools

• Bledsoe County Schools

• Blount County Schools

• Carter County Schools

• Johnson County Schools

• Clarksville/Montgomery County Schools

• Cocke County Schools

• Dyserburg City Schools

• Elizabethton City Schools

• Greene County/ Greenville City Schools

• Hamblen County Schools

• Henderson County Schools

• Humboldt City, Trenton Special School District, Milan Special District

• Jackson/Madison County Schools

• Kingsport City Schools

• Knox County Schools

• Lauderdale County Schools

• Loudon County Schools

• McMinn County Schools

• McNairy County Schools

• Metro Nashville Public Schools

• Polk County Schools

• Putnam County Schools

• Sequatchie County Schools

• Shelby County Schools

• TN School for the Blind

• TN School for the Deaf

• Tullahoma City Schools

• Unicoi County Schools

• Warren County Schools

• Washington County Schools

In fiscal year 2014 the division changed the services offered under the TSW agreements. These new agreements provide more innovative services to the LEAs and the students.

While the Division provides transition services to all LEAs throughout the state, these Third Party Agreements enable the provision of an expanded and more intense transition service to students/clients resulting from the inclusion of Transition Case Managers, job coaches, transition coaches, and work place readiness specialists that would not otherwise be available to work with the vocational rehabilitation clients. These agreements enable the Division to have a greater presence within the schools and act as a stronger resource to the LEAs in the provision of transition services. The Division will continue to make efforts to increase the number of Third Party Agreements.

Over the last two years, the Division has expanded contractual arrangements that have increased coverage across the state. These expansions include new LEA contracts in the following areas:

• Germantown Municipal Schools

• Chester County Schools

• Hardeman County Schools

• Haywood County Schools

• Grundy County Schools

• Williamson County Schools

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

All of the appropriate information is included in the response to question 1of this section.

3. ALL STATE PLAN REQUIREMENTS W ILL APPLY

Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

All of the appropriate information is included in the response to question 1of this section.

C. COOPERATIVE AGREEMENTS W ITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEW IDE WORKFORCE DEVELOPMENT SYSTEM.

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

The Division has interagency cooperation, collaboration, and coordination with other state and local entities that are not components of the Statewide Workforce Investment System.

The Division works in cooperation with the following federal, state, and local agencies and programs to provide services for individuals with significant disabilities:

1. The Department of Children's Services for youth-The Program is currently meeting with DCS state office staff to determine how to blend DCS Independent Living Services with VR program services. DCS state office staff has toured the TRC at Smyrna to learn more about the services provided at the TRC. The DCS Independent Living Coordinators statewide have an annual meeting. The VR Program has offered to host the 2016 spring meeting of the DCS Independent Living Coordinators. During that meeting, all Independent Living Coordinators will tour the facility in order to assist in a plan for coordination of services.

2. The Department of Health in providing services to individuals with Traumatic Brain Injury (TBI);

3. Post-secondary school systems and their governing bodies;

4. The Department of Education and Local Education Agencies for individuals who are transitioning from school to work.

5. The Department of Corrections for individuals released from state correctional facilities;

6. The Tennessee Board of Probation and Parole for individuals released from state correctional facilities and monitored by the Board.

7. Local city police, county sheriffs and judge's programs for individuals being released from jails or on probation or trial diversion;

8. The Department of Human Services Family Assistance and Child Support Division for individuals participating in services under the Temporary Assistance for Needy Families (TANF) program;

9. The Department of Mental Health and Substance Abuse Services for individuals with mental illness and substance related disorders;

10. The Department of Intellectual and Developmental Disabilities for individuals with intellectual and developmental disabilities;

11. University of Tennessee, Center for Literacy, Education and Employment for marketing to businesses the services provided by the Division, to recruit businesses to hire the Division's clients and to provide staff training and development and consultation services for community supported employment service providers;

12. 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, Special Technology Access Center, East Tennessee Technology Access Center and other collaborative entities of the Division;

13. Tennessee Works for employment partnerships and collaborative efforts to increase access to meaningful work and internet-based information.

14. Community Rehabilitation Agencies of Tennessee which administers the Tennessee State Use Program, directs government procurement toward organizations serving individuals with disabilities.

15. Council on Developmental Disabilities that promotes public policies to increase and support the inclusion of individuals with developmental disabilities in their communities and works with public and private groups across the State to find necessary supports for individuals with disabilities and their families, so that they may have equal access to public education, employment, housing, health care, and all other aspects of community life.

16. Tennessee Council for the Deaf and Hard of Hearing and Centers for the Deaf and Hard of Hearing and Deaf-Blind that operate in six communities and provide interpreter services consultation.

17. Tennessee Technology Access Programs that operate in five communities and provide assistive technology services and evaluations. These programs provided the contracted services with the Program within the Division that administers activities described in section 4 of the Assistive Technology Act.

18. 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.

19. Community Rehabilitation Providers throughout the state that provide rehabilitation services under a Letter of Agreement.

20. In addition to the MOUs listed above, the Division has entered into an MOU with the State Medicaid agency, TennCare. State Medicaid - the Division of TennCare for the Employment and Community First CHOICES program that provides long-term services and supports, including employment services, to individuals with intellectual and developmental disabilities.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

Information regarding this question is included with the response to question 1 in this section.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE UNITED STATES DEPARTMENT OF AGRICULTURE;

Information regarding this question is included with the response to question 1 in this section.

4. NONEDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

Information regarding this question is included with the response to question 1 in this section.

5. STATE USE CONTRACTING PROGRAMS.

Information regarding this question is included with the response to question 1 in this section.

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. DSU'S PLANS

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

The Division maintains an ongoing interagency agreement with the Tennessee Department of Education, Tennessee Department of Children’s Services, Tennessee Department of Finance and Administration, Bureau of TennCare, Department of Intellectual and Developmental Disabilities, Tennessee Department of Health, Tennessee Department of Mental Health and Substance Abuse Services and Tennessee Department of Corrections. The agreement, along with the Division’s policy manual and Standard Procedures Directives, outlines the plans, policies and procedures for coordination with education officials to facilitate the participation of the Division staff in transition planning and the referral of students with disabilities to the Division for a determination of eligibility for VR services.

The DSU entered into an exclusive Interagency Agreement with the Department of Education in October, 2017. The Agreement lays out the Purpose of the Agreement, VR responsibilities, DOE responsibilities, and mutual responsibilities. We were aided by WINTAC, an RSA technical assistance contractor. Training has begun across the state at the Special Education Study Councils and is currently being provided at the Partners in Education Conference, February 6-8, 2018.

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 Division’s staff is invited and to the extent possible participates in these IEP meetings.

The Division has been under an Order of Selection since 2001. Under the current Order, the Division is able to provide direct services to those eligible individuals in Priority Category 1 and Priority Category 2. The Division was able to open Priority Category 2

effective September 30, 2012. There was a release of clients from the waiting list in Priority Category 3 on October 1, 2013. From January 2015-March 2015 all PCs were closed for the provision of new services. This was a brief closing and Priority Categories 1 and 2 were re-opened in March 2015. The opening and release of clients from the waiting list allows for the provision of direct services to significantly more students with disabilities. The Division provides information and referral services to help all applicants find services through other agencies and entities. The inclusion of Pre-Employment Transition Services (Pre-ETS) will allow for the provision of the five stated Pre-ETS services for those students with a disability who are eligible or potentially eligible for VR services.

The IEP team, which should include the Division's staff when invited and when available, parent and student, determines that the student should be referred for VR services. The Division's staff should inform the student and parents, preferable at the IEP meeting, the purpose of the vocational rehabilitation program. VR Staff make every effort to attend IEP meetings, however due to staff resources this is not always possible. However information regarding VR Services is made available during IEP meetings.

The Transition School to Work Unit within the VR program is working with the Department of Education on how to incorporate VR services information into the IEP meeting. The Director of the Unit has been trained on Easy IEPs. In the provision of the Pre-Employment Transition Services, students with disabilities and their families will start receiving information on VR services as early as age fourteen. Information will be made available to Middle school staff in order to assist with the beginning the transition.

Beginning in October 2015, these IEP meetings will include information on Pre-Employment Transition Services (Pre-ETS) services that are available at age 14. Pre-ETS services are available to students with disabilities ages 14-22. Pre-ETS services can be provided without an application for VR services. For those individuals that are interested in applying for services, the information should include the application procedures, the eligibility requirements including the Order of Selection, and the potential scope of services that may be available. As soon as possible after referral, the Division takes an application from the student and determines eligibility as well as whether the student is in an open priority category. If the student is in an open priority category, the Division's staff assists in the formulation of the student's IEP and the student's vocational rehabilitation Individualized Plan for Employment as soon as it is determined that the student can benefit from services provided by the Division in preparation for exiting the school system and transitioning into training and/or employment. Services provided by the Division may include attending job fairs, community vocational adjustment training and pre-employment, vocational skills training, college prep, and job readiness training.

The DSU has chosen to provide Pre-Employment Transition Services through Transition School to Work Contracts, Pre-ETS contracts, LOAs and direct staff contact.

VR is providing application materials to the school for the students to become recipients.

The DSU has hired 9 Pre-Employment Transition Specialists and 3 Pre-employment Transition Supervisors to coordinate services provided in their areas, identify Local Education Agencies (LEAs) who have a need for Pre-Employment Transition Services,

and recruit Community Rehabilitation Providers (CRPs). They will 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 will work with the schools to identify students who are of working age who want to become VR clients and make referrals to the VR Counselor assigned to the school.

There are 28 Pre-Employment Transition Community Rehabilitation Providers providing services.

The LEA's involved in the interagency agreement with the Division should cooperate in developing and coordinating services for students and youth with disabilities within each respective agency's legal authority. The ultimate goal of each agency participating in the agreement is to provide, or cause to be provided, a continuum of appropriate services leading to transition from school into employment. The agreement provides for:

1. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including vocational rehabilitation services;

2. Consultation and technical assistance on providing reasonable accommodations;

3. Transition planning by personnel of the Division of Rehabilitation Services and the educational agency for students with disabilities that facilitates the development and completion of their individualized education programs under section 614(d) of the Individuals with Disabilities Education Improvement Act (IDEIA) of 2004 (P.L. 108-446);

4. 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

5. Procedures for outreach and identification of students with disabilities who need transition services.

A VR counselor is assigned to work with each local education agency (LEA) for the purposes of referrals, eligibility determination and the provision of services to eligible students. In twenty-one LEAs, the VR counselor is dedicated to the LEA under a contract with the LEA. VR counselors provide technical assistance to school personnel and LEAs to help them identify appropriate referrals for vocational rehabilitation services. The VR counselor also provides information and referral to students not eligible for VR services.

In 2014 VR transitioned from VR counselors to TSW grants to work in the school systems. There are currently 38 TSW grants serving 42 LEAs.

It is the Division's policy that the development and approval of the IPE for each student determined eligible for VR services occurs as soon as it is determined that the student can benefit from services provided by the Division. An IPE must be developed before the student leaves the school setting.

The interagency agreement identifies the financial responsibility of the Department of Education (DOE) to ensure that individuals who are IDEIA eligible receive a free appropriate public education (FAPE) in the least restrictive environment. A free appropriate public education means regular and special education and related services which:

1. Are provided at public expense, under public supervision and direction, and without charge to the parent;

2. Meet the standards established by state law, including the requirements of IDEIA Part B and the Rules, Regulations and Minimum Standards for the Governance of Tennessee Public Schools, issued by DOE;

3. Include preschool, elementary school, and secondary school (including appropriate vocational, career or work experience education); and

4. Are provided in conformity with an IEP.

The interagency agreement relates the financial responsibility of the Division to ensure that individuals who are IDEIA eligible and meet the Division's eligibility requirements will receive VR Services. VR Services means any services necessary to determine eligibility and those services described in an IPE necessary to assist an individual with a disability in preparing for, securing, retaining, or regaining an employment outcome that is consistent with the strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of the individual.

The LEA is responsible for the educational costs related to the provision of special education and related services for the individual attending school. The agreement states that if another public agency is obligated under federal or state law or assigned responsibility under state policy to provide or pay for any services that are considered special education or related services and are necessary for ensuring FAPE to students who are IDEIA eligible, the public agency shall fulfill that obligation or responsibility, directly, through contract or by another arrangement. However, failure of that public agency to pay for that service does not relieve the LEA of its obligation to provide that service to an individual with a disability in a timely manner.

The Division is responsible for all costs necessary for eligibility determination and provision of services under an IPE. The Division must take into account 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 Division's staff maintains a working relationship with special education supervisors, vocational education supervisors, directors, secondary school guidance counselors, and LEA administrators for the purpose of providing outreach for students with disabilities and technical assistance to school personnel to assist LEAs in preparing students with disabilities for career opportunities. The Division participates in in-service training programs for LEAs, as well as in statewide special education conferences for the purpose of providing information regarding VR services. The Division also participates in and organizes local community job fairs, job clubs, attends civic club/organization meetings

to inform students and parents of the purpose of the VR program, the application procedures, the eligibility requirements, and the potential scope of services that may be available.

Other activities to identify students with physical, mental or emotional disabilities who do not meet the criteria for special education services (commonly referred to as Section 504 services) include completion of student health survey forms coordinated with guidance counselors or general education teachers.

It is the Division's intent to develop relationships with LEA middle or junior high schools to provide consultation for students with disabilities who are about to enter high school.

The Division has two dedicated full-time state office position that coordinate transition services statewide. One position is focused on the provision of the Pre-Employment Transition Services (Pre-ETS) to students with disabilities. The other position serves as liaison with the State Department of Education and other partners in the interagency agreement to provide technical assistance and training related to vocational rehabilitation services. Both positions work with VR counselors and supervisory staff to improve access and services for students with disabilities. In addition, both positions identify, arrange for, or provide training to the Division's counselors, educators, students with disabilities, and families in a variety of areas related to transition services. On a yearly basis, staff in the Transition Unit provides presentation at the Partners in Education that is sponsored by the Department of Education.

The Division currently contracts with forty-four LEAs as part of its transition initiative. The contracts provide for a menu of needed and additional services chosen by the LEA to assist in the transitioning of students from school to work. All services provided under these contracts/agreements have a VR employment focus. All services provided under these contracts/agreements are in keeping with all state plan requirements to include our state's Order of Selection requirements. Services provided under these contracts/agreements are only available to applicants for, or recipients of, services of the Division. The Division will strive to increase the number of contracts with LEAs as allowed by the Division's and LEAs' funding availability.

Although the Division utilizes contracts with LEAs as part of its transition initiative, all decisions affecting eligibility for VR services, the nature and scope of available services, and the provision of these services remain the sole responsibility of the VR counselor employed by the Division. VR staff is responsible for determinations to close cases and for all allocations of expenditures for services.

The Division in partnership with 6 LEAs and the Council on Developmental Disabilities, operates 6 High School Transition Project Search Sites. Those Sites are located as follows:

• Memphis/Shelby County-LeBonheur Children's Hospital

• Nashville/Davidson County- Embassy Suites Downtown

• Murfreesboro/Rutherford County-Embassy Suites

• Blount County -Maryville College

• Jackson/Madison County- Jackson Madison Hospital

• Clarksville/Montgomery County-County Government offices

Project SEARCH is in the second year of a 3 year state rollout. There are currently 9 programs with 72 interns. 54 of the previous year's interns are employed for a 66% successful employment rate. One site had an employment rate of 100%.

Project SEARCH has added an additional high school transition site at:

• Sheraton Downtown in partnership with Shelby County Schools

A two-day Project SEARCH® orientation was held in Knoxville, TN in November, 2017. There were 4 potential programs who participated in the orientation and 3 have chosen to move forward and form a Steering Committee.

2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT W ITH THE STATE EDUCATIONAL AGENCY W ITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

Information regarding this question is included with the response to question 1 in this section.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

Information regarding this question is included with the response to question 1 in this section.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

Information regarding this question is included with the response to question 1 in this section.

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS W ITH DISABILITIES W HO NEED TRANSITION SERVICES.

Information regarding this question is included with the response to question 1 in this section.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service

providers. Based on information gathered by continuing statewide studies, the annual facility survey of public and private community rehabilitation programs and the on-going monitoring and annual evaluation of effectiveness, the Division continues to maximize the use of community rehabilitation programs to provide rehabilitation services in the most integrated setting possible consistent with the informed choices of the individual.

The Division is utilizing community rehabilitation programs (CRPs) throughout the state as follows:

I. The Division's Facility Program:

A. The Tennessee Rehabilitation Center (Center) at Smyrna is a state operated comprehensive residential rehabilitation facility that serves individuals with significant disabilities. The facility is accredited by the Commission on Accreditation of Rehabilitation Facilities (CARF) in programs of comprehensive vocational evaluation services, employee development services, and employment skills training services. The Center offers the following program and support services:

i. Program Services

- Comprehensive vocational evaluation and mobile evaluation services
- Employment Readiness Program (ERP) a pre-employment and life skills training program to encourage positive work behaviors and independence.
- Occupational skills training in automotive maintenance/detailing, manufacturing, garden center services, retail, business education, food service, warehouse training, power equipment operations, and pharmacy technician.
- Physical Rehabilitation Services to include: Work Conditioning and Work Hardening, Occupational and Physical Rehabilitation, Spinal Cord Injury Program, Personal Care Attendant training, Vision Rehabilitation, Independent Living Skills, Equipment Operation Screens and Adaptive Equipment Assessments.
- Traumatic brain injury services to include: Case Management, Occupational, Physical, and Speech/Language Pathology to include cognitive therapy; Vision Rehabilitation, Therapeutic Golf Rehabilitation, Vocational Evaluation and Assessments; Behavioral instruction, Job Skills/Readiness training and Community Re-entry training.
- Vision impairment services to include: pre-vocational assessment, training for independent living to include adaptive kitchen skills and home management skills; braille, Orientation & Mobility training, Adaptive communication skills, assistive technology assessments and training; computer training; and prerequisite evaluation and training for entry into Tennessee Business Enterprises.

ii. Support Services

- Campus Life Services (Residential Living)
- Student Health Services to include Medical Dormitory
- Case management services
- Psychiatric and physician services

- Recreation therapy and leisure-time skills
- Remedial education
- Job seeking skills training
- Psychological services
- Independent living skills training
- Autism Support Services
- Deaf Service
- Behavioral Education

The Center operates at a program capacity of 190 individuals with an annual enrollment ranging from 700 - 1000 Tennesseans with significant disabilities each year.

The Center is a member of the National Consortium of State Operated Comprehensive Rehabilitation Centers. An Advisory Council is utilized to provide valuable feedback used in guiding decision making in Center operations and program development. In addition, the Center conducts exit customer satisfaction surveys on all individuals completing services, and conducts client family surveys, as well as a referring counselor needs assessment and satisfaction survey on an annual basis. Feedback obtained from these survey instruments is also used in guiding decisions about current and future support services and program services operations, as well as accessibility and physical plant operations.

B. A network of 17 Tennessee Rehabilitation Centers (TRCs) is located across the state providing day services to eligible individuals with significant disabilities, seeking competitive integrated employment. All community TRC facilities are accredited by the Commission of Accreditation of Rehabilitation Facilities (CARF) in programs of comprehensive vocational evaluation and employee development services. The TRCs are supported by a combination of appropriated local and Federal funds.

i. Program Services

- Comprehensive vocational evaluation services provide an individualized, timely and systematic process for identifying viable vocational options and developing employment goals and objectives.

An accredited comprehensive vocational evaluation service is used to examine a wide range of employment alternatives using the following techniques:

1. Assessment of functional/occupational performance in real or simulated environments

2. Psychometric testing

3. Preference and interest inventories

4. Personality testing

5. Extensive personal interviews

6. Other appropriate evaluation tests depending on the individual

7. Analysis of prior work experience and transferable skills

- Employee Development Services

1. Services are based upon individual needs and can include comprehensive employment services or any individual component.

2. Employee development services and/or job readiness instruction

3. Work skills development through a facility workshop: including the use of contract work, job readiness assessment and training.

4. Community Employment Services include: (job development and placement)

5. Job readiness assessment and instruction includes: interview skills instruction, completing a job application, developing a resume, grooming and hygiene for the work place, self-determination training, developing and using job-finding networks and resources.

6. Job development and placement into competitive employment through the identification of employment opportunities in the local job market

7. Development of realistic employment goals

8. Establishment of service plans to achieve employment outcomes

9. Identification of resources to achieve and maintain employment.

TRC facilities conduct exit customer satisfaction surveys on individuals completing services from each program of service provided, completes a yearly survey with clients receiving services, referring counselors, contract providers, funding sources, employers, and other identified stakeholders. Feedback obtained from the surveys is used to improve program services.

II. Service Contracts:

A. The Division plans to continue service contracts with the following community rehabilitation providers to ensure quality services statewide provided funding is available:

- Clovernook
- Department of Education
- National Federation for the Blind
- Southeast TN Human Resource Agency
- Technology Centers: East Tennessee Technology Access in Knoxville; Signal Centers; Technology Access Center of Middle Tennessee in Nashville; West Tennessee Special Technology Access Resource (STAR) Center in Jackson; and Mid-South ACT in Memphis
- Tennessee Disability Coalition Benefits to Work
- University of Tennessee, Center for Literacy Education and Employment
- Cincinnati Children’s Hospital Medical Center
- Statewide Independent Living Council
- STAR Center
- Department of Education

- Department of Labor and Workforce Development
- Department of Mental Health and Substance Abuse
- Department of Intellectual and Developmental Disabilities

B. The Division has two service contracts with community rehabilitation programs (Clovernook and Volunteer Blind Industries, Inc.) serving visually impaired clients in the areas of evaluation, adjustment, activities of daily living, orientation and mobility, training, job development and employment.

The Division has four service contracts with Center for Independent Living (CIL)-IL expanded outreach (Empower TN, Jackson, Memphis, and Training Advocacy Referral and Peer Support (TARP). These services are provided in accordance with the 2017-2019 State Plan for Independent Living. To conduct needs access to identify independent living needs of people with disability in Tennessee.

The Division has five service contracts for deaf services and advocacy services (Frontier Health, Interpreting Services for the Deaf, doing business as DeafConnect of the Mid-South, Jackson Center for Independent Living, Knoxville Center for the Deaf, and Partnership for Families, Children and Adults.) They provided outreach, referral and advocacy, interpreting services to the deaf, deaf/blind, and the hard of hearing individuals.

III. Letters of Agreement

A. Beginning in FFY2013, the Division began a rewrite of the Letters of Understanding (LOU), to change them to Letters of Agreement (LOA). The LOA has the same purpose as the LOU in that it is an agreement between the Division and the Community Rehabilitation Programs and in cooperation with the Department of Finance and Administration. The LOA describes the functions and responsibilities of the Division and the CRP as well as the scope of services and payment methodology agreed upon by both the Division and CRP in a joint effort of improving and expanding employment opportunities for individuals with disabilities.

Some of the differences in the LOAs from the LOUs are:

- Concentrated focus on outcomes rather than services
- Different payment schedule based on Priority Category assignment of the client
- Bonus for exceptional wages
- Streamlined application and approval process

CRP's must apply and be approved for a LOA each year. The application period is in the Fall (October, November). LOAs are effective during the calendar year each year, January thru December.

For State Fiscal Year 2017-2018, the Division has 142 total LOAs with CRPs throughout the state.

- 84 LOAs for Vocational Assessment
- 32 LOAs for Vocational Adjustment Services

- 83 LOAs for Trial Work Experiences
- 115 LOAs for Job Placement Services
- 92 LOAs for supported employment services
- 12 LOAs for Pre-Employment Transition Services

The Divisions Facility Programs, Service Contracts and Letters of Agreements are used to provide needed services such as but not limited to:

- Vocational evaluation
- Personal and vocational adjustment training
- Transportation and daily meals
- Vocational training
- Job readiness training
- Job development and job placement
- Supported employment
- Rehabilitation technology
- Orientation and mobility
- Activities of daily living
- Trial work experiences
- Follow-up
- Pre-Employment Transition Services

The VR Program is finalizing the implementation of Customized Employment Services and extended services to youth with most significant disabilities who require supported employment.

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

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

1. The Department of Intellectual and Developmental Disabilities for individuals with intellectual and developmental disabilities;

2. The Department of Mental Health and Substance Abuse Services for individuals with mental illness and substance related disorders;

3. The Tennessee Employment Consortium, 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 to provide a forum for all stakeholders to review and discuss state policies and share best practices;

4. University of Tennessee, Center for Literacy Education and Employment to provide staff training and development and consultation services for community supported employment service providers; and

5. Tennessee Department of Labor and Workforce Development, to provide customized employment services through their system of Career Centers on behalf of VR clients and business and industry. The Department of Mental Health and Substance Abuse Services for individuals with mental illness and substance related disorders. Utilizing an evidence based Individual Placement and Support (IPS) model of supported employment; Tennessee Division of Health Care Finance and Administration, Division of TennCare for provision of employment services for individuals enrolled in Employment and Community First CHOICES. The Department of Education for the provision of Pre-Employment Transition Services.

The Division has encouraged the establishment and development of Community Rehabilitation Providers (CRPs) to improve and expand services through Letters of Agreement. The Letter of Agreement (LOA) is an agreement between the Division and the CRP. The LOA describes the functions and responsibilities of the Division and the CRP as well as the scope of services and payment methodology agreed upon by both the Division and CRP in a joint effort of improving and expanding supported employment and extended services for individuals with disabilities. The Division currently has 92 LOAs for supported employment services. The Division continues its' efforts to increase S.E. providers and anticipates the numbers of providers will increase. VR is actively pursuing a number of other providers for underserved areas across the state.

G. COORDINATION WITH EMPLOYERS

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR SERVICES; AND

In Tennessee, the Vocational Rehabilitation Program employs Business Employment Consultants (BECs) in order to facilitate the relationships between businesses and the VR Program.

- Role of the State Business Employment Consultant and Business Employment Consultants (BECs): Facilitate employment opportunities for persons with disabilities by providing services and resources to assist Tennessee businesses in recruiting, hiring, returning to work, and retaining employees with disabilities.
- Number and location of the BECs: Currently, there are a total of 11 BEC's positons statewide and the positions are located in the following regions: region 1, region 2, region 3, region 4, region 5, region 6, region 7, and region 8. There is also a Statewide Business Employment Consultant located in state office, which assists with statewide participation in the Talent Acquisition Portal (TAP) that is

managed by the Consortium of State Agencies of Vocational Rehabilitation (CSAVR).

According to the Tennessee Department of Labor and Workforce Development, the rapid rise of technology, rebounding manufacturing and construction, and large presence of the healthcare sector are expected to offer numerous jobs for those looking for work. Tennessee's current unemployment rate is at 3.2% and nationwide it is 4.2%.

WIOA expands the VR Program's customer base as Business becomes a recognized partner of the program. As this concept continues to grow, the VR Program is developing more Initiatives with Businesses in order to provide more opportunities for competitive integrated employment and career exploration opportunities.

- Business Initiatives: The Division conducts several business initiatives across the state such as Walgreens' REDI programs, Project Search East TN Children's Hospital and UT Medical Center, Kroger/Peyton's distribution centers, AutoZone distribution centers, Vanderbilt University Cummins, Auto Zone, Cracker Barrel, Food City, Allegro, Phoenix Boats, and Veteran's Administration- Johnson City.

Role of the state agency with 503 Compliance: Tennessee VR BECs work with contacts established through the US Department of Labor's Office of Federal Contract Compliance Programs as a resource to assist federal contractors in addressing the Final Rule of Section503 of the Rehabilitation Act of 1973. The BECs participate in regional/local meetings to provide information about services and job candidates available through Tennessee's VR services. The BECs assist in recruiting efforts by linking businesses with qualified applicants.

- Additional business initiatives for the agency are: The TN Rehabilitation Center at Smyrna has developed customized training partnerships with Schwan Cosmetics, Walgreens, and CVS Caremark to develop curriculums specific to their hiring requirements which build capacities for diversity within companies.

VR has been working with NASA at Marshall Space Flight Center as a resource to assist in their efforts of 503 compliance. TN VR and Alabama VR has been coordinating efforts to assist in their hiring efforts.

TRC continues to develop new partnerships and keep the relationships of its current partners. This makes the training experience for the students available in many different areas. Auto Detail/Lube has had a long relationship with Od's Car Wash and Detail in Murfreesboro, TN and has developed a recent commitment for internships with Nashville's Auto Art Body Shop. Food Service recently signed a partner agreement with Jim N'Nicks Bar-B-Q that will allow students to intern. Another longtime partner is the local ProCharge Company in LaVergne. TRC is also excited about employers such as Publix, Walmart, and Onin staffing who have recognized the great skill sets of our clients and hired recent graduates for their companies.

The Tennessee Rehabilitation Center at Smyrna has also established agreements with local employers to provide career exploration, externships, and internship training opportunities on site. New agreements are being signed on a regular basis.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

Pre-Employment Transition Services (Pre-ETS) is a set of 5 services available to students with a disability ages 14-22 who are eligible or potentially eligible for VR services. These services should be provided in a collaborative manner with the recipient's educational provider.

Fifteen percent (15%) of the Basic VR grant must be set aside for the provision of Pre-ETS services. TN VR provides the 5 Pre-ETS services through contracts with qualified Community Rehabilitation Partners (CRPs), Local Education Agencies (LEAs) and/or VR staff.

The 5 Pre-Employment Transition Services are:

1. Job Exploration Counseling can be provided in classroom or a work setting of in-demand occupations. Counseling can include completing interest inventories to determine a student's interests, job shadowing, exploration of Career Pathways, and researching local labor market information that apply to the student's interests.

2. Work-Based Learning Experiences, which may include in-school or after-school opportunities, or experiences outside of the traditional school settings (including internships). It is provided in an integrated environment in the community to the maximum extent possible;

3. Counseling on Post-Secondary Opportunities, which may include exploration and preparation for enrollment in comprehensive transition or postsecondary education programs at institutions of higher education;

4. Workplace Readiness Training for the development of social skills and independent living skills necessary for successful employment. This may include skill acquisition as well as opportunities to apply newly acquired knowledge.

5. Instruction in self-Advocacy, which may include Self-Determination, Life Skills Training and peer mentoring from individuals with disabilities working in competitive integrated employment. Recipients learn about their rights, responsibilities, and how to request accommodations for post-secondary education placement as well as employment.

H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

Tennessee is an Employment First State, and there is an established Employment First Task Force. The Employment First Task force facilitated the completion of a Memorandum of Understanding for services to youth with disabilities between the following State agencies:

- Vocational Rehabilitation
- Department of Education
- Department of Intellectual and Developmental Disabilities
- Department of Labor and Workforce Development
- Department of Mental Health and Substance Abuse Services
- Council on Developmental Disabilities (Oversees the Implementation of the MOU

In Tennessee the agency that administers the State Medicaid plan is the Bureau of TennCare. The VR Program is developing a Memorandum of Understanding with the Bureau of TennCare. The VR Program has developed a Memorandum of Understanding with the Department of Developmental and Intellectual Disabilities.

In conjunction with the Department of Mental Health and Substance Abuse Services, the VR program is providing supported employment to individuals with severe and persistent mental illness under the Individual Placement and Supports Model. In Federal Fiscal Year 2015 there were 351 total SE cases in Status 26 (VR program only). At least 15.38% or 54, were from IPS. The VR Program plans to expand the IPS program into other areas of the state in Federal Fiscal Year 2016.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS W ITH DEVELOPMENTAL DISABILITIES; AND

Information regarding this question is included in the response to question 1 in this section.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

Information regarding this question is included in the response to question 1 in this section.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT A. QUALIFIED PERSONNEL NEEDS.

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

The Division received 7,692 applications for new services in FY2014 and provided services to 21,545 eligible individuals. In FY2015, the division received 6,782 applications and provided services to 19,500 eligible individuals.

The Division currently has 610 allocated positions. Of these 610 positions, 174 are currently vacant (28.5%). Out of the 610 positions 334 positions provide direct client services. 101 of the direct client services positions are currently vacant. All VRC position are filled at the Master's degree level. The CSPD requirement in Tennessee is eligibility to sit for the Certified Rehabilitation Counselor (C.R.C.) exam. All current counselors will meet the CSPD requirement by January 1, 2018. When new staff are hired at the Master's degree level, if they do not meet the CSPD at the time of hire, they have 36 months to meet the requirements

As a result of changes regarding personnel in WIOA, TN will we assessing current staffing patterns and staffing needs.

The Tennessee Division of Rehabilitation Services utilizes a department wide on-line computer system known as Edison for collecting and tracking all personnel actions relative to positions being vacated (resignations, terminations, retirement) as well as tracking personnel data relative to filling vacant positions (new hires, position transfers and/or promotions).

Job Title	Total positions	Current vacancies	Projected vacancies over the next 5 years
Administrative	17	3	0
Clerical	77	23	0
Rehabilitation Assistants	66	14	0
Supervisors	86	18	0
Support	20	5	0
Instructor	44	5	0
VR Direct Client Services Staff	243	100	0
Medical	28	4	0
BEP Specialist/Consultant	15	0	0

ii. The number of personnel currently needed by the State agency to provide VR services, broken own by personnel category; and Information regarding this question is included with the response to question A in this section.

iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Information regarding this question is included with the response to question A in this section.

B. PERSONNEL DEVELOPMENT

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

In Tennessee, there is one university that has Council on Rehabilitation Education (CORE) certified program offering a master's degree in rehabilitation counseling. It is The University of Memphis, located in the western part of the state.

The University of Tennessee at Knoxville (UTK) has a current enrollment of 17 students in its distance education program, 5 of whom are employees of the Division. Of the 17students currently enrolled, 5 have disabilities and 3 students represent a minority. For the federal fiscal year (10/13 - 9/14), 3students graduated from the program. All 3 graduates met the academic criteria to sit for the Certified Rehabilitation Counselor (CRC) exam.

The University of Memphis currently has 18 graduate students in their on-campus program. None(0%) of these students are employed by the Division.

Institutions	Students enrolled	Employees sponsored by agency and/or RSA	Graduates sponsored by agency and/or RSA	Graduates from the previous year
University of Memphis	18	0	0	57
University of TN - Knoxville	17	5	5	15

ii. The number of students enrolled at each of those institutions, broken down by type of program; and Information regarding this question is included in the response to question (i) in this section.

iii. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure. Information regarding this question is included in the response to question (i) in this section.

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

Information regarding this question is included in the response to question (i) in this section.

3. PERSONNEL STANDARDS

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN W HICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

Members of the Division’s leadership team have quarterly contact with the program administrators at the University of Tennessee and the University of Memphis for the purpose of planning and sharing information relative to personnel development activities. The Rehabilitation Services Training Unit staff also meets or corresponds with University of Memphis staff for the purpose of gathering information regarding the number of students enrolled in their respective rehabilitation counselor education programs, as well as the number who graduated from their programs during the past year.

To advance recruitment activities, the Division has dedicated a program specialist position. This program specialist is actively seeking out other masters level programs across the nation; primarily those with RSA funded slots, to increase the number of incumbent staff in masters programs. Other duties of the program specialist include developing/distributing recruiting brochures at job fairs, speaking to graduate level programs to promote state employment in the rehabilitation field and encouraging incumbent staff to take advantage of graduate level training opportunities in rehabilitation counseling distance learning programs. The Division recognizes that recruitment activities are also the responsibility of counseling, supervisory and management level

staff across the state with these personnel involved in recruitment activities in their regional and local communities.

The Tennessee Excellence, Accountability and Management (TEAM) Act of 2012 is designed to establish methods for attracting, selecting, retaining and promoting the best applicants and employees based on performance and equal opportunity, free from coercive political influence, and to provide technically competent employees to render impartial service to the public at all times.

The TEAM Act will give agencies greater flexibility in personnel management and increase customer focused effectiveness and efficiency in a best practice environment, and by doing so, will allow the Division to strengthen its efforts to hire and retain top quality counselors.

The division has had over twelve (12) interns serve in a variety of capacities at regional offices and community rehabilitation centers during the past two (2) years. Five (5) of them have been rehabilitation counseling graduate students completing their practicum and 600-hour internships, of those three (3) have been hired as master VR counselors. One intern chose to work for Veterans Administration and the other went to work for a non-profit agency.

Current incentives for incumbent staff to participate in a Master's degree program include financial assistance with tuition, books, fees, and minimal educational leave. Funding for a pay incentive based upon successful completion of a Master's Degree program was approved in January 2005 for graduates and has been requested and approved for each successive graduate.

The Division continues to explore retention strategies for qualified staff. Exemplary counselors are given priority for attendance at various out-service training events in recognition of their hard work, dedication and commitment to assisting individuals with disabilities in achieving their employment goals.

In WIOA the definition of qualified personnel has undergone some changes. The Vocational Rehabilitation Program will be assessing its current staffing patterns to ensure qualified personnel are available.

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE W ITH 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 W ITH DISABILITIES.

Information regarding this question is included with the response to question A in this section.

4. STAFF DEVELOPMENT.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. SYSTEM OF STAFF DEVELOPMENT

A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

The Office of Professional Development (OLPD), is a section of the Office of General Counsel (OGC) - Human Resources and Professional Development (HRPD) division of the Department of Human Services (DHS). OLPD provides staff development and training for DHS employees, and in so doing, conducts training needs assessments and provides training opportunities (mandatory and elective) to enhance staff competencies and skill sets. OLPD has dedicated staff to provide support for Rehabilitation Services and works in conjunction with the Rehabilitation Services division in the development of training necessary to ensure effective, outcome driven results. The development of core competencies for effective service delivery is an integral focus of Rehabilitation Services training. Additionally, HRPD provides performance management support to all DHS employees in alignment with the goals and priorities established by the Governor and the Commissioner of DHS. HRPD has processes in place to create individual performance plans and on-going evaluations of employees' performance in each division, including rehabilitation services.

Additional data is collected relative to training needs through the following methods:

1. Input from staff in all job classifications compiled into a statewide training needs report;

2. State rehabilitation management and administrative staff input;

3. State Human Resources Department training division mandates;

4. Rehabilitation Services Administration guidelines;

5. Recommendations of the State Rehabilitation Council and the Statewide Independent Living Council;

Program case reviews conducted by the Department's Performance Management Unit (QUISS) division of DHS are also utilized to identify strengths and deficiencies among staff and related training needs.

Staff was encouraged to give feedback on what they thought were their training needs. Outcomes of this internal review yielded the following training related recommendations:

OLPD sends out a training effectiveness survey that asks respondents of training needs.

1. Additional human resources to meet statewide need for new and incumbent staff training;

2. More timely delivery of training for new counselors; The OLPD standard is to provide (or at least begin) new employee training within 90 days of hire.

3. Expand the new counselor curriculum to be more comprehensive /incorporate more hands- on activities to reinforce knowledge and skill sets; The comprehensive NCI 6 week training curriculum was presented to learners in 2013 and has continued ensuring current policy by completing revisions prior to each new session.

4. Provide refresher training for incumbent staff relative to the Division's policy and other disability related topics; and Counselor policy Refresher training was developed and was scheduled for quarterly or semi-annual facilitation. To this point, only one statewide refresher training consisting of three sessions was approved and was held in September of 2014.

5. Additional/follow up training regarding the new online case management system.

As a result of these staff recommendations, the Rehabilitation Services Training Unit, under Division of Human Resources and Professional Development is implementing the following strategies

1. There are four VR training positions and one program coordinator. Of the four VR/ OLPD trainers, in addition to maintaining current policy and TRIMS knowledge to facilitate segments of NCI and Counselor Refresher training, each trainer is assigned a specific area of focus based on specialized training and/or experience. Currently, one trainer is assigned to work specifically with sensory loss units; one is assigned to work with community TRC; one with Smyrna TRC; and one with TSW program in light of all the WIOA policy implications.

2. All new counselors will be expected to participate in the new counselor training within the first 3 months of employment.

3. The previous two one-week training sessions for new counselors has been significantly expanded (2012/2013) to a new curriculum. The curriculum is an intensive, hands-on training, utilizing a variety of training modalities to include navigation of the new online case management system, case studies/scenarios, and individual and group discussions. Additionally, PowerPoint presentations, facilitator guides, participant guides, handouts, assessment questions and related materials are being revised to include recent policy revisions and updates as changes occur.

4. OLPD staff has provided regional and district policy trainings per contacts with regional and district supervisors to determine and address training needs.

5. OLPD has had in place for several years a training website entitled the Training Resource Website (TRW) whereby all training materials will be posted to enable trainers and supervisors to access training modules for disability related training topics.

6. Following implementation of the online case management system, follow up regional training sessions were conducted to further illustrate how to navigate the system and provide answers to staff questions. A new state office position was also added in recent years to serve as a resource to field staff in providing guidance in navigating/utilizing the new online case management system. TRIMS is being updated to include forms and processes that are consistent with the recent policy revisions.

VR Program contracted for online course system offered by the VR Development Group (VRDG). All courses are designed for the field of VR. VRDG is the only organization offering accessible, interactive multimedia courses in the VR field. VRDG information is continuously updated and includes changes from WIOA and the 2017 CRC Code of Ethics. Course topics include: Effectively Managing VR Caseloads, Autism Spectrum Disorders and Employment, Introduction to VR, Comprehensive Assessment, and Job Development and Employment Acquisition (to name a few). These trainings are available 24/7. Supervisors choose the sessions for their staff. At the end of each session there is a quiz to check for learning and comprehension.

As part of the new Performance and Quality Improvement process, focus groups were formed to identify new employee specific training needs relative to each job position/classification. These focus groups laid the foundation for the development of a progressive training curriculum to include standards for measuring performance at three, six and nine month increments during the probationary process. Utilizing this process to identify specific training needs and a subsequent training curriculum relative to each job position/classification has proven to be a more effective means of identifying and addressing training needs than staff surveys conducted in the past.

Below are the top 5 training priorities based on staff and management feedback:

1. Leadership/supervisory training provided through the New Supervisor Academy (NSA); All new supervisors must attend a three week New Supervisor Academy session, delivered by the Department's OLPD division, to enhance and develop their leadership skills.

2. Caseload management (moving a case through the VR process, critical casework activities such as eligibility determination, plan development, budgeting, etc.). This training is provided as part of the New Counselor Institute (NCI) and as needed to incumbent VR counselor staff.

3. Communication skills/customer service (interviewing skills, effective communication, how to deal with difficult people, cultural diversity) VR/OLPD staff has information included in the NCI, counselor refresher and community TRC staff training modules regarding appropriate and professional communication, interviewing, and cultural awareness. TN Department of Human Resources, DoHR has courses available which are currently being delivered to management staff by OLPD staff members, who have become DoHR certified trainers, on topics of Customer Service, Respectful Workplace, and Civil Rights.

4. Employment / placement training (including disability disclosure) NCI covers some on disability disclosure. The module recently developed on job development and placement for sensory loss staff could be modified for delivery to all counseling staff as well as Business Employment Consultants.

5. General on-boarding for new employees (vision/values, people first language, respectful workplace, customer service, ethics, and departmental and division organization).On boarding training has been revised and is being reviewed by DOHR. NCI addresses vision and values and people first language as well as Departmental and

divisional organization. As is noted above Customer Service and Respectful Workplace are provided by certified facilitators as part of the onboarding training.

Based on the recommendations VR has provided VRDG training on effective case management to improve counselors understanding and implementation of VR case management.

The Tennessee Rehabilitation Center at Smyrna also holds staff in-service two times per year and includes training and workshops designed to improve the effectiveness and efficiency of vocational training programs offered.

The Division continues to provide on-going training and technical assistance regarding the Americans with Disabilities Act to staff and the general public, including business and industry. As part of the on-boarding process, counselors also receive training relative to the Rehabilitation Act of 1973 and subsequent amendments.

The Division continues to contract with technology centers across the state for training and technical assistance in rehabilitation technology services. Rehabilitation technology contracts are in place with the East Tennessee Technology Access Center (Knoxville), Technology Access Center of Middle Tennessee (Nashville), West Tennessee STAR Center (Jackson), Signal Center (Chattanooga), and Mid-South Access Center for Technology (Memphis).

The Divisions employees continue to receive specialized training in assessment and vocational evaluation activities. Through a partnership with the University of Memphis, vocational evaluators receive extensive instruction in the appropriate selection of assessment tools, interviewing skills, evaluation techniques and report writing. The contract with the University of Memphis has expired. Current training on Vocational assessment and evaluation is being provided by Tami Long, the OLPD/RS training director who has nine years of experience as an evaluator, and maintains both the CRC and the Vocational Evaluation Specialist certification (CVE) through The Commission on Rehabilitation Counselor Certification. Statewide Vocational Evaluator training was provided in September 2015 for all community TRC evaluators and mangers. Training covered interviewing skills, scheduling, evaluation techniques, choosing assessments, and report writing.

Evaluators complete a competency examination with subsequent training provided based on the individualized needs of each employee. New counselors receive, via a new counselor training program, training relative to assessments, vocational evaluation and interpreting medical and psychological reports to assist them in acquiring skills to identify the specific strengths and weaknesses of individuals with disabilities. Training in the areas of vocational counseling, job placement and other topics relevant to client service delivery continue to be focal areas for the Division. The training noted above was delivered to incumbent staff as the pilot for the new VE training. This training will become the new employee training and will be provided within 90 days of hire as approved by program. All evaluators will be expected to submit reports for review and will receive training based on individual needs.

Division employees are encouraged to participate in web-based training events as offered through the Department and other Agencies, as appropriate. The Vocational

Rehabilitation Program was approved for a one-time no cost extension to the training grant funds offered from RSA. These funds will allow the program to continue to provide training to staff.

While dedicated funding is no longer available, the Division has begun exploring other cost affected means of providing staff development through the purchase of modular web-based training that allows the Division to purchase high quality training as needed through contractual partnerships.

The Office of Learning and Professional Development (OLPD) is currently examining the existing structure of collecting personnel and training data. A new database for collection of personnel, professional, and training data is currently being developed.

The new system will provide a more effective way to track and report the staff data for TDRS. Edison's Enterprise Learning Management has been in place for several years. It is the system that allows for documenting available courses, learner enrollment, and learner participation in various classes. Each learner has a "My Learning" page that documents all sessions of training (classroom or online) attended and completed.

The Division has posted information memoranda on its intranet website to provide staff with an easily accessible means of acquiring information on current research, resources and related activities in the vocational rehabilitation field. Leadership staff also disseminates new information (such as the latest Institute on Rehabilitation Issues publications) through electronic conveyance. Employees, particularly those with specialized job responsibilities, are encouraged to attend conferences, seminars and training workshops relative to their specialty areas. Local, regional and statewide meetings provide an additional avenue for keeping employees informed of new developments in the vocational rehabilitation field.

B. ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOW LEDGE

Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

Information regarding this question is included with the response to question A in this section.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

The Division 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; 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 communicate with limited English speaking individuals. Telephonic translation services are available through Avaza Language Services. All regions have received orientation packages to be used to train all of their staff in the use of this service.

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, Blind or Deaf-Blind. The Divisions policy addresses the (1) significance of such services, (2) the selection of service providers, (3) the scheduling and payment for services, and (4) an evaluation process for such services.

6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

The Individuals Disabilities Education Act provides renewed emphasis on the planning for service delivery and collaboration of the various divisions and programs designated to serve students and youth with disabilities.

The Division has an interagency agreement with the Division of Special Education, state Department of Education in providing administrative support for a coordinated, collaborative effort of service delivery. The Blind and Visually Impaired Services/Deaf and Hard of Hearing unit continues an agreement with the Tennessee School for the Blind and the Tennessee School for the Deaf. Networking of the two divisions relative to transition services has provided a means for coordinating and sharing information regarding personnel development under IDEIA. There is ongoing communication between the two divisions and each division has responsibility for providing input into personnel development activities.

An interagency agreement was developed to fulfill the requirements of IDEIA. The most recent version of this agreement was signed July 1, 2012. The purpose of this agreement is to identify and define the financial responsibility of each state agency for providing services under IDEIA and to facilitate the provision and coordination of services for all children with disabilities. The following state agencies are participating in this agreement: Tennessee Department of Education; Tennessee Department of Children’s Services; Tennessee Department of Finance and Administration; Bureau of TennCare; Department of Developmental Services; Tennessee Department of Health; Tennessee Department of Human Services; Tennessee Department of Intellectual and Developmental Disabilities; and Tennessee Department of Correction.

In 2013, Governor Bill Haslam signed an Employment First Executive Order. This Executive Order established the Employment First Taskforce. In 2014, the Employment First Taskforce sign and executed a Youth Memorandum of Understanding (MOU). The agencies involved in the MOU are:

- Department of Education
- Vocational Rehabilitation
- Department of Labor and Workforce Development
- Department of Intellectual and Developmental Disabilities
- Department of Mental Health and Substance Abuse Services
- Council on Developmental Disabilities (this agency oversees the implementation of the MOU.

The purpose of this MOU, is to state how these agencies will work together to provide transition school to work services to students and youth with disabilities.

The Division continues to recognize the value of the involvement of its State Rehabilitation Council in personnel development activities. It is the policy of the Division to give the Council ongoing review and input on the development of issues associated with the Comprehensive System of Personnel Development.

The Council continues to be involved with CSPD issues associated with the recruitment and retention of staff, such as; counselor salaries and pay incentives for the successful attainment of counselors with a Master's degree in Rehabilitation and also training for existing staff to obtain a Master's Degree in Rehabilitation.

J. STATEW IDE ASSESSMENT

(Formerly known as Attachment 4.11(a)).

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING W ITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. W ITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

The Tennessee Division of Rehabilitation Services (Division), in collaboration with the State Rehabilitation Council (SRC), completed a comprehensive assessment of the vocational rehabilitation needs of Tennesseans with disabilities in the summer of 2013 and is conducting needs assessments on a three-year cycle. The VR program is conducting a new Comprehensive Needs Assessment to be completed in the summer of 2016. As required in 34 CFR § 29, the information obtained from a number of sources was assessed and analyzed to determine the needs as stated above.

Methodology

Five surveys were developed, one for each category of participant. The surveys have some questions in common. The five surveys were administered in mid-August 2013. Survey participants included vocational rehabilitation clients and/or their caregivers, staff, workforce investment system personnel, community resource partners, and vocational rehabilitation stakeholders. All five surveys were administered through an anonymous web-based (Survey Monkey) process. In addition, five interviewers attempted to administer the client/caregiver survey to a beginning list of 1,000 (750 active and 250 closed) clients. In all, there were 907 completed surveys evaluated and analyzed for this Vocational Rehabilitation Needs Assessment. There were 6,291 e-mail

requests sent and 616 calls made. These 6,907 contacts yielded a response rate of 13%. Earlier during this Needs Assessment, Focus Groups of VR Staff and VR Clients were conducted in six Regions (1, 2, 5, 7, 8, and 9). These Focus Groups aided in the low response rate of the Client/Caregiver survey.

Survey Overview

Five surveys were developed, one for each category of participant. The surveys have some questions in common. The five surveys were administered in mid-August 2013. Survey participants included vocational rehabilitation clients and/or their caregivers, staff, workforce investment system personnel, community resource partners, and vocational rehabilitation stakeholders. All five surveys were administered through an anonymous web-based (Survey Monkey) process. In addition, five interviewers attempted to administer the client/caregiver survey to a beginning list of 1,000 (750 active and 250 closed) clients.

The client/caregiver sample was obtained from active cases and case closures from October 2011 to March 2013. The list of 19,689 clients included active cases (Status 10 and 18), successful outcome closures (Status 26), and closures without a successful outcome (Status 28). Of the 15,965 active cases on the list, 5,521 provided an e-mail address for contact information. In addition, of the 3,724 closed cases on the list, 1,158 provided an e-mail address for contact information. Therefore, the client/caregiver survey link was sent to 6,679 participants. Of the 5,521 active case participants with an e-mail, 598 e-mails bounced back undeliverable. Therefore, 4,923 active Vocational Rehabilitation clients received the survey link. Of the 1,158 closed case participants with an e-mail, 617 e-mails bounced back undeliverable. Therefore, 541 closed case Vocational Rehabilitation clients received the survey link. Of the 541 total participants, 495 began the survey process and 469 completed the client/caregiver survey. The survey completion rate was 94.7%.

So that customers without access to the Internet could also have an opportunity to provide their opinions, five interviewers contacted 1,000 (750 active and 250 closed) clients by phone. The 1,000 clients were chosen randomly in SPSS from the customers without e-mail addresses. Of the 1,000 customers contacted by phone, there were 384 wrong numbers or disconnected numbers. Of the remaining 616, 151 were contacted and agreed to complete the client/caregiver survey. These 151 participants fully completed 146 surveys for a completion rate of 96.7%. Approximately 25% of the 1,000 clients called completed the client/caregiver survey. Combined, the web-based survey link and the telephone survey of clients' response rate totaled approximately 10%.

The Staff survey link was sent by e-mail to 537 staff members and 45 supervisors for a total of 582 staff members. Of these 582 staff members, 123 started a staff survey and 106 or 86.2% completed the survey questions. Therefore, 21% of Vocational Rehabilitation Staff responded to the staff survey.

The Workforce Investment Act System (WIAs) personnel were sent their survey link in 92 e-mails. However, 128 WIA surveys were completed. Therefore, the survey link e-mail sent out by the Research and Planning Unit was shared with at least 36 other

individuals. The completion rate for these 128 surveys was 91.4% for the 117 surveys completed. The response rate for the WIAs survey equaled 79%.

Community Resources Partners (CRPs) were sent 118 e-mail requesting respondents complete the CRP survey. There were 46 surveys started by the CRPs and 43 surveys finished. This is a completion rate of 93.5%. This places the return rate much lower at approximately 39%.

Vocational Rehabilitation Stakeholders were sent 35 e-mails for the Stakeholder survey link. Twenty- nine started the survey and 26 completed all questions on the survey. This is a survey completion rate of 89.7%. However, this particular surveys return rate was 83% much higher than were the others.

In all, there were 907 completed evaluated and analyzed for this Vocational Rehabilitation Needs Assessment. There were 6,291 e-mail requests sent and 616 calls made. These 6,907 contacts yielded a response rate of 13%. Earlier during this Needs Assessment, Focus Groups of VR Staff and VR Clients were conducted in six Regions (1, 2, 5, 7, 8, and 9). These Focus Groups aided in the low response rate of this particular survey. The five surveys shared several like items, but also differed on distinct issues for each group.

From these five survey instruments, this Needs Assessment will attempt to identify the needs of individuals with the most significant disabilities in Tennessee, to discover the unmet needs of minority groups (including the not served and the underserved) in Tennessee, and to recognize which population(s) of individuals with disabilities are those not served and/or the underserved in Tennessee.

Survey Results & Analysis

Vocational Rehabilitation Stakeholders

Overall, respondents (38%) are sometimes satisfied with the services VR clients receive from TN Rehabilitation Services. Twenty-four percent are satisfied and 21% are dissatisfied. Two respondents listed not applicable, two were very dissatisfied, and one person stated that they were very satisfied with the services VR clients receive. One stakeholder praised VR's improvements made in "*Working on developing relationships with future clients before they leave high school; actively participating in meaningful IEP transition meetings.*"

According to survey results, 48% of stakeholders straddled the fence in their belief that VR Counselors fully understand how and why a client's disability affects their chances of employment. Twenty-four percent agree and 17% percent disagree that VR Counselors understand the impact a disability has on employment. Eleven of the Stakeholders felt that employment opportunities were an unmet need of individuals with disabilities. One respondent shared that "*There seems to be a lack of creativity to find positions that are compatible with their disabilities."*

Slightly over one third of stakeholder respondents agree that VR Client chances of getting a job increased because of training and services received through Vocational Rehabilitation. One third feel training and services sometimes assist in increased job probability for clients. In addition, 30% disagreed with the statement. Qualitatively, 18

Stakeholder respondents felt that potential employers are looking for the following four types of skills from individuals with disabilities: 1) Entry level (55%), 2) Timeliness/Good Work Ethic (16%), 3) Behavior/Soft Skills (16%), and 4) Basic Computer Skills (11%). From comments on this survey, most employers seek "Reliability, job pride, honesty and friendliness."

Of the 29 Stakeholder respondents, an overwhelming 72% do not feel that VR Counselors help secure employment for VR Clients. Fifty-five percent of respondents feel the majority of clients find jobs themselves. Only 10, 34.5% feel clients do not secure their own employment. Three people did not respond to the survey question.

Forty-one percent of responding Stakeholders feel VR Counselors sometimes invite VR Clients to be part of developing their vocational goals. Thirty-eight percent agree that VR Counselors involve Clients in the development of their goals and 17% disagree, while one person chose to skip the question. The 17% that disagree may feel that clients are being judged by their behavioral choices. One respondent stated an unmet need as *"The effects of their disabilities are often confused with behavioral choices, making them often appear to be resistant to services."*

Of those who responded, 55% feel that VR Counselors do inform their clients of the available jobs of interest that also match their skills. Twenty-one percent agree that counselors do make clients aware of possible jobs, while 17% disagree. Two people skipped this question.

One Stakeholder suggested the *"need for job carving for some individuals on spectrum."*

More stakeholders disagreed (31%) than agreed (24%) that VR Counselors are strong advocates for VR clients' mental, physical, and vocational needs. However, the majority, 41%, is unsure if Counselors are strong advocates or not. One responder did not answer. The lack of communication was a constant theme in this survey. One respondent made the following comment concerning communication: "Placing information on the VR web site and keeping it updated, be a highly visible collaborative partner with disability related organizations and efforts geared toward employment, and positive outreaches and advertising to the community."

Community Resource Partners (CRP)

On average TN Vocational Rehabilitation Community Resource Partners, service more than 100 individuals with disabilities. CRP qualitative comments state that the more clients are provided one- on-one interaction time with various jobs and receive personal individualized attention or job site assessments they are better able to provide or suggest a more suitable work environment and with greater success. In addition to interpreter services, Community Resource Partners also listed computers as a big need in their agency to accommodate people with disabilities. According to respondents, the most successful element of CRP soft skills training is Individualized attention and Job Readiness. CRP sees the underserved and the not served population to be those with severe disabilities, autism, deaf and hard of hearing, along with cognitive functions. Unmet needs of the not served population include counseling and guidance as well as communication, outreach. To serve these clients CRP suggest developing better partnerships and changing eligibility to be more inclusive and flexible.

CRP believes that potential employers are most interested in employees who have appropriate behavior, work ethic, and timeliness in respective job settings. Survey response state the most beneficial agency partnerships for CRP have been other non-profits agency. The majority of CRP survey respondents are interested in documentation training. Many CPR responders report constant policy and procedure changes in VR are confusing.

CRPs provided information about successful pieces to their assessment process and successful soft skills. For both the job readiness category garnered the most responses. For assessment one provider stated "Providing a concise report that includes realistic vocational options based on interests, aptitudes, transferrable skills, and labor market information" as the successful piece of their assessment process. Another provider stated "Job Shadowing Job Sampling Working Interviews" were a successful soft skill teaching tool for clients.

CRPs reported the unserved and underserved to be individuals with developmental disabilities (Autism Spectrum Disorder and Asperger's), Veterans in category 3 or category 4, and individuals with felony charges and/or chronic or recent drug addictions. These unmet needs were reported by CRPs to be met by education and training 24% of the time. For instance, *"employment specialist needs to help stabilize client's job". "They have the skills to GET job but have no skills to KEEP the job."* The barriers reported by minorities with disabilities were VR knowledge/awareness (20%) and language barriers (14%).

CRPs requested better training in job development and job placement. They praised the opening of Priority 2 category as a significant positive. In order to improve communication, they requested weekly or bi-weekly meetings with VR Counselors and Supported Employment staff to review caseloads.

Workforce Investment Systems (WIS)

On average Workforce Investment Systems service more than 100 individuals with disabilities. Services that WIS felt was most helpful include job readiness, Support services, and education.

Computer hardware topped the list in most needed accommodations for people with disabilities. The majority of qualitative comments requested updated staff computers as well as updated computers for clients. WIS is also asking for laptops they can carry between sites and visits. The most helpful element of their assessment is the staff's knowledgebase of the client, disability, and job market. Interviewing skills, communication, and job readiness were the number one soft skills WIS felt helped clients obtain and maintain employment. The suggestions for underserved or unserved clients included opening the priority categories, blind and visually impaired along with clients who have autism. Suggested ways to reach this group include expand outreach, improve resources, and communication. Stated barriers to reaching this group include cultural competence, educating VR staff and employers on various barriers. Respondents also suggested building the awareness of VR services among the common population, including schools, business, and VR partners.

Five respondents stated that they do not have any clients with disabilities. Another 5 stated they provide services to 1-9 persons with disabilities. Nine respondents service 10-39 clients while 40-59 clients are seen by at least 12 of the Workforce Investment Systems who responded to the survey. Three (8.6%) respondents provide client services to approximately 60-79 clients. Eleven of the 128 WIS see at least 80-99 persons with disabilities while the majority, 56.3%, of survey respondents provides supportive services to over 100 persons with disabilities.

In addition to non-VR clients, the majority, 54.7%, of surveyed Workforce Investment Systems provide services for more than 100 Vocational Rehabilitation clients. Five respondents stated that they do not have any VR clients. Seven stated they provide services to 1-9 Vocational Rehabilitation Clients. Ten respondents service 10-39 clients while 40-59 clients are seen by at least nine of the Workforce Investment Systems who responded to the survey. Fifteen (11.7%) respondents provide client services to approximately 60-79 clients, while only 10 of the 128 WIS see at least 80-99 VR Clients.

Of the services available through WIS, Job Development (50%), Job Search (44%), On-the-Job Training (35%), and Assessments (32%) are the most successful components in obtaining and maintaining employment for individuals with disabilities.

Vocational Rehabilitation Staff

VR Staff would like more training in New Counselor Training, Job Development, Case Management, and Disabilities. Many feel they are adequately aware of the job market but would like a more thorough understanding of connecting their clients with the right employment match based on need and client skills. From focus groups conducted in February Staff feel they would do a much better job if they are able to build relationships with businesses in their surrounding areas. Unserved clients are those who are elderly, economically unqualified, those with learning disorders, and high school students ranked as the most mentioned unserved group. Most underserved group include middle aged working age people, and those with less severe and more severe disabilities (autism and learning disabilities were listed) Support Services such as technology access, job training, were listed as unmet needs. Barriers to reaching out to the unserved and underserved include cultural competence in understanding various cultures and disabilities on the part of employers and some staff.

Job Readiness and basic computer skills topped the list in expected training and skills most potential employers are looking from VR clients. VR Staff feel that the DHS Vocational Rehabilitation is most successful in providing assistance to clients, conducting assessments and making changes to serve them more effectively.

Forty-nine percent of VR Staff agrees that the current accommodations their clients receive meet their employment needs. Four people did not respond.

Forty-six percent of VR Staff agrees that the job training their clients received or are still receiving adequately prepares them for employment. Five people did not respond.

Fifty-four percent of VR Staff agrees that they are well informed and understand how and why clients' disabilities impact their chances of getting or keeping a job. Four people did not respond.

Sixty-one percent of VR Staff stated yes, they often help clients obtain jobs. Eighteen people did not respond.

Seventy percent of VR Staff respondents stated, no, the majority of their clients do not find jobs themselves. Ten people did not respond.

Eighty-one percent of VR Staff respondents agree that they do invite clients to participate in developing vocational goals and they are involved in selecting the services of the preferred providers. Staff feels clients are unaware of the available providers, there are not enough providers, and some clients do not like to be told their ideas or plans for a career will not be supported by VR. Clients feel VR should support whatever career choice and path they decide.

Twenty-five percent of respondents agreed that on average, clients use VR services approximately 3 times to obtain employment. Fourteen staff did not respond.

Thirty-nine percent of respondents sometimes agree that the VR assessment process correctly identifies clients' strengths and their physical, mental and emotional needs. Fourteen people did not respond.

Thirty-six percent of responding VR staff stated that placement agencies are most effective method or practice that often leads to the best employment outcomes for their clients. Non-profit agencies were the second most helpful followed by family and friends.

Two-thirds of responding VR Staff feels they are adequately informed of the developing labor market and how to better advise their clients in developing skill sets that will be in demand.

At the time of the survey, 71% of VR Staff stated that their clients were not employed. Only 10 of the 122 responded that their clients were currently employed.

Of the 34 responding VR Staff, 9 agreed that clients are employed 1-3 months on average, followed by 7 who stated 1-2 years and another 7 stated 6-12 months. The time span varied practically even from 3 months - more than 2 years. There wasn't a great variation.

Of the 92 who responded, 48 stated that few clients have jobs when they leave the VR program. Forty-two (42%) stated that most clients have jobs and only 2 stated none of their clients have jobs when they leave the program.

Most clients, 60-79%, currently receive checks from the government such as SSI or SSDI, according to 30% of the VR Staff respondents. Another 28% stated that 80-90% of their clients receive SSI or SSDI.

Half of the staff who responded has Master's degrees. Another fourth have a bachelor's degree. Twenty-six people skipped this question. Most respondents are between the age of 45-64 years of age.

VR Client/Caregivers

Fifty-nine percent of the respondents are satisfied with the services they received or are still receiving from VR. However there were suggestions regarding education and

training. VR Clients repeatedly want education expenses paid for college and perhaps graduate level courses. VR Clients continue to be thoroughly uninformed of the policy, procedures, and stipulations for funding school or training programs. One responded stated, *"Explaining how the money is dispersed would be helpful in the beginning of the person's acceptance into the program and how it works with the available financial aid the client receives."* Other suggestions for improvement include basic computer skills training, additional options for job training and improved and increased employment prospects. Clients voiced concern about too many jobs being geared towards janitorial, cooking, and cleaning.

Over 50% agree that the job training they received or are still receiving prepares them for employment.

Sixty-three percent of surveyed Clients agree that their counselor understands how and why their disability impacts their chances of getting or keeping a job.

Fifty-three percent of respondents agree that their chances of getting a job increased because of VR training and services. Only 185 (29%) disagreed with this statement. The remaining 94 selected "sometimes". Twenty-four respondents elected to skip this question.

Of the 639 who responded, only 12% stated that their counselor helped them secure a job. Forty- four percent selected N/A and the remaining 43% did not feel counselors helped them secure employment.

Twenty-three percent of responding clients stated that they found their own job, while 27% stated they did not find their job on their own and 50% selected N/A meaning they currently did not have or job or they have never had a job while working with VR.

Fifty-five percent of VR clients who responded agreed that their counselor invites them to be a part of developing their vocational goals and involved in selecting services and training. Seventeen percent of those who responded selected 'sometimes' and another 28% state that they disagree or strongly disagree that the counselor invites them to participate in the development of goal setting and training.

The majority of respondents, 43%, stated that their counselor informs them of available jobs of interest and skill match. Thirty-eight percent disagreed with this statement. Eighteen percent were felt counselors sometimes informed them and sometimes did not inform them of suitable jobs.

Only 1/8 of the responding VR Clients had a job when they left the VR program. Thirty-two percent stated they did not have a job when leaving the program.

Over half (55%) of the VR Client's responding to the survey stated they have not used VR services to secure employment. More than 20% used VR services at least once to secure employment. The remaining respondents, 112, secured employment via VR services 2-5 times.

Only 18% of those who received placement were satisfied with their current job situation. Eight percent are unsatisfied and 40 of the 631 responding were on the fence of satisfied and not satisfied. They selected 'sometimes'.

Fifty-seven percent of respondents agree that their counselor is a strong advocated for their mental, emotional, and vocational needs. Twenty-eight percent disagree, 14% sometimes feel the counselors are strong advocates. The remaining 4% of the 646 skipped this question.

In 2016, the Department of Human Services, Vocational Rehabilitation conducted their triennial statewide needs assessment. The Research and Data Analysis unit monitored and collected surveys from the following groups: VR Staff, VR Community Resource Partners, VR Clients/Caretakers, VR Stakeholders, and Workforce Innovation and Opportunity Partners.

Participants had 2 weeks (July 25-August 8, 2016) to complete their respective survey.

In addition to the VR Management team, the State Rehabilitation Council (SRC) consulted and validated the creation and distribution of the surveys.

Vocational Rehabilitation staff, clients, caregivers, community partners and stakeholders were asked for guidance from their perspective. The results of the 2016 Needs Assessment identified that the Vocational Rehabilitation Program in Tennessee should focus efforts, over the next three years, in the areas of program knowledge for employees, community partners and the general public.

Specifically, the assessment identified the following primary needs for the program:

• Outreach materials to increase awareness and knowledge about the VR program and services to communities and local businesses. VR's outreach activities are woven throughout the state plan. See sections a, d, e, j, l, o, p, and q.

• Training to VR employees and Community Resource Partners covering policy changes and Letters of Agreement (LOA). The state plan includes numerous training initiatives and strategies for both VR staff and CRPs in sections a, c, d, f, i, j, l, n, o, p, and q.

• Training to VR employees covering medical impairments and how they impact limitations with work. As noted above, the state plan includes numerous training initiatives and strategies in sections a, c, d, f, i, j, l, n, o, p, and q.

• Transportation for clients. Meeting the transportation needs of clients continues to be an identified need in Tennessee. Transportation was a need identified in 2010, 2013, and 2016. Transportation is a major support service provided by VR either directly to an individual or through area transportation providers. The needs assessments identified needs in rural areas that do not have the transportation opportunities available in urban areas. To the extent possible, VR works with each individual to address transportation needs through rural transportation agencies or family members until an individual can afford his or her own transportation following employment. DHS continues to work with rural transportation providers and Human Resource Agencies to address rural transportation needs for individuals participating in work programs.

• Improved communication with Community Resource Partners (CRP). The state plan includes information on communication with CRPs through contracts, letters of agreement, training, and monitoring as outlined in sections a, c, d, e, f, l, m, o, p, and q.

• Increase in Pre-Employment Transition Services. The state plan includes several updates to the pre-employment transition service activities occurring throughout the state in sections a, d, e, f, g, l, and m.

• Increase in Local Education Association (LEA). The state plan includes several updates to its work with local education agencies in sections a, d, g, l, o, and p. Most notably, the number of LEAs served by the Transition School to Work program has increased.

B. W HO ARE MINORITIES;

Information regarding this question is included with the response to question A in this section.

C. W HO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Information regarding this question is included with the response to question A in this section.

D. W HO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEW IDE WORKFORCE DEVELOPMENT SYSTEM; AND

Information regarding this question is included with the response to question A in this section.

E. W HO ARE YOUTH WITH DISABILITIES AND STUDENTS W ITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

Information regarding this question is included with the response to question A in this section.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS W ITHIN THE STATE; AND

Information regarding this question is included with the response to question 1 in this section.

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS W ITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO W HICH SUCH SERVICES ARE COORDINATED W ITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS W ITH DISABILITIES EDUCATION ACT .

Information regarding this question is included with the response to question 1 in this section.

K. ANNUAL ESTIMATES

(Formerly known as Attachment 4.11(b)). Describe:

1. THE NUMBER OF INDIVIDUALS IN THE STATE W HO ARE ELIGIBLE FOR SERVICES;

As of Sept 30, 2017, 8,010 individuals in the state are eligible for services under an IPE. Of this number and in compliance with our Order of Selection, 7,255 are receiving services provided with Title I, Part B funds and 755 are receiving services provided with Title VI, Part B funds and with Title I, Part B funds.

For Fiscal Year 2018, it is projected that there will be 5,499 new applicants and that 12,754 individuals in the state will be eligible for services under an IPE. Of this number, 12,013 will receive services under an IPE provided with Title I, Part B funds and 741 will receive services under an IPE provided with Title VI, Part B funds and with Title I, Part B funds. It is estimated that the number of individuals to be served under Title I, Part B and Title VI, Part B under an IPE during Fiscal Year 2018 under each priority category within our Order of Selection will be:

- Priority Category 1 - 8,928 (Includes Title VI, Part B)
- Priority Category 2 - 3,826

Total 12,754

Note: Estimates for eligible individuals and those who will be provided services under our Order of Selection in Fiscal Year 2018 is based on current trends and adjustments to utilization of Title VI, Part B funds.

It is estimated that the cost of Title I, Part B and Title VI, Part B services for the projected 12,754 individuals who will be eligible for services under an IPE will be approximately $25,150,000 and that the service cost for each priority category within the Order of Selection for the individuals served will be:

- Priority Category 1 - $17,605,128 (Includes Title VI, Part B)
- Priority Category 2 - $7,544,872

Total $25,250,000

Note: Estimated cost for services is based on the total available funding approved by the State's Department of Finance and Administration for our Delegated Purchase Authority.

Category	Title 1 orTitle VI-	Estimated Funds	Est toBe ServedUnder IPE	Average andTotal Costof Services
1 and 2	N/A	$25,150,000	12,754	$1,972/per case

Category	Title 1 orTitle VI-	Estimated Funds	Est toBe ServedUnder IPE	Average andTotal Costof Services
1	Title VI included	0	8,928	$17,605,128
2	N/A	0	3,826	$ 7,544,872
Totals	N/A	0	12,754	$25,150,000

2. THE NUMBER OF ELIGIBLE INDIVIDUALS W HO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

Information regarding this question is included with the response to question 1 in this section.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

3. THE NUMBER OF INDIVIDUALS W HO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

- Priority Category 3 as of Sept 30, 2017 - 82
- Priority Category 4 as of Sept 30, 2017 - 138

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

Information regarding this question is included with the response to question 1 in this section.

L. STATE GOALS AND PRIORITIES

The designated State unit must:

1. IDENTIFY IF THE GOALS AND PRIORITIES W ERE JOINTLY DEVELOPED

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

The goals and priorities for 2017 are:

Goal 1. Continue Increasing Successful Employment Outcomes

Objective 1.1:

A. Increase Successful Employment Outcomes by 2% or more annually over the next 4 years. The opportunity exists to reinvigorate historical referral sources. This effort will include development of marketing initiatives for use in local areas for community outreach as well as joint efforts for partners listed below but not limited to:

- All agencies as required in the Combined State Plan
- Tennessee's Department of Labor and Workforce Development
- Department of Economic and Community Development
- Department of Intellectual and Developmental Disabilities
- Department of Children's Services and Department of Mental Health and Substance Abuse Services
- Chambers of Commerce
- Tennessee Works Partnership
- TennCare

The Division will develop strategies for increasing referrals of Pre-Employment Transition Services (PRE-ETS) through local education agencies. Special focus will include the identification of any underserved population at the regional level.

B. Action Steps to establish a stronger focus on employment related activities include:

i. Fully staff the Agency: Increase visibility and engagement of the Agency's Business Services Unit for regional and statewide activities;

ii. Building a comprehensive network of employment resources across the state;

iii. Implementing services to employers promoting the value of the Division and the hiring of people with disabilities;

iv. Maintain the current Community Rehabilitation Provider monitoring process to ensure effectiveness and efficiency;

- Develop/disseminate surveys to determine adequate training needs of service providers (new and seasoned staff)
- Maintain the monitoring and expansion of contracts related to Business Initiatives (ex. CLEE)

v. Continue to work collaboratively with and provide greater technical assistance to the Workforce Investment System. The program will continue to have counselors co-located in each of the State's Local Workforce Investment Areas[DS2] ' comprehensive career centers and to provide itinerant counselors to serve all satellite career centers.

Objective 1.2:

The Program will continue to monitor expenditures and available resources to determine sufficiency of releasing and/or opening Categories 3 and 4.

<u>Goal 2</u>. Improve Efficiency and Effectiveness in Client Services Delivery System

- Throughout the SFY, Vocational Rehabilitation will achieve a monthly timeliness rating of 92% for the determination of eligibility with the inclusion of extension agreements per policy. Determination of eligibility within 60 days.
- Throughout the SFY, Vocational Rehabilitation will develop the Individualized Plan for Employment within 90 days unless there is an agreed upon extension between the client and counselor. A timeliness rating of 90%.
- Meet with core partners to develop goals around the new federal standards and indicators regarding wages

Objective 2.2:

- Research prevailing wages for various industries

Objective 2.3:

- Research, develop, and implement strategies to increase the awareness and accessibility of client satisfaction surveys
- Achieving an 80%or higher satisfaction rating for the vocational rehabilitation program as reported by the consumer satisfaction survey program for successful outcome closures
- Continue to increase staff knowledge in rehabilitation practices through on-going training.

Objective 2.4:

Ensure access to VR documents, materials and training for clients, citizens, and staff:

1. The Program will ensure that all documents and materials are available in alternate formats.

2. The Program will ensure that timely requests are made when qualified interpreters are needed or requested

3. The Program will create VR marketing materials to accommodate individuals with sensory disabilities

4. The Program will research, develop, and implement a marketing plan to educate the community about VR services.

5. Meet with Disability Pathfinder to identify needs and engage diverse populations

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS.

Information regarding this question is included in the response to question 1 in this section.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

Information regarding this question is included in the response to question 1 in this section.

A. THE MOST RECENT COMPREHENSIVE STATEW IDE ASSESSMENT, INCLUDING ANY UPDATES;

Information regarding this question is included in the response to question 1 in this section.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF W IOA; AND

Information regarding this question is included in the response to question 1 in this section.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDING AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

Information regarding this question is included in the response to question 1 in this section.

M. ORDER OF SELECTION

Describe:

1. W HETHER THE DESIGNATED STATE UNIT W ILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOW ED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES.

Description of Priority categories

PRIORITY CATEGORY I -- Eligible individuals who have the most significant disabilities

PRIORITY CATEGORY II -- Eligible individuals who have significant disabilities

PRIORITY CATEGORY III -- Eligible individuals who do not have significant disabilities and whose vocational rehabilitation is expected to require multiple vocational rehabilitation services

PRIORITY CATEGORY IV -- Eligible individuals who do not have a significant disability that cannot be classified into a higher priority category

Definitions

"Most Significant Disability" means the individual meets the criteria for having a significant disability but has a physical or mental impairment that seriously limits two or more functional capacities in terms of an employment outcome.

"Significant Disability" means the individual meets the three following criteria:

1. The individual has a severe physical, sensory or mental impairment which seriously limits at least one functional capacity (such as visual/mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome; and

2. The individual has one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, deaf /blind, head injury, heart disease, hemiplegic, hemophilia, respiratory or pulmonary dysfunction, mental retardation, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorders, neurological disorders (including stroke and epilepsy), paraplegia, quadriplegia and other spinal cord conditions, sickle cell anemia, specific learning disability, and end-stage renal disease; or another disability or combination of disabilities determined on the basis of an assessment for determining eligibility, and vocational rehabilitation needs to cause comparable substantial functional limitation; and

3. The individual's vocational rehabilitation program can be expected to require multiple vocational rehabilitation services over an extended period of time.

"Non-Significant Disability" means the individual does not meet the criteria for significant disability or the criteria for most significant disability.

"Multiple Vocational Rehabilitation Services" mean two or more major vocational rehabilitation services, i.e. physical or mental restoration, training, counseling, guidance and placement. Excluded are support services such as transportation, maintenance, and the routine counseling and guidance that should take place in every case.

"Extended Period of Time" means 6 months from the date services begin until the employment objective is achieved.

B. THE JUSTIFICATION FOR THE ORDER.

The Division's Order of Selection is developed in accordance with 34 CFR § 361.36 of the final regulations. The Order of Selection has four priority categories as defined below in this section.

On August 1, 2001, the Division implemented an Order of Selection due to funding limitations that would not allow the Division to provide services under an IPE to all eligible individuals. Only Priority Category 1 cases (eligible individuals who have the most significant disabilities) were served until 2009.

From 2009 until October 2012 there were numerous releases of Priority Category 2 and 3 cases. Beginning October 1, 2012, the Division opened Priority Category 2 for services. The Division is now serving all Priority Category 1 and 2 cases. Those Priority Category 3 cases that were on the waiting list were released for services on October 1, 2013.

The Division's funds and resources remain inadequate to serve individuals in all four priority categories. The Division expects to have approximately $21,000,000 from the federal grant and state appropriations to spend for assessments for an estimated 5,499 new cases and planned services for approximately 12,754 existing and new cases.

Approximately half of this amount must be allocated for pre-employment transition services.

The Division also elects not to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment. The Division expects to serve 12,754 existing and new Priority Category 1 and 2 in 2018. Of this number, the Division expects to provide services for 8,928 Priority Category 1 cases and 3,826 Priority Category 2 cases.

The Division will monitor staffing needs to determine if there is sufficient manpower to schedule releases of Priority Category 3 and 4 cases for services or open all Priority Category 3 cases for services. Therefore, continuation of the Order of Selection mandated by the Rehabilitation Act of

1973, as amended, to determine which eligible individuals will be served under an IPE is still warranted due to staffing deficiencies.

The Division monitors services and expenditures on a continuous basis, allowing the Division to manage available funds and staff to assure sustainability of services for cases placed in an open priority category and receiving services under an Individualized Plan for Employment (IPE). Additionally, adequate funds will continue to be conserved and staffing deficiencies monitored to provide assessment services for all applicants expected to apply throughout the year to determine eligibility and to provide services for those eligible individuals in an open priority category within the Order of Selection.

C. THE SERVICE AND OUTCOME GOALS.

The Order of Selection priority categories outcome and service goals and time frames are as follows:

1. PRIORITY CATEGORY I -- Eligible individuals who have the most significant disabilities

A. Outcome and Service Goal: Expect to determine eligibility for 3,751 new individuals in this priority category; serve 8,928; and close 1,500 successfully employed.

B. Goal will be achieved by September 30, 2018.

2. PRIORITY CATEGORY II -- Eligible individuals who have significant disabilities

A. Outcome and Service Goal: Expect to determine eligibility for 1,708 new individuals in this priority category; serve 3,826; and close 500 successfully employed.

B. Goal will be achieved by September 30, 2018.

3. PRIORITY CATEGORY III -- Eligible individuals who do not have significant disabilities and whose vocational rehabilitation is expected to require multiple vocational rehabilitation services

A. Outcome and Service Goal: Expect to determine eligibility for 30 new individuals in this priority category and have 95 on the waiting list.

B. Goal will be achieved by September 30, 2018.

4. PRIORITY CATEGORY IV -- Eligible individuals who do not have a significant disability that cannot be classified into a higher priority category

A. Outcome and Service Goal: Expect to determine eligibility for 10 new individuals in this priority category and have 140 on the waiting list. Goal will be achieved by September 30, 2018.

D. THE TIME W ITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER.

Cases	Estimated Number of individuals to be served	Estimated number of individuals who will exit with employment after receiving services	Estimated number of individuals who will exit without employment after receiving services	Time within which goals are to be achieved	Cost of services
New	5,499	0	N/A	$1,374,750	
PC 1	8,928	1,500	Sept. 30, 2018	$17,605,128	
PC 2	3,826	500	Sept. 30, 2018	$7,544,872	
PC 3	40 eligibility and PC determination only	0	Sept. 30, 2018	$10,000 Assessments	
PC 4	10 eligibility and PC determination only	0	Sept. 30, 2018	$2,500 Assessments	

E. HOW INDIVIDUALS W ITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

The Division is currently serving Priority Category 1 and 2 cases. If the Division cannot continue to serve all Priority Category 1 and 2 cases, then Priority Category 1 cases will continue to be served and services for Priority Category 2 cases will be provided based on the date of application for services. If the Division cannot continue to serve all Priority Category 1 cases, then services will be provided based on the date of application for services.

The Division plans to open Priority Category 3 within the 2015 plan year. If after Priority 3 is opened and the Division cannot continue to serve all Priority 3 cases then services will be provided based on the date of application for services.

The Division continues to monitor resources in order determine if resources would allow the Division to open Priority Category 3 in a sustainable manner. If Priority 3 is opened

and the Division cannot continue to serve all Priority 3 cases then services will be provided based on the date of application for services.

Individuals who are determined to be in a closed priority category are referred to other appropriate agencies for services.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, W HO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT.

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS.

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

The Division continues to provide supported employment services to eligible clients with the most significant disabilities who have been determined to require on-going support (extended) services in order to maintain employment.

It is the continued goal of the Division to provide quality supported employment services which are delivered in an effective, efficient and timely manner. Supported employment services are provided through Letters of Agreement with community rehabilitation providers, and in cooperation with the Department of Intellectual and Developmental Disabilities, and the Department of Mental Health and Substance Abuse Services. The community rehabilitation providers must assure that on-going support (extended) services will be provided prior to the implementation of supported employment services or will be developed as natural supports during training. The Division has an excellent supported employment program along with training and support activities to ensure the continued provision of quality supported employment services. These programs are ongoing and are not subject to a specific timeline. Prime examples of these ongoing activities are:

1. Through contract with the University of Tennessee, Center for Literacy, Education and Employment (CLEE), the Division funds three supported employment consultants who are charged with the responsibility of working with our many supported employment community rehabilitation providers in providing training and technical assistance to the staff who provide services to our clients. These same consultants also work with the Division staff on an as needed basis to provide technical assistance.

2. The Division has Program Specialists in the three grand regions of the state who assist in the monitoring of and consultation to the community rehabilitation providers to ensure appropriate services are being provided to our clients.

3. The Division plans to continue the funding of the UT CLEE SE consultants activities as well as continue the provision of in-house monitoring of the services provided to the Division’s clients by the SE community rehabilitation providers.

The Division will continue to seek community rehabilitation providers to provide supported employment services to under-served disability groups with the most significant disabilities who, because of their disability, have not been able to enter

traditional competitive employment or whose employment is intermittent or interrupted due to a most significant disability.

The Division expects to continue increasing employment opportunities for those individuals eligible for supported employment with co-occurring disorders of mental illness, and alcohol and drug abuse by expanding more effective partnerships with mental health entities that work with this population and by implementing improved services. The Division has a Central Office field liaison who works with mental health entities and the Division's staff statewide in developing such partnerships where needed and who provides training and technical assistance to the mental health community rehabilitation providers and our staff.

The Division has a Central Office field liaison who works with service providers statewide that provides supported employment and extended services for individuals with intellectual and developmental disabilities to assist with technical assistance and staff training.

The Division expects to serve in excess of 740 clients through the supported employment program during the Fiscal Year 2018. The Division has consistently closed around 22% of the supported employment clients in successful employment. This would mean around 163 successful outcomes for FY2018.

The Division has established service codes and defined the extended services that will be provided for up to 4 years for youth with disabilities. The Community Rehabilitation Providers have been notified of these services that can be provided for youth.

In 2013, Governor Bill Haslam signed an Employment First Executive Order. This Executive Order established the Employment First Taskforce. In 2014, the Employment First Taskforce sign and executed a Youth Memorandum of Understanding (MOU). The agencies involved in the MOU are:

- Department of Education
- Vocational Rehabilitation
- Department of Labor and Workforce Development
- Department of Intellectual and Developmental Disabilities
- Department of Mental Health and Substance Abuse Services
- Council on Developmental Disabilities (this agency oversees the implementation of the MOU.

This MOU will assist the Division in leveraging other public funds to increase resources for extended services and extended employment.

2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, W ITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH W ITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:

A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND

Information regarding this question is include with the response to question 1 in this section.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

Information regarding this question is include with the response to question 1 in this section.

O. STATE'S STRATEGIES

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS W ITH DISABILITIES.

Funds will be utilized in Fiscal Year 2017 for addressing the following priorities that continue to be identified in our needs assessment as they relate to individuals with the most significant disabilities, including those who need supported employment services; individuals with disabilities who are minorities; individuals with disabilities who have been un-served or underserved by the vocational rehabilitation program; and individuals with disabilities served through other components of the statewide workforce investment system and personnel assisting those individuals through the components of the system: Education and Training; Employment Opportunities; Information; Support Services; and Counseling and Guidance.

In addition, as the Division continues to serve Priority Category 1 and 2 cases, more individuals with significant disabilities are able to access vocational rehabilitation services. The Division continues to monitor the budget and the staff capacity in order to determine the ability to serve Priority 3 and 4 cases. It is anticipated this activity will lead to improvement in the number of individuals with disabilities reaching successful rehabilitation outcome statuses by:

1. Continuing the practice of ensuring the availability of appropriate training activities and resources to meet the individualized needs of clients by seeking out and developing partnerships with other private and public entities to provide specialized education and training activities, to include those that can be provided through self-employment, on-the-job- training by employers, and customized employment.

2. Continuing the development and expansion of statewide employer relationships that focus on inclusion of employees with disabilities in the workforce and the value of hiring people with disabilities. The Division will continue its expansion of our activities with Employment Groups across the state and in the local areas with new programs, such as Walgreens REDI and Project Search.

3. Continuing to support expansion of supported employment services by actively seeking out, training, and monitoring community rehabilitation providers; especially in the more rural areas, that are willing to provide supported employment services to vocational rehabilitation clients with the most significant disabilities; and by fostering partnerships with DIDD and chapters of The ARC in Tennessee to implement employment network projects with community rehabilitation providers. The Division is striving to have shared vendors with DIDD in order to access services for shared clients. The Division is expanding participation in the Individual Placement Model of Supported Employment (IPS) statewide.

4. Continue to increase employment opportunities for clients through development, training, and monitoring of community rehabilitation providers providing job coach pools and employment services.

5. Development of the Business Services Unit will increase targeted marketing and education services to employers; and the provision of additional technical support and expertise to Division staff, clients, and employers in the areas of ongoing and emerging disability issues, and supported employment issues.

6. Continuing to support expansion of Transition School-to-Work services by continuing to work with Local Education Agencies (LEA's) in the maintenance of existing partnerships and the creation of additional partnerships to provide vocational rehabilitation services targeted specifically to that LEA's school system. Continuing to work with and educate school personnel on the mission and scope of the Division in order to maximize services from both entities to better serve our mutual clientele to include appropriate qualified interpreters/accommodations for students that are in LEA/School to Work programs. The newly hired Transition School to Work Director will manage this process.

7. Continuing improvement in the service delivery of the Division's 17 community rehabilitation centers and the comprehensive rehabilitation center at Smyrna geared directly toward providing services leading to successful employment of individuals with the most significant disabilities. Pursue the development of additional service delivery entities in metropolitan and rural markets for services including vocational evaluation, personal and work adjustment, job development, job placement, and job coaching. The 17 Community rehabilitation centers are focusing on expansion of the job readiness programs and collaboration with local area businesses. : The Smyrna TRC is expanding vocational training programs through partnerships with CVS Caremark and Nissan and continues to research national employment trends to identify needs for new training programs.

8. Continuing support of vocational rehabilitation counselor development by providing opportunities for vocational rehabilitation counselors to obtain Masters Degrees in Rehabilitation Counseling. The Division will pursue all available RSA slots for master's level training available to the Division through outreach and research. The Division will continue utilization of recruiter staff for recruiting vocational rehabilitation counselors who have a Master's Degree in Rehabilitation Counseling. Finally, the Division will continue financial support of counselors seeking master's degrees.

9. Developing and implementing a comprehensive staff development program based on core competencies for all VR Staff. Utilize partnerships through the university programs. There is an Education Development Plan being developed for all staff in order to reinforce and encourage the Division's goals and priorities.

10. Continuing to implement a marketing/outreach plan that targets and reaches un-served or underserved populations to include all minorities, such as Spanish-speaking clients and clients with traumatic brain injury, autism, deaf-blindness, and mental illness. The marketing efforts will target individuals with the most significant disabilities who are seeking employment.

11. Continuing to support the Workforce Investment System by continuing to co-locate vocational rehabilitation counselors in each of the major Workforce Investment Act Service delivery area career centers and ensuring that all career center satellites also have vocational rehabilitation counselors assigned to visit their centers on a regular basis to work with individuals with disabilities that visit each center.

12. Providing cross training to the career center staff in regard to meeting the needs of individuals with disabilities. Continue to provide consultation on career center accessibility and accommodation needs in regard to the accessibility needs in the building(s), and accommodations in terms of appropriate technology needed to serve individuals with the disabilities. Continue to partner with the American Job Centers (AJCs) in employment initiatives such as the summer youth employment project and the DEI grant

13. Continuing to support the Ticket to Work and Self-Sufficiency Program and use of other Social Security work incentives that benefit clients by continuing contract with the Benefits to Work Company. This company provides Social Security benefits counseling to clients before and after the Individualized Plan for Employment process. Currently the Division contracts with Benefits to Work to provide outreach to communities on how working affects Social Security Benefits, work incentives, and benefits planning. The agency will also continue to promote the most effective use of Ticket to Work Employment Network programs for the Division and our partners.

14. Continuing training for vocational rehabilitation staff on how effective rehabilitation technology options lead to successful employment outcomes. Staff at the Technology centers meeting quarterly with staff to provide training on services.

15. Continuing support of the State Rehabilitation Council. Council members will be reimbursed for reasonable and necessary expenses for attending Council meetings and performing Council duties (including child care, - personal assistance services and qualified interpreters).

16. Continuing support of the Statewide Independent Living Council. Council members will be reimbursed for reasonable and necessary expenses for attending Council meetings and performing Council duties (including child care, personal assistance services and qualified interpreters).

17. Continuing to submit to the Commissioner an annual report of how funds are utilized relative to innovation and expansion activities.

18. Continuing to provide a coordinated, comprehensive and statewide assistive technology delivery system through a network of contracted assistive technology centers. Each of these five centers, strategically located in Memphis, Jackson, Nashville, Chattanooga and Knoxville ensure access to clients from all 95 counties in Tennessee regardless of location. The centers diverse staff includes: Rehabilitation Engineers; Speech and Language Pathologists; Assistive Technologists; Orientation and Mobility Specialists, Therapists and other Professionals who provide clients with evaluation, training, device fabrication and follow up services. By providing clients with access to this highly trained and skilled resource, and by purchasing the required devices, clients have the tools that they need throughout their rehabilitation program to assist them in realizing their IPE goals.

19. Continue implementation of the electronic case management system (TRIMS) utilizing input from agency staff and vendors to enhance the Division's technological infrastructure and client service capabilities.

20. Continue partnerships with the three federal grants that target employment of persons with disabilities. Those grants are Tennessee Works, Employment First, and DEI. Tennessee is one of three states in the country that are receiving all three grants.

21. Revise the self-employment process to streamline the experience for clients seeking the self-employment option. Research other state VR self-employment policies for efficient, consumer oriented strategies; and include successful business owners in the process to produce a successful program that will help individuals with disabilities become successful entrepreneurs.

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS W ITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEW IDE BASIS.

Information regarding this question is included with the response to question 1 in this section.

3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS W ITH DISABILITIES W HO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS W ELL AS THOSE W HO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM.

Information regarding this question is included with the response to question 1 in this section.

4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS W ITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES).

Information regarding this question is included with the response to question 1 in this section.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS W ITHIN THE STATE.

Information regarding this question is included with the response to question 1 in this section.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE W ITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF W IOA.

Information regarding this question is included with the response to question 1 in this section.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS W ITH DISABILITIES.

Information regarding this question is included with the response to question 1 in this section.

8. HOW THE AGENCY'S STRATEGIES W ILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT W ITH THE COMPREHENSIVE NEEDS ASSESSMENT;

Information regarding this question is included with the response to question 1 in this section.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

Information regarding this question is included with the response to question 1 in this section.

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS W ITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

Information regarding this question is included with the response to question 1 in this section.

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

Describe:

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR W ERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.

The goals and priorities of the Division of Rehabilitation Services for Fiscal Year 2012, as developed and agreed to by the Division of Rehabilitation Services staff and the State Rehabilitation Council, are focused around the Division's strategic plan.

The goals and priorities for 2015 are:

Goal 1. Continue Increasing Successful Employment Outcomes

OBJECTIVE 1.1:

A. Increase Successful Employment Outcomes by 10% or more over Federal Fiscal Year 2014. The opportunity exists to reinvigorate historical referral sources. This effort will include development of marketing initiatives for use in local areas for community outreach as well as joint efforts with the:

a. Workforce Investment System

b. Tennessee's Department of Labor and Workforce Development

c. Department of Economic and Community Development

d. Department of Intellectual and Developmental Disabilities

e. Department of Children's Services and Department of Mental Health and Substance Abuse Services

The Division will develop strategies for increasing referrals of transition school to work clients through local education agencies. Special focus will include the identification of any underserved population at the regional level.

ACHIEVEMENT: In Federal Fiscal Year the Program had 2358 successful employment outcomes. This is a 9% increase over FY2014's successful employment outcomes of 2159. The VR Program continued focused collaborative efforts with numerous state agencies, in addition to collaboration with Universities across the state. In FFY 2015 Transition School to Work contracts were increased.

B. Action Steps to establish a stronger focus on employment related activities include:

a. Staffing the Agency's Business Services Unit for regional and statewide activities;

b. Building a comprehensive network of employment resources across the state;

c. Implementing services to employers promoting the value of the Division and the hiring of people with disabilities;

d. Continuing the current Community Rehabilitation Provider monitoring process to ensure effectiveness and efficiency;

e. Continue to work collaboratively with and provide greater technical assistance to the Workforce Investment System. The Division will continue to have counselors co-located in each of the State's Local Workforce Investment Areas' comprehensive career centers and to provide itinerant counselors to serve all satellite career centers.

ACHIEVEMENT: In FFY2015, the VR Program met with the Business Services Coordinator from the VR Program in Alabama to discuss strategies on expansion of the Business Services Unit in Tennessee. The Statewide Business Services Consultant worked with over 130 businesses statewide in FFY2015. The program offered new services to businesses, such as assistance with Section 503 compliance. The Department of Human Services continues to provide monitoring of the CRPs throughout the state.

OBJECTIVE 1.2:

The Division will continue to monitor expenditures and available funding to determine if there is sufficient funding to release Category 3 and 4.

Goal 2. Improve Efficiency and Effectiveness in Client Services Delivery System

OBJECTIVE 2.1:

Meet or exceed the Federal rehabilitation success rate of 55.8% for FY 2014 (Success rate is determined by the number of Status 26 rehabilitated case closures divided by the number of Status 26 plus the number of Status 28 non-rehabilitated Case closures).The division is focusing on the Employment Needs Assessment Process in order to write better Individualized Employment Plans. This effort will increase the number of successful closures and decrease the number of unsuccessful closures.

OBJECTIVE 2.2:

Meet or exceed the Federal ratio of the average hourly wage of individuals who achieved competitive employment to the average hourly wage of all employed individuals in the State of 0.520.Fifty-two percent of closures should be working at wages of $10-$11 per hour.

ACHIEVEMENT: The VR Program did not meet this goal. The ratio has consistently been 0.49, meaning Forty-nine percent of the successful closures were work at wages of $10-$11 per hour.

OBJECTIVE 2.3:

Ensure adherence to quality services leading to employment and quality case management practices by:

1. Achieving an 80%or higher satisfaction rating for the vocational rehabilitation program as reported by the consumer satisfaction survey program for successful outcome closures.

2. Continuing with improvements to the Division’s electronic case management system (Tennessee Rehabilitation Information and Management System, TRIMS) to enhance efficiency and accuracy.

3. Training- Continue to increase staff knowledge through continuous training.

ACHIEVEMENT: The Program continues to make improvements the TRIMS system that will increase efficiency and effectiveness for the staff.

OBJECTIVE 2.4:

Ensure access to VR documents, materials and training for clients and staff:

1. The Division will ensure that all documents and materials are available in alternate formats, as needed and requested.

ACHIEVEMENT - the Division always ensures that materials are available in alternate formats. This information is always made available.

2. The Division will ensure that timely requests are made when qualified interpreters are needed or requested.

ACHIEVEMENT: The Division makes requests for interpreters as soon as possible.

3. Video ASL for the Deaf

ACHIEVEMENT: The Division continues to research how to best achieve this goal.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Information regarding this question is included with the response to question A in this section.

2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR W ERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.

Information regarding this question is included with the response to question 1 in this section.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Information regarding this question is included with the response to question 1 in this section.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF W IOA.

Information regarding this question is included with the response to question 1 in this section.

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES W ERE UTILIZED.

Information regarding this question is included with the response to question 1 in this section.

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES.

Include the following:

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS W ITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

The Division continues to provide supported employment services to eligible clients with the most significant disabilities who have been determined to require supported employment services, in accordance with 34 CFR § 361 and 363, in order to obtain and maintain competitive integrated employment.

In FFY 2017, the goal was to serve 1,300 supported employment cases and to close 286 successful rehabilitation outcomes. The agency served approximately 1,527 and closed 369 cases in Status 26. These can be attributed to the improved and stronger alliance with the community rehabilitation providers and with other state agencies.

When the Supported Employment attachment to the Letter of Agreement was introduced on January 2015, one of the staffing qualification requirements for Employment Specialists is to have completed training through the Association of Certified Rehabilitation Education (ACRE) or by obtaining the Certified Employment Support Professional (CESP) certification. Tennessee providers have been proactive in securing the CESP certification and there have been 223 reported individuals that have obtained the certificate since CESP was introduced to the state.

It is the continued goal of the Division to provide quality supported employment services which are delivered in an effective, efficient and timely manner. Supported employment services are provided through Letters of Agreement with community rehabilitation providers and in cooperation with the Department of Intellectual and Developmental Disabilities (DIDD), Department of Mental Health and Substance Abuse Services (DMHSAS), and the Division of TennCare. The VR staff and community rehabilitation providers must assure that extended services will be available prior to the provision of supported employment services or will be developed as natural supports.

During FFY 2017, interagency agreements were signed and implemented that articulated the following collaboration:

- The agreement between the Division and the DMHSAS solidified the use of evidence based supported employment model, Individual Placement & Support (IPS), in assisting individuals with behavioral health and co-occurring diagnoses in their pursuit of competitive integrated employment. The Division has 8 CRPs that have specific IPS LOA with the agency.
- The agreement between the Division and the Department of Intellectual and Development Disabilities created a pilot program for individuals who are in DIDD's Harold Jordan Center. It is a state owned facility for individuals with intensive behavioral issues and will utilize employment as part of the wrap around services.
- The agreement between the Division and the Division of TennCare created provision of employment services for persons enrolled in the Employment and Community First (ECF) CHOICES program. Federal guidance for Medicaid LTSS stipulates employment should be an ongoing part of the delivery of

services. Regulations for home and community-based programs requiring provision of opportunities to work in competitive integrated setting. The target populations are individuals with intellectual and/or developmental disabilities. The agreement intends to ensure that services are coordinated, seamless, and efficient. The Division and TennCare coordinated training efforts to implement the agreement requirements.

There is a small pilot supported employment program for individuals with intellectual and development disabilities that have a behavioral health diagnosis. This pilot program is utilizing IPS in providing SE services. IPS is a promising employment service model for non-behavioral health individuals. The Division along with the DIDD, DMHSAS, and the CRP are testing the applicability of the IPS model in serving individuals with said diagnoses.

For FFY 2018, the Office of Disability Employment Policy (ODEP) has selected Tennessee as a Core and Vision Quest state to receive technical assistance under the Employment First State Leadership Mentoring Program (EFSLMP). As a Core state, TN will be assisted in Employer Engagement and Provider Transformation. TN's goal to increase the number of providers undergoing transformation and increasing the people engaged in competitive integrated employment. As a Vision Quest state, TN will receive guidance about funding and expansion of IPS services in partnership with VR, DMHSAS, and TennCare.

The Division coordinates with other state agencies and the community rehabilitation providers to transition clients receiving supported employment services to extended services. An individual is moved to extended services when the client has reached a point where he/she has achieved maximum performance on the job; has achieved minimum necessary supports on the job; the job is not in jeopardy of ending; and individual is maintaining work performance which is acceptable to employer and client. The Division is working with the University of Tennessee, Center for Literacy, Education and Employment to develop training for CRPs on how to develop natural supports to address extended services where funding is not available from another Agency.

The Division will continue to contract for services from the University of Tennessee's Center for Literacy, Education and Employment (CLEE). These programs will provide continuing training to the Division's staff and contracted community rehabilitation providers to assure competency and compliance.

The number of supported employment providers has increased over the past year from 62 to 75 supported employment CRPs. The Division continues its efforts to increase S.E. providers and anticipates the numbers of providers will increase. VR is actively pursuing a number of other providers for underserved areas across the state. While the number of CRPs remains adequate to serve the Division's number of supported employment clients, there remains a shortage of CRPs able to provide supported employment services in more rural areas and under-served communities and under-served populations of the state. The Division will continue to enter into supported employment agreements with appropriate state agencies, as well as Letters of Agreement with private and/or non-profit agencies which have the capabilities of providing quality service delivery and extended services in

multiple counties. The Division will assertively seek those agencies that will provide supported employment services to persons being transitioned from institutional settings to the community and to work in competitive, integrated employment settings.

The Division will continue to seek community rehabilitation providers to provide supported employment services to under-served disability groups with the most significant disabilities.

The Division expects to serve in excess of 1430 clients through the supported employment program during the Fiscal Year 2018. The Division has consistently closed around 22% of the supported employment clients in successful employment. This would mean around 315 successful outcomes for FY2018.

For the provision of extended services to youth with disabilities who received supported employment services, the division will continue to collaborate and find partnership opportunities with DIDD, DMHSA, Department of Education, and other entities to continue outreach to transition students that may need supported employment. As mandated, the Division has set aside applicable VR funds for extended services of youth with most significant disabilities who require supported employment but whose extended services are not funded by other entities or sources. To capture this, the Division has created a specific status code for these cases.

The Division will work with the Department of Education using the PRE-ETS program. These would offer work experiences that can assist transition students to a more positive and encouraging supported employment roadmap.

The Division will continue to work with the Center for Medicare and Medicaid Services (CMMS) in continuing to align policies and funding that would support employment services.

The Division has convened a work group of VR staff, CRPs, managed care organizations (Amerigroup, BlueCare, and United Health Care) and other entities to review policies, training, identify improvements and best practices for the ECF CHOICES program.

The Division will work with disability specific stakeholders and advocacy groups such as the Autism Society and chapters of The ARC in Tennessee in conducting collaborative meetings to help identify sources of support.

The Division will continue to work with the IPS community for expansion and sustainability of the IPS SE services.

The Division will continue to encourage CRPs to become Employment Networks as possible funding source for on-going services. The Division will continue to train CRPs and VR staff to increase usage of SSA PASS plan and other work incentive programs.

The Division will assure that funds are made available will only be used to provide Supported Employment services to individuals who are eligible to receive such services.

The Division’s case management system, TRIMS, has the ability to identify cases and expend the funds allotted as required by the RSA.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Information regarding this question is included with the response to question 1 in this section.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate

Vocational Rehabilitation Program

Name of designated State agency: Tennessee Department of Human Services

Full Name of Authorized Representative: Danielle Barnes

Title of Authorized Representative: Commissioner

States must provide written and signed certifications that:

1. The designated State agency or designated State unit (as appropriate) listed above is authorized to submit the VR services portion of the Unified or Combined State Plan under title 1 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.** Yes

2. 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 listed above agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan* , the Rehabilitation Act, and all applicable regulations, 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;** Yes

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes

7. The Authorized Representative listed above 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; Yes

8. The Authorized Representative listed above has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes

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. Yes

FOOTNOTES

Certification 1 Footnotes

* Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

Certification 2 Footnotes

* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

** No funds under title 1 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.

*** 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 3485; and the State VR Services Program regulations.

Certification 3 Footnotes

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes

ADDITIONAL COMMENTS ON THE CERTIFICATIONS FROM THE STATE

CERTIFICATION REGARDING LOBBYING — VOCATIONAL REHABILITATION

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.

Applicant’s Organization: Tennessee Department of Human Services, the VocationalRehabilitation Program

Full Name of Authorized Representative: Danielle Barnes

Title of Authorized Representative: Commissioner

SF LLL Form- Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

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.
Applicant’s Organization

Full Name of Authorized Representative: Title of Authorized Representative:

SF LLL Form - Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html).

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined

State Plan and its supplement makes the following assurances: The State Plan must provide assurances that:

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. SUBMISSION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. 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:

A. THE ESTABLISHMENT OF THE DESIGNATED STATE AGENCY AND DESIGNATED STATE UNIT, AS REQUIRED BY SECTION 101(A)(2) OF THE REHABILITATION ACT.

B. THE ESTABLISHMENT OF EITHER A STATE INDEPENDENT COMMISSION OR STATE REHABILITATION COUNCIL, AS REQUIRED BY SECTION 101(A)(21) OF THE REHABILITATION ACT.

The designated State agency or designated State unit, as applicable

C. CONSULTATIONS REGARDING THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE W ITH SECTION 101(A)(16)(B) OF THE REHABILITATION ACT.

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 W ITH SECTION 101(A)(3).

E. THE LOCAL ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE W ITH SECTION 101(A)(2)(A) OF THE REHABILITATION ACT.

The designated State agency allows for the local administration of VR funds No

F. THE SHARED FUNDING AND ADMINISTRATION OF JOINT PROGRAMS, IN ACCORDANCE W ITH SECTION 101(A)(2)(A)(II) OF THE REHABILITATION ACT.

The designated State agency allows for the shared funding and administration of joint programs: No

G. STATEWIDENESS AND W AIVERS OF STATEW IDENESS REQUIREMENTS, AS SET FORTH IN SECTION 101(A)(4) OF THE REHABILITATION ACT.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. Yes

H. THE DESCRIPTIONS FOR COOPERATION, COLLABORATION, AND COORDINATION, AS REQUIRED BY SECTIONS 101(A)(11) AND (24)(B); AND 606(B) OF THE REHABILITATION ACT.

I. ALL REQUIRED METHODS OF ADMINISTRATION, AS REQUIRED BY SECTION 101(A)(6) OF THE REHABILITATION ACT .

J. THE REQUIREMENTS FOR THE COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT, AS SET FORTH IN SECTION 101(A)(7) OF THE REHABILITATION ACT.

K. THE COMPILATION AND SUBMISSION TO THE COMMISSIONER OF STATEW IDE 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.

L. THE RESERVATION AND USE OF A PORTION OF THE FUNDS ALLOTTED TO THE STATE UNDER SECTION 110 OF THE REHABILITATION ACT FOR THE DEVELOPMENT AND IMPLEMENTATION OF INNOVATIVE APPROACHES TO EXPAND AND IMPROVE THE PROVISION OF VR SERVICES TO INDIVIDUALS W ITH DISABILITIES, PARTICULARLY INDIVIDUALS W ITH THE MOST SIGNIFICANT DISABILITIES.

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:

A. COMPLY W ITH ALL REQUIREMENTS REGARDING INFORMATION AND REFERRAL SERVICES IN ACCORDANCE WITH SECTIONS 101(A)(5)(D) AND (20) OF THE REHABILITATION ACT.

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 W HO IS PRESENT IN THE STATE IN ACCORDANCE W ITH SECTION 101(A)(12) OF THE REHABILITATION ACT .

C. PROVIDE THE FULL RANGE OF SERVICES LISTED IN SECTION 103(A) OF THE REHABILITATION ACT AS APPROPRIATE, TO ALL ELIGIBLE INDIVIDUALS W ITH DISABILITIES IN THE STATE W HO APPLY FOR SERVICES IN ACCORDANCE W ITH SECTION 101(A)(5) OF THE REHABILITATION ACT?

Agency will provide the full range of services described above No

D. DETERMINE W HETHER COMPARABLE SERVICES AND BENEFITS ARE AVAILABLE TO THE INDIVIDUAL IN ACCORDANCE W ITH SECTION 101(A)(8) OF THE REHABILITATION ACT.

E. COMPLY W ITH THE REQUIREMENTS FOR THE DEVELOPMENT OF AN INDIVIDUALIZED PLAN FOR EMPLOYMENT IN ACCORDANCE W ITH SECTION 102(B) OF THE REHABILITATION ACT.

F. COMPLY W ITH REQUIREMENTS REGARDING THE PROVISIONS OF INFORMED CHOICE FOR ALL APPLICANTS AND ELIGIBLE INDIVIDUALS IN ACCORDANCE WITH SECTION 102(D) OF THE REHABILITATION ACT.

G. PROVIDE VOCATIONAL REHABILITATION SERVICES TO AMERICAN INDIANS WHO ARE INDIVIDUALS W ITH DISABILITIES RESIDING IN THE STATE, IN ACCORDANCE W ITH SECTION 101(A)(13) OF THE REHABILITATION ACT.

H. COMPLY W ITH THE REQUIREMENTS FOR THE CONDUCT OF SEMIANNUAL OR ANNUAL REVIEW S, AS APPROPRIATE, FOR INDIVIDUALS EMPLOYED EITHER IN AN EXTENDED EMPLOYMENT SETTING IN A COMMUNITY REHABILITATION PROGRAM OR ANY OTHER EMPLOYMENT UNDER SECTION 14(C) OF THE FAIR LABOR STANDARDS ACT OF 1938, AS REQUIRED BY SECTION 101(A)(14)OF THE REHABILITATION ACT.

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

J. W ITH RESPECT TO STUDENTS W ITH DISABILITIES, THE STATE,

I. HAS DEVELOPED AND W ILL IMPLEMENT,

A. STRATEGIES TO ADDRESS THE NEEDS IDENTIFIED IN THE ASSESSMENTS; AND

B. STRATEGIES TO ACHIEVE THE GOALS AND PRIORITIES IDENTIFIED BY THE STATE, TO IMPROVE AND EXPAND VOCATIONAL REHABILITATION SERVICES FOR STUDENTS W ITH DISABILITIES ON A STATEW IDE BASIS; AND

II. HAS DEVELOPED AND W ILL IMPLEMENT STRATEGIES TO PROVIDE PRE-EMPLOYMENT TRANSITION SERVICES (SECTIONS 101(A)(15) AND 101(A)(25)).

5. PROGRAM ADMINISTRATION FOR THE SUPPORTED EMPLOYMENT TITLE VI SUPPLEMENT:

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.

B. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL SUBMIT REPORTS IN SUCH FORM AND IN ACCORDANCE W ITH 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.

C. THE DESIGNATED STATE UNIT WILL COORDINATE ACTIVITIES W ITH ANY OTHER STATE AGENCY THAT IS FUNCTIONING AS AN EMPLOYMENT NETW ORK UNDER THE TICKET TO WORK AND SELF-SUFFICIENCY PROGRAM UNDER SECTION 1148 OF THE SOCIAL SECURITY ACT.

6. FINANCIAL ADMINISTRATION OF THE SUPPORTED EMPLOYMENT PROGRAM:

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 W ILL 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 W ITH THE MOST SIGNIFICANT DISABILITIES W ITH THE FUNDS RESERVED FOR SUCH PURPOSE UNDER SECTION 603(D) OF THE REHABILITATION ACT, IN ACCORDANCE WITH SECTION 606(B)(7)(G) AND (H) OF THE REHABILITATION ACT.

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 W ITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING EXTENDED SERVICES TO YOUTH W ITH 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, W HEN PROVIDING SUPPORTED EMPLOYMENT SERVICES SPECIFIED IN THE INDIVIDUALIZED PLAN FOR EMPLOYMENT, IN ACCORDANCE W ITH SECTION 606(B)(7)(A) AND (D), OF THE REHABILITATION ACT.

7. PROVISION OF SUPPORTED EMPLOYMENT SERVICES:

A. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL PROVIDE SUPPORTED EMPLOYMENT SERVICES AS DEFINED IN SECTION 7(39) OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT:

I. THE COMPREHENSIVE ASSESSMENT OF INDIVIDUALS W ITH 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 W ITH THE REQUIREMENTS OF SECTION 606(B)(7)(B) OF THE REHABILITATION ACT

II. AN INDIVIDUALIZED PLAN FOR EMPLOYMENT THAT MEETS THE REQUIREMENTS OF SECTION 102(B) OF THE REHABILITATION ACT , WHICH IS DEVELOPED AND UPDATED W ITH TITLE I FUNDS, IN ACCORDANCE W ITH SECTIONS 102(B)(3)(F) AND 606(B)(6)(C) AND (E) OF THE REHABILITATION ACT.

ADDITIONAL COMMENTS ON THE ASSURANCES FROM THE STATE

TN full WIOA Combined State Plan (http://www.tn.gov/assets/entities/labor/attachments/TN_WIOA_Combined_State_Plan.pdf)

LMI Info (http://tn.gov/assets/entities/labor/attachments/APPENDIX_2_ECONOMIC_AND_WORKFORCE_ANALYSIS.pdf)

TANF-Specific Strategic and Opertaional Planning Elements (https://www.tn.gov/assets/entities/labor/attachments/TANF_WIOA_Specific_Stategic__Operational_Elements.pdf)

Workforce 360 (http://tn.gov/assets/entities/labor/attachments/APPENDIX_3_WORKFORCE_360.pdf)

Drive to 55 (http://tn.gov/assets/entities/labor/attachments/APPENDIX_4_ECONOMIC_BENEFITS_OF_POSTSECONDARY_CREDENTIALS_-_DRIVE_TO_55_ACHIEVEMENT.pdf)

SNAP Plan (http://tn.gov/assets/entities/labor/attachments/TN_SNAP_ET_State_Plan_FFY_2016.pdf)