



Center for Workforce Development
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The Center for Workforce Development serves as staff to the Smoky Mountains Area WIA Board.
Claiborne • Cocke • Grainger • Greene • Hamblen • Hancock • Hawkins • Jefferson • Sevier • Union

May 13, 2013

Ms. Christy Montgomery
Grants Program Manager Youth, Planning, Boards
Division of Workforce Services
220 French Landing Drive
Nashville, TN 37243-1002

Dear Ms. Montgomery:

On behalf of the Smoky Mountains Area Workforce Board, I am requesting an extension of our current five-year plan through June 30, 2014. This year's plan includes some updates, primarily as a result of the closure of three career centers in our area. We have also included a request to utilize the three youth waivers to ensure the efficient and effective delivery of youth services and to ensure performance.

Please let us know if you or the board has any questions about our request.

Sincerely,

A handwritten signature in black ink that reads 'Nancy B. Brown'. The signature is written in a cursive, flowing style.

Nancy Benziger Brown, Ph.D., FAICP
Dean of Workforce Development



A Tennessee Board of Regents College

SMOKY MOUNTAINS AREA



2013 PLAN MODIFICATIONS

Level II Application

Tennessee Center for Performance Excellence

Submitted by the staff on behalf of the Smoky Mountains Area WIA Board

Center for Workforce Development

Walters State Community College

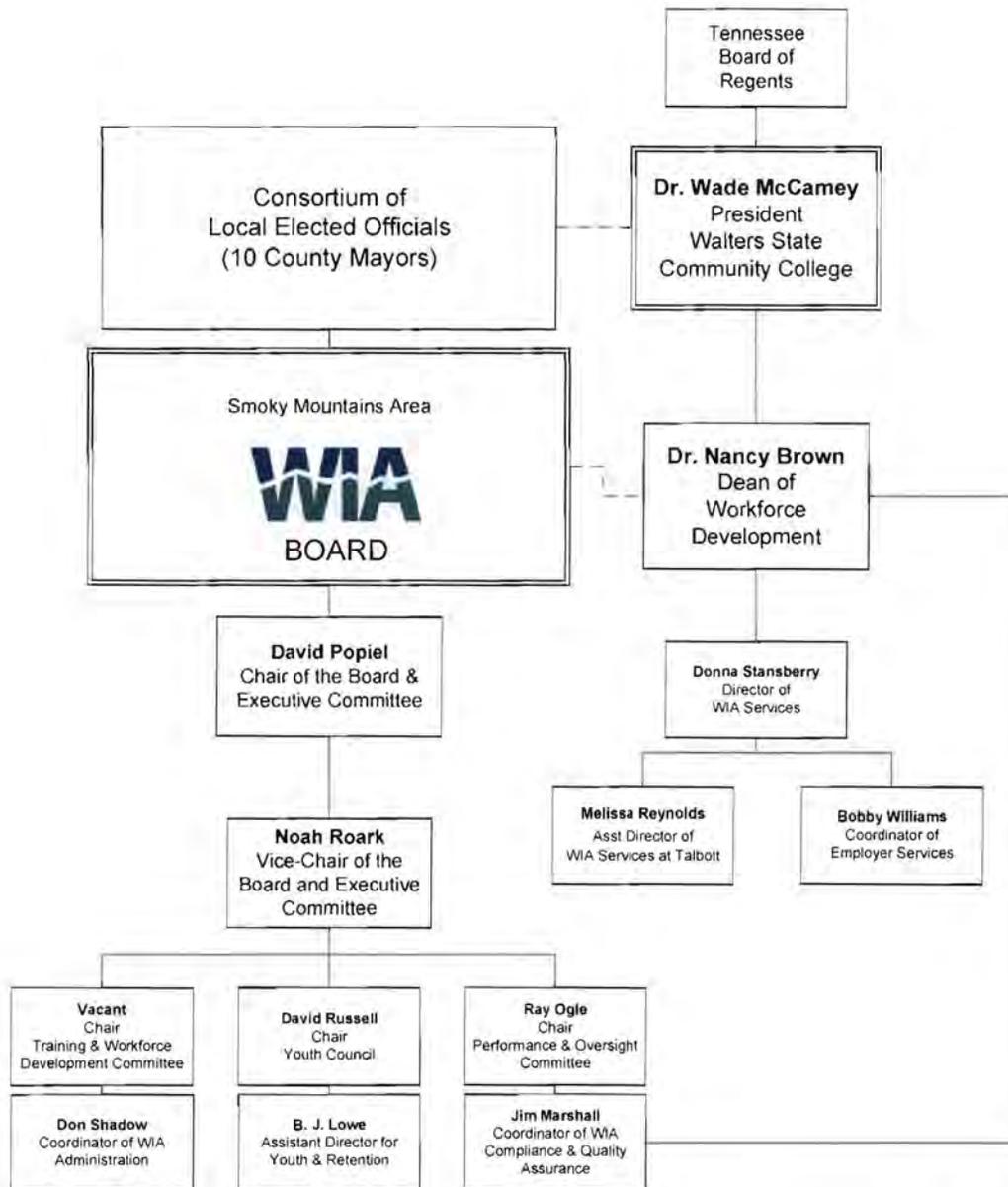
Morristown, Tennessee

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Organizational Chart



Key Terms

Administrative Entity	Organization designated by the local elected officials to administer the Workforce Investment Act funds. In the Smoky Mountains WIA Area, the Consortium of Local Elected Officials chose Walters State Community College as the administrative entity for the 10 counties in Local Area 2.
ARRA	American Reinvestment and Recovery Act
CLEO	The Consortium of Local Elected Officials is composed of the 10 county mayors in the Smoky Mountains WIA Area.
CRC	Career Readiness Certificates test the work readiness of jobseekers using WorkKeys.
CWE	The Center for Workforce Education at Walters State Community College received an ARRA grant from TDLWD in 2009 to develop a clean energy technology training program.
CWD	The Center for Workforce Development at Walters State Community College staffs the Smoky Mountains Area WIA Board and provides WIA program services in area career centers and career service offices.
eCMATS	Tennessee's enhanced Case Management and Activity Tracking System, a statewide database for WIA and other state programs.
ETRAMA	East Tennessee Regional Agribusiness Marketing Authority.
GIS	Geographic Information System.
HVAC	Heating, ventilation and air conditioning.
JTPA	Jobs Training Partnership Act and the program authorized by the act.
LEED	Designates buildings that meet nationally accepted standards for the design, construction and operation of energy-efficient, environmentally-friendly "green" buildings.
LWIA 2	Local Workforce Development Area 2 was renamed the Smoky Mountains WIA Area by the local workforce board in 2008.
LWIB 2	The Local Workforce Development Area 2 Workforce Board was renamed the Smoky Mountains Area WIA Board 2008.
NAWB	National Association of Workforce Boards.
OJT	On-the-job training.
RR	Rapid Response
SACS	Southern Association of Colleges and Schools.
SETA	Southeastern Employment and Training Association.

SMAWB	Smoky Mountains Area WIA Board.
Smoky Mountains WIA Area	Ten counties in East Tennessee which comprise the Smoky Mountains WIA Area: Claiborne, Cocke, Grainger, Greene, Hamblen, Hancock, Hawkins, Jefferson, Sevier and Union.
TBR	Tennessee Board of Regents.
TDLWD	Tennessee Department of Labor and Workforce Development.
Training Waiver	The Workforce Investment Act of 1998 states that one entity cannot serve as both staff to the local workforce board and as a training provider unless the board request a waiver each year from the governor.
USDOL	U. S. Department of Labor.
WIA	Workforce Investment Act of 1998 and the program authorized by the Act
WSCC	Walters State Community College.

PREFACE: ORGANIZATIONAL PROFILE

P.1 Organizational Description

The Smoky Mountains Area WIA Board (SMAWB) oversees the provision of Workforce Investment Act (WIA) services in 10 East Tennessee counties: Claiborne, Cocke, Grainger, Greene, Hamblen, Hancock, Hawkins, Jefferson, Sevier and Union. Walters State Community College is the administrative entity for the 10 counties, and the college's the Center for Workforce Development (CWD) serves as staff to the board. Adult and dislocated worker participants in the WIA program are currently served through the regional Tennessee Career Center at Talbott, affiliate centers in Sevierville, Greeneville and Rogersville, the Center for Workforce Development Career Service office in Tazewell, and the Center for Workforce Education (CWE) on Walters States Morristown campus. **The affiliate offices in Rogersville, Greeneville, Newport and the Center for Workforce Education (CWE) on Walters States Morristown campus will close in June of 2013.** With its partners in the career centers, including the Tennessee Department of Labor and Workforce Development (TDLWD), the staff makes every effort to provide seamless services to jobseekers. Youth service providers in the 10 counties serve eligible youth.

The board's other key partners in the career centers include Adult Education, Vocational Rehabilitation, and Senior Services. Together they respond to the needs of the unemployed, underemployed, dislocated workers, individuals with disabilities, non-English speakers, senior jobseekers, and employers.

WIA services for adults and dislocated workers include assessment, job search and

support (e.g., workshops on completing applications and developing resumes), basic skills remediation, Career Readiness Certificate (CRC) testing, training for occupations in demand, and follow-up.

In addition to providing WIA services, CWE provides technical training on state-of-the-art manufacturing equipment. A new training program has been developed in Green Power to continue the center's mission.

WIA youth services, which are provided by contractors in each of the 10 counties by youth service providers, include the 10 elements required by law:

- Tutoring, study skills training, and instruction leading to completion of secondary school, including dropout prevention activities
 - Alternative secondary school services
 - Summer employment opportunities
 - Paid and unpaid work experience, including internships and job shadowing
 - Occupational skills training
 - Leadership development activities
1. Adult mentoring
 2. Supportive services
 3. Follow-up services for not less than 12 months (as appropriate)

The vision of the board is "To support the economic development and quality of life in the 10-county region of Local Workforce Investment Area 2 by integrating the

delivery of services to job seekers and employers. The mission of the board is to prepare youth and adults for employment by providing a seamless system of services that maximizes customer satisfaction, demonstrates a commitment to continuous improvement, strengthens the area's economic base, and meets or exceeds all performance standards.

The values and goals established by the board are to:

- maximize employment and re-employment opportunities in LWIA 2 by promoting a partnership of business, industries and service agencies;
- empower individuals to succeed in the dynamic and changing LWIA 2 workforce;
- ensure that all customers are satisfied with workforce development services in LWIA 2;
- increase the number of individuals achieving self-sufficiency by assisting them to locate, obtain and retain stable employment;
- provide employers, educators and job seekers with relevant and timely information on the local labor market, services that support business growth, and a system that connect job seekers and employers with job opportunities;
- maximize the use of available resources, use resources in a cost-effective and efficient manner, and maximize the return on investment in the workforce development system in LWIA 2;
- support the development of successful local employers that maximize the

potential and skills of the LWIA 2 workforce; and

- provide universal access, customer choice, and integration through an outcomes-oriented system that is based on the needs of job seekers and employers, ensures equal access to information, services and lifelong learning and continuously improves services to customers.

The Center for Workforce Development has 25 staff members, including a management team that includes the Dean of Workforce Development, Director of WIA Services, Director of WIA Fiscal, Assistant Director for Youth Services and Retention, Assistant Director of WIA Services, Coordinator of WIA Administration, Coordinator of WIA Compliance and Quality Assurance, and Coordinator of Employer Services. Education levels range of the management team from bachelor's degrees to a Ph.D. WIA Career Center Specialists with bachelor's degrees or higher provide services to adults and dislocated workers, along with WIA Career Center Assistants with high school diplomas or higher, and four clerks. Technology services are provided by a CWD staff with associate degrees and the college IT staff with bachelor's degrees or higher.

The staff is team oriented and values diversity. Monthly career center staff meetings include the management team. The career center staff that are not located at the regional career center attend monthly meetings to address their specific concerns. Monthly youth technical assistance meetings provide continuing support for the youth service providers.

The staff is more diverse than the 10 counties, with 12% minorities. Walters

State actively supports diversity in the staff and student population, and recently added an international program that showcases the talents of many nations, and a diversity month that includes presentations by groups such as the area's Native Americans and a very popular Unity Luncheon that features ethnic food.

Walters State is a highly respected institution in the 10 counties that benefits from being a Tennessee Board of Regents institution. The college provides excellent benefits that help draw qualified staff. Job advertisements often result in 40-70 applications for each job, including support positions. Walters State provides a fully-paid retirement plan, health insurance, longevity pay, 13 holidays per year, one day of sick leave per month, and one to two days of annual leave. There are also optional benefits available, such as dental insurance and a 401k. Walters State strives to provide its employees with the best possible working conditions, competitive salaries, and quality benefits.

The WIA program has excellent facilities. The administrative offices are located on the main campus of Walters State in Morristown, Tennessee. Walters State has received an award as one of the most wired campuses in the United States for two years in a row. The Center for Workforce Education is also located on campus in a completely renovated facility. The center houses training areas, advanced technical training equipment, a career center, and a resource room with a computer laboratory.

The CWD staff at the regional Career Center at Talbott is co-located with partner staff. The facility, which is conveniently located near a major manufacturing area at the intersection of two major highways, has a large resource room, large and small classrooms, an assessment lab and offices for the partner staff. The WIA staff is also co-located in recently renovated affiliate centers in Gatlinburg and Newport, and in a new facility in Rogersville. Two WIA career services offices are located at Walters State campuses in Greeneville and Tazewell. The Tazewell office moved to a completely renovated campus in late 2010.

In addition to the Workforce Investment Act of 1998, federal regulations for WIA, and state and federal policies, the college is governed by the Tennessee Board of Regents and post-secondary laws and regulations. The local board and Consortium of Local Elected Officials (CLEO) operate under adopted by-laws and establish policies for the operation of the WIA program. Additional guidelines are developed when needed by staff to guide program operations. The board members and staff sign conflict of interest statements and comply with applicable requirements of the Tennessee Department of Labor and Workforce Development.

Walters State is accredited by the Southern Association of Colleges and Schools (SACS); the most recent reaffirmation of accreditation occurred in 2008. The Center for Workforce Development helps fulfill the college's public service mission.

Education and training are important to the college and to CWD. All Career Center Specialists receive training to become certified Global Career Development Facilitators and to maintain their certification through annual training. Some of the staff have additional professional accreditations and one is a Fellow of a national organization. The staff works with other WIA staff in East Tennessee to offer regional training two to three times each year. Representatives of the staff also attend workforce development conferences each year, such as the National Association of Workforce Boards and the Southeastern Employment and Training Association. Staff also stays current with workforce issues through the Employment and Training Reporter, local and national newspapers, and other workforce development publications.

The Consortium of Local Elected Officials, which is comprised of the 10 county mayors, appoints the private sector members of the board and determines the administrative entity. The local workforce board has two private sector members from each county and two additional private sector members that may come from any county to ensure diversity. Partner agencies appoint local board representatives; the board's by-laws, which are modeled on the state board's recommended by-laws, govern the membership of the board.

The chair of the local workforce board is, by law, a private sector member. The board's chair and vice-chair are elected biennially. The board chair appoints committee chairs for the Performance and Oversight Committee, Training and Workforce Development Committee and Youth Council. The chair also chairs the Executive

Committee. As the need may arise, task forces may be appointed. Examples include the Marketing Task Force and OJT Task Force, which both made significant recommendations that were adopted by the board.

CWD staff carries out the day-to-day administrative and program operations of the program. The senior staff person reports directly to the president of the college and serves on his Executive Council. The president reports to the Tennessee Board of Regents chancellor. The Director of WIA services oversees the operation of the career centers, and the Assistant Director for Youth Services and retention oversees the operation of the youth program by youth service contractors. Requests for Proposals are issued biennially by the board for youth services.

The workforce board has three key customers. The first is the jobseeker that needs assistance in obtaining or retaining a job. The second is youth that need assistance in preparing to enter the workforce or higher education. The third is employers in the area. The key stakeholders are the elected officials and economic development staff that need to attract and retain businesses to be economically viable.

There are several market segments: jobseekers, including dislocated workers; incumbent workers; youth, and employers. Jobseekers at the career centers are classified as adults or dislocated workers. An adult is anyone 18 years of age or older that needs WIA services. A dislocated worker is someone that has lost a job through a layoff or closure. Youth must meet specific income criteria and need WIA services. Employers can be divided into

those that are hiring new employees and those that need training for incumbent employees.

Employers that are using WIA services want to hire qualified employees and train their current employees at the least possible cost. They want jobseekers to be screened, job orders to be filled, and both new and current employees to work efficiently, to be productive, and to stay. Jobseekers want to find jobs that provide them with income and, ideally, a chance to advance. If they lack qualifications for a job leading to self-sufficiency, they also want and need training that matches their skills and abilities and that will get them a job. Youth want to be equipped to finish high school, succeed in post-secondary education if they decide to continue their education, and be ready to go to work.

With the current economic downturn, it is not possible to provide employment for many jobseekers. Employers are struggling to survive the downturn. Some employers are able to choose from more qualified applicants than previously, but the converse is that more employees than usual are underemployed or working part-time.

The board and staff are continuously seeking new ways of improving services and insuring quality. With the rapid downs and ups in funding, such as the recent rescission which was followed by the economic stimulus, it is critical to be prepared for change. Many of the innovations have resulted from learning about best practices in other local areas, such as the revamped OJT process. Others have benefitted from improvements in technology, such as the digital board briefing book that is emailed to the board, partners and staff before each meeting.

The ability to work as a team to tackle problems and develop solutions has resulted in many improvements, such as the new forms for release of personal data required by increasingly strict rules and regulations.

Employers, jobseekers and partners are also a source of ideas. The career center partners work very effectively together to meet the unprecedented demand for services during the economic downturn. Jobseekers that have needs that are not being met can help the staff identify changes that are needed in the policies or operation of the program, such as extending the time limit for training when a medical emergency occurs. The board's perspective and the questions board members ask can guide the staff in pursuing innovative ideas and procedures. These invaluable contributions by the task forces have resulted in better WIA services.

The Center for Workforce Development staff relies on the college, employers, jobseekers and youth to support the program. The staff benefits from the college environment and its role in the community and from the trust that elected officials have placed in it. The programs need a constant influx of participants to produce qualified employees for the employers, and also need a constant supply of job openings from employers.

The board, staff, career center partners, youth providers, and county mayors have developed strong working relationships. The board and county mayors have a joint meeting each quarter that is staffed by the coordinators, dean, director and assistant director. The career center staff and partners have meetings and celebrations whenever possible. A Career Center Management Committee, which also

includes a regional staff member from the Tennessee Department of Labor and Workforce Development, meets quarterly to discuss problems and develop continuously improving approaches to providing services.

The Public Information staff at Walters State works with the media to ensure coverage of WIA activities, and also assists with the quarterly newsletter for employers. Two major surveys have helped identify the needs of employers, and customer surveys are given to WIA participants. The results of the surveys are reported to the board, along with performance, workload, finances, on-the-job training, and dislocations. In addition, email is used regularly to communicate, and the draft agenda and minutes are also sent by surface mail three weeks prior to the board meetings. A draft board briefing book is also emailed to the board members, partners, county mayors, career center specialists, and regional Job Service managers.

The local board, staff and partners are committed to providing the best possible services to all jobseekers, employers and youth in the 10 counties in the Smoky Mountains WIA Area.

P.2. Organizational Challenges

The Smoky Mountains Area WIA Board is a unique organization which partners with many other organizations that support workforce development, rather than competing with them. The goal of the board is to avoid duplication and overlap and to mitigate the silo effect of having different funding sources in the career center system. WIA competes with other federal programs for resources at a national level, but not locally.

While the board does not directly compete for clients or resources, there are other important measures of success. The Workforce Investment Act established 17 measures of performance in 1998. Since that time, seven common measures have been adopted for certain government programs. The area has been awarded incentives for exceeding performance levels seven times. The board is preparing for the large amount of new stimulus funds, up a 100% increase in current funding, by identifying skills that will be needed for the recovery jobs.

The state collects data to determine the performance of local WIA programs. It also utilizes Unemployment Insurance data to measure employment and wages of exited participants. The staff uses economic data from federal, state and for-profit sources to compare with other areas. The UI data is confidential, so the board is not able to determine some information, such as the occupation or employer.

The current economic downturn represents the single largest challenge to the board and staff. It will be a challenge to enroll and serve an ever-increasing number of dislocated workers, develop quality short-term training programs, and to help jobseekers find jobs at a time when the job market is shrinking daily. The strong relationships between the partners, board, college administration and county mayors will provide sustainability.

The board uses the state's DolceVita system to track performance and identify areas for improvement. The Coordinator of Compliance and Quality Assurance monitors the staff and youth service providers, and the state monitors compliance with the act and regulations each year. The board has a Performance

and Oversight Committee which reviews performance results each quarter. A performance report is also included in the briefing book for the quarterly workforce board meeting.

Level II Application Categories

1. Leadership

The Smoky Mountains Area WIA Board works as a team with the staff and local elected officials to develop its vision and values and to address workforce development challenges. The vision, which was developed in 2000, was aligned with the state's workforce board's vision in 2008. The board uses its quarterly meetings, task forces, and staff and board communications to deploy its vision and values to their partners in the public and private sectors.

In the past several years the board expanded its activities and completed several tasks as well as planning for new challenges. The Executive Committee scheduled quarterly meetings to plan for the upcoming board meeting and to provide guidance to the staff on board initiatives. The committee reviewed proposed motions for the board meeting and approved or modified them, chose programs, and began a new initiative focusing on broadband needs in the region, especially business and industry and non-computer literate jobseekers and incumbent workers. The broadband initiative was coordinated with the county mayors who are members of the East Tennessee Regional Agribusiness Marketing Authority, which includes four additional counties outside the workforce area.

Board members serve without compensation. Many have served more than one two-year term although there are also new members appointed each year. They consider board policies at each meeting, which often are modified policies designed to continuously improve the program.

The Smoky Mountains Area WIA Board adopted new by-laws in October 2008 that were modeled on the by-laws recommended by the State Workforce Investment Board. The by-laws provide clear guidance on the requirements for communicating with the public and define those actions which could be a conflict of interest. The staff members also sign a conflict of interest statement.

The county mayors, who form the Consortium of Local Elected Officials, appoint the private sector members. As a group, they appoint two additional private sector members that insure diversity on the board and the economic development representatives. When a board position becomes available, the staff consults board members and other knowledgeable local leaders in the new member's county to identify potential candidates.

The board communicates in many ways. It has a quarterly newsletter, *Workforce Focus*, which is mailed to every employer in the 10 counties that has at least five employees. *Workforce Focus Extra*, a one-page newsletter, is emailed to the board bimonthly to keep board members informed about workforce issues, such as the latest unemployment figures. Board meetings are covered by local media, who help keep other leaders in the community, the workforce, partners, jobseekers and employers, other stakeholders and the general public informed. Two websites also provide information through the college and the career centers.

The Consortium of Local Elected Officials, composed of the 10 county mayors in the Smoky Mountains WIA Area, was established in 1999 and operates under bylaws that have been modified as necessary. The consortium chose the

administrative entity, Walters State Community College. The county mayors each choose two private sector members to serve on the board that live or work in their county. Together they choose two economic development representatives, and two at-large private sector members to insure diversity of the board. The CLEO has a quarterly meeting in conjunction with the board.

As noted, SMAWB is governed by bylaws that are modeled after the model bylaws prepared by the state workforce board. Meetings are held quarterly, and the April board meeting is designated as the annual meeting. The board maintains a private sector majority. The other required members, such as the career center partners, are appointed by their organizations.

The board has three standing committees in addition to the Youth Council: Executive, Training and Workforce Development, and Performance and Oversight. Task forces are appointed to address specific challenges, such as marketing. Staff members are assigned to each committee and task force.

The Workforce Investment Act mandated 17 performance measures. Seven common measures are now used to measure performance. The board expects the staff to achieve or exceed performance measures and work continuously to attain the board's vision. In addition, the board receives reports on activities that are not included in the performance measures, such as on-the-job training and incumbent worker training.

The WIA program is monitored by the state's Program Accountability and Review staff, audited once every two years by state auditors as part of the college's audit, and

reviewed by the Internal Auditor when requested by the President. The WIA program may also be monitored by the US Department of Labor, since Walters State serves as a subcontractor for the Tennessee Department of Labor and Workforce Development. The college undergoes the process of reaccreditation every 10 years, which includes the Center for Workforce Development.

The staff of the Center for Workforce Development has a performance review each year. The Dean of Workforce Development is evaluated by the President and by reverse evaluations from that staff that report directly to her. Staff managers in CWD evaluate the staff that report to them and are reverse evaluated. Reverse evaluations are forwarded to the staff person's supervisor. When the evaluations and meetings with staff to review performance are completed, the supervisors forward the evaluations to their supervisor and then the Dean, who forwards them to the President.

The workforce board uses surveys as needed to determine areas that need improvement, such as the orientation of new members. The members of the Executive Committee and the committee chairs are given the opportunity, when funding is available, to attend the National Association of Workforce Boards and Southeastern Employment and Training Association conferences. Other local and regional conferences may also be offered to the board members. If funding allows, one board meeting each year is organized as a retreat outside the college.

With the highest unemployment in many decades, the board and staff try to anticipate future demand as well as employers' current needs. At its January

2009 meeting the board reviewed the occupations that the staff expects to be in demand to meet the objectives of the recovery plan. Using an economic modeling program, the skills for these occupations will be matched to the skills of dislocated worker in the 10 counties. If training classes are not available, the board approved a policy to allow contract classes to meet demand. There are no apprenticeship programs available in the local area, but union representative on the Executive Committee has been asked to relay information about training opportunities, especially as the stimulus projects get underway. The staff has also tried to interest employers in developing new apprenticeships and offered their assistance.

The greatest impact on services for dislocated workers and other adults, as well as the youth, resulted from the drastic rescission of funds that were already committed for use in the program. The board's policy was to provide up to \$6,000 for tuition each year for up to two years, pay for books and supplies required by the training provider, pay \$7 per day of training for transportation, and pay for childcare for one or two children. As a result of funding cuts, every WIA participant benefit was cut except tuition and transportation. Tuition for credit programs was **limited to \$2,000 per year for tuition and tuition related fees but reimbursement for non-degree, short-term programs such as truck driver training and continuing education had to be limited to \$1,000.** The total expenditures for training were cut in half, vacant staff positions were not filled, and travel and staff training were restricted.

The conflict of interest provisions and board by-laws promote ethical behavior in

the conduct of board and staff activities. One example is the recusing of board members with interests in organizations that are being considered for youth service contracts. Board members who recuse themselves do not vote on contracts that may affect them. Depending on the concern, the staff receives training and are monitored to ensure ethical behavior and compliance with the college's policies and procedures, as well as the state and national laws and regulations, and local board policies.

The board encourages interaction between the staff, committees, partners, and local leaders. Support for economic development activities, for example, includes membership in all local chambers of commerce and support for recruitment of new businesses and industries. Staff members provide data, meet with prospects at the request of the chambers, and explain the services available. Continuous support is provided for the board's key customers, jobseekers and employers.

Strategic planning occurs each year during the annual preparation of the plan or plan modifications. The Executive Committee also provides continuing direction to the staff in focusing their efforts. The staff develops the plan or plan modifications according to guidance issued by the state, and reviews the draft with the board, as well as advertises it to the public. The staff tries to constantly monitor development in the workforce field, changes in national direction that may affect the workforce, and employer needs.

The yearly plan includes developing or updating a SWOT analysis. The staff receives daily updates from online publications, such as the *New York Times*,

and local newspapers. They also review the Employment and Training Reporter and other local, regional and national workforce development publications. The staff is prepared to respond to shifts in funding as well as changes in technology and the needs of customers. Customer surveys assist in understanding the needs of jobseekers and major surveys of employers help identify employer needs that help sustain the board's ability to respond and modify policies.

Organizational Challenges

The most significant challenge for the board is to identify and train dislocated workers and other jobseekers to qualify for jobs that will result from the new administration's recovery plan. The board has sponsored several regional workshops with national speakers such as Dick Gaither for dislocated workers, those in the community assisting dislocated workers, and WIA staff from nearby areas.

The Smoky Mountains Area Workforce Board wants to provide the highest possible level of benefits to the greatest number of participants. Following the most recent rescission, the board had to determine which benefits were core benefits and which type of training provided the most employment. The board chose to keep tuition for academic programs at the same level, \$6,000 per year for two years, and to continue to pay \$7 per day for travel while in training. Other programs were limited to \$1,500. Books, supplies and child care were eliminated. These cutbacks allow the board to continue to support approximately the same number of participants.

In addition, ITA's were funded by semester, instead of by year, to avoid over-

commitment of funds and invoking priority of services.

The Smoky Mountains Area WIA Board and the staff review data on industries each year and identify any changes that might impact the target industry list. Data that provides a rationale for identifying target industries is provided by reports generated by Strategic Advantage, an economic development modeling program. The data is a compilation of government data, such as statistics from the Census Bureau, and calibrated estimates of growth.

The selection of target industries for the Smoky Mountains WIA Area included the following steps.

1. Examined current data on demographics (census), existing industry mix, employment by industry, industry wages, projections of occupational growth and trends in technology.
2. Identified tentative target industries and occupations based on the industries with the greatest potential for growth in employment and wages.
3. Selected the following target industry focus groups in the local area:
 - a. Tourism
 - b. Non-durable goods
 - c. Health & social services
 - d. Automotive parts & machinery manufacturing
 - e. Retail
 - f. Finance
 - g. Trucking/warehousing/wholesale
 - h. Professional & other services
 - i. Construction

4. Identified workforce development gaps, including training.
5. Recommended development of needed workforce development and occupational training.
6. Made a commitment to continue reviewing data annually with board and partners and to revising the list of target industries as needed.

With the continuing changes in the economy, the board again reviewed the target industries in preparation for the 2013 plan modifications to determine if any changes need to be made to the target industry list. Many of these industries, such as tourism, have been significantly affected by the economic downturn and the recession. However, tourism will continue to employ many area residents and, as the economy rebounds, should continue to be a major employer. Two other areas that were closely scrutinized are automotive parts and machinery and construction.

The board adopted a group of target industries at its January 2012 board meeting and identified the top three target industries:

- 1) Tourism
- 2) Health & social services
- 3) Trucking/warehousing/wholesale

Other target industries are:

- Automotive parts & machinery manufacturing
- Construction
- Finance
- Non-durable goods
- Professional & other services

- Retail

While sectors such as automotive parts and machinery manufacturing have been significantly affected by changes in the economy, the board feels that these industries continue to slightly improve in the area.

Training is the primary method used to prepare workers for high-skills, high growth job opportunities. Incumbent worker training and on-the-job training have both been used very effectively by area businesses and industries. The partners in the Smoky Mountains WIA Area work cooperatively to encourage participants to choose training in occupations that will be in demand in the future, as well as in the present.

The Smoky Mountains Area WIA Board encourages submission of new training programs for inclusion on the Approved Training Provider list. One challenge for the upcoming year will be to obtain training for participants that chose training for programs such as masonry and truck driver training that are no longer being offered by the Tennessee Technology Center at Morristown, due to the cutbacks in state funding.

Approved apprenticeship programs are not available in the 10 counties, but are available in Area 3. Openings are limited, and job opportunities have also been limited. With the recovery plan, the unions may be able to work with the local areas to provide apprenticeships in occupations that will be in demand. Employers are encouraged to consider developing approved apprenticeship programs. It is more difficult to find programs in primarily rural areas, but staff continues to look for

opportunities to provide or develop registered apprenticeships.

3. Customer and Market Focus

3.1. Customer and Market Knowledge

Regional economic development partnerships are very important in the area. Area staff works closely with local chambers of commerce, chamber partnerships, local government economic development staff and a regional economic entity, the East Tennessee Regional Agribusiness Marketing Authority (ETRAMA). ETRAMA focuses on the need for universal broadband access in the 12 counties that are members of the organization. In 2013 ETRAMA will continue to look at clean energy technology, particularly wood pelletization. The staff provides economic data such as a year-long study conducted by the Morristown Area Chamber of Commerce. In past years, the staff has assisted in recruiting businesses such as Colgate. In addition to providing local economic information, WIA and TDLWD staff from the regional career center provides information about the services available in the local area.

Two customer surveys are available for visitors to the career center and enrolled participants. A major survey in December 2008, which was sponsored by CWE, went to over 4,000 employers in the region. The results of the survey will be used to develop short-term training programs.

As the automotive industry struggles, the board is looking at opportunities in the recovery plan. The staff is working with the Technical Education Division to identify, develop and fund new programs for green industries. Other industries and training,

such as construction and HVAC, are targeted for contract classes to provide the skills needed for infrastructure repair and construction. The staff is also encouraging renovation of a former high school in Tazewell, Tennessee, as a LEED building. The Industrial Development Board is preparing the building to serve as a new Claiborne County campus for Walters State. Following renovation, the building will house the Tazewell Career Services office as well as college offices, labs, classrooms and several Tennessee Technology Center programs.

The career centers continue to serve special populations, including individuals with disabilities, ex-offenders, seniors and veterans. Employer open houses throughout the year focus on these groups. The Disability Program Navigator has been very active in assisting individuals with disabilities to receive services and all of the area career centers and career service offices have adaptive equipment.

As veterans return in larger numbers, the local area will continue to work closely with TLDWD to serve them, their spouses and their children. The Disability Navigator is prepared to assist staff to provide services to veterans with disabilities. Workshops, specialized materials, and other resources are provided to veterans and their families. Employers are encouraged to hire veterans and are invited to open houses.

Greene County continues to have the most layoffs and closures and the highest unemployment in the 10 counties. Since January 1, 2012, WARN notices were issued for the following closures in the ten counties.

TABLE 1
CLOSURE WARN NOTICES (1/2012 – 12/2012)

Company	Employees
BOS	10
Foliot Furniture	24
BAE Systems	57
Food Lion	92
Vacumet	17
Esselte	94

Although major layoffs have diminished significantly, unemployment remains high. Sevier County is the only county that consistently has an unemployment rate comparable to the state. The others have ranged considerably higher.

The Smoky Mountains Area WIA Board Youth Council is very active. A variety of youth programs were sponsored by the Smoky Mountains Area WIA Board and Youth Council in 2012.

The adoption of common performance measures has resulted in changes for the youth program, more than for the adult and dislocated worker programs. A concerted effort has been made to inform the youth service providers about the current performance standards and the board's goals.

The state was granted a waiver for WIA Section 123 that requires providers of WIA Youth Program elements to be selected on a competitive basis. This waiver allows Walters State Community College to provide three of the ten youth program elements: supportive services, follow-up services, and paid/unpaid work experience. Summer employment is also allowed by statute to be provided by the administrative entity. WSCC, as administrative entity, reserves the right to

provide any waived elements as deemed necessary in the case of no bids or no acceptable bids. Therefore, we are requesting the use of the waiver on behalf of the Smoky Mountains Area Workforce Board.

3.2 Customer Relationships and Satisfaction

The Smoky Mountains Area WIA Board has completed the initial tasks in developing a marketing strategy for WIA services. The board adopted a new logo that allows immediate recognition of the local area. Previously the board lacked a name, as it was simply designated as Local Area 2.

The board strongly encourages and supports training through the on-the-job Incumbent Worker Grant programs. On-the-job training has many advantages including retention of employees. Companies must agree to retain the employee and show evidence of retention before they are reimbursed. The Incumbent Worker program is increasingly popular with employers, as it provides flexibility for offering training to many different types of employees, and large groups of employees.

4. Measurement, Analysis, and Knowledge Management

4.1 Measurement, Analysis, and Improvement of Organizational Performance

The SMAWB utilizes demographic and economic data from local, state and federal sources and also data collected by eCMATS to measure performance. In addition to the measurements and analysis provided by the Tennessee Department of Labor and Workforce Development, two customer surveys are distributed to those using the resource room and those completing training. An additional survey of noncredit and incumbent worker training is being developed for administration at the end of classroom training. The Youth Council and staff examine provider performance and may award additional funds based on meeting performance goals.

The board's Performance and Oversight Committee reviews the performance data in its quarterly meetings, and performance data is summarized in the board briefing book. The board receives regular updates on demographic and economic data from the staff and experts. Data resources such as The Source are constantly used to help guide and direct the board's policies and the staff's provision of services.

A total of **292** adults and dislocated workers were exited from **January 1, 2012, to December 31, 2012**. This figure included **189** adults who exited. The board's goal is to continue to exit approximately the same number in the upcoming program year if funding remains at current levels. Every effort is made to continue to enroll participants. Instead of continuing the

same level of funding for individuals in training, reimbursement for some programs that do not receive credit is limited, travel was kept at the same level, and books, supplies and childcare were eliminated.

If increased funding is available, the board expects to have a proportionate number of additional participants and exiters. If the training providers are able to offer short-term training programs or condense existing programs, more participants may be able to exit.

4.2 Management of Information, Information Technology, and Knowledge

Information is gathered daily from a variety of sources, including Labor Market Information in The Source; Strategic Advantage, an economic modeling program with GIS mapping application; local contacts, area newspapers, Internet sites, webinars, and other printed materials. Technology services are provided by Walters State's Information Technology Department, two CWD support staff, and TDLWD. Information is maintained electronically and in hard copy files. The goal is to convert all necessary hard copy files to electronic records.

Information is shared with customers and partners in reports and board briefings. Specialized reports are provided on request to individual businesses, chambers and economic development groups to improve, retain and recruit businesses.

5. Workforce Focus

5.1. Workforce Engagement

WIA staff members are employees of Walters State's Center for Workforce Development or WIA Fiscal Services. Walters State's salaries are considered competitive and its benefits are considered excellent. Every effort is made to provide training in individual skills, such as computer skills, workforce development knowledge, and economic and demographic knowledge. The staff attends regional training several times a year and is given the opportunity to attend state and national workforce conferences when funding is available.

The college also sponsors many activities to engage staff. A meeting is held for all staff twice a year. The president discusses progress made by the departments, including CWD, and introduces new staff members. Staff is continually encouraged to provide feedback to the college, the department, and the board.

Many staff members have utilized the tuition benefits provided by the college to further their educations. Staff members who complete a degree or become a Certified Professional Secretary receive a pay increase.

CWD holds an annual staff meeting with all staff, in addition to monthly staff meetings. Common questions and problems are discussed, and there is an opportunity to socialize. The yearly staff meeting includes all staff, while the monthly meetings focus on providing continuously improving services in the career centers. The management group also has staff meetings as needed to keep up-to-date on college

policies and procedures. These are normally held after the president's Executive Council meeting.

5.2 Workforce Environment

CWD and the board are committed to teamwork. The CWD staff holds monthly staff meetings to discuss issues and develop solutions. Day to day questions are handled by emails to the management team, which exchanges ideas and develops a response with input from the staff member. The Staff is encouraged to ask questions at any time. Guidelines are developed as a result of these questions, which helps other staff in similar situations.

The staff has regular celebrations of events such as achievements and holidays. The annual meeting is designed to be more relaxed than the regular monthly meetings. New staff members tour the facilities and are introduced to other college and WIA staff.

All Career Center Specialists complete Global Career Development Facilitator training and are certified. The staff is encouraged to further their formal education, and may obtain associates, bachelors, masters and doctoral degrees while employed. The college provides tuition reimbursement for one course a semester for each employee and half tuition for dependents and spouses.

CWD tries to assure that staff has adequate facilities and equipment. If funding is available, computers are upgraded every three to four years. Software is upgraded as new versions become available.

6. Process Management

6.1. Work System Design

As noted, the work system is a team approach. The career centers have management team composed of the career center partners, and the Center for Workforce Development has a management team composed of the coordinators, directors, assistant director, and public information staff. The entire CWD staff utilizes a team approach to problem-solving as well as to providing services. Staff members are encouraged to email day-to-day operational questions to the management team, which considers the questions with the staff member and provides a timely response. Some work teams are formally designated to perform continuing tasks, such as evaluating incumbent worker grant applications. Other teams are composed of interested staff to focus on short-term issues or questions, such as updating a form.

Core competencies are measured by educational attainment and experience. Each application for employment is evaluated using a predetermined scoring system that includes the required job elements. After employment, there is a six-month probationary period, and then yearly performance evaluations are used to review achievement of competencies and to establish goals for individual staff.

The work processes include three main areas: fiscal, board staffing, and program operation. Policies and procedures are developed as needed to assure that these areas are fully integrated.

TBR requires that the college completes a detailed risk management self-assessment process that includes CWD. Risks are

assessed, procedures to mitigate risks are determined, and results are monitored.

The goal of the board and staff is to provide customers with the best possible service that funding allows. Surveys, monitoring, and feedback from a variety of sources is used to improve the value of the program to customers. The college has provided administrative and program services under earlier federal job training programs such as JTPA, as well as under WIA, which indicates its overall success and the satisfaction of the county mayors and other area leaders, as well as customers.

6.2 Work Process Management and Improvement

The yearly planning process and the quarterly board meetings, as well as additional task force and committee meetings, provide opportunities to assess key work processes. In some instances, guidelines are developed. In other cases, more informal steps may improve processes. An annual report is made to the board, and the President of Walters State reviews performance with the Dean each year. Weekly reports are also made to the president and other administrators at a weekly Executive Council meeting.

Needed changes and improvements to work processes may be identified in regular monitoring activities or daily operations or required by changes in laws, policies and regulations. Some examples are the recent streamlining of the ITA form and processes, implementing increased safeguards for Social Security numbers, and formatting of documents to incorporate the new logo. Staff work groups are assigned to recommend changes to work processes that cut across the organization, such as streamlining the ITA form and processes.

7. Results

7.1 Product and Service Outcomes

Results are measured in several ways, including performance data provided by the state. The board has consistently met or exceeded all performance goals. Employer services have been significantly increased, with OJTs, incumbent worker training and data services. WIA services, especially assessment and on-the-job training, have been a key component in attracting new industries, such as Colgate and Phoenix Plastics. Career Certificates are becoming increasingly popular.

Quarterly board briefing books include a performance report and graph. The Coordinator for Compliance and Quality Assurance review performance with the Performance and Oversight Committee on a quarterly basis. A yearly progress report is prepared for the board for its annual meeting in April. Copies are also provided to the college.

Examining the data by program, Table 1 illustrates actual performance and percent of goals achieved for adults. From January 1, 2008, to December 3, 2008, a total of 941 adults were enrolled and 588 were exited. A total of 335 self-service

participants were registered by the career centers. The percent of goal achieved, excluding 15% and incumbent workers, was above 100%.

TABLE 3
ADULT PERFORMANCE AND PERCENT OF GOAL
ACHIEVED
 PROGRAM YEAR 2012, QUARTER 3

Regression Performance Measures	Performance Goals	Second Quarter Performance		Four Quarters Performance	
		Actual Performance	Percent of Goal Achieved	Actual Performance	Percent of Goal Achieved
Adult Entered Employment	75.0%	82.8%	110%	87.7%	117%
Adult Employment Retention	84.0%	78.8%	94%	83.5%	99.0%
Adult Avg. 6-Month Earnings	\$12,805	\$16,088	126%	\$13,332	104.0%

Table 4 illustrates the results for dislocated workers. A total of 169 dislocated workers were enrolled from April 1, 2012 to March 31, 2012, and 103 exited the program. The retention rate for dislocated workers has stayed consistently high.

TABLE 4
DISLOCATED WORKERS PERFORMANCE AND PERCENT OF GOAL
ACHIEVED
 PROGRAM YEAR 2012, QUARTER 3

Performance Measures	Performance Goals	Current Quarter Performance		Four Quarters Performance	
		Actual Performance	Percent of Goal Achieved	Actual Performance	Percent of Goal Achieved
DW Entered Employment	70.0%	94.7%	135%	83.5%	119%
DW Employment Retention	87.2%	76.2%	87%	85.3%	98%
DW Avg. 6-Month Earnings	\$12,830	\$12,695	99%	\$13,332	104%

Youth performance, which has been outstanding, is shown in Table 5. There were **308** youth enrolled from **April 1, 2012, to March 31, 2013.**

TABLE 5
YOUTH PERFORMANCE AND PERCENT OF GOAL ACHIEVED
 PROGRAM YEAR 2012, QUARTER 3

Performance Measures	Performance Goals	Current Quarter Performance		Four Quarters Performance	
		Actual Performance	Percent of Goal Achieved	Actual Performance	Percent of Goal Achieved
Youth (14-21) Placement Rate	71.3%	66.7%	94%	72.4%	102%
Youth (14-21) Attainment Rate	73.0%	81.4%	112%	76.4%	105%
Youth Literacy/Numeracy Gains	47.4%	0.0%	0.0%	30.3%	64%

In addition to the performance data, customer surveys have shown a consistently high level of satisfaction with the career center services. The board survey also showed confidence in the board staff, although improvements were suggested in communications with the board and board member orientation. An additional board communication, *Workforce Focus Extra*, was developed to keep board members informed between board meetings, and the board orientation now involves individual visits to new board members instead of group orientations.

The goal of the board and staff is to meet or exceed 100 percent of the performance goals. Performance goals have been consistently achieved for all measures. Wages in the 10 counties are the second lowest of any local area in Tennessee, and therefore the performance goal for dislocated worker average 6-month earnings is consistently challenging. All Trade Adjustment Act (TAA) participants in training are co-enrolled in WIA, which can affect performance. While short-term increases have been achieved, the economy may not sustain these wages.

7.2 Customer-Focused Outcomes

The board's goal is to provide each individual participant with the highest possible level of services. As a result, the board provides up to \$4,000 for tuition and training-related fees over two years for academic training. With additional funding, the board plans to restore funding for books and supplies, childcare, and travel during job search, and to increase the amount of funding for travel. The board also supports Trade Adjustment Act (TAA) participants that need additional funding

before or after their TAA benefits are in use.

The board takes opportunities to provide additional benefits whenever possible, such as providing a nationally-known speaker for the Career Transition Fair in March 2009. Two workshops were offered specifically for dislocated workers trying to cope with job loss, and a special workshop was developed for supporters of dislocated workers, such as ministers.

The tables and figure in category 7.1 illustrate the board's specific customer-focused outcomes. One measure of performance is retention. Retention of both adults and dislocated workers in the second quarter after exit exceeded the retention goal for the most recent four quarters. With changes in the economy, it will be a challenge to meet performance goals for entering employment and retention for adult and dislocated workers. Placement rates for youth may also suffer.

Employer services have been significantly expanded during the last five years. The Coordinator of Employer Services promotes OJT and Incumbent Worker Training grants works with interested employers and to prepare and administer contracts and grants. In the first three months of program year **2012**, there were **3** active incumbent worker training grants totaling **\$45,000**. A wide variety of employers and types of job training have been provided to employers. Incumbent workers have been trained in over 25 skills, ranging from lean manufacturing to Kaizen training to rigging and hydraulics. The evaluation process for OJTs includes a ranking of applications which incorporates wage levels and benefits.

TABLE 6
EMPLOYER GRANTS AND CONTRACTS
(7/1/12 – 12/31/12)

Program	Employers	Number to be Trained
Incumbent Worker Training Grants	3	84
On-the-Job Training Contracts	6	50
Total Employer Grants and Contracts	9	134

7.3. Financial and Market Outcomes

The board has been successful in providing administrative, fiscal and program services through Walters State. Individual Training Accounts have been limited to \$2,000 per year for academic programs and \$1,000 for non-academic programs. Books, fees, childcare and other support services were limited.

So far in the program year, on-the-job training contracts funded training for **19** workers in the ten-county area in **3** job classifications. The companies used on-the-job training for employees in a variety of job classifications, including **Welder, Material Handler, Metal Fabrication, Key Operator, Upholster Assembly and Grinder Operator**. Employers had an opportunity to provide training for current employees through the TDLWD's Incumbent Worker Training Grant program. Employers received **\$45,000** in Incumbent Worker Training Grants from the state during the program year; the grants are administered by the college. These grants provided training in Lean Manufacturing, Six Sigma, industrial

maintenance, Value Stream Mapping, STAR Leadership, Kaizen Processes, Sharepoint implementation, computer skills, and electrical.

The board plays a leadership role in providing economic and demographic data for the region and for the counties. The 10 counties are in two different economic development regions, so data is not readily available for the region. Specialized reports and presentations are prepared by CWD staff on request for chambers of commerce, community groups, and economic organizations such as the East Tennessee Regional Agribusiness Marketing Authority (ETRAMA). As part of its economic development mission, CWD helps coordinate ETRAMA meetings. CWD maintains membership in all local chambers, and staff participates in chamber meetings as well as other economic and workforce development groups in the local area.

The board's goal is to serve as a resource and advocate for workforce development in the 10 counties. With recent efforts in marketing and public relations, the board is becoming better known and, as a result, has more opportunity to influence and support workforce development in the local area.

7.4. Workforce-Focused Outcomes

Engagement of the workforce is very important to the board and to the college. The staff of the Center for Workforce Development is encouraged to work as a team, to continuously improve process and procedures and to exchange best practices. Monthly staff meetings are held to address common questions and problems, learn

about new policies, and update staff on the college's activities.

Individuals are also encouraged to continuously improve their skills. Each career center specialist completes Global Career Development Facilitator training and maintains their certification through continuing education provided by CWD. Formal education is highly valued by the college, which provides tuition reimbursement for staff. Currently four staff members (11%) are pursuing additional degrees. Eight staff members have completed bachelors or master's degrees in the past two years. Tuition reimbursement is provided for one course each semester at a state or other accredited higher education institution.

Each staff member is given the opportunity to learn additional skills through continuing education, as well as higher education. For example, a technical communications specialist recently completed advanced training in a new software application. The staff is also required to be tested each year on their understanding of equal opportunity (EO) rules and regulations.

Each staff member has a performance evaluation after six months of employment, and then has yearly performance evaluations. The staff is encouraged to provide feedback and set goals at their annual evaluations. The staff is also encouraged to submit a reverse evaluation of their supervisor. These evaluations allow staff and their supervisors to identify areas of improvement and determine steps to meet goals, as well as to highlight exceptional performance.

Several staff members have additional professional accreditations, and one is a

Fellow of a national professional association.

The staff works with other WIA staff in East Tennessee to offer regional training two to three times each year. Representatives of the staff also attend conferences of the National Association of Workforce Boards and the Southeastern Employment and Training Association each year. Staff also stay current with workforce issues through the weekly *Employment and Training Reporter*, local and national newspapers, workforce development websites, and other workforce development publications.

The staff is more diverse than the 10 counties and the college as a whole, with 12.5% minorities. The staff also includes a larger number of professionals (11.4%) who are minorities.

The staff benefits from the college's emphasis on diversity. There are many opportunities to participate in learning about different ethnic groups and cultures. For instance, during Black History Month, films such as *Freedom Writers* are shown on all campuses.

7.5 Process Effectiveness Outcomes

One of the board task forces focused on board operations. During the program year, changes have been made in the by-laws, board meeting schedule, board program, communications, marketing, orientation, and committee staffing. The board adopted a consent agenda to provide more time for presentations and discussion groups and improved the board briefing book. Task forces have also been utilized to improve the OJT process, examine and make recommendations on board operations, and develop a marketing plan. The board

has discussed topics such as broadband and workforce development in small groups at its meetings, and has heard presentations on topics such as the proposed economic recovery package. The board adopted a new logo proposed by the Marketing Task Force.

CWD follows Walters State's emergency plan for the campuses where there are CWD offices. Emergency evacuation and relocation drills are done on a regular basis. The staff is evacuated when the threat is within the building, such as a violent student. The staff is relocated when there is a threat from outside the buildings, such as a tornado.

A separate plan was developed for the regional career center and an emergency manual has been prepared for the regional career center. The affiliate career centers have emergency plans prepared by TDLWD. As a Tennessee Board of Regents institution, Walters State participates in a detailed threat assessment designed to identify issues related to work processes and facilities. The Center for Workforce Development staff completed the first detailed assessment in the college. The identified threats are being monitored by the internal auditor.

The staff constantly seeks means of improving work processes, forms and guidelines in accordance with the WIA Act and applicable federal, state, and local regulations and policies. The staff and board have identified improvements for major processes, such as OJT, using a task force approach. Forms and guidelines are analyzed by teams representing different parts of the staff to assure improvements meet the needs of the staff as a whole.

Yearly monitoring by TDLWD may also identify areas for process improvement.

7.6 Leadership Outcomes

The board has been certified by the governor every two years, and has obtained a waiver for Walters State to serve as both an administrative entity and training provider each year. The staff and board closely monitor changes in laws and regulations to insure compliance and to update local policies as needed.

The Dean of Workforce Development reports to the president of Walters State, insuring accountability of the staff to college and TBR rules and regulations, as well as WIA. The staff participated in the re-accreditation of the college in 2008 and participates in the college's planning, budgeting, audits and monitoring processes each year. During the planning process, CWD sets five-year goals, determines specific objectives and reports yearly progress.

Ethics are important to the board, staff and college. New board members sign a conflict of interest statement, and a record is made of those recusing themselves from votes because of a potential or actual conflict. The staff provides a brief review of the conflict of interest provisions each year at a board meeting. The staff contract states that staff must comply with applicable TBR policies. The CWD staff are asked to sign a conflict of interest statement showing that they have read and understood the board's, college's and TBR's policies.

The Coordinator of Compliance and Quality Assurance is responsible for assuring that the board's policies and staff guidelines are consistent with federal, state and local laws, regulations and policies. Guidelines are developed when needed to assist the staff in making decisions about allowable services and activities.