

Strategic Policy & Performance Council Meeting Agenda
JUNE 8, 2021 • 9 – 11 A.M. ET
SAWGRASS MARRIOTT
1000 TOURNAMENT PLAYERS CLUB BLVD, PONTE VEDRA BEACH, FL 32082
MEETING ROOM: MASTERS ABCD

TO JOIN THE MEETING:
MICROSOFT TEAMS MEETING LINK
CALL-IN NUMBER: 1 (850) 629-7293
CONFERENCE ID: 368 052 84#

Chair's Welcome and Remarks

Brittany Birken

Strategic Policy and Performance Unit Initiatives Update

Dan McGrew

A Closer Look: Workforce Innovation and Opportunity Act Indicators of Performance and Policy Development

Casey Penn

*Chief, Bureau of One Stop and Program Support
Department of Economic Opportunity*

Dan McGrew

*Vice President, Strategic Policy and Performance
CareerSource Florida*

Action Items

1. CareerSource Florida Administrative Policies ***Casey Penn***
 - a. Common Exit
 - b. Rapid Response
 - c. Disaster Recovery Dislocated Worker Grants
 - d. Jobs for Veterans State Grant Staffing Requirements
 - e. Priority of Services for Veterans and Eligible Spouses
 - f. Veteran Intake at CareerSource Florida Network Career Centers
 - g. Trade Adjustment Assistance Training and Other Activities Funding
2. CareerSource Florida Strategic Policy - Policymaking Authority and Delegation ***Dan McGrew***
3. CareerSource Florida Strategic Policy - Rapid Response and Layoff Aversion System ***Andra Cornelius, CEcD***

Florida Insight: Economic Outlook One Year Later

Adrienne Johnston

*Director, Division of Workforce Services
Department of Economic Opportunity*

Young Adult Job Seekers – Employment Needs and Goals

John Page

*Vice President, Research Services
Integrated Insight*

Open Discussion/Public Comment

Chair's Closing Remarks

Brittany Birken

Information Items



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or go to <http://bit.ly/SPPJUN21>

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lead.**





Fiscal Year 2020-2021 Strategic Policy and Performance Initiatives

May 2021 Update

Continuous Improvement Performance Initiative

The [Continuous Improvement Performance Initiative](#) was created in fiscal year 2019-2020 in support of CareerSource Florida's core value of continuous improvement. It is aligned with CareerSource Florida's corporate goals and strategies and the federal Workforce Innovation and Opportunity Act's Primary Indicators of Performance, for which all states are responsible for achieving performance targets. The initiative recognizes the performance of local workforce development boards based on three board-approved, mission-critical [metrics](#): *Employment Rate First Quarter After Exit*, *Participant Training Rate* and *Business Penetration*. Local workforce development boards receive additional credit within the employment and training metrics for serving individuals with barriers to employment (e.g., low income, individuals with disabilities, current or former foster care youth and others). Additional credit also is earned within the business metric for providing staff-assisted, high-value services to business establishments in up to five pre-determined industry sectors of focus per local workforce development board. The CareerSource Florida Board of Directors has allocated a total of \$10 million, \$5 million per year, to recognize performance in fiscal years 2019-2020 and 2020-2021.

Status Update: Performance awards totaling \$3.33 million were awarded for performance in fiscal year 2019-2020. For fiscal year 2020-2021, \$1.69 million has been awarded to date. Performance awards for this fiscal year will continue through February 2022 due to the availability of certified wage data from the Department of Revenue, which is needed for the employment metric. A copy of the current performance and awards issued to local workforce development board is provided with this packet.

Strong Finish Pilot Grant Program

Recognizing that postsecondary degrees and technical certifications provide enhanced skills and education attainment to support a more robust workforce for employers, the CareerSource Florida Board of Directors allocated \$750,000 for credential attainment grants in fiscal year 2020-2021 aimed at providing supportive services to students in the last half of their degree or credential program who need assistance with unexpected financial challenges. CareerSource Florida, the Florida Department of Education and the Department of Economic Opportunity partnered to develop Florida's Strong Finish pilot program modeled after a similar program in North Carolina.

Status Update: Work on this initiative included collaboration with the state Department of Education and the Department of Economic Opportunity to develop a project charter and establish work groups to review policies and initiate development of outreach and training strategies among other tasks.

As a result of the COVID-19 pandemic, there are similar programs, funded by the federal CARES Act and American Rescue Plan, available throughout the post-secondary education system. Additionally,

local workforce development boards have the ability to assist students in training with related supportive services. Policies approved at the December and February board meetings offer more flexibility for local boards to provide these services. The work completed to date on this initiative has been archived for potential future use.

Gig Economy Study, Resource Guide and Dashboard

As gig markets evolve and expand, the CareerSource Florida Board of Directors commissioned a comprehensive study on the potential impacts of the emerging gig economy on Florida's workforce system. The [Gig Economy and Florida's Workforce System report](#) provides a roadmap for CareerSource Florida partners across the state to engage in the gig economy including opportunities for independent workers and entrepreneurs as well as the businesses that employ them. To complement the development of the report, CareerSource Florida worked with consultants and stakeholders to develop and finalize a Gig Economy Resource Guide and Dashboard. The Gig Economy Resource Guide provides a comprehensive overview of resources available to Florida's gig workers and businesses engaged in the gig economy. It also provides quick access to state and national workforce, education and entrepreneurial resources for gig workers and information and links to frequently asked questions. The CareerSource Florida Gig Economy Dashboard provides summary statistics to illustrate gig economy activity in Florida at the state, workforce region and county level. The dashboard summarizes data from national sources including the U.S. Census Bureau and the Internal Revenue Service.

Status Update: The Gig Economy Resource Guide and Dashboard were finalized and are available on the [CareerSource Florida website](#) as well as on the [CareerSource Florida Performance website](#).

Policy Development Framework and Upcoming Policies

The CareerSource Florida Board of Directors approves strategic and administrative policies that affect the state workforce system. Strategic policies are high-level principles or directional statements that inform or clarify federal and state legislative policy or workforce system strategies. Strategic policies direct decision-making at the program level and may result in the development of administrative policies by the Department of Economic Opportunity. Administrative policies ensure compliance with state and federal regulations for the workforce system.

In fiscal year 2019-2020, CareerSource Florida and the Department of Economic Opportunity developed the [Policy Development Framework](#) to support the vision, mission, values, strategies and operations of the CareerSource Florida network and its statewide policy and investment board while strengthening the state workforce development system. The Framework describes best practices for the development of strategic and administrative policies and provides definitions for additional policy tools such as communiques, memoranda and other types of workforce guidance. The full Framework is available [here](#).

Status Update: CareerSource Florida and the Department of Economic Opportunity are presenting for consideration in this board meeting policies that enhance the accountability and transparency of Florida's workforce development system. These policies improve services for veterans and their spouses, provide guidance to local workforce development boards on the administration of training services and dislocated worker grants, and modernize Florida's rapid response and layoff aversion systems. Additionally, recently passed legislation will result in new strategic and administrative policies including an updated policy on Eligible Training Providers Lists.

Florida CLIFF Dashboard

Transitioning individuals on public assistance to a sustainable path to self-sufficiency is imperative to ensuring Florida is the leader in workforce education by 2030, per Governor Ron DeSantis' [Executive Order 19-31](#), and the global leader for talent, fulfilling the CareerSource Florida Board of Directors' vision for Florida's workforce system. In-demand career pathways offer the mobility and wages needed for self-sufficiency. However, as individuals on public assistance train for or advance in their careers, they may encounter overall decreases in their net resources resulting from the loss of benefits due to changes in eligibility as wages increase. In fiscal year 2020-2021, CareerSource Florida has partnered with the Federal Reserve Bank of Atlanta to develop a Florida-specific Career Ladder Identifier and Financial Forecaster (CLIFF) Dashboard to visually represent meaningful data related to Florida's in-demand occupations and the potential benefits cliffs encountered by individuals on public assistance. The dashboard will help career counselors and case managers consider benefits cliff scenarios when helping individuals on public assistance with career planning and will help inform policymaking aimed at solving the complexity of social programs to help families move toward economic self-sufficiency.

As a second phase in this initiative, the Atlanta Fed also will develop a personalized CLIFF Financial Planner for more intensive career and financial counseling of low-income job seekers and their families. The Financial Planner will allow for individually customized career paths while considering benefits, taxes and expenses over time.

Status Update: The Federal Reserve Bank of Atlanta completed development on the Florida version of the CLIFF Dashboard in late May. The dashboard is currently in review and a brand and logo are in development. A preview of the Florida dashboard was provided at the Florida Chamber Prosperity Summit on May 26. The Strategic Policy and Performance team will begin to convene stakeholder workgroups focused on different audiences for the CLIFF Dashboard – job seekers, policy makers, community partners, and businesses.



A Closer Look: Policy and Performance

The CareerSource Florida Strategic Policy and Performance Team developed this four-part series to offer a closer look at specific workforce development initiatives of interest to the work of the state workforce development board. The goal of these sessions is to further inform council members of the key elements of the state workforce system and how the actions of the council and board may support the Governor's workforce development strategy for Florida.

Below is a short description of the topics planned for this calendar year.

The Federal Workforce System – February 2021

Last February, the Strategic Policy and Performance Team highlighted the core federal grant programs implemented by the state's workforce system. Elements covered included the populations served by each grant, types of services provided and types of outcomes sought for each program. Additionally, the team provided an overview of the Floridians served through these programs.

Performance and Policy – June 2021

In this session, the Strategic Policy and Performance Council will dive deeper into the performance measures set forth in the federal Workforce Innovation and Opportunity Act (WIOA) and review Florida's current and historical performance. This session also will highlight the policy development process and the relationship between policy and performance.

Strategic Planning – September 2021

WIOA requires states to submit a comprehensive strategic plan every four years with modifications submitted biannually. In this session, the Strategic Policy and Performance Team will discuss the planning process and the partners involved. The session will focus on board engagement and leadership opportunities as well as important elements planned for Florida's two-year WIOA Modification Plan, which is due to the U.S. Department of Labor in early 2022.

State Board Initiatives – December 2021

The CareerSource Florida Board of Directors approves initiatives that will be funded by a portion of the state-legislated set-aside funds, representing 15 percent of the state's federal WIOA funding. During this session, the Strategic Policy and Performance Team will highlight the history of initiatives funded by the board of directors and the process for allocating these funds.

Action Item 1

CAREERSOURCE FLORIDA ADMINISTRATIVE POLICIES

The Florida Department of Economic Opportunity (DEO), in coordination with the CareerSource Florida professional team, continues its work to develop and enhance administrative policies that guide the accountability and transparency of Florida's workforce development system. These policies are intended to operationalize the state workforce board's strategic plan and vision while establishing a consistent service delivery standard across all 24 local workforce development boards.

The following administrative policies are recommended for approval:

Workforce Innovation and Opportunity Act: New Administrative Policy – Common Exit

This new policy was developed in response to the United States Department of Labor's (USDOL) recent comprehensive review and provides guidance to local workforce development boards related to:

- The requirement for program exits to occur when a participant has not received any Workforce Innovation and Opportunity Act (WIOA) or partner-funded services for 90 consecutive calendar days, has no planned gap in services, and is not scheduled for future services.
- Ensuring that exits will not be prolonged by extending service dates or opening new services unless it is demonstrated and documented that the participant has unmet needs and is actively being served.
- Procedural guidance for the creation, transfer and exit of program participants in a manner that preserves data integrity and ensures a more efficient integrated service delivery system.

Workforce Innovation and Opportunity Act: New Administrative Policy – Rapid Response Program Administration

This new policy was developed to ensure Florida job seekers and businesses receive a standard and consistent quality of service when layoff events occur. The policy provides guidance to local workforce development boards related to:

- Establishing a framework to design and implement a local business engagement strategy and articulates the role of layoff aversion within effective Rapid Response systems.
- The minimum Rapid Response requirements and activities mandated by WIOA.
- The events which require Rapid Response activities and services.
- Reporting requirements for Employ Florida for employers and affected workers.
- Connection to coordinated programs and services to include WIOA Dislocated Worker, Short-Time Compensation, Incumbent Worker Training, Trade Adjustment Assistance and Layoff Aversion Activities.

Workforce Innovation and Opportunity Act: New Administrative Policy – Disaster Recovery Dislocated Worker Grants

The impact of the COVID-19 pandemic on workers in Florida led to an increase in Disaster Recovery Dislocated Worker Grants received by the state and implemented by local workforce development boards. This new policy provides guidance related to:

- Program administration requirements for Disaster Recovery Dislocated Worker Grants, which provide temporary disaster relief jobs, as well as employment and training services to minimize the job losses that are a result of large, unexpected emergencies and natural disasters.
- Participant eligibility and documentation requirements.
- Requirements related to temporary disaster relief jobs, training and employment activities and supportive services.
- Program performance reporting requirements.
- Establishment, approval and evaluation of temporary disaster relief job worksites and employers.

Jobs for Veterans State Grant (JVSG): New Administrative Policy – Staffing Requirements

The Jobs for Veterans State Grant is supported through a federal staffing grant and the timely staffing of positions allows the state to expend funds in accordance with planned budgets submitted to USDOL and ensures no interruption in services to veterans. In summary, this new policy provides guidance to local workforce development boards related to:

- Requirements to fill all Veteran Program-funded position vacancies within 50 days of vacancy.
- The requirement for all Veteran Program staff to attend mandatory training through the National Veteran Training Institute in Dallas, Texas.

- Eligibility requirements for the staffing of Veteran Program positions.
- The requirement for DEO to designate state staffing levels through an analysis of the veteran population using data compiled from the U.S. Department of Veterans Affairs National Center for Veteran Analysis and Statistics.

Jobs for Veterans State Grant: New Administrative Policy – Priority of Service for Veterans and Eligible Spouses

This policy was developed to establish a standard for service to veterans and eligible spouses seeking services from the local workforce development boards and provides guidance related to:

- Requirements to provide priority of service to veterans and eligible spouses for all USDOL-funded programs.
- Eligibility requirements for priority of service.
- Establishing processes to identify veterans at the point of entry at the career center.
- The requirement for local workforce development boards to provide priority of service training annually.

Jobs for Veterans State Grant: Administrative Policy 102 – Veteran Intake at Career Centers

This policy was revised to consolidate Veteran Program requirements from several federal documents for ease of application. In summary, the following changes were made to this policy:

- Streamlines the intake process used to determine eligibility for Veteran Program services in order to improve the veteran customer experience and reduce administrative burden on staff.
- Establishes requirements to identify veterans at the point of entry at the career center and refer all eligible veterans seeking employment services to Veteran Program staff.
- Outlines exemptions to allow Veteran Program staff to immediately engage with and serve veterans referred from partner programs and who have been determined eligible through their Employ Florida registration.

Trade Adjustment Assistance: Administrative Policy 101 – Training and Other Activities Funding

Revisions to this policy were made to improve alignment with current USDOL guidance and improve guidance for Employ Florida reporting. In summary, the following changes were made to this policy:

- Modifies language to align with federal reporting terminology.

- Provides clarification to improve alignment of program and financial expenditure reporting, in accordance with guidance provided by USDOL.
- Expounds upon existing language regarding Employ Florida reporting and determining reasonable participant training costs.

FOR CONSIDERATION

- **Approve the following CareerSource Florida Administrative Policies:**
 - **Common Exit**
 - **Rapid Response**
 - **Disaster Recovery Dislocated Worker Grants**
 - **Jobs for Veterans State Grant Staffing Requirements**
 - **Priority of Services for Veterans and Eligible Spouses**
 - **Veteran Intake at CareerSource Florida Network Career Centers**
 - **Trade Adjustment Assistance Training and Other Activities Funding**



Administrative Policy

**POLICY
NUMBER
TBD**

Title:	Common Exit
Programs:	Workforce Innovation and Opportunity Act, Wagner-Peyser and Trade Adjustment Assistance
Effective:	TBD

I. PURPOSE AND SCOPE

The purpose of this policy is to provide local workforce development boards (LWDBs) the minimum requirements for the common exit of program participants for the Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser (WP) and Trade Adjustment Assistance (TAA) programs, and procedural guidance for associated processes.

II. BACKGROUND

WIOA establishes performance accountability indicators, aligns performance-related definitions, ensures comparable data collection, and integrates performance reporting requirements to assess the effectiveness of states in achieving positive outcomes for individuals served by the workforce development system.

In accordance with [Training and Employment Guidance Letter \(TEGL\) 10-16, Change 1](#), states are encouraged to implement a common exit policy. Common exit is intended to ensure a more efficient and effective integrated service delivery system, track the coordination of services and align performance reporting.

III. AUTHORITY

[20 Code of Federal Regulations \(CFR\) Part 677](#)

[TEGL 10-16, Change 1](#)

[TEGL 14-18](#)

[TEGL 19-16](#)

[TEGL 21-16](#)

IV. POLICIES AND PROCEDURES

Florida has an established common exit policy implemented through its online case management and labor exchange system, Employ Florida. This policy requires that an individual who is participating in any program covered by the common exit policy will not exit (and be counted in performance) until the individual is no longer being served by any program to which the policy applies.

Florida's common exit policy is applicable to the following programs:

- a) WIOA Title I – Adult, Dislocated Worker, Youth
 - i. National Dislocated Worker Grants (NDWG)
- b) WIOA Title III – Wagner-Peyser
 - i. Jobs for Veterans State Grant (JVSG)
 - ii. Migrant and Seasonal Farmworkers (MSFW)
- c) Trade Adjustment Assistance

Program performance measures, including four of the six WIOA Primary Indicators of Performance, as defined in [TEGL 10-16, Change 1](#), are associated with the participant's exit; therefore, accurate documentation and reporting of exit dates, as well as the services which impact the participant's exit, is critical.

A. Reportable Individual

Reportable individuals register in Employ Florida and may access self-service system functionalities and receive information-only services or activities. Reportable individuals are tracked and reported in performance reports but do not impact program performance and may not be used to impose sanctions. Reportable individuals are not considered participants in a program, so they do not exit and are instead closed as never enrolled. The date of closure for reporting purposes is determined as follows:

- a) Individual does not become a participant.
- b) Individual is served with only self-service and/or information-only services.
- c) 90 days elapsed since being identified as a reportable individual, and the individual has not received additional self-service or information-only services or activity during the 90-day time frame.

Once the above criteria have been met, the date of closure is applied retroactively to the last day of receipt of self-service and/or information-only services or activities. This methodology is used to ensure reportable individuals do not remain in the system indefinitely.

B. Participant

A reportable individual becomes a participant when he/she has met program enrollment requirements for eligibility and received a staff-assisted participating service. The participation date is the date the individual receives the first participating service (and is enrolled in the appropriate program). Participating services that establish or extend participation are identified in the [Employ Florida Service Code Guide](#).

Note: WIOA Youth are not considered participants until they have received the following:

- a) Objective assessment;
- b) Individual Service Strategy (ISS); and
- c) At least one of the 14 Youth Program Elements as described in [20 CFR Part 681.460](#).

C. Extending Participation

Every participating service provided to a participant, once recorded, establishes a new exit date and extends participation for 90 days. Self-service, information-only services or activities, and follow-up services do not delay, postpone or affect the date of exit. The management of participant services includes regular, direct contact with the participant on all aspects of their workforce development needs.

Direct contact is considered to have occurred when the LWDB staff and the participant have exchanged information, or the participant has agreed to the service being provided by LWDB staff. LWDB staff should ensure that direct contact is made at a minimum of every 30 days with the participant to maintain the highest level of individual service. Determined on an individual basis and/or by local operating procedures, more frequent contact may be required. Indirect contact attempts, such as sending workshop flyers or job leads by mail or email or leaving telephone messages without receiving a response, do not constitute direct contact for the purpose of providing a service or keeping an activity open.

Direct contact may be performed in-person or remotely and may be conducted by mail, telephone, email, or other documented means of contact. Such contact should result in a participating service being provided to the participant. Contact where the participant does not engage will not be considered direct and must not result in a participating

service being recorded in Employ Florida. An offer to provide a service or a scheduled appointment to provide a service must only be entered as a case note or non-participating service, as appropriate.

D. Participant Transfer

Participants may relocate from one LWDB to another and continue to receive workforce services without interruption. For WIOA Title I and TAA participants, the Department of Economic (DEO) Bureau of One-Stop and Program Support is responsible for approving the transfer of cases from one LWDB to another in Employ Florida.

Prior to WIOA Title I or TAA participants being transferred in Employ Florida, authorized representatives from both LWDBs must agree to the transfer in writing. This requirement may be met by retaining copies of emails detailing the transfer agreement. Receiving LWDBs should ensure they have received any participant files or documents stored outside of Employ Florida prior to the agreement of transfer.

When a case is transferred from one LWDB to another, the receiving LWDB must accept responsibility for the outcomes and performance associated with that participant. In addition, both LWDBs must maintain documentation on file indicating that the completed transfer was agreed upon. The receiving LWDB will be responsible for ensuring the case file is in good standing and bear responsibility for monitoring issues following the date of accepted transfer. In order to ensure seamless, high-quality service to the participant, transfers will require close coordination within the network of LWDBs. The coordination will include, but not be limited to:

- a) Confirmation of reason for transfer to another LWDB (e.g. relocation, customer request);
- b) Dialogue between LWDBs where customer is enrolled and receiving LWDB prior to transfer;
- c) Review of the participant's case file by the transferring LWDB prior to transfer;
- d) Review of the participant's case file by the receiving LWDB prior to approving transfer;
- e) Discussion and resolution of any identified issues between LWDBs;
- f) Requesting guidance from DEO via email at WIOA@deo.myflorida.com for customers files and Employ Florida services that are not in good standing and cannot be resolved between LWDBs.

Note: LWDBs may not decline to accept transferring customers without consulting DEO.

To initiate a WIOA Title I or TAA participant transfer, the transferring LWDB must close all open activities and plans, and submit the following to PRA@deo.myflorida.com:

- The LWDB and office the participant is being transferred from;
- The LWDB, office and staff member the participant is being transferred to;
- Documentation of the agreed upon transfer from both LWDB's (email); and
- The participant's State ID and Employ Florida Program Application ID.

Note: WIOA Title III (Wagner-Peyser) cases do not require transfer. However, before providing staff-assisted services, staff must update the participant's Employ Florida Wagner-Peyser Program Application and registration to their respective LWDB.

E. Case Closure

When staff have determined a participant no longer requires services because he/she has entered employment or education, become disabled or otherwise incapable of working, or the participant voluntarily opts out of service, the participant's case should be formally closed in Employ Florida. This will immediately stop the addition of any other program services and prompt staff to gather any employment data.

Case closure should not be confused with Exit, which is federally defined and structured. The decision to close the case should be documented accordingly by staff in case notes. While a participant's case may be closed because the participant entered employment or education, the participant may not be ready for exit and follow-up services. Ideally, each participant should remain a program participant long enough to be stable in a job or post-secondary education.

Prior to closing a participant's case, staff must:

- a) Ensure the Individual Employment Plan/Service Strategy (IEP/SS) Plan has been closed out. (see the [Virtual One-Stop User Guide for Staff, Section 4: Individuals - Case Management](#) for further guidance);
- b) Ensure all services have been closed;
- c) Enter any credential(s) earned during the program, including the type, verification and credential date to the Closure Information tab or Credential Section. (see the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA](#) for further guidance);
- d) Make sure any Measurable Skills Gains attained during the program have been added to the participant's Measurable Skills Gain ribbon or, individuals below post-secondary education level literacy/numeracy gains or to the Educational Functioning Level for Measurable Skills Gain ribbon (see the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA](#) for further guidance); and

- e) Add any unsubsidized or On-the-Job Training (OJT) employment entered during the program or at closure to the Add Employment ribbon (see the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA](#) for further guidance).

Note: LWDBs may delete case closures for participants who request or demonstrate a need for continued services if the participant has not exited. For participants who have exited, the case closure may not be deleted if 90 days has lapsed, and a new program application in Employ Florida will be required for the participant.

F. Follow-Up Services

For WIOA Adult and Dislocated Worker programs, follow-up services may begin immediately following placement into unsubsidized employment if no future services (other than follow-up services) are scheduled or expected. For the WIOA Youth program, follow-up services may begin immediately following the last date of service if no future services (other than follow-up services) are scheduled or expected.

Follow-up services do not cause the exit date to change, delay exit or trigger re-enrollment in the program. LWDBs must provide and document WIOA follow-up services in Employ Florida unless the participant refuses services. If a participant refuses follow-up services, staff must document the refusal with a case note in Employ Florida. Guidance regarding the recording of follow-up services in Employ Florida is available in the [Virtual OneStop® User Guide for Staff, Section 6: Programs - WIOA](#). Employ Florida follow-up service codes are outlined in the [Employ Florida Service Code Guide](#).

Note: Follow-up services are not required for TAA or Wagner-Peyser participants, or any WIOA Title I participant exited due to a global exclusion, as described in [Section IV.G.2](#) of this policy.

G. Exits

Individuals who are participating in more than one program covered under the common exit policy will have a single common exit date. The participant's exit occurs when he/she has:

- a) Not received services for at least 90 calendar days from any programs to which the common exit policy applies; and
- b) No future services scheduled, except for self-service, information-only activities, or follow-up services.

The participant's exit date cannot be determined until 90 days have elapsed since the participant last received a participating service and no services are scheduled for the future. The exit date is applied retroactively to the last service date. There are two (2) different types of exits:

1. System Exit

System (soft) exit occurs automatically after participants receive no staff-assisted services for 90 days in either WIOA Title I, WP, or TAA programs. Exit will occur automatically based on actual or projected end dates of reported participating services/activities. For WIOA and TAA, case notes should support the last date of staff-assisted services provided with activity end dates that accurately reflect the actual last service provided.

In some cases, WIOA and/or TAA activities may be completed but the participant continues to receive WP services, which will extend program exit. Exit is often triggered by completion of training, successful transition into employment, or loss of contact. The completion of training and successful transition into employment must be documented in services with corresponding activity end dates. However, if the participant is not engaged in open WIOA activities, loss of contact must only be documented in a case note. WIOA participants who are exited due to a loss of contact must follow the closure guidelines in [Section IV.E](#) of this policy.

2. Manual Exit

Manual (hard) exits are not allowed unless the participant falls into one of the WIOA Title I global exclusion scenarios. Otherwise, participants must be soft exited from the system to be closed out after 90 days of receiving no staff-assisted services.

Participants can be excluded from the Primary Indicators of Performance Measures at the time of closure for any of the following global exclusions that precludes the participant from entering employment or participating in services:

- a) **Institutionalized:** The participant exits the program because he or she has become incarcerated in a correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center while receiving services as a participant.
- b) **Health/Medical:** The participant exits the program because of a medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
- c) **Deceased:** The participant is deceased.

- d) **Reservist called to Active Duty:** The participant exits the program because the participant is a member of the National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days.
- e) **Foster Care (WIOA Youth Only):** The participant is in the foster care system, as defined in 45 CFR 1355.20(a) and exits the program because the participant has moved from the local workforce development area as part of such a program or system.

Note: If a participant is exited due to an exclusion and it is due to a medical reason or disability, staff must collect information in a separate file and not disclose in case notes the details pertaining to the reason for exit. The exclusionary/neutral exit reasons that could disclose medical or disability-related information are:

- a) Health/medical issues; and
- b) Residing in an institution or facility providing 24-hour support, such as prison or hospital.

LWDB staff should submit requests to create a manual closure through global exclusion in writing to the LWDB's Data Integrity Specialist (DIS) or an individual designated by the LWDB as the approving authority for global exclusion. LWDB staff should state the reason for the request and provide the name and state identification of the participant in order to receive approval from the approving authority to create a closure and exclusion on behalf of the LWDB.

If the approval to create the closure and exclusion is granted, then the requesting staff member is solely responsible for ensuring that all the necessary and required documentation has been secured and uploaded to Employ Florida for verification purposes. The approving authority must review all the necessary documentation before the hard exit and exclusion is created. LWDBs should reference the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA, 6-133](#) for further guidance.

H. Mismanagement of Exits

The participant's exit must not be prolonged by staff extending service dates, removing exits or opening new services unless it is demonstrated and documented that the participant has unmet needs and is actively being served. Additionally, Employ Florida service codes that are not training or work experience services must not be future dated to extend participation. Attempts to re-engage a participant do not constitute a participating service for the purpose of providing a service or keeping an activity open. These contacts must instead be documented by case notes or by the appropriate non-participating service. Prolonging exit due to the inability to contact a participant is inappropriate.

The following actions do not constitute a service nor direct contact with a participant for the purpose of extending participation:

- a) Leaving voicemail messages for the participant;
- b) Speaking with relatives of the participant who are not the participant's guardian(s);
- c) Scheduled services or an offer to provide services;
- d) Sending flyers, letters or postcards;
- e) Speaking with the participant's parole officer;
- f) Casual, unscheduled conversations with the participant in public;
- g) Having the participant bring in time sheets and/or attendance records for payment without providing meaningful guidance, service or conducting a review of the participant's IEP; and
- h) Contacts to obtain employment status, educational progress, need for additional services or income support payments without providing meaningful guidance, service or conducting a review of the participant's IEP.

I. State and Local Monitoring

DEO will monitor the requirements outlined in this policy and local operating procedures. Additionally, LWDBs must establish local monitoring policies and procedures that include, at minimum:

- a) Roles of the participant and LWDB staff; and
- b) Local monitoring procedures for implementation of this policy.

V. DEFINITIONS

Common Exit - Occurs when a participant has not received services (excluding self-service, information-only service or activities, or follow-up services) from any program covered by the common exit policy for at least 90 days, and no future services are planned. The common exit date for all programs in which the participant is enrolled will be the end date of the last participating service the participant received.

Data Integrity Specialist - An individual designated by the LWDB, and provided elevated system privileges by the local administrator, to assist with maintaining security protocols and data validation in the state's MIS, Employ Florida.

Non-Participating Service - A service that does not commence or extend program participation. Supportive services, self-service, information-only services, administrative, follow-up services, and locally defined services are non-

participation services. (Exception: for WIOA Youth, supportive services are a participation service).

Participant - An individual who is determined eligible to participate in the program and receives a service funded by the program in either a physical location (CareerSource Florida Network Career Center or affiliate site) or remotely through electronic technologies.

Participation Date - The first day, following a determination of eligibility, (if required), that the individual begins receiving a staff-assisted participating service funded by the program.

Participating Service - A program-funded, staff-assisted service provided to an eligible applicant, other than supportive services, self-service, information-only services, administrative, local defined, or follow-up services. (Exception: for WIOA Youth, supportive services are a participating service).

Reportable Individual - A job seeker who engages with the workforce system on an initial level through non-participation services and may not have met program requirements for eligibility or participation.

VI. RESOURCES

[Workforce GPS Performance Reporting Community](#)

[USDOL WIOA Technical Assistance Resources and Tools](#)

VII. REVISION HISTORY

Date	Description
TBD	Issued by Florida Department of Economic Opportunity.
TBD	Approved by CareerSource Florida Board of Directors.



Administrative Policy

**POLICY
NUMBER
TBD**

Title:	Rapid Response Program Administration
Program:	Workforce Innovation and Opportunity Act (WIOA)
Effective:	TBD

I. PURPOSE AND SCOPE

This policy notifies Local Workforce Development Boards (LWDBs) of the minimum Rapid Response requirements and activities mandated by the [Workforce Innovation and Opportunity Act](#) (WIOA). This policy provides a framework for LWDBs to design and implement a local business engagement strategy and articulates the role of layoff aversion within effective Rapid Response systems.

II. BACKGROUND

WIOA requires states to implement statewide Rapid Response activities to assist employers and impacted workers as quickly as possible following the announcement of a permanent closure, layoff, or natural or other disaster resulting in a mass job dislocation.

Rapid Response promotes economic recovery and vitality by developing ongoing, comprehensive approaches to identifying, planning for, or responding to layoffs and preventing or minimizing the impacts of layoffs on workers, businesses, and communities. Rapid reemployment is a central tenant of Rapid Response and is accomplished by helping affected workers quickly transition to reemployment, minimizing the duration of unemployment, or averting layoffs whenever possible.

III. AUTHORITY

[Public Law 113-128, Section 134\(c\)\(2\)](#)

[20 Code of Federal Regulations \(CFR\), Part 639](#)

[20 Code of Federal Regulations \(CFR\), Part 682](#)

[Training and Employment Guidance Letter \(TEGL\) 19-16](#)

IV. POLICIES AND PROCEDURES

Rapid Response provides customer-focused services to both dislocated workers and employers, ensuring immediate access to services for affected workers to expedite reentry into the workforce. WIOA legislation requires Rapid Response and early intervention assistance be provided to workers to avert or minimize the economic disruption of a mass job dislocation event.

A. State Rapid Response Program Office

The Department of Economic Opportunity (DEO) provides direction to the LWDBs to ensure consistency in the statewide operations and delivery of Rapid Response services. DEO's [State Rapid Response Program Office](#) is responsible for carrying out statewide Rapid Response activities and overseeing Rapid Response activities carried out by the LWDBs. State-level Rapid Response activities are managed by the State Rapid Response Coordinator.

B. Rapid Response Events

The classification of a Rapid Response event is without regard to industry, size of the employer, number of workers potentially affected or the time between notification and layoff date.

There are four types of Rapid Response events:

- a) [Worker Adjustment and Retraining Notification](#) (WARN) event: Any employer that provides written notice of a mass layoff or closure with intent to meet the federal WARN requirements;
- b) Non-WARN event: Any employer experiencing a mass layoff or closure, even if it is not subject to the federal WARN requirements;
- c) [Trade Adjustment Assistance](#) (TAA) event: Any employer for which a TAA petition has been filed with the U.S. Department of Labor (USDOL); and
- d) Natural disasters: Any employer experiencing a mass layoff or closure due to natural or force majeure disasters.

Rapid Response activities assist areas that experience employer closures, mass layoffs, disaster mass job dislocations, or TAA petition filings that precipitate substantial increases in the number of unemployed individuals. Rapid Response services and

activities shall be provided to all employers that experience a mass layoff or closure, regardless of how the LWDB was notified or became aware of the event.

DEO provides LWDBs notification of filed TAA petitions and WARN notices via e-mail to the LWDB's Rapid Response Coordinator and other designated recipients as assigned by the LWDB. LWDBs may add individuals to the Rapid Response event distribution list by submitting an e-mail with the requested recipient's name and e-mail to WARN@deo.myflorida.com.

1. Worker Adjustment and Retraining Notification Administration

The [WARN](#) Act of 1988 requires employers, in certain circumstances, to provide advance notification of layoffs and plant closings in order to provide workers with enough time to seek other employment or retraining opportunities. Employers covered under the WARN Act submit WARN notices to the State Rapid Response Coordinator sixty (60) days in advance of plant closings and/or mass layoffs.

LWDBs may assist employers that meet the criteria set forth in the WARN Act of 1988 and required in [20 CFR Part 639](#), with filing WARN notices by providing the procedures and instructions available in the [Employer's Guide to Advance Notice of Closings and Layoffs](#). WARN filing assistance must be documented in the employer's Employ Florida service plan with employer service code E47 WARN Notice Assistance.

Upon receipt of a WARN notice, DEO shall provide notification via e-mail to the LWDBs where the layoffs are to occur. DEO shall provide a copy of the WARN notice and any known separation details in a notification e-mail to the LWDB within two (2) business days of receipt. If a WARN notice is incomplete, DEO will provide the known details to the LWDBs in the form of an advanced, partial layoff notification.

A summary of all WARN information is available from the DEO public website at www.floridajobs.org. The State Rapid Response Program Office is responsible for updating the list and keeping it current within three (3) business days of receiving a WARN notice. The online WARN Summary Report includes:

- a) Company name and address;
- b) Total number of affected workers;
- c) The affected employer's industry;
- d) WARN notification date;
- e) Layoff dates; and
- f) A copy of the WARN notice.

DEO is responsible for inputting WARN information in the state's online labor exchange and case management system, Employ Florida, within two (2) business days of receipt. LWDBs may enter non-WARN Rapid Response events by following the instructions provided in the [Virtual OneStop® Administration System User Guide](#). The use of the WARN1234 numbering sequence for Rapid Response events is reserved for DEO use only.

2. Non-WARN Events

To serve businesses that are not covered by the WARN Act or a TAA petition, LWDBs must actively work with local business services teams to identify potential Rapid Response events in the local area. Local business services teams and Local Rapid Response Coordinators shall utilize local economic development resources, local Small Business Development Center (SBDC) network offices, and other resources and technology to identify potential Rapid Response events.

3. Trade Adjustment Assistance Petition Filings

The Trade Act of 1974 established the [Trade Adjustment Assistance for Workers Program](#), referred to herein as the TAA Program, to assist workers who have been laid off or whose jobs have been threatened because of foreign trade or competition (trade-affected workers). To establish eligibility, a group of two workers (or their representative) must file a petition with USDOL. Upon receipt of the petition, USDOL investigates to verify the role of foreign trade or competition in the workers' job losses, reduction in hours or reduction in wages.

In accordance with WIOA, the filing of a TAA petition requires LWDBs to deliver rapid response services to the affected workers. TAA petitions filed with USDOL are provided to the State Rapid Response Coordinator by the [USDOL Office of Trade Adjustment Assistance](#) (OTAA). The State Rapid Response Program Office shall provide a copy of the TAA Petition and any known separation details in a notification e-mail to the LWDB responsible for the service area of the employer within two (2) business days of receipt.

4. Natural and Other Disasters

Local Rapid Response Coordinators shall respond to natural disasters and coordinate with the State Rapid Response Coordinator and other local government divisions and organizations to provide Rapid Response services to natural disaster-affected workers. Workers separated due to natural or force majeure disasters must be screened for the eligibility requirements included in the WIOA Dislocated Workers program, per [WIOA § 3 \(15\)\(C\)](#), "unemployed as a result of general

economic conditions in the community in which the individual resides or because of natural disasters.”

Local Rapid Response Coordinators have the flexibility to institute agendas and programs that respond to known, regional disasters such as flooding, hurricanes, freezes, wildfires, heat waves, drought, shelter-in-place orders, evacuations, and health crises. Exceptions to recognized disasters are sudden geological processes, tornadoes, hailstorms, and mass criminal or terrorist events.

C. Local Rapid Response Teams

LWDBs are responsible for the day-to-day coordination of Rapid Response services to businesses and workers that are experiencing layoffs or closures. LWDBs must designate a full-time Local Rapid Response Coordinator as the primary point of contact for Rapid Response. The Local Rapid Response Coordinator is responsible for:

- a) Communicating with DEO and the State Rapid Response Coordinator;
- b) Serving as lead contact for affected employers and dislocated workers;
- c) Leading the LWDB’s Rapid Response team; and
- d) Ensuring Rapid Response activities are documented in Employ Florida.

It is strongly recommended that LWDBs designate a Business Development Representative (BDR) as their Local Rapid Response Coordinator or at a minimum, develop a local integration strategy that includes BDRs as early as possible in the process. Including the BDR at the earliest stage in the process is an effective strategy to foster talent transfer. Effective strategies may include, but are not limited to, offering customized hiring events for the affected workers and earlier identification of grant funds and training opportunities.

The LWDB’s Rapid Response team is comprised of individuals who provide information, resources and services to assist affected employers and workers. The team may include, but is not limited to:

- a) Business development representatives;
- b) Local TAA Coordinators;
- c) Department of Children and Families (DCF) case managers;
- d) Division of Vocational Rehabilitation (DVR) Business Outreach Specialists;
- e) WIOA case managers;
- f) Supplemental Nutrition Assistance Program (SNAP) staff;
- g) Temporary Assistance for Needy Families (TANF) staff; and/or
- h) Local Veteran Employment Representatives (LVER).

Note: Disabled Veteran Outreach Program (DVOP) specialists funded through the Jobs for Veterans State Grant may participate in Rapid Response events only when it

has been predetermined that the dislocated workers include veterans who may be eligible for DVOP services as described in [Administrative Policy 102: Veterans Initial Intake Process at Career Centers](#).

D. Initial Contact

Once the Rapid Response event has been identified, the Local Rapid Response Coordinator will establish contact with the employer and act as the single point of contact for arranging and scheduling all Rapid Response activities. Upon determination of a Rapid Response event, the Local Rapid Response Coordinator must contact the affected employer within two (2) business days to discuss the following:

- a) The employer's schedule for the layoff;
- b) The types of services the employer would be interested in hosting on-site or remotely;
- c) General information on the skills and abilities of the affected workers;
- d) The spaces where employee meetings or other services may take place, including virtual accommodations and other accommodations for disabilities;
- e) The spaces where employees may safely meet to receive services following a natural disaster; and,
- f) The duration of Rapid Response assistance to workers, and the ability for workers to receive services during regular work hours.

E. Rapid Response Services

As part of the LWDB's Rapid Response service delivery system and pursuant to [20 C.F.R. 682.330](#), the following services must be made available, as needed, to affected employers and workers:

- a) Immediate and on-site contact with the employer, representatives of the affected workers which includes an assessment of and a plan to address:
 - i. Layoff plans and schedules of the employer;
 - ii. Background and probable assistance required for the affected workers;
 - iii. Reemployment prospects for workers; and
 - iv. Available resources to meet the short- and long-term assistance needs of the affected workers.
 - v. Investigation of possible trade-impact.
- b) The provision of information about and access to [Reemployment Assistance](#) (RA) benefits and programs, such as Short-Time Compensation (STC), comprehensive career center services, and employment and training activities, including information on the TAA program, Pell Grants, the GI Bill, and other resources.

- c) The delivery of other available services and resources including workshops, classes and job fairs to support reemployment efforts of affected workers;
- d) The provision of emergency assistance adapted to the mass layoff;
- e) Delivery of services to worker groups for which a petition for TAA has been filed; and
- f) The provision of limited, additional assistance to local areas that experience Rapid Response events when such events exceed the capacity of the local area to respond with existing resources.

The above list represents the minimum services that must be readily available and should be offered with the end goal of rapid reemployment. WIOA requires states and local areas conduct layoff aversion activities. However, it is left to the discretion of the local Rapid Response programs to determine which layoff aversion strategies and activities are applicable in each potential layoff situation. Pursuant to [20 C.F.R. 682.340](#), LWDBs may devise Rapid Response strategies or conduct activities that are intended to minimize the negative impacts of dislocation on workers, businesses and communities to ensure rapid reemployment for workers affected by Rapid Response events.

F. Dislocated Worker Program

The Rapid Response Program is a prelude to the WIOA Dislocated Worker Program. The WIOA Dislocated Worker Program provides transitional services designed to assist in the early stages of a layoff. These services are offered in recognition that Dislocated Workers have various levels of need. Some workers only require minimal assistance to successfully return to the workforce, while others may need more.

G. Layoff Aversion

Locally driven layoff aversion strategies and activities are a required component of Rapid Response. A layoff aversion strategy helps employers retain a skilled workforce and/or provides workers rapid transition to new employment. The implementation of local layoff aversion strategies minimizes periods of unemployment for workers impacted by layoffs. Layoff aversion is a central component of a high-performing business engagement strategy, requiring a shared responsibility among numerous partners at the state, regional and local levels.

The intent of layoff aversion is to provide business solutions to companies that want to save jobs. To save jobs, the Rapid Response team must be able to identify an at-risk company well in advance of layoffs, obtain executive level commitment to work together, assess the needs of the company and deliver solutions to address risk factors. LWDBs must work with local community partners and businesses to implement a mechanism to determine at-risk employers.

The LWDB shall determine which strategies and activities are applicable in each situation. Local Rapid Response programs have the flexibility to institute agendas and programs that respond to their local workforce challenges. Layoff aversion strategies include, but are not limited to:

- a) Ongoing engagement, partnership and relationship-building activities with businesses in the community, in order to create an environment for successful layoff aversion efforts and to enable the provision of assistance to affected workers in obtaining reemployment as soon as possible;
- b) Assisting employers in managing reductions in force, which may include early identification of firms at risk of layoffs, assessment of the needs and options for at-risk firms, and the delivery of services to address these needs;
- c) Funding feasibility studies to determine if a company's operations may be sustained through a buyout or other means to avoid or minimize layoffs;
- d) Developing, funding and managing Incumbent Worker Training (IWT) programs or other worker upskilling approaches as part of a layoff aversion strategy or activity;
- e) Connecting companies to state Short-Time Compensation or other programs designed to prevent layoffs or to quickly reemploy dislocated workers, employer loan programs for employee skill upgrading; and other federal, state and local resources as necessary to address other business needs;
- f) Establishing linkages with economic development activities at the federal, state and local levels, including federal Department of Commerce programs and available state and local business retention and expansion activities;
- g) Partnering or contracting with business-focused organizations to assess risks to companies, propose strategies to address those risks, implement services, and measure impacts of services delivered;
- h) Conducting analyses of the suppliers of an affected company to assess their risks and vulnerabilities from a potential closing or shift in production of their major customer;
- i) Engaging in proactive measures to identify opportunities for potential economic transition and training needs in growing industry sectors or expanding businesses;
- j) Coordinate with local government divisions, organizations and local non-profit organizations, to plan for and respond to natural and other disasters; and
- k) Connecting businesses and workers to short-term, on-the-job, or customized training programs and apprenticeships before or after layoff to help facilitate rapid reemployment.

H. Incumbent Worker Training

The Incumbent Worker Training (IWT) program provides reimbursement grants to businesses that pay for preapproved, direct, training-related costs to upgrade the skills of their current employees. The IWT program is used to help avert potential layoffs of employees or to increase the skill levels of employees so they may be promoted within the company and create backfill opportunities for the employers.

When appropriate, Local Business Development Representatives shall provide IWT program information and resources to employers during meetings, interviews and other engagements. For more information regarding IWT, please refer to the [CareerSource Florida Incumbent Worker Training Program Guidelines](#).

I. Short-Time Compensation Program

The provision of information and access to RA benefits and programs, such as [Short-Time Compensation](#) (STC) are required activities under Rapid Response. The STC Program is a voluntary employer program designed to help employers maintain their staff by reducing the weekly working hours during temporary slowdowns instead of temporarily laying off workers.

Employers that wish to participate in the STC Program must apply to be a part of the program before being able to offer it to their workforce. To apply for the STC Program, employers must apply through the DEO [website](#). Applying for STC for employees is exclusively online. The process to apply for the STC Program in Florida requires furnishing requested documents as well as information on the affected employees as outlined in [Chapter 443, Section 1116](#) of the Florida Statutes.

J. Reporting Requirements

As LWDBs initiate contact with the employers that have experienced a Rapid Response event, they are required to document the visits and services provided by entering, at minimum, employer service code E42: Rapid Response/Dislocated Workers Assistance in the employer's Employ Florida service plan. Employers that decline or refuse Rapid Response services must be documented by recording a case note in the employer's case note tab. Supporting evidence of the employer's refusal or declining of services must be retained for source documentation. Instructions for LWDB staff regarding the recording of Employ Florida employer service codes and case notes are available in the [Employ Florida Virtual OneStop® User Guide for Staff](#), Section 16: Manage Employers.

When feasible, affected employees should be registered in the state's online labor exchange and case management system, Employ Florida. Rapid Response activities

provided to affected employees must be reported in the affected employee's Employ Florida, Wagner-Peyser, TAA or WIOA program application(s), as applicable dependent upon which application is active at the time of service delivery, in accordance with the [Employ Florida Service Code Guide](#) and the [Employ Florida Virtual OneStop® User Guide for Staff](#).

K. Monitoring

Rapid Response services and activities must be monitored annually for compliance with requirements by USDOL and DEO. DEO monitors the requirements outlined in this policy and the LWDB's local operating procedures. LWDBs must establish local monitoring policies and procedures that include, at minimum:

- a) Roles of the Local Rapid Response Coordinator;
- b) Role of all other LWDB supporting staff; and
- c) Local monitoring procedures for implementation of this policy.

V. DEFINITIONS

Incumbent Worker Training (IWT) program: This program, funded by the WIOA, was created for the purpose of providing grant funding for continuing education and training of incumbent employees at existing Florida businesses. The program provides reimbursement grants to businesses that pay for preapproved, direct, training-related costs.

Local TAA Coordinator: A merit-staff employee designated by the LWDB to determine TAA eligibility and to provide TAA case management and employment services with the goal of leading participants to suitable employment.

Fringe Benefits: Fringe benefits include, but are not limited to, health insurance, retirement benefits under defined benefit pension plans as defined in subsection 35 of s. 1002 of the Employee Retirement Income Security Act of 1974, 29 U.S.C., contributions under a defined contribution plan as defined in s. 414(i) of the Internal Revenue Code, paid vacation and holidays, and sick leave.

Mass Layoff: Layoffs affecting 50 or more workers or layoffs when a WARN notice has been filed, regardless of the number of workers affected by the layoff announced.

Petition: A request submitted to USDOL to certify an employer as adversely impacted by global trade or competition.

Trade-Affected Worker: An individual who has been totally or partially separated from employment in a firm or subdivision of a firm that has been certified under TAA.

Worker Adjustment and Retraining Notification (WARN) Act: A federal act that helps ensure advance notice in cases of qualified plant closings and mass layoffs per 20 CFR Part 639.

Workforce Innovation and Opportunity Act (WIOA): A federal act that provides direction and guidance for the workforce system in every state. The law prioritizes a market-driven approach to talent development that prepares people seeking employment for the jobs of today and of the future. WIOA is a transformative law designed to strengthen our nation's public workforce system, helping job seekers, particularly those with barriers to employment, access the education, training, and support services they need to obtain and advance in quality jobs and careers, and to help businesses hire and retain the skilled workers they need to succeed in a global economy.

VI. RESOURCES

[Rapid Response Services for Businesses Fact Sheet](#)

[Short-Time Compensation Fact Sheet](#)

[WorkforceGPS Business Engagement Collaborative Community](#)

[State Rapid Response Program](#)

[State Rapid Response Program Resources](#)

[State Worker Adjustment and Retraining Notification Database](#)

[U.S. Department of Labor Employment and Training Administration Rapid Response Services](#)

[WorkforceGPS Rapid Response Process Flow Chart](#)

VII. REVISION HISTORY

Date	Description
TBD	Issued by Florida Department of Economic Opportunity.
TBD	Approved by CareerSource Florida Board of Directors.



**POLICY
NUMBER
TBD**

Administrative Policy

Title:	Disaster Recovery Dislocated Worker Grants
Program:	Workforce Innovation and Opportunity Act
Effective:	TBD

I. PURPOSE AND SCOPE

The purpose of this policy is to provide local workforce development boards with the minimum requirements for administering Disaster Recovery Dislocated Worker Grants.

II. BACKGROUND

Disaster Recovery Dislocated Worker Grants, authorized by the Workforce Innovation and Opportunity Act (WIOA), temporarily expand the service capacity of training and employment programs to respond to large, unexpected economic events which cause significant job losses. Dislocated Worker Grants provide funding and resources to states and local areas to quickly reemploy laid-off workers by offering training and career services to help laid-off workers regain employment.

Disaster Recovery Dislocated Worker Grants may be issued to the state after a federal agency¹ makes a major emergency or natural disaster declaration. These grants can be used to provide disaster-recovery assistance to areas included in the declaration. Such assistance may include temporary disaster-relief jobs in addition to training and career services.

III. AUTHORITIES

[Public Law \(WIOA\) Sections 3\(15\); 170\(a\) and \(d\); 134; 181; 184; 185; 188; 189.](#)

[20 Code of Federal Regulations \(CFR\) 687](#)

[Training and Employment Guidance Letter \(TEGL\) 12-19, Change 1](#)

[TEGL 19-16](#)

¹ Typically, the Federal Emergency Management Agency (FEMA) issues the declarations.

IV. POLICIES AND PROCEDURES

Disaster Recovery Dislocated Worker Grants are meant to address situations beyond those that are the focus of WIOA formula funds. Disaster Recovery Dislocated Worker Grants enable areas impacted by a disaster to employ workers in jobs assisting in recovery and humanitarian efforts, as well as to provide training opportunities that support customers in accessing employment.

When an emergency or disaster has met the criteria for disaster grant funding, the Florida Department of Economic Opportunity (DEO) will coordinate with the impacted local area(s) to assess the need for clean-up and humanitarian efforts, ascertain the availability of eligible individuals to perform the disaster relief work, and provide technical assistance on the application process and operational considerations.

If a need for disaster grant funding is identified, DEO will work with impacted local areas interested in participating to submit either:

- a) An emergency application within 15 days of the disaster declaration using an abbreviated format to facilitate rapid implementation of services (followed by a full application within 60 calendar days of award notification if funding is approved); or
- b) A full application within 60 calendar days of the disaster declaration which must include a narrative describing the project and services, a list of worksites in each county, job titles for the temporary positions being created, and line item budget for each participating county.

A. Funding of Disaster Recovery Dislocated Worker Grants

The U. S. Department of Labor issues its funding decision within 45 calendar days of receipt of a valid application. If the application is approved, DEO will notify the participating local workforce development boards of their sub-grant award amounts.

DEO distributes funds to local workforce development boards in areas affected by a federal disaster/major emergency declaration, based on identified needs and availability of funds. DEO is responsible for ensuring that funds are expended in compliance with grant requirements and for de-obligating and re-obligating funds to meet ongoing needs.

Funds are released to local workforce development boards through Notices of Grant Award/Fund Availability which describe special grant conditions. A Notice of Grant Award/Fund Availability may include grant conditions that restrict the application of some of the provisions of this policy. Disaster grants are issued incrementally. A maximum funding level will be approved, but a lesser amount will be initially disbursed. Requests for additional funds must be submitted when needed and must be supported by enrollments, completion of work goals, and expenditures.

As participating local areas require additional funding to continue operating, DEO may temporarily or permanently reduce another area's maximum funding level or allocation amount to optimize utilization of the grant resources statewide.

B. Participant Eligibility

Local workforce development boards must ensure that individuals receiving services funded by a Disaster Recovery Dislocated Worker Grants meet at least one of the following eligibility requirements:

- a) Temporarily or permanently laid off because of the disaster;
- b) A dislocated worker as defined in WIOA section 3(15);
- c) A long-term unemployed individual; or
- d) A self-employed individual who became unemployed or significantly underemployed as a result of the disaster.

Note: A long-term unemployed individual for Disaster Recovery Dislocated Worker Grants is defined as an individual who has been unemployed for six out of the last 13 weeks. An individual is considered unemployed if they were not employed during the weeks in question and were available for work.

Local workforce development boards must document eligibility² in the participant's Employ Florida program application, including, but not limited to the participant's:

- a) Citizenship or right to work³;
- b) Compliance with the Selective Service Act; and
- c) One of the four grant-specific eligibility requirements listed above.

Examples of documentation demonstrating dislocated worker status include:

- a) Letter of separation from employer
- b) Verification of Reemployment Assistance or other forms of unemployment assistance
- c) Paystubs or other payroll records showing the last day of employment
- d) Self-Attestation may be accepted as an exception and must not be used as a regular method of determining eligibility. When self-attestation is accepted due to its being the only verification method, the local workforce development board must describe efforts made to obtain other, independent documentation.

Circumstances surrounding the disaster may make documentation of eligibility difficult to obtain during the initial stages, however, local workforce development boards are required

² [TEGL 23-19](#) provides guidance on data validation to ensure the accuracy of annual reports, safeguard data integrity, and promote the timely resolution of data anomalies and inaccuracies.

³ A copy of the completed I-9 must be maintained in the file of a participant placed into a temporary disaster-relief position.

to obtain complete eligibility verification within six (6) months of the participant's enrollment or the grant closeout date, whichever occurs first. Local workforce development boards must maintain a written local policy which describes the circumstances under which they will accept self-attestation in lieu of full documentation of eligibility. The policy must also describe when and how the local workforce development board will review the files of participants whose eligibility is based on self-attestation. The timeframe for such review may be based on the situations following a disaster but must not exceed six (6) months or extend beyond the grant closeout date.

If, during the reverification review of participants enrolled through self-attestation, the local workforce development board discovers that it served an ineligible participant, the participant must be terminated from the program and a case note must be recorded in Employ Florida comprising the review process and subsequent determination of ineligibility. This situation will not result in a disallowed cost.

Self-employed individuals must submit documentation to establish their self-employment prior to the disaster and unemployment/underemployment due to the declared disaster through the following:

- a) Self-Attestation describing the impact of the disaster, supported by one of more of the following:
 - i. Federal tax return and/or evidence of payment of estimated taxes to the Internal Revenue Service (IRS)
 - ii. Evidence of business closure
 - iii. Business ledger
 - iv. Business license
 - v. Customer/client verification
- b) Self-attestation may be accepted as an exception if other documents are not available (and are subject to reverification). When self-attestation is accepted due to its being the only verification method, the local workforce development board must describe efforts made to obtain other, independent documentation.

To verify that an individual was unemployed six out of the last 13 weeks, the following documentation may be used:

- a) Self-attestation supported by wage records for the quarter in which the WIOA application is taken (and previous quarter if relevant)⁴.
- b) Self-attestation may be accepted as an exception if other documents are not available (and are subject to re-verification). When self-attestation is accepted due

⁴ Probative wage records will not be available at the time of application and must be verified the following quarter(s).

to its being the only verification method, the local workforce development board must describe efforts made to obtain other, independent documentation.

Note: If wage records indicate that there may be a discrepancy between the self-attestation and the reported earnings, the local workforce development board must follow up to resolve the discrepancy.

C. Veteran and Eligible Spouse Priority of Service

Covered persons (veterans and eligible spouses) determined eligible for services under a Disaster Recovery Dislocated Worker Grants must receive priority over non-covered persons in accordance with Administrative Policy 111: Priority of Service for Veterans and Eligible Spouses.

D. Disaster Recovery Dislocated Worker Grants Allowable Activities

In most cases, Disaster Recovery Dislocated Worker Grants projects must include a temporary disaster relief employment component⁵. Participants may be enrolled into temporary disaster relief employment, as well as career and training services, concurrently, sequentially, or as stand-alone services. However, certain Disaster Recovery Dislocated Worker Grants may limit the availability of certain activities as specified within the accompanying Notice of Grant Award/Fund Availability.

Prioritization of types of services must be determined in coordination with local emergency planning and recovery agencies.

1. Temporary disaster relief jobs

Disaster-relief employment is temporary employment of eligible individuals for the purposes described in WIOA Section 170(b)(1)(B) and (d), 20 CFR 687.180(b) and (c), and TEGL 12-19. Local workforce development boards must demonstrate that disaster-relief employment created under a Disaster Recovery Dislocated Worker Grant aligns with the categories of humanitarian assistance or cleanup activities. Post-disaster response and recovery activities address needs associated with mass care/sheltering, public health and health care, (re)housing, debris/infrastructure removal and repair, support to business owners, emotional/psychological support, public health and health care, and mitigation⁶ activities.

Humanitarian assistance provided by temporary disaster-relief workers generally includes actions designed to alleviate suffering and maintain human dignity in the immediate aftermath⁷ of disasters. The humanitarian assistance provided by disaster-

⁵ Note that Disaster Recovery Dislocated Worker Grants due to the relocation of evacuees from a disaster-affected area do not require a temporary disaster-relief employment component.

⁶ Allowable mitigation activities are those that are directed at correcting existing damage. Activities that are in preparation for future disasters are not allowed.

⁷ The immediate aftermath involves time and causality. With every declared disaster, there will be physical damage which results in the dislocation of individuals, families, and businesses, as well as economic and emotional damage.

relief workers must relate directly to needs created by the disaster and economic consequences due to the disaster. Disaster-relief positions that deliver humanitarian assistance to address humanitarian needs cannot be used to fund the actual humanitarian aid. For example, funding could be used to support food delivery workers at food shelters but not the food itself.

Eligible participants may be enrolled into temporary disaster-relief jobs under a Disaster Recovery Dislocated Worker Grant for up to 12 months or 2,080 hours, unless the U.S. Department of Labor approves an extension for up to an additional 12 months through a grant modification.

Participants must be paid the higher of the comparable rate of pay for individuals employed in similar occupations by the same employer, and no less than the federal or state minimum wage. In accordance with WIOA Section 181(a)(1)(A), generally, participants must be compensated at the same rates, including periodic increases, as employees who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills.

Where applicable, fringe benefits should be paid in accordance with the policies of the worksite employer. If other employees of the worksite employer are doing similar work and receiving hazard pay, disaster-relief temporary workers can also be paid hazard pay rates for their work⁸.

2. Training and career services

Training and career services, as described in local policies and procedures, may be offered to eligible participants to help them obtain reemployment that leads to self-sufficiency when they are unlikely to return to their prior employment. These services may include, for example, job search/job readiness activities, literacy instruction including English as a second language, occupational skills training and/or work-based training for career pathways that lead to high-demand jobs in high-growth industries.

Participants must meet eligibility requirements and/or prerequisites detailed in WIOA section 134(c)(2) and (3), 20 CFR 680 and other U.S. Department of Labor guidance for accessing specific services. An Individual Employability Plan must detail the need for training services as well as certain individualized career services, such as work experiences, literacy/GED prep/ESOL, short-term prevocational services, out-of-area job searches/relocation.

3. Supportive services

Supportive services are allowable to enable a participant's involvement in grant activities. Supportive services for a Disaster Recovery Dislocated Worker Grant must align with the local workforce development board's supportive service policy and be

Temporary disaster-relief workers may be provided to help deal with these crises since they are the immediate consequence of the disaster for the time necessary to help affected individuals recover.

⁸ Overtime is allowable.

consistent with WIOA and state requirements⁹. Transportation, childcare, and dependent care are examples of allowable supportive services, as are tools, protective clothing, etc.

In order to be ready to respond to natural disasters/major emergencies, local workforce development boards should include in their local policies and procedures supportive services that may be unique to potential disaster/emergency situations. For example, there may be a need for insect repellent for individuals conducting cleanup of damaged public property — a supportive service that a local workforce development board might not provide under normal circumstances¹⁰. Additionally, local workforce development boards should describe in their policies and procedures how they will deal with extraordinary circumstances that may arise due to a declared disaster.¹¹

Needs-Related Payments may be made to those individuals enrolled in training services who do not qualify for or have exhausted benefits under Reemployment Assistance or Disaster Unemployment Assistance. WIOA section 134(d)(3)(B) limits the availability of Needs-Related Payments for dislocated workers as follows: “a dislocated worker who has ceased to qualify for unemployment compensation may be eligible to receive needs-related payments under this paragraph only if such worker was enrolled in training services—(i) by the end of the 13th week after the most recent layoff that resulted in a determination of the worker’s eligibility for employment and training activities for dislocated workers under this subtitle; or (ii) if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months.” Local workforce development boards should address how they may facilitate providing Needs-Related Payments to dislocated workers who need training to become re-employed.

Note: Individuals who receive wages from disaster-relief temporary jobs are not eligible for Needs-Related Payments.

⁹ See 20 CFR 680.900, *et seq.*, and CareerSource Florida [Administrative Policy AP-109, Supportive Services and Needs Related Payments](#).

¹⁰ The COVID-19 pandemic saw a need for personal protective equipment, as well as electronic tablets and access to the Internet for remote temporary disaster-relief positions.

¹¹ In response to the COVID-19 pandemic, the U.S. Department of Labor informed Dislocated Worker Grant grantees that it may permit exceptions to allow grantees to pay relocation and lodging costs for medical personnel as described in the [COVID-19 Frequently Asked Questions](#), even if such costs are typically not covered by state or local policy. A request for this limited exception must be included in an application for a COVID-19 Dislocated Worker Grant or in a grantee’s modification request. It must include enough justification and be approved by the Grant Officer before a grantee begins paying relocation and lodging expenses as described in the [COVID-19 Frequently Asked Questions](#). Note that the relocated workers must meet the eligibility requirements described above.

4. Program outputs and performance outcomes

With the issuance of TEGL 12-19, Change 1, the U.S. Department of Labor is requiring states to describe measurable goals with milestones and timelines when DEO submits full applications¹² and modification requests¹³.

Local workforce development boards must provide measurable goals with milestones and timelines in the following areas:

- a) Planned number of participants to be served in temporary disaster-relief employment
- b) Planned worksite employers with description of worksites, tasks, length of time needed, and number of workers needed¹⁴ (and, for modifications, percentage of work completed)
- c) Planned number of participants to be enrolled in training, including on-the-job training, targeted industries and occupations, anticipated length of training
- d) Planned number of participants to be enrolled in work experiences, types of work experience sites, anticipated length of activity
- e) Planned number of participants to receive supportive services, types of supportive services
- f) Planned number of participants to be placed in employment upon completion of grant activities
- g) Planned other outcomes, such as continuation in training/other WIOA services after the grant ends, credential attainment

Local workforce development boards must provide information to DEO to describe their planned levels of service and planned expenditures. Progress is tracked monthly through a review of participant data in Employ Florida and financial information entered in DEO's financial management systems. Local workforce development boards must also use provide planned worksite information and submit monthly updates to DEO. Such information is to be submitted via the DWG@deo.myflorida.com mailbox.

For participants who only receive disaster relief employment, the same performance data collection requirements apply as for other Dislocated Worker Grant participants. However, participants who receive only disaster relief employment are not included in the primary indicators of performance unless they receive other allowable career and training services provided through the grant or through co-enrollment in another WIOA core or partner program that shares a common exit with Dislocated Worker Grant in the state's common exit policy.

However, performance outcomes are measured for individuals enrolled in training and/or career services through the grant or through co-enrollment in another WIOA or partner program that shares a common exit. Consequently, local workforce development boards are responsible for performance outcomes for any Disaster

¹² A full application is due within 60 to 90 days from the Disaster Declaration date.

¹³ Modification requests are submitted to request additional funds or to make substantive changes.

¹⁴ For example, City of XX Parks & Recreation, debris cleanup for 12 city parks, anticipated time frame 12 months, number of workers: 12 laborers and two supervisors.

Recovery Dislocated Worker Grant-funded participant who receives career or training services through workforce-funded activities.

Local workforce development boards are responsible for the placement of Disaster Recovery Dislocated Worker Grant participants into suitable, unsubsidized employment and must conduct quarterly follow-up through the 4th quarter after exit to document post-exit outcomes in the participant's Employ Florida WIOA Program Application.

E. Disaster-Relief Worksites

Disaster-relief worksites must be in the geographic area covered by the qualifying event and within the local workforce development board's jurisdiction. WIOA requires that cleanup activities respond to the impacts of the disaster. Local workforce development boards must give the highest priority to clean-up of the disaster area's most severely damaged public facilities and to the cleanup and the provision of humanitarian assistance to economically disadvantaged portions of the disaster area. The administration of grant funds must be in coordination with projects administered by emergency management and disaster recovery agencies.

Note: The provision of disaster-relief activities that focus on prevention and planning for future disasters is not an allowable activity for a temporary disaster-relief worker.

1. There is no limitation on what type of entity may be a worksite employer¹⁵.

Typically, disaster-recovery worksites are governmental agencies and community/faith-based organizations (CBO). Private, for-profit worksites may also be approved to host eligible temporary disaster-relief workers under the following conditions:

- a) The local workforce development board's policies and procedures establish a priority of disaster-relief activities in coordination with the county's disaster-recovery team¹⁶ that identifies the need for and use of private for-profit worksites, as applicable;
- b) The delivery of temporary disaster-relief activities through a private for-profit worksite is coordinated through a governmental entity or CBO; and
- c) The funding of temporary disaster-relief positions shall not duplicate or supplant other funding.

2. Work on private properties is authorized under the following circumstances:

- a) The specific work on private properties has been approved by the U.S. Department of Labor;

¹⁵ Under previous guidance, only governmental and nonprofit entities were allowable worksites.

¹⁶ In some communities, groups are sanctioned by the County Emergency Operations Center, and any number or type of non-profits could be the county's proxy for disaster relief activities. (This may include the Red Cross, Salvation Army, United Way, faith-based groups and others.)

- b) The work is necessary to remove health and safety hazards to the larger community located on private lands or around homes or other structures and only to return them to a safe and habitable level and not to improve them¹⁷;
- c) The work is intended to address or alleviate specific economic or employment-related impacts of the disaster, such as clean-up work needed for disaster-affected employers to resume operations¹⁸;
- d) Priority is to be given to older individuals and individuals with disabilities; and
- e) Funds may not be used to cover the cost of materials to do repairs.

Local workforce development boards must establish policies and procedures to implement disaster-recovery work on private properties that include the following provisions:

- a) How work on private properties falls within the local workforce development board's priority of disaster-relief activities;
- b) How the local workforce development boards will ensure that priority is given to the homes of older individuals, individuals with disabilities. A second priority is for the homes of low-income individuals;
- c) Submission to DEO of requests to have temporary disaster-relief workers work on private properties for DEO to seek U.S. Department of Labor approval; and
- d) The U.S. Department of Labor approves the worksite/temporary-relief job.

3. Coordination with FEMA and non-duplication of funds

Disaster-relief activities must be coordinated with the appropriate local emergency management agencies to avoid duplication of benefits¹⁹ and ensure that grant activities appropriately respond to the affected community's needs after a disaster. Local workforce development boards must also coordinate with federal agencies responding to the disaster either through direct contact or through state or local agencies working with the federal agencies.

As FEMA and Disaster Recovery Dislocated Worker Grant funds can pay for similar services, the best way to ensure the local workforce development boards is not duplicating FEMA funding is to obtain a written statement from the county, city and/or non-profit as to what services and/or funding FEMA is or will be supplying to the entity and what disaster-recovery services will be provided by disaster-relief temporary workers. This will provide documentation to show that Disaster Recovery Dislocated Worker Grant funds are not duplicated with FEMA-funded services/activities. The written statement should include a brief description of what staff, equipment, supplies, etc., are being paid through FEMA vs. Disaster Recovery Dislocated Worker Grant

¹⁷ For example, fallen trees on private properties that become a hazard to the community or debris fields from storm adjacent to a navigable waterway and at risk of clogging the waterway water could be removed.

¹⁸ If the cost of repairs to a damaged structure is to be covered by insurance, only stabilizing activities may take place, such as placement of tarps on roofs, removal of damaged sheetrock and insulation, etc.

¹⁹ Duplication occurs when a beneficiary receives assistance from multiple sources for a total that exceeds the need.

sources. When a Disaster Recovery Dislocated Worker Grants funded disaster-relief temporary job participant works at a site which is later approved for FEMA reimbursement, and it is time for FEMA to reimburse the costs of the project, the wages of the temporary job participants must be deducted from the cost of the project before FEMA reimburses 75% of the cost of the project to the local government.

Local workforce development boards must establish policies and procedures that describe how the local workforce development boards will assess the availability of other resources, such as assistance from FEMA, private insurance, etc. to ensure non-duplication of funds and recover grant funds when other funds become available for the same activities. The established policies and procedures must also address a plan to recover grant funds expended for activities or services for which other funds become available from FEMA, public or private insurance, or other available resources.

Note: Disaster Recovery Dislocated Worker Grant funds may not be used to match FEMA funds.

4. Use of equipment for temporary disaster-relief workers

Generally, Disaster Recovery Dislocated Worker Grants funds may not be used to purchase equipment²⁰. [Administrative Policy 87 Prior Approval Administrative Policy for Local Workforce Development Boards](#) requires prior approval by DEO before funds awarded to a local workforce development board may be used to purchase equipment for such cases which may be subject to exception.

If equipment needed for the temporary disaster-relief worker to complete their assigned task is not available from the worksite employer, such equipment may be rented, as allowed by the local workforce development board's policies and procedures²¹. Equipment rental expenses must be detailed as a separate line item in the budget(s) submitted by Local workforce development boards to DEO.

5. Prioritizing Disaster-Relief Worksites

Local workforce development boards must be prepared to deploy the most appropriate temporary disaster-relief jobs based on the criteria listed in TEGL 12-19, as well as through consultation with local government, community and faith-based organizations, economic development and industry stakeholders, etc. Priorities for the types of disaster-relief jobs should be based on an assessment of the following factors:

- a) Physical impact on public properties
- b) Human impact on the elderly, people with disabilities, low-income and other special needs populations

²⁰ Equipment means tangible [personal property](#) (including information technology systems) having a useful life of more than one year and a per-unit [acquisition cost](#) which equals or exceeds the lesser of the capitalization level established by the [Non-Federal entity](#) for financial statement purposes, or \$5,000. 2 CFR 200.33.

²¹ Note that if the cost of the equipment rental increases the cost per temporary disaster-relief worker so that it exceeds \$20,000, DEO may need to obtain approval for the increased cost from the U.S. Department of Labor.

- c) Impact on organizations that are needed to respond to the disaster or emergency (governmental, community and faith-based)
- d) Impact on local businesses, industry sectors, and the overall economic health of the area

6. Approval and Tracking of Worksites

Local workforce development boards are responsible for approving temporary disaster-recovery worksites and job duties for temporary disaster-relief workers. Worksite and job description information must be maintained and reported to DEO according to a schedule and in a format provided by DEO for each Disaster Recovery Dislocated Worker Grants. Worksite files must include:

- a) The worksite agreement between the local workforce development board and the employer including non-duplication requirements (see subsection 3 above);
- b) Approved job descriptions;
- c) Evidence of appropriate OSHA/safety training;
- d) Evidence that supervisor orientation²² has taken place;
- e) Description of supplies and equipment needed and responsibility for providing such²³; and
- f) Copies of payroll records.

Note: If a staffing agency is the employer of record, the agreement must describe how the staffing agency will be engaged with the worksite employer and the temporary disaster-relief employees. The agreement needs to clearly identify the roles and responsibilities of each party, including who is responsible for day-to-day supervision, safety instruction, providing documentation of hours worked and wages paid, and compliance with labor standards in work-based activities described in WIOA section 181(b).

7. Employer of Record

Each temporary disaster-relief worker must have an employer of record²⁴. The employer of record is responsible for maintaining all personnel and payroll records related to the employment of temporary disaster-relief workers, including employer and employee withholdings, and other benefits, if applicable²⁵. The employer of record may be responsible for unemployment claims filed by temporary disaster-relief workers when their assignment ends.

Note: The employer of record is required to secure workers' compensation for temporary disaster-relief workers and ensure that the workers receive adequate OSHA/security training. In any event, local workforce development boards are

²² Worksite supervisor orientation includes allowable activities, timekeeping, discipline, etc.

²³ The worksite file identifies the supplies and equipment that will be needed for the temporary disaster-relief employee(s) to fulfill their job duties. As supplies are provided to individual participants, these are recorded as supportive services in Employ Florida.

²⁴ The local workforce development board, a staffing agency, or another entity may be the employer of record.

²⁵ Payroll records can be electronic or physical.

responsible for ensuring and maintaining documentation that worker orientation and OSHA/safety training has occurred.

DEO may procure a contract with a staffing agency to be the employer of record for temporary disaster-relief workers. Such a contract is available to local workforce development boards, but local workforce development boards may make their own arrangements for selecting an employer of record for their Disaster Recovery Dislocated Worker Grant. Local workforce development boards may issue purchase orders with the DEO-procured staffing agency for the placement of temporary workers in a Disaster Recovery Dislocated Worker Grant project pursuant to DEO's contract with the staffing agency.

F. Monitoring

Local workforce development boards must adopt local policies and procedures to implement and monitor the state and federal requirements.

Each worksite must be monitored by the local workforce development board as part of its formal programmatic and fiscal monitoring plan. The formal monitoring must be conducted by an independent person or entity not engaged in worksite development/management or case management. The worksite monitor must engage with worksite supervisors and temporary disaster-relief workers on-site²⁶. Monitoring visits must be documented in a written report and address corrective actions, as needed.

If at any time, the local workforce development board becomes aware of temporary disaster-relief workers being employed in activities that are not disaster-relief activities, immediate action must be taken to remedy the finding and/or terminate the agreement.

V. RESOURCES

[COVID-19 Frequently Asked Questions – WIOA Dislocated Worker Program](#)

[National Dislocated Worker Grants – WIOA Desk Reference](#)

[National Voluntary Organizations Active in Disaster Resource Center](#)

VI. REVISION HISTORY

Date	Description
TBD	Approved by CareerSource Florida Board of Directors.
TBD	Issued by Florida Department of Economic Opportunity.

²⁶ A virtual meeting via video and audio conferencing must be conducted when on-site visits are not safe.



Administrative Policy

**POLICY
NUMBER
TBD**

Title:	Staffing Requirements
Program:	Jobs for Veterans State Grant
Effective:	TBD

I. PURPOSE AND SCOPE

The purpose of this policy is to provide local workforce development boards the minimum staffing requirements for staff supported by the Jobs for Veterans State Grant.

II. BACKGROUND

The Jobs for Veterans State Grant is a federally funded, formula-based staffing grant that supports the hiring of staff to provide individualized career and training-related services to veterans and eligible persons with significant barriers to employment and to assist employers in filling their workforce needs with job-seeking veterans and eligible spouses. Florida is currently the third largest recipient of Jobs for Veterans State Grant funding in the nation.

As a condition to receive funding, the Florida Department of Economic Opportunity (DEO) must submit a grant application and state plan narrative to the U.S. Department of Labor Veterans' Employment and Training Service every three years. This plan includes, but is not limited to, a description of the populations of veterans that will receive targeted services, provisions for priority of service for veterans, and performance goals. Each year thereafter, DEO must submit an annual funding modification to the approved state plan to describe any adjustments to the plan narrative and affirm the total number of full-time positions that will be supported by the State's Jobs for Veterans State Grant funding allocation.

III. AUTHORITY

[Title 20, Part 678](#)

[38 United States Code \(U.S.C.\), Chapter 41](#)

[Veterans Program Letter \(VPL\) 01-19](#)

[VPL 03-14](#)

[VPL 03-14, Change 1](#)

[VPL 03-14, Change 2](#)

IV. POLICIES AND PROCEDURES

Florida has established a fully integrated workforce services delivery system with DEO as the designated entity responsible for the administration of all workforce services programs, including the Jobs for Veterans State Grant. DEO provides workforce services through CareerSource Florida's 24 local workforce development boards and their network of local career centers.

Jobs for Veterans State Grant-funded staff are fully integrated into the career center to form a comprehensive team that provides services to veterans that address their employment and training needs. Local workforce development boards have assigned Jobs for Veterans State Grant-funded staff allocated according to veteran population and the needs of the community. Jobs for Veterans State Grant-funded staff are state merit staff, jointly managed by the local workforce development boards in accordance with current grantee-subgrantee agreements.

A. Jobs for Veterans State Grant-Funded Staff

The Jobs for Veterans State Grant supports the salary, benefits and fair-share cost of staff positions employed under a merit personnel system. These staff are included in the comprehensive career center required partner staff, which consists of all staff employed by programs or activities operated by partners listed in [20 CFR 678.400](#).

The Jobs for Veterans State Grant program, in and of itself, does not constitute the entirety of Florida's veterans' services. Rather, the program is a partner within Florida's workforce development system. The Jobs for Veterans State Grant program fills a specific role in the career center delivery of services to veterans and other eligible persons. The Jobs for Veterans State Grant program directly supports the following positions:

1. **Disabled Veteran Outreach Program (DVOP) Specialist:** DVOP specialists are jointly managed staff assigned to the local workforce development board to provide individualized career services to veterans with significant barriers to employment and other eligible individuals through the case management process in accordance with Title 38, U.S. Code and current Veteran Program Letters (VPLs). The local workforce development board must fill DVOP positions with eligible veterans and give preference to those with disabilities as defined in [38 U.S. Code § 4103A](#) with priority given to special disabled veterans and then disabled veterans.

2. **Local Veteran Employment Representative (LVER):** LVER staff are jointly managed staff assigned to the local workforce development board who actively advocate for employment and training opportunities with business, industry, and community-based organizations on behalf of veterans, consistent with Title 38, U.S. Code and current VPLs. LVER positions are filled in accordance with [38 U.S. Code § 4104](#); with priority given to disabled veterans and then eligible veterans.
3. **Consolidated Position (DVOP/LVER):** A Jobs for Veterans State Grant-funded staff person who performs both the duties of the DVOP Specialist and LVER. Consolidated DVOP/LVER positions must promote a more efficient administration of Jobs for Veterans State Grant program services to employers and veterans with an emphasis on veterans with disabilities.

B. Local Staffing Level Designations

The deliberate assignment of Jobs for Veterans State Grant staffing levels to local workforce development boards is paramount to the success of the Jobs for Veterans State Grant program. The proportion of DVOP and LVER staff, as well as the total number of Jobs for Veterans State Grant-funded, full-time positions assigned to each local workforce development board, is determined by DEO through an analysis of veteran population using data compiled from the Department of Veterans Affairs National Center for Veteran Analysis and Statistics. The statewide, total number of Jobs for Veterans State Grant-funded, full-time positions, by classification, is tracked and maintained by the State Veterans Program Coordinator (SVPC) and submitted annually to USDOL VETS.

Local workforce development boards may request a modification to the proportion of DVOP and LVER staff or the number of Jobs for Veterans State Grant-funded positions in their local area by submitting a written justification for the requested changes to the Jobs for Veterans State Grant at VETS@deo.myflorida.com. Local workforce development boards are not authorized to eliminate or modify Jobs for Veterans State Grant-funded positions without approval from DEO.

C. Jobs for Veterans State Grant-Funded Position Vacancies

In accordance with U.S. Code, Title 38, Chapter 41, the state is required to expend Jobs for Veterans State Grant funds in accordance with planned budgets submitted to USDOL VETS. To ensure Jobs for Veterans State Grant funds are expended within the grant period, local workforce development boards must ensure Jobs for Veterans State Grant-funded position vacancies are posted and filled with qualified veterans in a prompt manner. Failure to properly staff Jobs for Veterans State Grant-funded positions may result in a loss of Jobs for Veterans State Grant program funding and subsequently impact the State's ability to serve Florida's veterans.

Jobs for Veterans State Grant-funded vacancies must be advertised and filled through the People First Job Center at <https://jobs.myflorida.com>. Local workforce development boards may post vacancies through the People First Job Center immediately upon learning of the anticipated vacancy, there is no requirement to wait until the position is vacant. The local workforce development board may use a single posting to fill multiple vacancies for a period of up to 6 months. Local workforce developments may contact the DEO Bureau of Human Resource Management for assistance regarding posting vacancies through the People First Job Center.

Jobs for Veterans State Grant funds may be used to support the advertising of Jobs for Veterans State Grant vacancies through private job boards (i.e. Indeed, Monster) in addition to Employ Florida; however, applicants must be redirected to apply through the People First Job Center. Cross-advertising may increase the pool of qualified veteran candidates and allow greater flexibility with regards to the nomenclature of the position title.

Local workforce development boards must ensure Jobs for Veterans State Grant-funded positions are filled with a qualified veteran by submitting a completed hiring package to DEO within 50 days of the position becoming vacant. Local workforce development boards that are unable to meet this timeline must provide notification to the SVPC with written justification for any foreseen delay in filling the vacancy within 25 days of the position becoming vacant. Notifications may be sent to the SVPC via email at VETS@deo.myflorida.com. The SVPC may provide written approval for any delay in filling vacancies for extenuating circumstances, if deemed appropriate by DEO.

D. Pass-Through Funding

Jobs for Veterans State Grant funds are awarded to pay for specialized staff that provide services to veterans and other eligible persons. DEO is required to provide USDOL VETS a quarterly analysis to ensure the majority of Jobs for Veterans State Grant expenditures are used to support salaries for personnel and fringe benefits.

Pass-through funding is issued to local workforce development boards in a manner that ensures DEO remains in alignment with Jobs for Veterans State Grant requirements. If a local workforce development board is not receiving sufficient pass-through funding to support the fair share cost of Jobs for Veterans State Grant staff, they may submit a written request for additional funding to VETS@deo.myflorida.com. Upon review and approval by the SVPC and [DEO's Bureau of Financial Management](#), additional funds may be issued.

Pass-through funding provided by Jobs for Veterans State Grant to local workforce development boards must be expended in accordance with federal cost principles outlined in [2 CFR 200, Subpart E](#). Local workforce development boards with questions about allowability of specific costs should contact DEO's Bureau of Financial Management for assistance.

E. National Veterans' Training Institute Mandatory Training

All Jobs for Veterans State Grant-funded staff must attend a mandated training offered by the National Veterans' Training Institute (NVTI) located in Dallas, Texas, and administered by Management Concepts, Inc. This training must be completed within 18 months of the position start date. All costs for training, to include travel and lodging, are provided for by the Jobs for Veterans State Grant. The SVPC will coordinate with individual local workforce development boards to schedule NVTI training for Jobs for Veterans State Grant-funded staff.

Note: Training opportunities through NVTI are available for local workforce development board executive directors, career center managers and other relevant staff, as approved by the DOL VETS State Director and the requestor's management. If approved, all costs for training, to include travel and lodging, are provided for by the Jobs for Veterans State Grant. A full list of available trainings is located at <https://www.nvti.org/Training/Class-Descriptions>. To request training for non-Jobs for Veterans State Grant staff, local workforce development boards must submit a NVTI Training Application Form (Attachment A) to the SVPC by email at VETS@deo.myflorida.com.

F. Monitoring

Local Jobs for Veterans State Grant programs must be monitored annually for compliance with state and federal requirements by DEO. DEO will monitor the requirements outlined in this policy and local operating procedures. Additionally, local workforce development boards must establish local monitoring policies and procedures that include, at minimum:

- a) The duties assigned to DVOP specialists and LVER staff by the local workforce development board;
- b) The way DVOP specialists and LVER staff are integrated into the local workforce development board's employment service delivery system; and
- c) Local monitoring procedures for implementation of this policy.

V. DEFINITIONS

Disabled Veteran - A veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary, or a person who was discharged or released from active duty because of a service-connected disability.

Eligible Spouse - Spouse of any of the following:

- a) Any veteran who died of a service-related disability;

- b) Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - i. Missing in action;
 - ii. Captured in line of duty by a hostile force; or
 - iii. Forcibly detained or interned in line of duty by a foreign government or power.

Eligible Veteran - A person who:

- a) Served on active duty for a period of more than 180 days and was discharged or released from such duty with other than a dishonorable discharge;
- b) Was discharged or released from active duty because of a service-related disability;
- c) As a member of a reserve component under an order to active duty pursuant to section 12301(a), (d), or (g), 12302, or 12304 of title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge; or
- d) Was discharged or released from active duty by reason of a sole survivorship discharge (as that term is defined in [section 1174\(i\) of title 10](#)).

Significant Barrier to Employment - A barrier that impedes the veteran from employment as designated by the U.S. Department of Labor, outlined in [Administrative Policy 102 Veteran Intake at CareerSource Florida Network Career Centers](#).

Special Disabled Veteran - A veteran who is entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary for a disability rated at 30 percent or more, or rated at 10 or 20 percent in the case of a veteran who has been determined to have a serious employment handicap; or a person who was discharged or released from active duty because of service-related disability.

VI. ATTACHMENTS

A. NVTI Training Application Form

VII. REVISION HISTORY

Date	Description
TBD	Approved by CareerSource Florida Board of Directors.
TBD	Issued by Florida Department of Economic Opportunity.



Administrative Policy

**POLICY
NUMBER
111**

Title:	Priority of Service for Veterans and Eligible Spouses
Program:	Workforce Innovation and Opportunity Act, Wagner-Peyser Act Trade Adjustment Assistance, Migrant Seasonal Farmworker Program, Jobs for Veterans State Grant, National Dislocated Worker Grants
Effective:	TBD

I. PURPOSE AND SCOPE

The purpose of this administrative policy is to provide local workforce development boards (LWDBs) the minimum requirements for implementing priority of service for veterans and eligible spouses for all U. S. Department of Labor (DOL) funded programs and services.

II. BACKGROUND

The Jobs for Veterans Act (JVA), codified at 38 United States Code (U.S.C.) 4215, established a priority of service requirement for covered persons (i.e., veterans and eligible spouses) in qualified job training programs. While recipients of DOL funds for qualified job training programs have been required to provide priority of service since 2002, the publication of 20 CFR Part 1010, Priority of Service for Covered Persons Final Rule, which took effect on January 19, 2009, signaled that recipients of USDOL funds for these job training programs should review, and, if necessary, enhance their current policies and procedures to ensure that adequate protocols are in place to ensure priority is given to veterans and eligible spouses.

III. AUTHORITY

[Chapters 41 and 42, Title 38, U.S.C.](#)

[Public Law 107-288](#)

[20 Code of Federal Regulations \(CFR\), Part 1010](#)

[Veterans Program Letter \(VPL\) 07-09](#)

[Training and Employment Guidance Letter \(TEGL\) 10-09](#)

IV. POLICIES AND PROCEDURES

Priority of service means covered persons are given priority over non-covered persons for the receipt of employment, training, and placement services funded in whole or in part by DOL, including, but not limited to:

- a) Workforce Innovation and Opportunity Act (WIOA) Title I, (Adult, Youth and Dislocated Worker);
- b) WIOA Title III, (Wagner-Peyser);
- c) Trade Adjustment Assistance (TAA);
- d) Migrant and Seasonal Farmworkers (MSFW);
- e) National Dislocated Worker Grants (NDWG); and
- f) Senior Community Service Employment Program (SCSEP).

A. Eligibility

Covered persons may self-attest their status as eligible for priority of service. The only services that require eligibility verification are those cases where a decision is made to commit funding (e.g., WIOA training) to a covered person over another non-covered individual. Covered persons, for purposes of the provision of priority of service, are defined as follows:

- a) **Veteran:** A person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C 101(2). Active service includes full-time federal service in the National Guard or a reserve component. It does not include full-time duty performed strictly for training purposes, nor does it include full-time active duty performed by National Guard personnel who are mobilized by state rather than federal authorities.
- b) **Eligible Spouse:** The spouse of:
 - i. A veteran who died of a service-connected disability.
 - ii. A member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - a. Missing in action;
 - b. Captured in the line of duty by a hostile force;
 - c. Forcibly detained or interned in the line of duty by a foreign government or power;
 - d. A spouse of any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
 - e. A spouse of any veteran who died while a total, service-connected disability was in existence.

Note: The statutory requirements for the Jobs for Veterans State Grant (JVSG) require application of a more narrowly defined definition of veteran (i.e., eligible veteran). For purposes of receiving individualized career services from a Disabled Veteran Outreach Program (DVOP) specialist, “eligible veteran” means a person who meets any of the following:

- a) Served on active duty for a period of more than 180 days and was discharged or released with a character of service other than dishonorable;
- b) Was discharged or released from active duty by reason of a sole survivorship discharge;
- c) Was discharged or released from active duty because of a service-connected disability; or
- d) As a member of a reserve 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 a character of service other than dishonorable.

B. Identifying Covered Persons

LWDBs must develop and implement measures, to include Local Operating Procedures (LOPs) to identify covered persons who access career centers and/or programs and notify them with timely and useful information on priority of service for covered persons. These measures include, but are not limited to:

- a) **Point of Entry:** Ensuring staff (receptionists, welcome team) ask individuals at the point of entry if he/she, or his/her spouse, is currently serving, or has ever served, in the U.S. military;
- b) **Electronic Intake Systems:** Ensuring electronic kiosk intake systems allow individuals to self-identify as a covered person;
- c) **Prominently Displayed Notices:** To encourage covered persons to self-identify, LWDBs must develop and prominently display notices and signs strategically throughout the career center, to include the front intake area;
- d) **Staff Training:** All career center personnel must receive priority of service training on an annual basis. The LWDB’s Local Veteran Employment Representative (LVER) must provide the required training. If a LVER is not available to conduct the training, the LWDB will temporarily assign another qualified staff member to conduct the training. LWDBs are encouraged to use the [Priority Of Service Training Template](#), developed by the Department of Economic Opportunity’s (DEO’s) State Veterans’ Program Office;
- e) **Websites:** LWDB websites must include an explanation of priority of service for covered persons; and
- f) **Orientations:** Orientations, conducted remotely or in person, must include an explanation of priority of service for covered persons.

C. Applying Priority of Service

The application of priority of service varies depending on the eligibility requirements of the program. The four basic categories for WIOA Title I funded programs are listed below:

1. Universal Access Programs

For workforce programs that operate or deliver services to the public without targeting specific groups (e.g., Wagner-Peyser, WIOA basic career services), veterans and eligible spouses receive priority of service over all other program participants. Priority of service provides covered persons access to a service earlier than a non-covered person, or if a service or resource is limited, the person receives access instead of or before the non-covered person.

For example, if a veteran arrives at a career center and there is a waiting list to use a resource room computer, the covered person moves the front of that list. Priority of service does not mean staff ask a non-covered person to cease using the resource room computer to allow the covered person access. Covered persons do not supplant non-covered persons who are already in receipt of a resource or service.

2. Programs with Eligibility Criteria

Eligibility criteria identify basic conditions that each participant in a specific program is required to meet. For example, for the WIOA Adult, Dislocated Worker, and Youth programs, every participant is required to meet program eligibility requirements (e.g., age, selective service registration, etc.). A veteran or eligible spouse must first meet all the eligibility criteria to be considered eligible for participation in the program. Once determined eligible for participation, the covered person receives priority for participation in the program and receipt of services.

3. Programs with Statutory Priorities

In addition to the eligibility criteria all participants are required to meet, some programs have priorities that target certain populations and establish a rank order for enrolling or serving participants. While veterans' priority is required under federal law and cannot be waived, it is not intended to displace existing eligibility requirements and statutory priorities. Therefore, in these instances, veterans and eligible spouses must first meet both the program's eligibility and statutory priority criteria to receive priority for participation in the program and receipt of services (i.e. WIOA Adult). LWDBs must administer priority of service in accordance with the rank order prescribed in [Administrative Policy 105: Priority of Service](#).

4. Programs with Discretionary Priorities

Programs with discretionary priorities may try to provide a certain level of service to a group. However, the law does not mandate that the target group be served before other eligible individuals. With respect to priority of service, the only feature that distinguishes discretionary targeting programs from universal access programs is the additional application of the discretionary targeting criterion to non-covered persons. Therefore, LWDBs must apply priority of service in the order below:

- a) Veterans and eligible spouses;
- b) Non-covered persons within the discretionary targeting group; then
- c) Non-covered persons outside the discretionary targeting group.

D. Reporting Priority of Service

To accommodate priority of service at point of entry, Geographic Solutions has implemented notification pop-ups in the state's case management and online labor exchange system, Employ Florida. The pop-ups notify newly registered veterans and covered persons and ensures these newly registered veterans and covered persons are aware of their entitlement to priority of service and the scope and types of services available under priority of service. When a covered person self identifies at the point of registration in Employ Florida, the system automatically generates a service code 089 (Automated Veteran Priority of Service Notification) on the participant's Wagner-Peyser Program Application.

In instances where a covered person does not self-identify at registration, but is later determined to be eligible, staff must ensure the covered person is provided information regarding their priority of service rights and document this staff-assisted service through Employ Florida service code 189 (Notification of Veteran Priority of Service) and include the appropriate documentation/case note that aligns with the requirements prescribed in the [Employ Florida Service Code Guide](#).

E. Monitoring

Priority of service for veterans and eligible spouses must be monitored annually for compliance with state and federal requirements. DEO will monitor the requirements outlined in this policy inclusive of local operating procedures. Additionally, LWDBs must establish local monitoring policies and procedures that include, at minimum, how the LWDB will:

- a) Ensure covered persons are notified of their entitlement to priority of service, including the full array of employment, training, and placement services available, and applicable eligibility requirements for programs and services.
- b) Enable individuals to identify themselves as veterans or eligible spouses at the point of entry to the system for priority.
- c) Monitor the implementation of priority of service.
- d) Ensure continuous priority of service training for career center staff.

V. DEFINITIONS

Covered Person - An individual who meets the definition of veteran, or eligible spouse and as such, is eligible for priority of service.

Disabled veteran - A veteran who is entitled to compensation, or who, except for the receipt of military retirement pay, would be entitled to compensation, under the Department of Veterans Affairs, or a veteran who was discharged or released from active duty because of a service-connected disability.

Disabled Veterans' Outreach Program (DVOP) Specialist - A specialized case manager funded by the JVSG who provides basic and individualized career services and facilitates placements to meet the employment needs of eligible veterans with significant barriers to employment or who are part of a special population as designated by DOL.

Local Veteran Employment Representative (LVER) - A representative funded by the JVSG who:

- a) Conducts outreach to employers in the area to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search groups;
- b) Ensures priority of service is administered within the career center in accordance with federal in-state requirements; and
- c) Facilitates employment, training, and placement services furnished to veterans in a state under the applicable state employment service delivery systems.

Non-Covered Person - Any individual who meets neither the definition of veteran, nor the definition of eligible spouse.

Veteran (for Priority of Service) - A person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C 101(2). Active service includes full-time federal service in the National Guard or a reserve component. It does not include full-time duty performed strictly for training purposes, nor does it include full-time active duty performed by National Guard personnel who are mobilized by state rather than federal authorities.

VI. RESOURCES

[Department of Economic Opportunity Priority of Service Training Template](#)

[Training and Employment Notice \(TEN\) No. 15-10](#)

[Veterans and Spouses WIOA Desk Reference](#)

Priority of Service Poster Template

VII. REVISION HISTORY

Date	Description
TBD	Approved by CareerSource Florida Board of Directors.
TBD	Issued by Florida Department of Economic Opportunity.



Administrative Policy

**POLICY
NUMBER
TBD**

Title:	Veteran Intake at Career Centers
Program:	Wagner-Peyser Act, Jobs for Veterans State Grant
Effective:	TBD

I. PURPOSE AND SCOPE

The purpose of this policy is to provide local workforce development boards (LWDBs) the minimum requirements for establishing an initial intake screening process for transitioning service members, veterans, and eligible spouses at career centers throughout the CareerSource Florida network.

II. BACKGROUND

Florida is committed to serving transitioning service members, veterans, and their families by providing the necessary resources to prepare them to obtain meaningful careers and maximize employment and training opportunities. Florida serves transitioning service members, veterans, and their families through the Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser Act, Jobs for Veterans State Grant (JVSG), and Military and Family Employment Advocacy (MFEA) employment programs.

The JVSG enables the hiring of Disabled Veteran Outreach Program (DVOP) specialists and Local Veteran Employment Representative (LVER) staff to provide employment services to veterans. JVSG is but one component of an umbrella of programs that are required by law to ensure veterans receive quality employment and training services. The JVSG staff fill a niche in that overall set of services for veterans and must be used to provide specialized services for specific segments of the veteran population, in accordance with current U. S. Department of Labor (DOL) Veteran Program Letters (VPL).

III. AUTHORITY

[Public Law 113-128, Section 134\(c\)\(2\)](#)

[38 United States Code \(U.S.C.\), Chapter 41](#)

[38 U.S.C., Chapter 42](#)

[Training and Employment Guidance Letter \(TEGL\) 19-13](#)

[TEGL 19-13, Change 1](#)

[TEGL 19-13, Change 2](#)

[TEGL 20-13, Change 2](#)

IV. POLICIES AND PROCEDURES

LWDBs must establish a local written procedure or policy to collect demographic information of self-attesting transitioning service members, veterans, and eligible spouses at the point of career center entry and help them understand the options and services available to them, to include priority of service and enhanced career services available through DVOP specialists, when applicable.

A. Identifying Transitioning Service Members, Veterans, and Eligible Spouses

LWDBs must enable transitioning service members, veterans, and eligible spouses to self-identify at the point of entry of all career centers so that they may take full advantage of priority of service and be apprised of the full range of services available to them. Veterans may be identified through several means, including, but not limited to:

- Ensuring staff (receptionists, welcome team) ask individuals at the point of entry if he/she, or his/her spouse, is currently serving, or has ever served, in the United States military;
- Prominent priority of service signage that encourages veterans and eligible spouses to self-identify;
- Electronic kiosk intake systems which allow the individual to self-identify as a transitioning service member, veteran, or eligible spouse; or
- Staff review of the individual's military service section of the state's Management Information System, Employ Florida.

Note: Veterans are identified in Employ Florida by an American flag icon.

B. Initial Intake Screening for Enhanced Services

It is expected that the Wagner-Peyser and Workforce Innovation and Opportunity Act (WIOA) programs will provide employment services to most veterans, which will permit JVSG-funded DVOP specialists to focus their efforts on eligible veterans with Significant Barriers to Employment (SBEs) and/or special populations designated by DOL, as described in [Section IV.B.2.](#) of this policy.

As such, LWDBs must establish a local written policy to ensure DVOP specialists serve targeted populations designated by DOL. The local policy must include initial intake procedures to screen individuals visiting the career center for the purpose of obtaining employment assistance who identify as transitioning service members, veterans, or eligible spouses for eligibility for DVOP services. LWDBs must ensure the staff member who conducts the initial intake screening is a non-JVSG staff member who is well-informed of the services and programs available in the career center.

To facilitate the initial intake screening, LWDBs may use the Veteran Intake Form (See Attachment A – Veteran Intake Form), or locally established equivalent, to determine the individual's service level needs and eligibility for enhanced services from a DVOP specialist. The Veteran Intake Form may be modified by the LWDB or integrated into a local electronic intake kiosk, if the core elements which identify the demographics outlined in [Sections IV.B.1](#) and [IV.B2](#) of this policy are retained.

Individuals determined eligible for DVOP specialist services must immediately be referred to a DVOP specialist. Individuals who are not found to be eligible must be provided services by the first available qualified and appropriate career center staff member. In instances where a DVOP specialist is not available, individuals who would normally be served by DVOP specialists must be served by the next available qualified and appropriate career center staff member. Services to SBE and special population veterans must not be delayed or postponed due to the unavailability of a DVOP specialist.

1. Eligible Veteran and Spouse

In accordance with [Title 38, U.S.C.](#), LWDBs must apply a more narrowly defined definition of veteran (i.e. eligible veteran) or veteran/military spouse (i.e. eligible spouse) when determining eligibility for services from a DVOP specialist. LWDBs must establish a local process to ensure all individuals referred to, and/or who receive services from DVOP specialists, meet the definition of eligible veteran or eligible spouse. Individuals who meet the definition of one of the special population groups as described in [Section IV.B.2\(i-1\)](#) of this policy are exempt from this requirement and may be served by a DVOP specialist regardless of their status as an eligible veteran or eligible spouse.

a) Eligible veteran means a veteran who meets any of the following:

- i. Served on active duty for a period of more than 180 days and was discharged or released with a character of service other than dishonorable;
- ii. Was discharged or released from active duty because of a service-connected disability;
- iii. Was discharged or released from active duty by reason of a sole survivorship discharge; or
- iv. As a member of a reserve 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 a character of service other than dishonorable.

b) Eligible spouse means the spouse of any of the following:

- i. A veteran who died of a service-connected disability;
- ii. A member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - a. Missing in action;
 - b. Captured in the line of duty by a hostile force;
 - c. Forcibly detained or interned in the line of duty by a foreign government or power;
- iii. A spouse of any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
- iv. A spouse of any veteran who died while a total, service-connected disability was in existence.

2. Significant Barriers to Employment and Special Populations

In addition to meeting the definition of eligible veteran or spouse, LWDB local procedures and policies must ensure individuals referred to and/or who receive services from a DVOP specialist qualify under one of the following categories:

a) Disabled Veteran

A veteran of the U.S. military, ground, naval or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans

Affairs or was discharged or released from active duty because of a service-connected disability. This category of SBE is not applicable to non-veteran, eligible spouses.

This category also includes special disabled veterans, who are defined as veterans who have been rated at 30 percent disabled or more, or rated at 10 or 20 percent disabled in the case of a veteran who has been determined under [Title 38, U.S.C. 3106](#) to have a serious employment barrier.

Note: Veterans who have a pending disability claim with the U.S. Department of Veterans Affairs qualify for DVOP services under this category, as the LWDB must assume the decision for the veteran's claim will be in the affirmative.

b) Homeless

As defined in [Title 42, U.S.C. 11302\(a\) and \(b\)](#), the definition of homeless for the purpose of determining eligibility for DVOP services includes eligible veterans and spouses:

- a. Who lack a fixed, regular, and adequate nighttime residence;
- b. With a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- c. Who is living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by federal, state, or local government programs for low-income individuals or by charitable organizations, congregate shelters, and transitional housing);
- d. Who resides in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided;
- e. Who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions in the individual's or family's current housing situation, including where the health and safety of children are jeopardized, and who have no other residence and lack the resources or support networks to obtain other permanent housing.
- f. Veterans and eligible spouses who:
 - 1) Will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by federal, state, or local government programs for low-income individuals or by charitable organizations, as evidenced by:

- i. A court order resulting from an eviction action that notifies the individual or family that they must leave within 14 days;
 - ii. Having a primary nighttime residence that is a room in a hotel or motel and where they lack the resources necessary to reside there for more than 14 days; or
 - iii. Credible evidence indicating that the owner or renter of the housing will not allow the individual or family to stay for more than 14 days, and any oral statement from an individual or family seeking homeless assistance that is found to be credible.
- 2) Have no subsequent residence identified; and
 - 3) Lack the resources or support networks needed to obtain other permanent housing.

c) Recently Separated, Long-Term Unemployed

A veteran who has been separated from military service within the past three (3) years and who has been unemployed for 27 or more weeks, in the previous 12 months. The total unemployed weeks may be non-consecutive. This category is not applicable to non-veterans or eligible spouses.

d) Offender

An offender, as defined by [WIOA Section 3 \(38\)](#), is an individual who is currently incarcerated or who has been released from incarceration at any time.

Note: Individuals who were previously incarcerated but were later determined innocent or had charges dismissed are also eligible under this category.

e) Lacks High School Diploma or Equivalent

Eligible veterans or spouses who lack a high school diploma or equivalent.

Note: [The Florida Department of Education](#) provides for the award of a standard high school diploma, with no testing requirement, to eligible veterans who meet the following criteria:

- Left a public or non-public school located in any state prior to graduation and entered the armed forces of the United States;
- Is a current resident of the state of Florida or was previously enrolled in any high school in this state or was a resident of the state of Florida at the time of death; and

- Was honorably discharged from the armed forces of the United States.

f) Low Income

As defined by [WIOA Section 3 \(36\)](#), low income means an individual who:

- a. Receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through:
 - i. Supplemental Nutrition Assistance Program (SNAP); or
 - ii. Temporary Assistance for Needy Families (TANF) program; or
 - iii. Supplemental security income program; or
 - iv. State or local income-based public assistance.
- b. Is in a family with total family income that does not exceed the higher of:
 - i. The [poverty line](#); or
 - ii. Seventy (70) percent of the [Lower Living Standard Income Level](#) (LLSIL);

g) Special Population: Veterans Ages 18 to 24

Veterans who are between the ages of 18 to 24 at the time of application.

h) Special Population: Vietnam Era Veterans

The term “veteran of the Vietnam era” means an eligible veteran whose active military, naval, or air service was between August 5, 1964, and May 7, 1975, (regardless of whether the individual had ever been stationed or served (in-country) in the Republic of Vietnam).

In the case of a veteran who physically served in the Republic of Vietnam, the date range is expanded to the period between February 28, 1961, and May 7, 1975.

i) Special Population: Transitioning Service Members, Capstone

Transitioning service members are assessed on Career Readiness Standards (CRS) by unit commanders during Capstone sessions. Capstone sessions are offered to transitioning service members to help them make adequate preparations for post-military careers before they leave active duty.

When a service member is assessed as not meeting CRS (e.g., if a member does not have an adequate civilian resume), the commander then facilitates a “warm

handover” of the service member to an LWDB staff member or DVOP for individualized career services. For each transitioning service member, unit commanders evaluate and document CRS and readiness for transition to civilian employment on the member’s [DD eForm 2648 - Service Member Pre-Separation / Transition Counseling and Career Readiness Standards eForm for Service Members Separating, Retiring, Released from Active Duty \(REFRAD\)](#).

j) Special Population: Transitioning Service Members Ages 18 to 24

Transitioning service members who are between the ages of 18 to 24 at the time of application.

k) Special Population: Transitioning Service Members Reduction in Force

Transitioning service members who are being separated from active U.S. military service due to a reduction in force.

l) Special Population: Military Treatment Facility and Warrior Transition Unit (Transition Service Members/Spouses/Caregivers)

Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in a Military Treatment Facility (MTF), also known as military hospitals, or Warrior Transition Unit (WTU), also known as Soldier Recovery Units; and the spouses or other family caregivers of such wounded, ill, or injured members.

C. Employ Florida Recording

The provision of the veteran intake screening must be recorded in Employ Florida using Employ Florida service code 159 (Initial Intake Screening – DVOP Services) and include a case note that aligns with the requirements prescribed in the [Employ Florida Service Code Guide](#). Service code 159 (Initial Intake Screening – DVOP Services) does not trigger nor extend participation.

Note: An initial assessment as recorded by Employ Florida service code 102 (Initial Assessment) must no longer be used solely to determine eligibility for DVOP services. The purpose of the intake screening is to refer those individuals who are eligible for DVOP specialist services without delay. The first service from the DVOP specialist will be an objective assessment to determine service level needs.

The LWDB staff member conducting the veteran intake must, in addition to providing the intake screening, ensure priority of service has been explained to covered persons

in accordance with [Administrative Policy 111: Priority of Service for Veterans and Covered Persons](#).

D. Exceptions

Veterans referred by certain partner programs, or engaged during planned DVOP specialist outreach, upon verification of their eligible veteran/person status, may immediately be referred to, or served by (in certain circumstances) the DVOP specialist. Additionally, the DVOP specialist may make initial remote contact to veterans who have completed an Employ Florida registration and self-attested to having an SBE and/or are designated as a special population veteran. The exceptions to the veteran intake policy include:

1. Outreach

DVOP specialists are required to conduct outreach to areas where veterans congregate in order to engage SBE and special population veterans. If a DVOP specialist engages with a veteran during planned outreach, the DVOP may evaluate the veteran for JVSG eligibility and, if eligible, immediately provide individualized career services. The DVOP specialist must record a case note in the participant's objective assessment that states the veteran was initially engaged during outreach and record Employ Florida service code 117 in the individual's Wagner-Peyser program application in accordance with the [Employ Florida Service Code Guide](#). If the DVOP specialist engages a non-eligible veteran during outreach, the DVOP specialist will refer the individual to a non-JVSG staff member to assist with any required services.

2. Employ Florida

The initial intake screening categories are an integrated function of the state's case management and online labor exchange system, Employ Florida. The system's individual registration and Wagner-Peyser program application capture information from the individual that indicates eligibility for DVOP services. Individuals who meet the eligible veteran or spouse criteria with an SBE, or who are designated as a special population, are identified by an SBE icon below their name.

DVOP specialists may be the initial, remote contact for eligible SBE and special population veterans and spouses who have registered in Employ Florida for the purpose of explaining and promoting available career center services, including JVSG services. This remote contact must be recorded in Employ Florida in the form of a case note. If the individual presents at the career center for employment services as a result of the DVOP contact, the individual may be immediately

referred to the DVOP specialist. The DVOP must record a case note in the participant's objective assessment that states the veteran was initially engaged as a result of targeted, Employ Florida outreach.

3. Veteran Readiness and Employment Program, Chapter 31

The Veteran Readiness and Employment program, formally known as Vocational Rehabilitation and Employment (VR&E), is a joint collaboration between the U.S. Veterans Administration (VA) and the Florida Department of Economic Opportunity (DEO) to provide employment services to disabled veterans who have completed, or are about to complete, their VR&E-funded education. All veterans participating in the VR&E program are disabled veterans; therefore, they meet the SBE requirement for DVOP services.

4. Homeless Veteran Reintegration Program

The Homeless Veterans' Reintegration Program (HVRP), authorized by [Title 38, U.S.C., Chapter 20](#), is an employment focused competitive grant program of the Department of Labor, Veterans' Employment and Training Service (DOL-VETS), and is the only federal grant to focus exclusively on competitive employment for homeless veterans.

In accordance with Veteran Program Letter (VPL) 03-16, HVRP grantees must ensure HVRP veterans are co-enrolled with their local career center. Co-enrollment means the HVRP participant must receive, at minimum, one program-funded service from the LWDB. This may be accomplished by having Wagner-Peyser or other non-JVSG staff assist the veteran with the following:

- Notification of priority of service;
- Orientation to available programs and services in the career center;
- Employ Florida account registration assistance;
- Ensuring the HVRP grantee's five-digit grant number is entered in the veteran tab of the veteran's Employ Florida Wagner-Peyser Program Application, as detailed in the [Virtual OneStop® User Guide for Staff, Section 5: Programs – Wagner-Peyser](#).

Note: Employ Florida service code 189 (Notification of Priority of Service) does not trigger program participation for the purpose of performance reporting. This process is to ensure the veteran referred by HVRP is not enrolled in the LWDB's performance unless he/she is interested in receiving workforce services.

After the veteran has been informed of priority of service and all available workforce programs, and if the HVRP veteran meets the definition of an eligible veteran/person, he/she may be referred immediately to the DVOP for services, if

desired. If the HVRP veteran is requesting employment services and does not meet the definition of an eligible veteran, they must be served by the first available non-JVSG career center staff member.

E. State and Local Monitoring

Services and activities provided under JVSG must be monitored annually for compliance with JVSG requirements by DEO. DEO will monitor local activities, policies, and procedures for alignment with the requirements outlined in this policy.

V. DEFINITIONS

Caregiver - As defined by [Title 38, U.S.C. 1720G\(d\)](#), with respect to an eligible veteran, a caregiver means an individual who provides personal care services to support the veteran's:

- a) Health and well-being;
- b) Everyday personal needs (like feeding, bathing, and dressing); and/or
- c) Safety, protection, or instruction in their daily living environment.

Career Center - Also known as a One-Stop Center or American Job Center (AJC), career centers are designed to provide a full range of assistance to job seekers under one roof. Established under the Workforce Investment Act and reauthorized in the Workforce Innovation and Opportunity Act of 2014, these centers offer training referrals, career counseling, job listings, and similar employment-related services.

Case Notes - Online statements entered in Employ Florida by the staff member who identifies a participant's status for a specific data element, the date on which the information was obtained, and the career planner who obtained the information.

Covered Person - A veteran or eligible spouse who is entitled to priority of service as defined in Administrative Policy 111: Priority of Service for Veterans and Covered Persons.

Disabled Veteran Outreach Program (DVOP) Specialist - Specialists who provide individualized career services and facilitate placements to meet the employment needs of veterans and eligible persons who have significant barriers to employment or have otherwise been designated by the U.S. Department of Labor Veterans' Employment and Training Service (VETS).

Individualized Career Services - Services required to retain or obtain employment, consistent with [20 CFR 678.430](#). Generally, these services involve significant staff time

and customization to the veteran's needs. Individualized career services include services such as: specialized assessments, developing an individual employment plan, counseling, work experiences (including transitional jobs), etc.

Priority of Service - With respect to any qualified job training program, a covered person shall be given priority over nonveterans for the receipt of employment, training, and placement services provided under that program, notwithstanding any other provision of law. In order to be eligible for priority of service, a veteran must have served at least one day in the active military, naval, or air service, and have been discharged or released under conditions other than dishonorable, as specified in [Title 38, U.S.C. Section 101](#).

Remote Contact - Customer contacts, or contact attempts, by the staff member which are facilitated through phone, text message, video conference, or electronic mail (e-mail).

Service Connected - Means, with respect to disability or death, that such disability was incurred or aggravated, or that the death resulted from a disability incurred or aggravated, in the line of duty in the active military, naval, or air service.

Transitioning Service Member - A member of the U. S. military who will separate from active service in the next 12 months or who will retire from active service in the next 24 months.

VI. ATTACHMENTS

Attachment A - Veteran Intake Form

VII. RESOURCES

[Jobs for Veterans' State Grant Disabled Veteran Outreach Program Desk Reference](#)

[Jobs for Veterans State Grant Primer](#)

[Military Spouse Desk Reference](#)

DEO Veteran Intake at Career Centers Flow Chart

[VPL 03-16](#)

VIII. REVISION HISTORY

Date	Description
TBD	Approved by CareerSource Florida Board of Directors.
TBD	Issued by Florida Department of Economic Opportunity.



Administrative Policy

**POLICY
NUMBER 101**

Title:	Trade Adjustment Assistance Training and Other Activities Funding
Program:	Trade Adjustment Assistance (TAA)
Effective:	July 9, 2019

I. PURPOSE AND SCOPE

The purpose of this policy is to provide to local workforce development boards (LWDBs) the requirements for Trade Adjustment Assistance (TAA) Training and Other Activities (TaOA) funding.

II. BACKGROUND

The Trade Act of 1974 established the Trade Adjustment Assistance for Workers Program, herein known as the TAA program, to assist workers who have been laid off or whose jobs have been threatened because of foreign trade or competition (trade-affected workers). The TAA program has been amended several times in the last 40 years, most significantly in 2002, 2009, 2011 and 2015. The 2015 amendment, known as the Trade Adjustment Assistance Reauthorization Act of 2015 (TAARA 2015), reauthorized the TAA program and is the most current. Trade-affected workers may be covered and eligible to apply for TAA benefits and services under either the 2002, 2009, 2011 or 2015 amendments.

To be eligible for TAA benefits, a group of two or more workers must establish that they were separated from their employment either because their jobs moved outside the United States or because of an increase in directly competitive imports. To establish eligibility, a group of workers (or their representative) must file a petition with the U.S. Department of Labor (USDOL). Upon receipt of the petition, USDOL investigates to verify the role of foreign trade in the workers' job losses. If USDOL determines the workers meet TAA requirements, it will issue a certification which renders the workers eligible to apply to a local career center for individual services and benefits, to include training, employment and case management services, job search and relocation allowances, Trade Readjustment

Allowance (TRA), Reemployment Trade Adjustment Assistance (RTAA), and the Health Coverage Tax Credit (HCTC).

The TAA program is funded by a federal entitlement grant. Funds are allocated to the states via the USDOL Office of Trade Adjustment Assistance's grant allocation formula that considers past and anticipated program usage. States may expend training and reemployment service funds in the year of allocation or in either of the next two fiscal years. Fund allocations to LWDBs are made available through a Notice of Grant Award/Funding Availability that specifies which cost object the issued funds support.

The TAA program operates through three types of grants: Training and Other Activities, Trade Readjustment Allowances, and Reemployment Trade Adjustment Assistance. This policy covers the administration of funding allocated to LWDBs for Training and Other Activities. The Trade Readjustment Allowances and Reemployment Trade Adjustment Assistance are funded by a separate uncapped grant administered by the Florida Department of Economic Opportunity (DEO) and are not allocated to the LWDB. The Health Coverage Tax Credit is a federal tax credit that pays 72.5 percent of qualified health care insurance premiums for trade-affected workers and their families. This TAA program benefit is administered by the Internal Revenue Service.

III. AUTHORITY

[Trade Adjustment Assistance Act of 1974, as amended](#)

[Trade Adjustment Assistance Reform Act \(TAARA\) of 2002](#)

[Trade and Globalization Adjustment Assistance Act \(TGAAA\) of 2009](#)

[Trade Adjustment Assistance Extension Act \(TAAEA\) of 2011](#)

[Trade Adjustment Assistance Reauthorization Act \(TAARA\) of 2015](#)

[20 Code of Federal Regulations \(CFR\) Part 617](#)

[20 Code of Federal Regulations \(CFR\) Part 618](#)

[41 Code of Federal Regulations \(CFR\) Chapters 300-304 Federal Travel Regulation \(FTR\)](#)

[Training and Employment Guidance Letter \(TEGL\) 05-15](#)

[TEGL 15-12](#)

[TEGL 22-08](#)

[TEGL 18-20](#)

IV. POLICIES AND PROCEDURES

LWDBs must ensure TaOA funds are used as the first option to support allowable expenses for trade-affected workers eligible for and receiving services under TAA, including those who are co-enrolled in the Workforce Innovation and Opportunity Act Dislocated Worker

program. TaOA funds allocated to LWDBs fall into four cost categories: Training, Case Management, Job Search and Relocation, and Administrative funds.

A. Training Funds

Training funds are primarily used to directly fund training expenditures for eligible TAA participants. TAA participants who lack the education and skills to return to suitable employment may be eligible for training. If the results of the comprehensive assessment reveal the TAA participant requires training, and the participant is interested in training, the Local TAA Coordinator must provide individual counseling to determine suitable training, offer information on available training programs, and provide guidance on how to apply for such training. Eligible trade-affected workers request training services through the appropriate LWDB. The Trade Act requires that the LWDB must approve training for a trade-affected worker if the following six (6) program criteria are met:

- a) There is no suitable employment available for the worker;
- b) The worker would benefit from appropriate training;
- c) There is a reasonable expectation of employment following completion of such training;
- d) Training is reasonably available to the worker from either governmental agencies or private sources;
- e) The worker is assessed and qualified to undertake and complete such training; and
- f) The training is suitable for the worker (based upon the worker's capabilities, background and experience) and available at a reasonable cost.

Once approved and documented in the participant's Employ Florida TAA Program Application, training may be paid on the participant's behalf directly to the service provider or through a voucher system using TAA program funds at the local level. There is no federal or state limit on the amount of program funding that can be expended on training for a trade-affected worker so long as the cost is determined to be reasonable. Reasonable means that the costs of the training are not unreasonably high in comparison with the average cost of training of other workers in similar occupations at other providers. LWDBs may expend program funds on the following TAA training services (and all allowable benefits that accompany the services): classroom training, registered apprenticeship, on-the-job training, and customized training.

Examples of allowable costs accommodating training services include, but are not limited to: books, required supplies, course fees, registration fees, travel and subsistence costs for training outside the local commuting area, and other items or services deemed necessary by the training institution for the completion of training.

1. Employ Florida Reporting

Local TAA Coordinators must report training expenditures for TAA participants in the state's online labor exchange and case management system, Employ Florida, at the point of invoice. The point of invoice is the receipt date of the invoice. Electronically received invoices are date stamped via e-mail. Therefore, the received date and the invoice date shall be the same. Mailed invoices should be stamped on the day of receipt. Therefore, the received date, stamped date, and invoice date shall be the same. As such, LWDBs must establish procedures that ensure the LWDB's financial team and Local TAA Coordinator receive access to invoices for TAA training expenditures and report those expenditures at the same time. Local TAA Coordinators must report TAA training expenditures in Employ Florida under the participant's TRA Payments subsection of the TAA program application. LWDB financial teams report TAA training expenditures in the Subrecipient Enterprise Resource Application (SERA).

LWDBs are required to report TAA-approved training costs in Employ Florida under the participant's TRA Payments subsection of the TAA application. TAA participant data is reported quarterly to USDOL through the Participant Individual Record Layout (PIRL). The TAA program has performance measures that seek to ensure data accuracy and gauge the program's effectiveness. Quarterly, DEO receives a report card from USDOL referred to as the Trade Adjustment Assistance Data Integrity (TAADI) report. The TAADI is a standardized review of high-quality data that is essential to evaluating the program's effectiveness and monitoring service delivery. The TAADI report requires cross validation between participant data and fiscal data. This process ensures expenditure data recorded in the PIRL, as reported within Employ Florida, align with corresponding data on the state's TAA financial report, Employment and Training Administration (ETA) Form 9130.

B. Case Management Funds

States are required to use at least five percent of their program allocation to provide case management and employment services to TAA participants, except for those covered under TAARA of 2002. Under TAARA of 2002, case management funds may not be used to support employment services for participants certified under this amendment. Workforce Innovation and Opportunity Act (WIOA) and/or Wagner-Peyser funds must be used to support employment services for TAA participants covered under TAARA of 2002.

In accordance with Section 235 of the Trade Act of 1974 P.L. 93-618, as amended, LWDBs must offer and document the following eight employment services to trade-affected workers:

- a) Comprehensive assessments;
- b) Specialized assessments;

- c) Provision of labor market information;
- d) Individual career counseling;
- e) Development of an Individual Employment Plan;
- f) Information on training and financial aid;
- g) Information on the availability of supportive services; and,
- h) Short-term pre-vocational services.

The following list of activities are also considered to be case management and are allowable uses of case management funds:

- a) Outreach related to the public education and promotion of the TAA program's eligibility, benefits, and services to potentially trade-affected employers;
- b) Conducting Rapid Response TAA informational sessions;
- c) Entering data into Employ Florida, including entering service codes and case notes;
- d) Establishing and updating training benchmarks;
- e) Developing and tracking training plans (including verifying satisfactory participation);
- f) Monitoring TAA participant files;
- g) Developing, updating, and monitoring IEPs to include removing employment barriers;
- h) Costs associated with training TAA and LWDB staff on the TAA program, including activities and services available to TAA participants;
- i) Maintaining and enhancing tools and equipment (including electronic equipment) that would improve case management services;
- j) As a mandatory workforce program partner, program-related supplies, equipment, travel, postage, utilities, rental, and maintenance of office space for the Local TAA Coordinator;
- k) Indirect costs associated with the program; and
- l) Any other staff costs related to case management.

1. Local TAA Coordinators

As outlined in Training and Employment Guidance Letter (TEGL) No. 01-10, the TAA program operates in accordance with merit principles established under the Wagner-Peyser Act. Under this guidance, DEO, as the state workforce agency, is required to use TAA funds to hire merit-staff employees to provide case management and employment services to trade-affected workers, and apply to these personnel the standards for a merit system of personnel administration in accordance with Office of Personnel Management regulations at 5 CFR Part 900, subpart F.

To ensure case management and employment services are provided by state personnel, each LWDB is required to designate at least one merit-staff employee under their functional supervision as the Local TAA Coordinator. Local TAA Coordinators are primarily funded by Wagner-Peyser to provide TAA services to trade-affected workers. The case management cost category supports direct charges for Local TAA Coordinator salary and benefits.

C. Job Search and Relocation Allowances

LWDBs may receive funding to provide job search and relocation allowances. This funding should be used for TAA participants who have no reasonable expectation of securing suitable employment within the state-defined commuting area (see DEO memorandum, [State Definition of Trade Adjustment Assistance Commuting Area](#)).

Job search allowance is a support service that may be used to subsidize transportation and subsistence (lodging and meals) costs related to job search activities outside the state-defined commuting area. The amount payable is 90 percent of the total costs for transportation and 90 percent of the total costs for subsistence. Costs for transportation are determined by the prevailing amount authorized under U.S. General Services Administration's (GSA) privately-owned vehicle mileage reimbursement rates. Costs for subsistence payments are determined by the federal per diem rate as defined by GSA. Reimbursement for these expenses may not exceed \$1,250 for any worker.

Relocation allowance is a support service that may be used to subsidize the moving costs of TAA participants who have secured permanent employment outside of the state-defined commuting area. The amount payable is 90 percent of the reasonable and necessary expenses of moving the participant, their family, and their household items. Relocating TAA participants may also be eligible for a lump sum equivalent to three times their weekly wage, up to a maximum of \$1,250. Under TAARA of 2002, TAAEA of 2011 and TAARA of 2015, participants can receive an allowance equal to 90 percent of each of their job search and relocation expenses, up to a maximum of \$1,250 for each benefit. Under TGAAA of 2009, participants may receive up to \$1,500 for each benefit.

Job search and relocation funds shall be requested by LWDBs on an as-needed basis. LWDBs may request job search and relocation funds by emailing the request to the State Trade Program Office at TAA@deo.myflorida.com. The State Trade Coordinator will review all requests and route to the DEO Bureau of Financial Management for approval.

D. Administrative Funds

Administrative funding is limited to 10 percent of the state's total allocation. Administrative funding is used primarily to support state-level administration of the

TAA program including Trade Readjustment Allowances and Reemployment Trade Adjustment Assistance. Funds for the Trade Readjustment Allowances and Reemployment Trade Adjustment Assistance are issued directly to DEO by USDOL and are not issued to the LWDBs.

E. Initial Allocation Funding Methodology

At the beginning of each state program year (PY), DEO will automatically carry over the remaining allocation from the previous PY. If an LWDB does not have carry over funds, and a TAA petition is certified in their service area, the LWDB may request an initial allocation by emailing the request to the State Trade Program Office at TAA@deo.myflorida.com. The State Trade Coordinator will review requests and route to the DEO Bureau of Financial Management for approval. It is recommended that LWDBs with recently certified petitions submit the request to DEO after the TAA informational session with the trade-affected workers has been held. This will allow the LWDB to submit a request for funds that considers:

- a) The number of trade-affected workers;
- b) Estimated participant levels (based upon the workers who indicated an interest in receiving TAA services and benefits in the informational session or one-on-one meeting); and
- c) The projected cost of training.

LWDBs are expected to expend these funds within the period defined in the Notice of Grant Award/Fund Availability. LWDBs must ensure these funds are used in addition to, and not to offset, any funds the LWDB receives under Wagner-Peyser, WIOA or any other program.

F. Supplemental Funds

After LWDBs expend initial allocations for the PY, LWDBs may request additional TAA program funds by emailing the request to the State Trade Program Office at TAA@deo.myflorida.com. The State Trade Coordinator will review requests and route to the DEO Bureau of Financial Management for approval. For supplemental funding requests, it is recommended that the LWDB's Chief Financial Officer review and approve each submission.

G. State and Local Monitoring

Services and activities provided under TAA must be monitored annually for compliance with TAA requirements by DEO. DEO will monitor the requirements outlined in this policy and local operating procedures. If necessary and the documents are not easily located in Employ Florida, then DEO shall request documents from the

LWDB during a monitoring review. Additionally, LWDBs must establish local monitoring policies and procedures that include, at minimum:

- a) Roles of the Local TAA Coordinator and LWDB financial staff; and
- b) Local operating and monitoring procedures for implementation of this policy.

V. DEFINITIONS

Local TAA Coordinator - A merit-staff employee designated by the LWDB to determine TAA eligibility and to provide TAA case management and employment services with the goal of leading participants to suitable employment.

Petition - A request submitted to USDOL to certify an employer as adversely impacted by global trade or competition.

Reemployment Trade Adjustment Assistance (RTAA) - A wage subsidy for trade-affected workers 50 years of age or older who return to work paying less than their trade-impacted employment.

Subsistence - A monetary allowance to offset the costs of housing and meals when a participant must attend a training facility outside his or her normal commuting area.

Suitable Employment - Work of a substantially equal or higher skill level than the trade-affected worker's past trade-affected employment, with wages no less than 80 percent of the trade-affected worker's average weekly wage from the trade-affected employment.

TAA Participant - Any trade-affected worker who completes the initial TAA application and is enrolled in the TAA program by a Local TAA Coordinator by receiving a staff-assisted service.

Trade-Affected Worker - An individual who has been totally or partially separated from employment in a firm or subdivision of a firm that has been certified under TAA.

Trade Readjustment Allowance (TRA) - An income support payment for trade-affected workers who have exhausted Unemployment Compensation while attending TAA-approved full-time training or, if waived from training, while conducting work search.

VI. REVISION HISTORY

Date	Description
TBD	Approved by CareerSource Florida Board of Directors.
TBD	Issued by Florida Department of Economic Opportunity.

Approved _____
Disapproved _____

Action Item 2

CAREERSOURCE FLORIDA STRATEGIC POLICY – POLICYMAKING AUTHORITY AND DELEGATION

As the principal workforce policy organization for the state of Florida, CareerSource Florida, the state workforce development board, is responsible for providing policy direction to ensure workforce programs are aligned to federal, state, and local workforce development priorities. The CareerSource Florida Board of Directors, the CareerSource Florida professional team and the Department of Economic Opportunity developed a comprehensive policy development framework designed to support the vision, mission, values, strategies and operation of the state's workforce development system. The CareerSource Florida Policy Development Framework defines best practices for joint development and implementation of strategic and administrative policies and defines documents that serve as alternatives to formal policies.

The CareerSource Florida Policymaking Authority and Delegation Strategic Policy distinguishes between strategic and administrative policies and delegates different policymaking decisions to various entities including the CareerSource Florida professional team and CareerSource Florida's administrative entity, the Department of Economic Opportunity.

All CareerSource Florida strategic policies are presented to the state workforce development board to be considered for approval.

CareerSource Florida administrative policies and operational guidance include business rules, requirements, processes and responsibilities that expand, explain or specify federal and state legislative policy and board-approved strategic policy. These policies are developed by the Department of Economic Opportunity Bureau of One Stop and Program Support in consultation with the CareerSource Florida professional team using best practices from the Policy Development Framework. Administrative policies and operational guidance are reviewed by the CareerSource Florida professional team, which determines if these policies require approval by the state workforce development board.

The CareerSource Florida professional team notifies the state workforce development board of all strategic and administrative policies issued.

FOR CONSIDERATION

- **Approve CareerSource Florida Policymaking Authority and Delegation Strategic Policy directing the CareerSource Florida professional team to present all strategic policies to the CareerSource Florida Board of Directors to be considered for approval.**
- **Approve CareerSource Florida Policymaking Authority and Delegation Strategic Policy delegating authority to the CareerSource Florida professional team, in consultation with the Department of Economic Opportunity, to use its discretion in determining how to issue administrative policies and guidance.**
- **Adopt the CareerSource Florida Policy Development Framework and authorize the CareerSource Florida professional team, in consultation with the Department of Economic Opportunity, to update and revise the Framework as necessary to ensure its effectiveness in managing organizational performance.**



TBD

Strategic Policy

Title:	Statewide Workforce Development Board Policymaking Authority and Delegation
Adopted:	
Effective:	

I. PURPOSE AND SCOPE

This policy clarifies the policymaking authority of CareerSource Florida, the state workforce development board, and the delegation of various policymaking roles. The state workforce development board establishes the administrative and operational role of the CareerSource Florida professional team and CareerSource Florida's administrative entity, the Florida Department of Economic Opportunity (DEO), in providing policy direction and guidance to the state's local workforce development boards (LWDBs) and other impacted parties.

II. BACKGROUND

Public Law 113-128, the federal Workforce Innovation and Opportunity Act (WIOA), describes the formation of state workforce development boards. 20 CFR, Section 679.160 authorizes state workforce development boards to hire staff to assist in carrying out the functions described in WIOA Section 101(d). These functions include the development, implementation and modification of the state workforce development plan and the review of statewide policies, statewide programs and recommendations on actions that should be taken by the state to align workforce development programs to support a comprehensive and streamlined workforce development system (20 CFR 679.130).

The CareerSource Florida Board of Directors serves as the principal workforce policy organization for the state as described in Chapter 445.004(2), Florida Statutes. The purpose of the state board is to establish and direct the vision for the state workforce system, known as the CareerSource Florida network, to align with strategic partners within workforce investment, education and economic development systems.

Consistent with the Amended Bylaws of CareerSource Florida, Section 4.11, the state workforce development board may "delegate the performance of any duties or the exercise of

any powers to such officers and agents as the board may from time to time, designate by resolution.” Pursuant to Chapter 445.004(13), “[The Department of Economic Opportunity] may consult with the state board to issue technical assistance letters on the operation of federal programs and the expenditure of federal funds by the state board or any local workforce development board. A technical assistance letter must be in writing, must be posted on the department’s website, and remains in effect until superseded or terminated. A technical assistance letter is not a rule of general applicability under s. 120.54 and is not a declaratory statement issued under s. 120.565 or an order issued under s. 120.569. Section 120.53 does not apply to technical assistance letters.”

Consistent with its agreement with the Department of Economic Opportunity, CareerSource Florida, Inc., the CareerSource Florida professional team, provides administrative support for the state workforce development board. As described in CareerSource Florida Strategic Policy 2020.06.04.A.2 – State Workforce Development Board Roles and Responsibilities, the CareerSource Florida professional team shall develop and coordinate, under the direction and guidance of the board, the strategic policy development and financial and programmatic direction of its vision for the state’s workforce system. The CareerSource Florida professional team assists in developing and implementing strategic and administrative policies.

The Department of Economic Opportunity serves as the fiscal and administrative entity for the programs outlined in Chapter 445.004(5)(b), Florida Statutes. DEO consults with the CareerSource Florida professional team to develop and implement strategic and administrative policies to local workforce development boards and workforce partners. This includes developing the Statewide Workforce Innovation and Opportunity Act Plan, policies, communiques, memoranda, guidance letters, reports and publications. DEO monitors compliance with the state workforce development board’s policies and the expenditure of federal funds by both the state workforce development board and local workforce development boards.

III. POLICIES AND PROCEDURES

A. Policy Development Framework

The governance structure of CareerSource Florida facilitates strategic planning. As the principal workforce policy organization for the state of Florida, CareerSource Florida, the state workforce development board is focused on strategic policy and aligning federal, state and local workforce development priorities. This policy delegates operational policymaking decisions to the CareerSource Florida professional team and CareerSource Florida’s administrative entity, the Department of Economic Opportunity.

The CareerSource Florida Board of Directors, the CareerSource Florida professional team and the Department of Economic Opportunity follow a comprehensive policy development framework designed to support the vision, mission, values, strategies and operation of the state’s workforce development system. The Policy Development Framework applies to the CareerSource Florida Board of Directors, the CareerSource Florida professional team and DEO and defines a best practice process for joint development and implementation of strategic and administrative policies as well as the documents that serve as alternatives to formal policies. Alternatives to formal strategic administrative policy and workforce guidance include communiques, memoranda, and programmatic resource guides that

provide information and guidance and are used to enhance and supplement the deployment of formal policies.

The Policy Development Framework (the Framework) differentiates between strategic and administrative policies and identifies best practices for developing and implementing these policies. The Framework describes how policies and alternatives to formal policies are developed, approved and implemented.

Strategic Policies

CareerSource Florida Board of Directors strategic policies include high-level principles or directional statements that inform or clarify federal or state legislative policy or workforce system strategies for the state of Florida. These policies direct statewide workforce efforts through a variety of means including but not limited to establishing standards or priorities for workforce delivery, directing workforce funding, and defining statewide strategic goals. Strategic policies set expectations and direct decision making at the state level and may result in the development of administrative policies by DEO and/or local policies by the local workforce development boards.

Strategic policies are presented to, approved and adopted by the state workforce development board.

Administrative Policies, Operational Guidance and Workforce Guidance¹

CareerSource Florida administrative policies and operational guidance are developed by the Department of Economic Opportunity Bureau of One Stop and Program Support in consultation with the CareerSource Florida professional team using best practices from the Policy Development Framework. Administrative policies and operational guidance include business rules, requirements, processes and responsibilities that expand, explain or further specify federal and state legislative policy as well as board approved strategic policy.

Administrative policies and operational guidance are developed and revised using best practices defined in the Policy Development Framework. Administrative policies and operational guidance are binding on the workforce system and are subject to audit and monitoring by DEO.

Administrative policies and operational guidance are reviewed by the CareerSource Florida professional team, which determines if these policies require approval by the state workforce development board. The state workforce development board is notified of all administrative policies issued.

Workforce guidance is information that explains a legislative, strategic or administrative policy. Guidance may include best practices, supporting information, recommendations, Technical Assistance Letters, memoranda, communiques, desk aids, resource guides and other resources. Workforce guidance is reviewed and issued by DEO and may include consultation with the CareerSource Florida professional team.

¹ Note: The term “guidance” is used synonymously by workforce system stakeholders to describe administrative policy, operational guidance and workforce guidance.

B. Criteria for State Workforce Development Board Approval

The following criteria is presented for determining what policies require the state workforce development board's approval.

State Workforce Development Board of Directors Approval Criteria:

- State Workforce Development Plans
- Strategic policies
- Administrative policies that govern the state workforce development board or the CareerSource Florida professional team
- Board led, state-level projects and initiatives
- New grant initiative policies
- Policies that include potential sanctioning measures and appeal protocols to local workforce development boards for non-compliance
- Policies involving procurements or contracts
- LWDB requirements that require state workforce development board approval
- Policies as determined by the CareerSource Florida professional team to be approved by the state workforce development board

The following criteria is presented for determining what policies do not require the state workforce development board's approval but do require consultation with the CareerSource Florida professional team and require that the state workforce development board be notified of new administrative policies or changes to existing guidance:

DEO-Issued Operational Guidance Criteria:

- Business rules, requirements and processes related to the implementation and operation of workforce programs and grants (operational, programmatic and financial)
- Compliance-related administrative policies and guidance that operationalize federal or state laws and regulations as well as board-approved strategic policies.
- Instructions or guidelines for workforce programs and grants
- Auditing/monitoring implications

The following criteria is presented for determining what workforce guidance may be issued by the Department of Economic Opportunity without the state workforce development board's approval:

Workforce Guidance Criteria That:

- Explains or clarifies a legislative, strategic or administrative policy, or operational guidance.
- Provides clarification regarding program or system requirements.
- Resource information that shares best practices, supporting information, recommendations, examples, etc.
- Time-sensitive communication that requires immediate communication and implementation by the LWDBs.

C. Periodic Review of CareerSource Florida Policies

The state workforce development board delegates that the CareerSource Florida professional team and the Department of Economic Opportunity shall consult to review strategic and administrative policies, and operational and workforce guidance. The CareerSource Florida professional team and the Department of Economic Opportunity shall determine policy effectiveness and efficiency and make recommendations to the CareerSource Florida Board of Directors for the revision or rescission of policies, as necessary.

For retention, strategic policies must focus on strategy or existing initiatives rather than operational aspects of workforce system oversight. Policies that are determined to be more operational in nature may be transferred to DEO for administration. Obsolete or ineffective policies may be eliminated by action or consent of the CareerSource Florida Board of Directors.

When significant changes are made to applicable legal standards, such as federal, state, or administrative law, DEO must determine if revisions are necessary to update existing policies. Administrative policies and operational guidance are reviewed by DEO and the CareerSource Florida professional team, which determines if revision or elimination of these policies require approval by the state workforce development board.

In some instances, when significant changes are made to federal or state law or guidance, it may be necessary for the CareerSource Florida professional team, in consultation with the Department of Economic Opportunity, to rescind an existing policy until action can be taken by the CareerSource Florida Board of Directors. The state workforce development board is notified of administrative policies that are scheduled for revision or elimination and the board is notified when revisions or elimination are complete.

IV. AUTHORITIES

[Public Law 113-128, The Workforce Innovation and Opportunity Act \(WIOA\)](#)

[Chapter 445.003 – 445.004, Florida Statutes](#)

[20 CFR Sections 679.100 - 130](#)

[CareerSource Florida Strategic Policy 2020.06.04.A.2 – State Workforce Development Board Roles and Responsibilities](#)

V. HISTORY

Date	Description
TBA	CareerSource Florida Strategic Policy — Statewide Workforce Development Board Policymaking Authority and Delegation Approved by CareerSource Florida Board of Directors.

VI. RESOURCES

[Strategic and Administrative Policy Development Framework²](#)

[Policy Development Summary](#)

² Note: This document is subject to change as CareerSource Florida and DEO adjust, streamline or refine the components of the framework.

POLICY DEVELOPMENT FRAMEWORK

INTRODUCTION

This comprehensive policy development framework, developed by CareerSource Florida and the Florida Department of Economic Opportunity (DEO), is designed to support the vision, mission, values, strategies and operations of the CareerSource Florida network and its statewide policy and investment board while strengthening the state workforce development system.

Policy development and implementation is a critical aspect of managing organizational performance. Systematic identification of the need for policy, a structured policy development process, an effective policy evaluation and approval process and consistent approaches for effective outreach, communications and training are essential components of a comprehensive policy framework. Organizations with sound approaches for the development and deployment of strategic and administrative policies are better positioned for successfully executing strategy and conducting effective and efficient day-to-day operations.

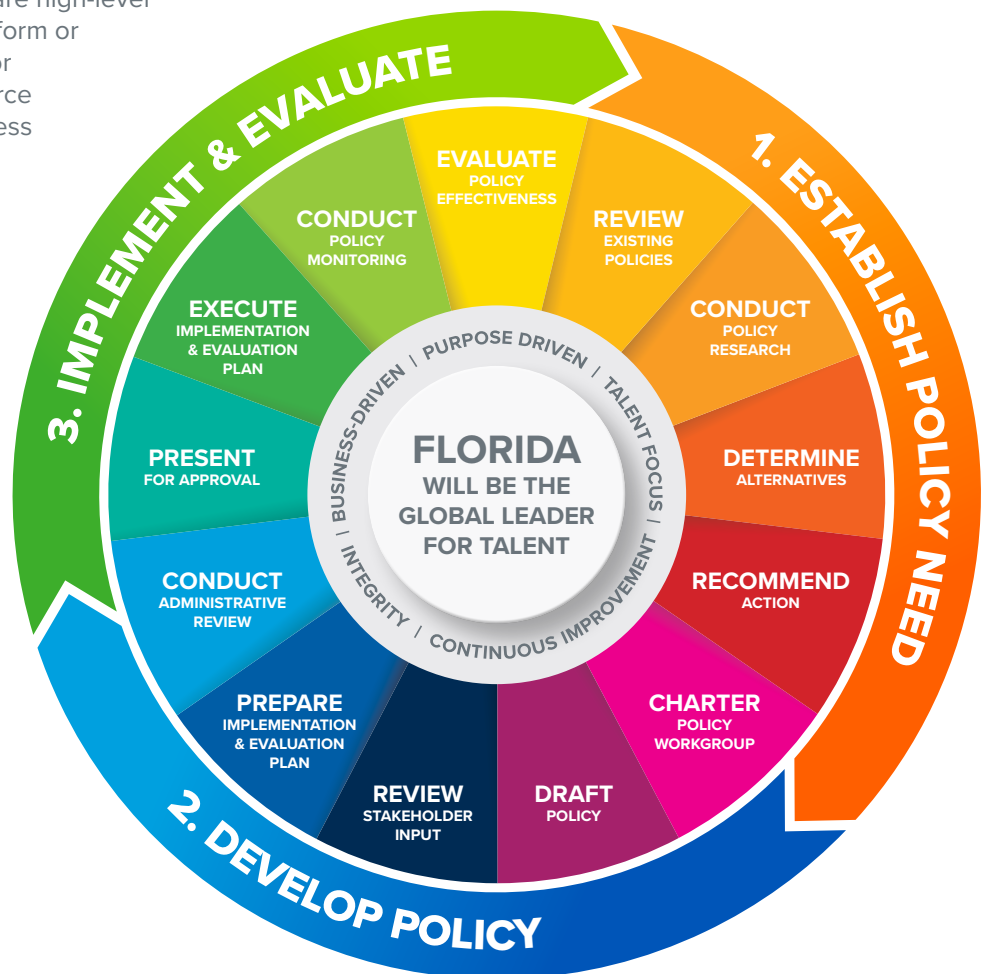
This framework describes how strategic and administrative policies are developed and approved and provides alternatives to formal policy.

CareerSource Florida Strategic Policies are high-level principles or directional statements to inform or clarify federal or state legislative policy or workforce system strategies. CareerSource Florida Administrative Policies are business rules, requirements, processes and responsibilities that expand, explain or further specify federal or state legislative policy.

The framework is applied at the state level and is recommended as a guide for the development of local operating procedures and policies. The framework also may be useful to any state workforce system partner in policy development and implementation.

The policy development framework consists of three major components:

1. Establish Policy Need;
2. Develop Policy; and
3. Implement and Evaluate.



Research identifies best practices in policy development. The key features listed below are considered and incorporated in the development of strategic and administrative policies for Florida's workforce system and include features associated with high-performing organizations:

MISSION, VISION AND VALUES-BASED

Policies drive and support the mission, vision and values of the CareerSource Florida network as established by the CareerSource Florida Board of Directors and carried out by the professional team.

Policy development considers how policies support Florida's vision to be the global leader for talent and mission to connect businesses with qualified and skilled job seekers for employment and career development that leads to economic prosperity. Policies reflect the network values of business-driven, continuous improvement, integrity, talent focus and purpose-driven.

Policies clearly uphold statutes and regulations, striving to exceed minimum requirements to accelerate and achieve the vision with integrity and transparency.

SYSTEMS PERSPECTIVE

Design and deployment of new policies considers potential impacts to existing policies, programs, key customer groups, workforce partners or stakeholders.

Consideration is given to alignment of policies with plans, programs, processes and measures.

Risks are identified and actively managed.

The policy development framework is agile, allowing for efficient and simplified policy development and revision based on changing conditions.

BUSINESS, JOB SEEKER, PARTNER AND STAKEHOLDER FOCUS

Design and deployment of new policies is transparent and clearly reflects attention to the needs and perspectives of businesses, job seekers, workforce partners and stakeholders affected by the policy.

Ample opportunities are created for stakeholder input during policy development and throughout the policy lifecycle.

PRAGMATIC AND OPERATIONAL: VALUING PEOPLE AND RESOURCES

Policy development considers the appropriate management and organizational structures needed for policy implementation. Factors include available financial, technical and human resources required for sustained successful and effective deployment.

Strategic and administrative policies include implementation plans for communicating changes and training employees as needed. Policy development and implementation is timely.

Administrative policies outline the roles and responsibilities of internal and external partners including guidance for how local boards implement programs.

INNOVATIVE AND EVIDENCE-BASED

New or revised policies consider innovative approaches, including new technologies, that reach beyond standard procedures. Innovative ideas can originate from a variety of sources including businesses, job seekers, key partners, stakeholder groups, cutting-edge research or board member insights.

Decisions on policy content are based on the best available information. Policy development considers performance data, key research findings and benchmarking of best practices in workforce systems and other organizations. Policies can be piloted on a smaller scale to collect additional evidence of effectiveness prior to full implementation.

FOCUSED ON SUCCESS, MEASURABLE RESULTS AND EVALUATION

Strategic and administrative policies clearly define expected successful performance outcomes. Metrics and/or other forms of information are prepared to accurately gauge the effectiveness and impact of policies over time. Where appropriate, the policy development framework takes a long-term view based on statistical trends and informed predictions of social, political, economic and cultural factors. Long term is generally considered at least four years into the future of the likely effect and impact of the policy. This timeframe considers evolving trends in workforce issues and supports policy alignment and synchronization with the strategic planning cycle.

For more information, please visit careersourceflorida.com.

Approved _____
Disapproved _____

Action Item 3

CAREERSOURCE FLORIDA STRATEGIC POLICY - RAPID RESPONSE AND LAYOFF AVERSION SYSTEM STRATEGIC POLICY

The federal Workforce Innovation and Opportunity Act (WIOA) requires states to deliver Rapid Response services to assist employers and impacted workers prior to and immediately following the announcement of a permanent closure, layoff or natural or other disaster resulting in a mass job dislocation. Allowable activities are defined in [Title 20 Code of Federal Regulations Part 682](#) and [Employment and Training Administration, Training and Employment Guidance Letter No. 19-16](#).

Layoff Aversion activities are part of the Rapid Response system and are also defined in WIOA. These activities promote economic recovery and vitality by developing ongoing, comprehensive approaches to identifying, planning for, or responding to layoffs or dislocations and preventing or minimizing their impacts on workers, businesses and communities. The Rapid Response system involves engagement with employers of all sizes, stakeholders and critical partners in developing workforce solutions that save jobs and give companies access to skilled workers necessary to increase growth and economic productivity while decreasing the negative impacts of unemployment and ensuring more immediate resources are available to individuals with greater needs.

The Rapid Response and Layoff Aversion System Strategic Policy requires local workforce development boards to utilize funding reserved for Rapid Response and Layoff Aversion to establish comprehensive, proactive Rapid Response systems with an emphasis on Layoff Aversion activities that dedicate resources to specific allowable activities.

FOR CONSIDERATION

- **Approve Rapid Response and Layoff Aversion System Strategic Policy**



Strategic Policy

TBD

Title:	Rapid Response and Layoff Aversion System
Adopted:	
Effective:	

I. PURPOSE

The federal Workforce Innovation and Opportunity Act (WIOA) encourages states to implement and promote programs and strategies that are consistent, high quality, timely and provide innovative responses within a comprehensive economic transition model that supports a broad vision for Rapid Response and embraces Layoff Aversion as one of its central tenets.

It is the intent of the state workforce development board for state and local Rapid Response teams to develop high quality, comprehensive and effective Rapid Response and Layoff Aversion strategies that maximize their ability to assist businesses, especially small businesses, in their local community. Rapid Response and Layoff Aversion activities should be focused on proactively engaging with businesses to prevent layoffs as well as reacting to announced layoffs and assisting affected workers.

II. BACKGROUND

WIOA requires states to provide statewide Rapid Response activities to assist employers and impacted workers prior to and immediately following the announcement of a permanent closure, layoff or natural or other disaster resulting in a mass job dislocation. This requires informed, strategic local business engagement.

Rapid Response and Layoff Aversion activities authorized under WIOA deliver solutions to address the needs of businesses in transition and throughout the business lifecycle (growth,

expansion, maintenance, or downsizing), including comprehensive business engagement and Layoff Aversion strategies. These activities maximize available assistance to local areas that experience natural disasters, mass layoffs, plant closings, or other events that impact businesses and increase the number of unemployed individuals. These activities include but are not limited to upskilling, Reemployment Assistance benefits, Short-Time Compensation, and employment services that help companies retain valuable skilled workers.

Effective Rapid Response and Layoff Aversion services promote economic recovery and vitality by developing ongoing, comprehensive approaches to identifying, planning for, or responding to layoffs or dislocations and preventing or minimizing their impacts on workers, businesses, and communities. It includes engagement with employers of all sizes, economic development organizations, chambers of commerce, small business development centers, business associations, and other critical partners in developing workforce solutions that improve the economic well-being and quality of life for a community, by creating and/or retaining jobs that facilitate growth and provide a stable tax base and support a competitive, resilient local workforce.

Small businesses represent a large percentage of the overall businesses in the state of Florida. Accordingly, many layoffs do not fall within the federal Worker Adjustment and Retraining Notification Act (WARN) requirements and may go undetected because they affect fewer than 50 employees. A strong rapid response/layoff aversion program will assist businesses of all sizes.

The benefits of an effective Rapid Response and Layoff Aversion system include saving jobs and giving companies of all sizes access to skilled workers necessary to increase growth and economic productivity while decreasing the negative impacts of unemployment and ensuring more immediate resources are available to individuals with greater needs.

III. STRATEGIC POLICY

Local workforce development boards shall implement a comprehensive, proactive Rapid Response system with an emphasis on Layoff Aversion activities that dedicate resources and efforts to the following:

- Strategic planning, business intelligence data gathering, and analysis designed to predict, prepare for, and mitigate layoff events.
- Strategies designed to maintain effective business engagement with companies of all sizes and industries within the community.
- Outreach and education regarding the provision of comprehensive, employer-based Layoff Aversion services to include Short-Time Compensation, federal emergency grant

and loan programs, local and community assistance programs, and incumbent worker training to avert layoffs and facilitate connections to other support services.

- Establishing early warning systems to identify businesses that may be at risk of closing, so that immediate support may be provided to avoid layoffs. Establishing local points of contact within the early warning system network to communicate and be accountable for Rapid Response services.
- Defining quantitative outcomes sought including but not limited to return on investment, employees retained or positions filled, business market penetration, and number of established partnerships.
- Defining service level standards and response times when notified of pending layoffs.

The allowable activities are defined in [20 CFR 682 Subpart C of the WIOA regulations \(covering 20 CFR 682.300 through 682.370\)](#) and described in [Training and Employment Guidance Letter No. 19-16](#).

For workers who are at risk of dislocation due to mass layoffs, plant closings, state or federal declared emergencies, or foreseeable events where local workforce development boards and the Department of Economic Opportunity are informed that layoffs may result in unemployed individuals, the maximum allowable percentage of funds may be reserved.

The Department of Economic Opportunity is the state administrative agency for Title I of WIOA. The Department has the responsibility for the distribution and management of the WIOA statewide Rapid Response funds. Of the total federal WIOA Dislocated Worker funding provided to the state, 25 percent may be reserved by federal law for the purposes of establishing and operating a Rapid Response system.

Funds shall be set aside to maintain an emergency reserve and fund the operational costs of the DEO Rapid Response Unit.

Pursuant to this policy, Rapid Response funds shall be used by local workforce development boards to establish Rapid Response and Layoff Aversion systems and provide Rapid Response and Layoff Aversion systems as described above.

IV. SCOPE

This policy applies to CareerSource Florida, the Florida Department of Economic Opportunity (DEO), and all 24 local workforce development boards. Local workforce development boards shall describe strategies for implementing and sustaining effective Rapid Response and Layoff Aversion systems in their local workforce development plans.

V. AUTHORITY

[Public Law 113-128, the Workforce Innovation and Opportunity Act](#)

[Chapter 445.003-445.007, Florida Statutes](#)

[Training and Employment Guidance Letter No. 19-16](#)

[20 CFR Part 665, Subpart C, Section 665.300 – Section 665.340](#)

[20 CFR Part 680, Subpart C, Section 682.300 – Section 682.370](#)

[CareerSource Florida Administrative Policy 100 – Work-based Training.](#)

VI. REVISION HISTORY

Date	Description
TBD	Amends and replaces Strategic Policy 2003.03.19.A.3 Rapid Response Process Modifications

FLORIDA'S FUTURE WORKFORCE

*Young Adult Job
Seekers – Employment
Needs and Goals*

IDENTIFYING THE CHALLENGE

Florida's future workforce includes our youngest job seekers – individuals ages 16 to 24, some in school and others working part or full time. They are racially and economically diverse, with different goals and expectations for their future, but one thing is certain – for Florida to thrive now and in the future, it is crucial to help these job seekers find their career path.

The economic impacts of the COVID-19 pandemic have had a disproportionate impact on this population. The CareerSource Florida network is well-positioned to help Florida's young adults train and prepare for a career in an in-demand industry. This, in turn, can help Florida's business community continue to thrive.



“I hope to have a job where I am able to show off my talents and my skills. I want a job that I enjoy and am able to grow from. I don’t want to work somewhere where I feel trapped or like I settled.”

ABOUT THE RESPONDENTS

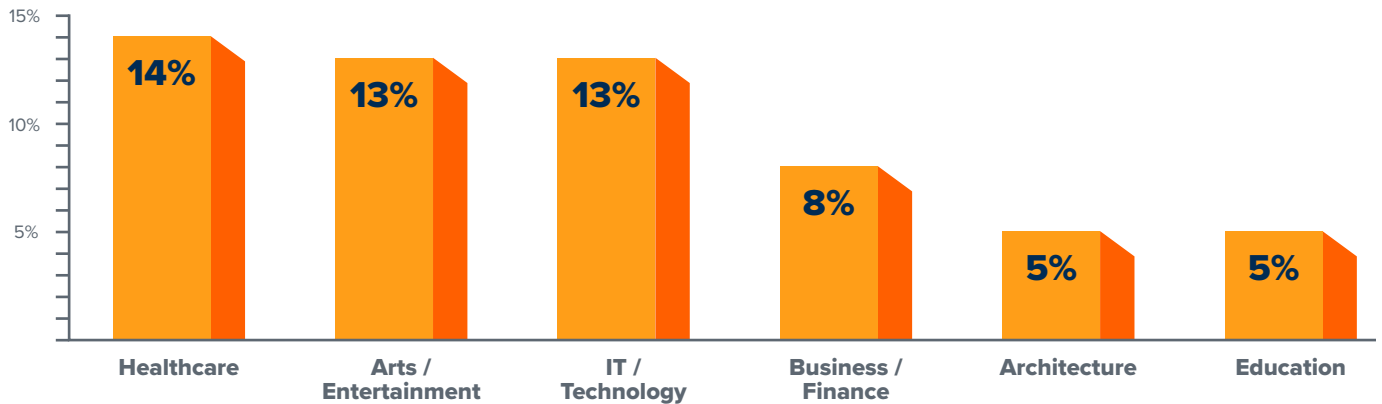
To better understand the motivations of Florida's young adults and identify the best ways to support them in their careers, CareerSource Florida commissioned a survey of 1,205 Floridians ages 16 to 24, to gauge awareness, knowledge, perceptions and past usage of the CareerSource Florida network's services; determine specific job development and employment needs; and gain a better understanding of resources they are currently using.

Additionally, 153 Florida employers involved in hiring youth were surveyed to provide further insight on what they look for in the youth they hire and their perception of the CareerSource Florida network and services.

OVERVIEW OF FINDINGS

CAREER ASPIRATIONS

The top industries respondents indicated they would like to enter include:



Regardless of career field, most respondents united around three common desires for their dream job:



Enables them to achieve financial stability



Fulfills them and is enjoyable



Allows them to impact and help others

“I want to have a job I have fun doing and that will also let me live the life that I want to live.”



FUTURE CONFIDENCE

Respondents were asked to gauge how likely it would be that they will be in the job or career they want by age 30.

► MOST CONFIDENT

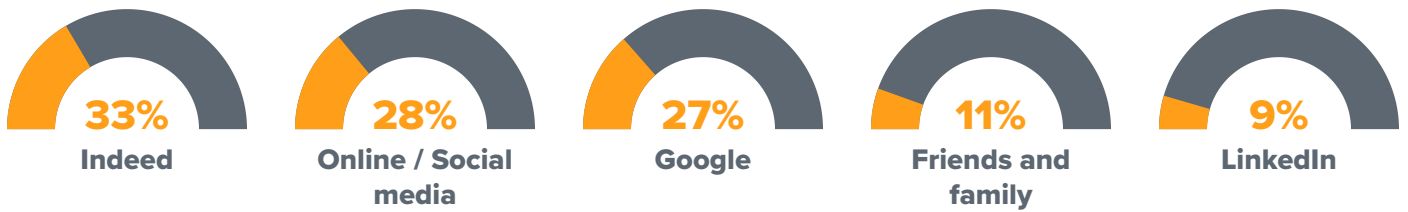
Young adults with trade school or two-year college degrees were most confident in their future career plans.

► LEAST CONFIDENT

Young adults just completing high school and those with four-year college degrees were least confident in their future career plans.

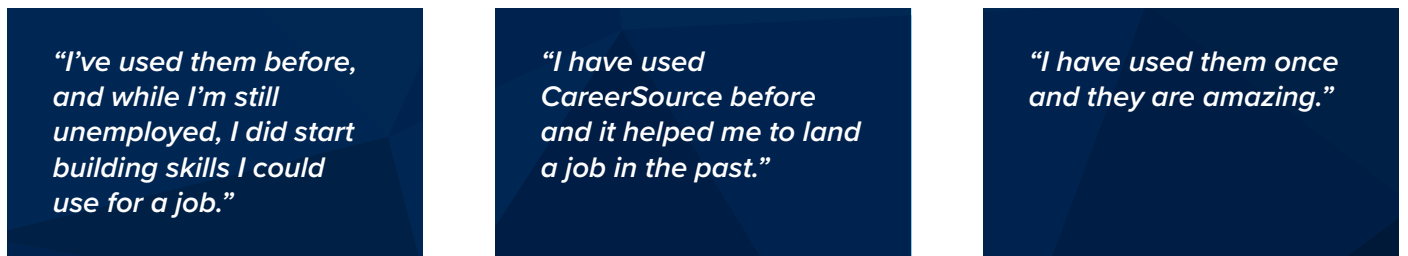
KNOWLEDGE AND USE OF THE NETWORK

When beginning a job search, young adults report using the following sources:



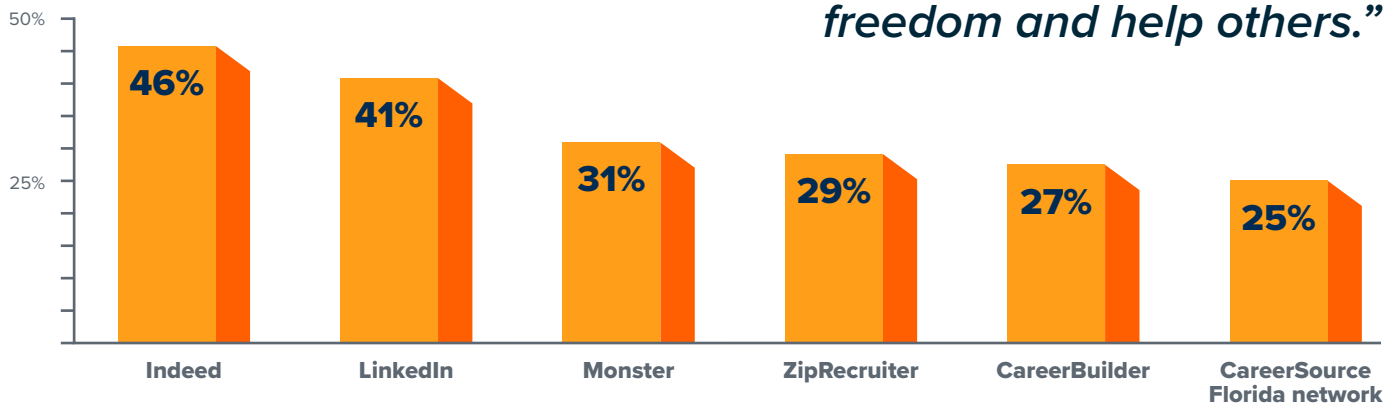
Other popular ways young adults find out about job opportunities include word of mouth, employer's website, employer's place of business (inquired in person), social media post / ad from employer and school or college website.

Half of the respondents had heard of the CareerSource Florida network when prompted with the name. Of those who have used the network, their experience was overwhelmingly positive.



EMPLOYER NEEDS

Top hiring sources for employers include:



"I hope to have a career that allows me to have financial freedom and help others."

92% of employers who have previously used the CareerSource Florida network indicated they would use it again for future hiring needs.

Employers noted some perceived challenges when hiring young adults, including:



Information Items



Speakers' Bios

Adrienne Johnston



Adrienne Johnston is director of the Florida Department of Economic Opportunity's Division of Workforce Services. Ms. Johnston previously served as chief of the Bureau of Workforce Statistics and Economic Research where her extensive experience in labor market information allowed her to lead the Bureau of Workforce Statistics and Economic Research team to deliver quality data analysis, informative data visualizations and applied research to better serve the agency and stakeholders across the state.

Prior to joining DEO, she served as project manager for Evergreen Solutions where she analyzed local labor markets and developed custom compensation and benefits plans for community colleges and local government organizations. Ms. Johnston has a master's degree in applied economics from Florida State University.

John Page



John Page is an innovative marketing research professional with 20 years of experience in leading research and consulting with executive leadership teams. Prior to joining Integrated Insight, at which he is the vice president of research services, Mr. Page was the senior manager of business and consumer insights at Cracker Barrel Old Country Store, responsible for strategic insights in support of the company's marketing, operations and finance teams. Prior to that, Mr. Page was manager of consumer insight at Walt Disney Parks and Resorts.

He has a bachelor's degree in business marketing from Winthrop University and a master's degree in marketing research from the University of Georgia.

Casey Penn



Casey Penn is the bureau chief for One Stop and Program Support for the Florida Department of Economic Opportunity. After working in the private sector for more than a decade, Mr. Penn joined DEO as the administrator of policy and quality assurance for workforce programs in 2018.

He returned to DEO after a short tenure at the Florida Department of Children and Families. In his current role, Mr. Penn leads a talented team tasked with providing oversight and support to the state's 24 local workforce development boards in the delivery of workforce programs.



Continuous Improvement Performance Initiative: Fiscal Year 2020-2021 Quarterly Performance Report

May 2021 Update

INTRODUCTION

The CareerSource Florida Board of Directors authorized the development and implementation of the [Continuous Improvement Performance Initiative](#) in fiscal year 2019-2020. In that first year, the board allocated \$5 million from state set-aside funds to recognize local workforce development board performance on board-approved, mission-critical metrics. In fiscal year 2020-2021, the board allocated another \$5 million to recognize the performance of the local workforce development boards based on these metrics.

The initiative includes three metrics with additional credit for serving individuals with barriers to employment and for providing staff-assisted, high-value services to business establishments in up to five industry sectors pre-selected by each local workforce development board. The operational definitions of the three metrics are:

- **Employment Rate First Quarter After Exit:** The percentage of Workforce Innovation and Opportunity Act and Wagner-Peyser Act participants who exited the system and had certified wages the first quarter after exit.
- **Participant Training Rate:** The percentage of Workforce Innovation and Opportunity Act participants who received training services.
- **Business Penetration:** The number of business establishments provided a staff-assisted, high-value service by a local workforce development board.

Local workforce development board performance is measured on a quarterly basis. The year-to-date performance for fiscal year 2020-2021 is provided on the pages that follow. Award payments for performance during this fiscal year will continue until February 2022 due to the availability of certified wage data by the state Department of Revenue, which is needed for the employment metric.

Local workforce development boards have received a total of \$1,696,658 (34% of the total amount available) in performance awards for fiscal year 2020-2021. This total represents awards for performance in the employment metric during the first quarter of the fiscal year and in the training and business metrics during the first three quarters of the fiscal year.

QUARTER 1 (July – September 2020)

PERFORMANCE RESULTS SUMMARY

Metric	Performance Targets Met*		Quarterly Performance Awards		Participants	Barriers to Employment	Businesses Served (worksites)	Services to Targeted Industries
	# of LWDB	%	Available	Awarded	Total	Total	Total	Total
Employment Rate 1 st Qtr After Exit**	12	50%	\$416,655	\$163,469	14,497	17,534		
Participant Training Rate***	12	50%	\$416,655	\$239,630	8,871	12,621		
Business Penetration***	19	79%	\$416,655	\$324,532			11,787	10,626
YTD Quarterly Total			\$1,249,965	\$727,631				

* All quarterly performance targets are based on 10% improvement compared to the same quarter in the previous year.

** Due to the lag in certified wage data from the Department of Revenue, Quarter 1 performance data for the employment metric were finalized in May 2021.

*** Quarter 1 performance data for the training and business metrics were finalized in November 2020.

PERFORMANCE HIGHLIGHTS

The top five barriers to employment identified in the Employment Rate First Quarter After Exit metric during Quarter 1 were: Reemployment Assistance claimants (5,790), older individuals age 55+ (2,800), low-income individuals (2,093), long-term unemployed (1,519) and individuals with disabilities (1,322).

The top five barriers to employment identified in the Participant Training Rate metric during Quarter 1 were: low income (6,638), single parents including single pregnant women (1,337), Reemployment Assistance claimants (1,185), long-term unemployed (867) and ex-offenders (647).

The top five staff-assisted, high-value services provided to business establishments in board-selected targeted industries were: job orders (2,814), candidate pre-screening (1,630), veteran services (1,393), human resource services (1,093) and detailed labor market study (904).

QUARTER 2 (October – December 2020)

PERFORMANCE RESULTS SUMMARY

Metric	Performance Targets Met *		Quarterly Performance Awards		Participants	Barriers to Employment	Businesses Served (worksites)	Services to Targeted Industries
	# of LWDB	%	Available	Awarded	Total	Total	Total	Total
Employment Rate 1 st Qtr After Exit**	-	-	-	-	-	-		
Participant Training Rate***	12	50%	\$416,655	\$247,983	8,922	12,737		
Business Penetration***	16	67%	\$416,655	\$240,374			9,885	9,566
Quarterly Total			\$833,310	\$488,357				

* All quarterly performance targets are based on 10% improvement compared to the same quarter in the previous year.

** Due to the lag in certified wage data from the Department of Revenue, Quarter 2 performance data for the employment metric are scheduled to be finalized in August 2021.

*** Quarter 2 performance data for the training and business metrics were finalized in March 2021.

PERFORMANCE HIGHLIGHTS

The top five barriers to employment identified in the Participant Training Rate metric during Quarter 2 were: low income (6,660), Reemployment Assistance claimants (1,303), single parents including single pregnant women (1,249), long-term unemployed (911) and ex-offenders (677).

The top five staff-assisted, high-value services provided to business establishments in up to five targeted industries during Quarter 2 were: job orders (2,509), veteran services (1,406), human resource services (1,064), candidate prescreening (855) and detailed labor market study (714).

QUARTER 3 (January – March 2021)

PERFORMANCE RESULTS SUMMARY

Metric	Performance Targets Met*		Quarterly Performance Awards		Participants	Barriers to Employment	Businesses Served (worksites)	Services to Targeted Industries
	# of LWDB	%	Available	Awarded	Total	Total	Total	Total
Employment Rate 1 st Qtr After Exit**	-	-	-	-	-	-		
Participant Training Rate***	13	54%	\$416,655	\$196,867	8,523	12,236		
Business Penetration***	19	79%	\$416,655	\$283,803			10,538	11,337
Quarterly Total			\$833,310	\$480,670				

* All quarterly performance targets are based on 10% improvement compared to the same quarter in the previous year.

** Due to the lag in certified wage data from the Department of Revenue, Quarter 3 performance data for the employment metric are scheduled to be finalized in November 2021.

*** Quarter 3 performance data for the training and business metrics were finalized in May 2021.

PERFORMANCE HIGHLIGHTS

The top five barriers to employment identified in the Participant Training Rate metric during Quarter 3 were: low income (6,390), Reemployment Assistance claimants (1,271), single parents including single pregnant women (1,144), long-term unemployed (932) and ex-offenders (622).

The top five staff-assisted, high-value services provided to business establishments in up to five targeted industries during Quarter 3 were: job orders (3,016), veteran services (1,639), human resource services (1,483), candidate prescreening (870) and employer outreach visits for veterans or migrant seasonal farm workers (842).

Workforce Innovation and Opportunity Act (WIOA) Primary Indicators of Performance

Performance Period Ending March 31, 2021



The federal Workforce Innovation and Opportunity Act (WIOA) establishes performance accountability measures, known as Primary Indicators of Performance, to assess the effectiveness of states and local workforce development boards in achieving positive outcomes for individuals served by the workforce development system. The US Department of Labor oversees the performance accountability requirements of WIOA on a program year basis (from July to June), which coincides with the state's fiscal year.

In the third quarter (January – March 2021) of Program Year 2020-2021, Florida's workforce development system met or exceeded 100% of the statewide negotiated targets for all WIOA Primary Indicators of Performance. Indicators are considered met when they achieve at least 90% of negotiated levels of performance.

Innovative and responsive workforce services and programs contributed to sustained statewide performance in the third quarter. Because of lagged data, the cohorts captured for the third quarter reporting period received services and placements prior to the full outbreak of the COVID-19 pandemic.

Performance on the WIOA Primary Indicators of Performance is reported to the US Department of Labor on a quarterly basis. This most recent report includes Florida statewide performance trends from PY 2011-2012* through the third quarter of PY 2020-2021. The PY 2020-2021 third quarter performance is a rolling one-year calculation representing four quarters of the most recent performance data available through March 31, 2021. The tables in this report show actual performance in relation to performance targets negotiated with USDOL for PY 2020-2021.

For additional information, please visit the Indicators of Performance Reports section on the Department of Economic Opportunity website at: [Indicators of Performance Reports](#). If you have questions about this report, please contact Charles Williams, Bureau of One-Stop and Program Support at the Department of Economic Opportunity, at (850) 245-7424.

* State performance on WIOA Primary Indicators of Performance prior to PY 2015-2016 was simulated using participant data from the Workforce Investment Act.

Populations Served

The following populations are served through the workforce development programs measured within the Primary Indicators of Performance:

WIOA Adult: Individuals who are 18 or older in need of job search assistance and training opportunities, with priority given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient.

WIOA Dislocated Workers: Individuals who are 18 or older and have lost their jobs through no fault of their own as a result of job loss, mass layoffs, global trade dynamics, or transitions in economic sectors.

WIOA Youth: Individuals who are 14 to 24 years old and face barriers to education, training and employment.

Wagner-Peyser: Individuals who are 18 or older, are authorized to work in the U.S. and are in need of job search assistance.

Employment Indicators

Employment 2nd Quarter After Exit (WIOA Adult, WIOA Dislocated Workers, Wagner-Peyser): This indicator captures the percentage of participants who are in unsubsidized employment during the 2nd quarter after exiting the program.

Youth Education and Employment 2nd Quarter After Exit (WIOA Youth): This indicator captures the percentage of participants in education or training activities, or in unsubsidized employment during the 2nd quarter after exiting the program.

Employment 4th Quarter After Exit (WIOA Adult, WIOA Dislocated Workers, Wagner-Peyser): This indicator captures the percentage of participants who are in unsubsidized employment during the 4th quarter after exit from the program.

Youth Education and Employment 4th Quarter After Exit (WIOA Youth): This indicator captures the percentage of participants in education or training activities, or in unsubsidized employment during the 4th quarter after exiting the program.

Median Earnings 2nd Quarter After Exit (WIOA Adult, WIOA Dislocated Worker, Wagner-Peyser, WIOA Youth): This indicator captures participants' median (middle value) quarterly earnings in the 2nd quarter after exiting the program.

Education/Training Indicators

Credential Attainment (WIOA Adult, WIOA Dislocated Worker, WIOA Youth): This indicator captures the percentage of those participants enrolled in an education or training program (excluding those in On-the-Job Training or customized training) who attain a recognized postsecondary credential or a secondary education diploma, or its recognized equivalent, during participation in or within one year after exiting the program.

Measurable Skill Gains (WIOA Adult, WIOA Dislocated Worker, WIOA Youth): This indicator captures the percentage of participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving documented academic, technical, occupational, or other forms of progress, toward such a credential or employment.

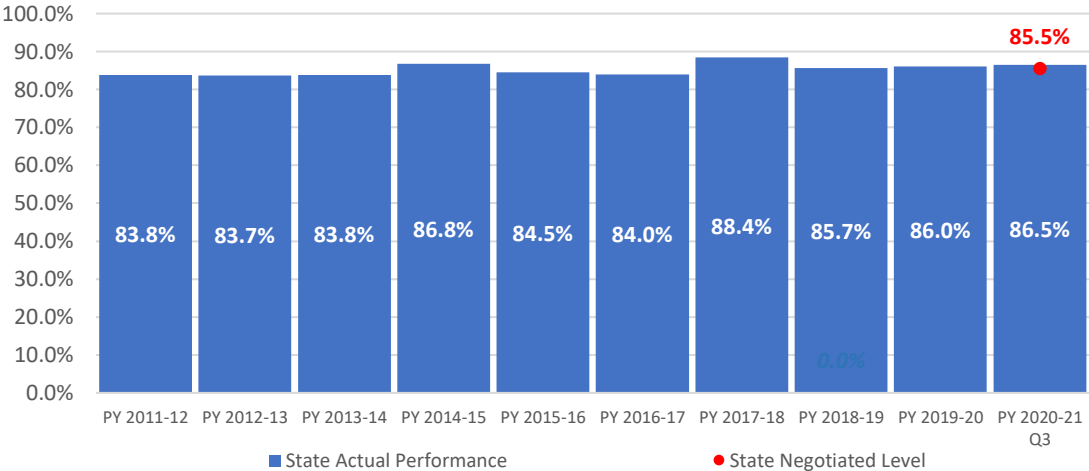
The Measurable Skill Gains indicator is used to measure interim progress of participants who are enrolled in education or training services for a specified reporting period. Therefore, it is not an exit-based measure. Instead, it is intended to capture important progressions through pathways that offer different services based on program purposes and participant needs and can help fulfill the vision for a workforce system that serves a diverse set of individuals with a range of services tailored to individual needs and goals.

WIOA Category:

Adult

WIOA Metric:

Employment Rate (2nd Qtr after exit)

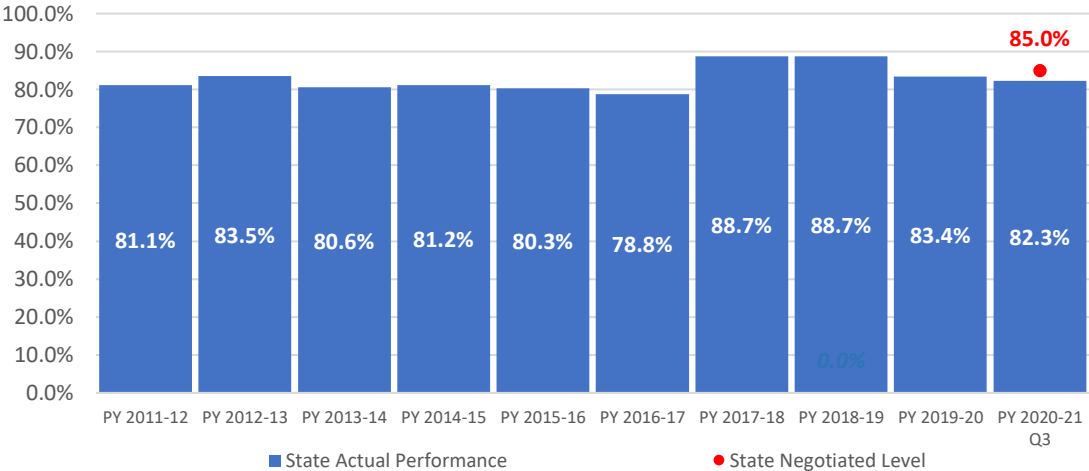


Program Year (PY)	Actual Performance	Participants (n)
PY 2011-12	83.8%	14,791
PY 2012-13	83.7%	12,741
PY 2013-14	83.8%	14,391
PY 2014-15	86.8%	13,900
PY 2015-16	84.5%	15,387
PY 2016-17	84.0%	15,214
PY 2017-18	88.4%	13,592
PY 2018-19	85.7%	9,859
PY 2019-20	86.0%	8,978
PY 2020-21 Q3	86.5%	8,096

WIOA Category:

WIOA Metric:

Dislocated Worker
Employment Rate (2nd Qtr after exit)

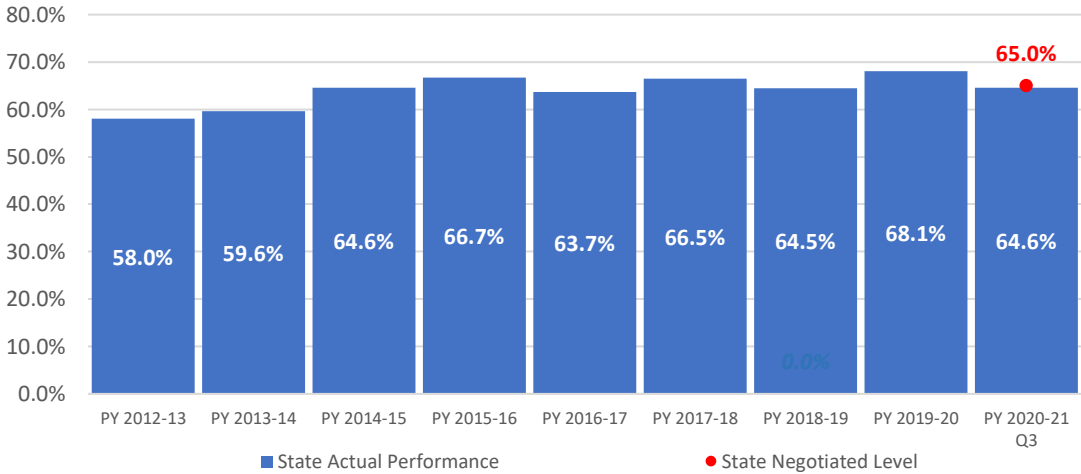


Program Year (PY)	Actual Performance	Participants (n)
PY 2011-12	81.1%	8,166
PY 2012-13	83.5%	8,077
PY 2013-14	80.6%	7,393
PY 2014-15	81.2%	6,442
PY 2015-16	80.3%	5,732
PY 2016-17	78.8%	4,777
PY 2017-18	88.7%	3,227
PY 2018-19	88.7%	2,655
PY 2019-20	83.4%	1,955
PY 2020-21 Q3	82.3%	1,495

WIOA Category:

WIOA Metric:

Wagner-Peyser
Employment Rate (2nd Qtr after exit)



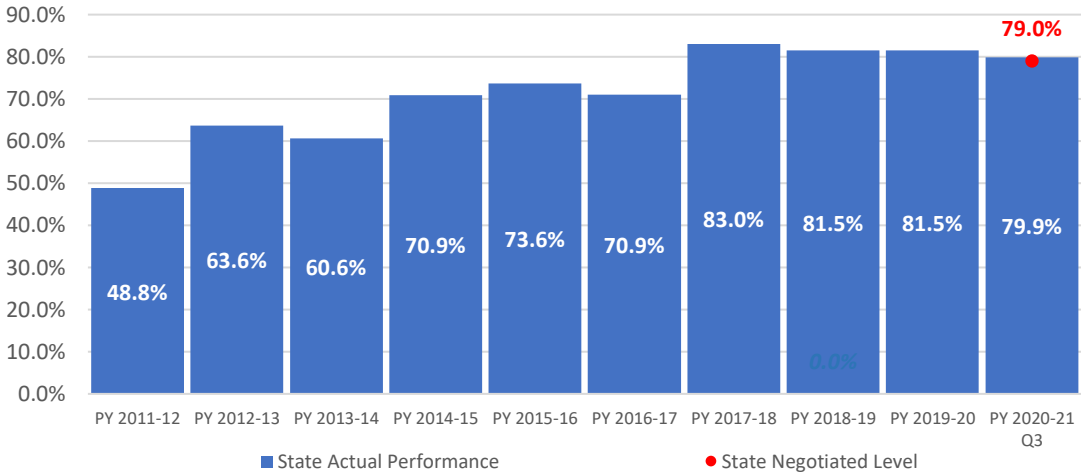
Program Year (PY)	Actual Performance	Participants (n)
PY 2012-13	58.0%	622,978
PY 2013-14	59.6%	702,411
PY 2014-15	64.6%	633,791
PY 2015-16	66.7%	593,729
PY 2016-17	63.7%	556,757
PY 2017-18	66.5%	480,444
PY 2018-19	64.5%	318,974
PY 2019-20	68.1%	204,725
PY 2020-21 Q3	64.6%	168,339

WIOA Category:

Youth

WIOA Metric:

Employment Rate (2nd Qtr after exit)



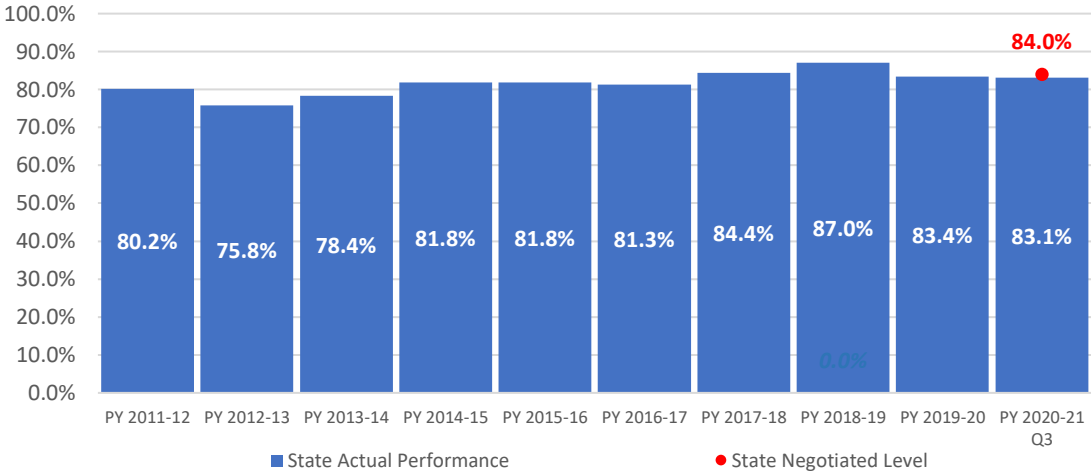
Program Year (PY)	Actual Performance	Participants (n)
PY 2011-12	48.8%	5,455
PY 2012-13	63.6%	4,931
PY 2013-14	60.6%	5,896
PY 2014-15	70.9%	4,881
PY 2015-16	73.6%	6,688
PY 2016-17	70.9%	6,571
PY 2017-18	83.0%	3,871
PY 2018-19	81.5%	4,544
PY 2019-20	81.5%	3,508
PY 2020-21 Q3	79.9%	3,220

WIOA Category:

Adult

WIOA Metric:

Employment Rate (4th Qtr after exit)

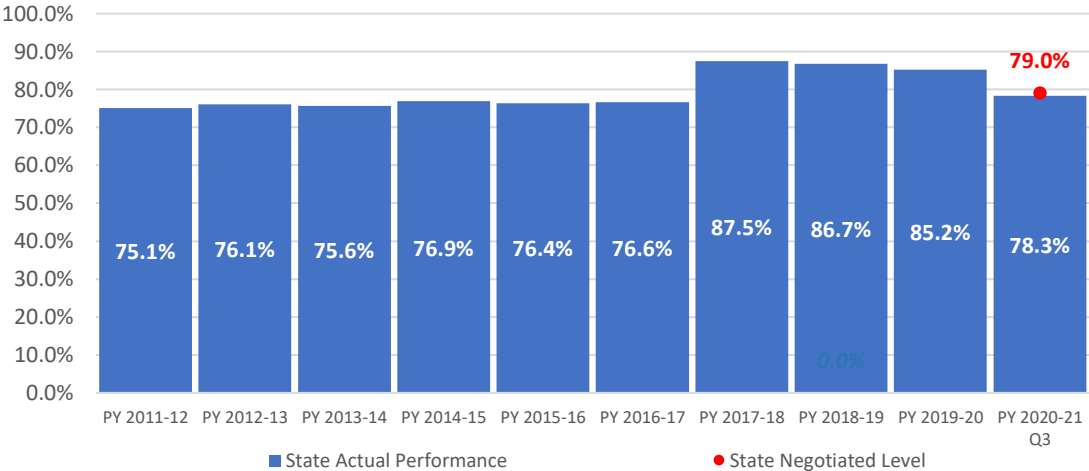


Program Year (PY)	Actual Performance	Participants (n)
PY 2011-12	80.2%	16,571
PY 2012-13	75.8%	13,802
PY 2013-14	78.4%	13,422
PY 2014-15	81.8%	14,364
PY 2015-16	81.8%	13,920
PY 2016-17	81.3%	15,630
PY 2017-18	84.4%	6,361
PY 2018-19	87.0%	11,544
PY 2019-20	83.4%	9,643
PY 2020-21 Q3	83.1%	9,036

WIOA Category:

WIOA Metric:

Dislocated Worker
Employment Rate (4th Qtr after exit)

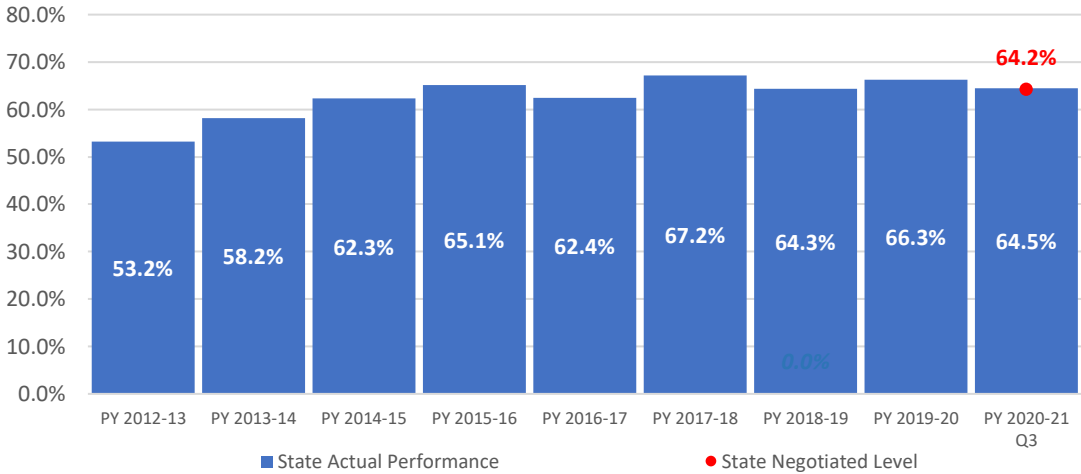


Program Year (PY)	Actual Performance	Participants (n)
PY 2011-12	75.1%	6,704
PY 2012-13	76.1%	8,878
PY 2013-14	75.6%	7,620
PY 2014-15	76.9%	6,883
PY 2015-16	76.4%	6,015
PY 2016-17	76.6%	5,262
PY 2017-18	87.5%	1,572
PY 2018-19	86.7%	3,088
PY 2019-20	85.2%	2,147
PY 2020-21 Q3	78.3%	1,781

WIOA Category:

WIOA Metric:

Wagner-Peyser
Employment Rate (4th Qtr after exit)



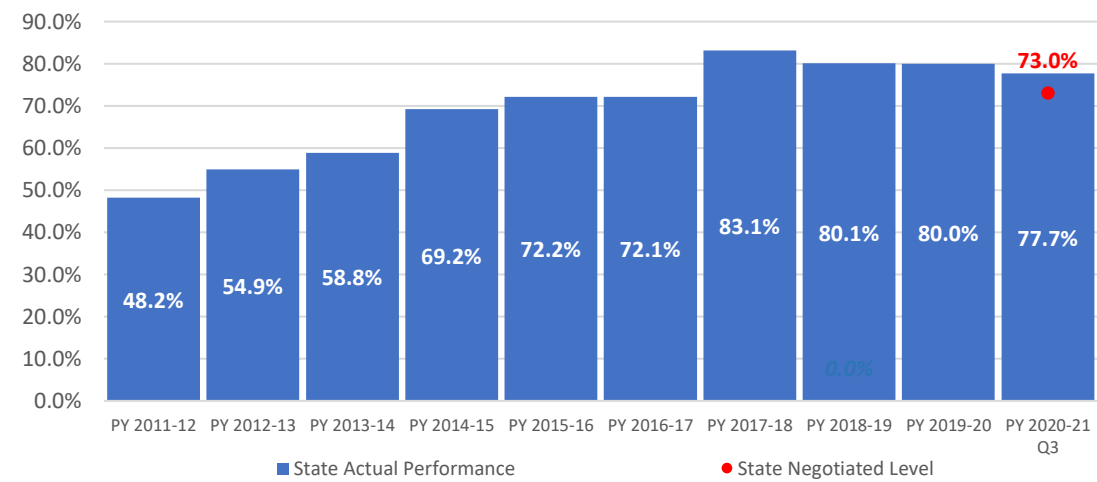
Program Year (PY)	Actual Performance	Participants (n)
PY 2012-13	53.2%	595,192
PY 2013-14	58.2%	695,674
PY 2014-15	62.3%	671,551
PY 2015-16	65.1%	598,928
PY 2016-17	62.4%	556,282
PY 2017-18	67.2%	230,646
PY 2018-19	64.3%	433,900
PY 2019-20	66.3%	247,442
PY 2020-21 Q3	64.5%	190,687

WIOA Category:

Youth

WIOA Metric:

Employment Rate (4th Qtr after exit)



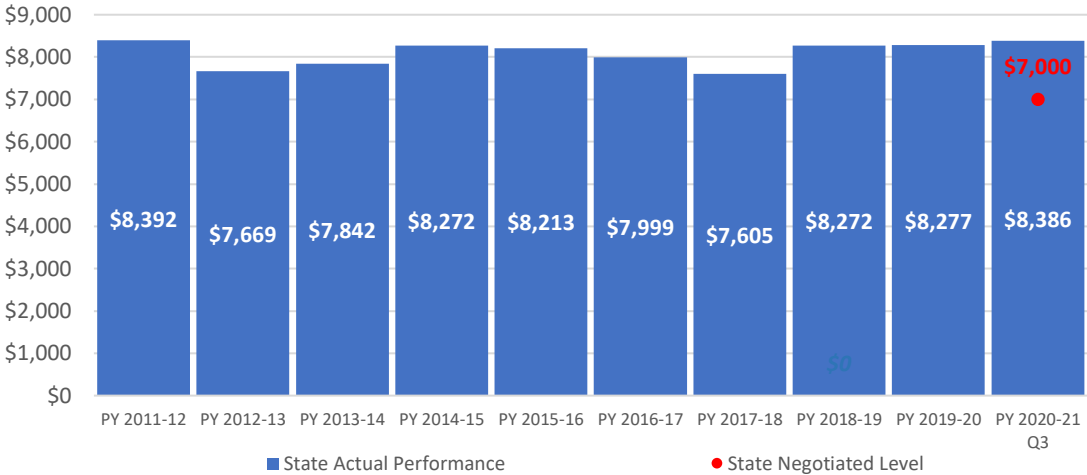
Program Year (PY)	Actual Performance	Participants (n)
PY 2011-12	48.2%	5,359
PY 2012-13	54.9%	4,908
PY 2013-14	58.8%	5,729
PY 2014-15	69.2%	5,245
PY 2015-16	72.2%	5,156
PY 2016-17	72.1%	6,709
PY 2017-18	83.1%	1,847
PY 2018-19	80.1%	4,250
PY 2019-20	80.0%	3,997
PY 2020-21 Q3	77.7%	3,368

WIOA Category:

Adult

WIOA Metric:

Median Earnings (2nd Qtr after exit)

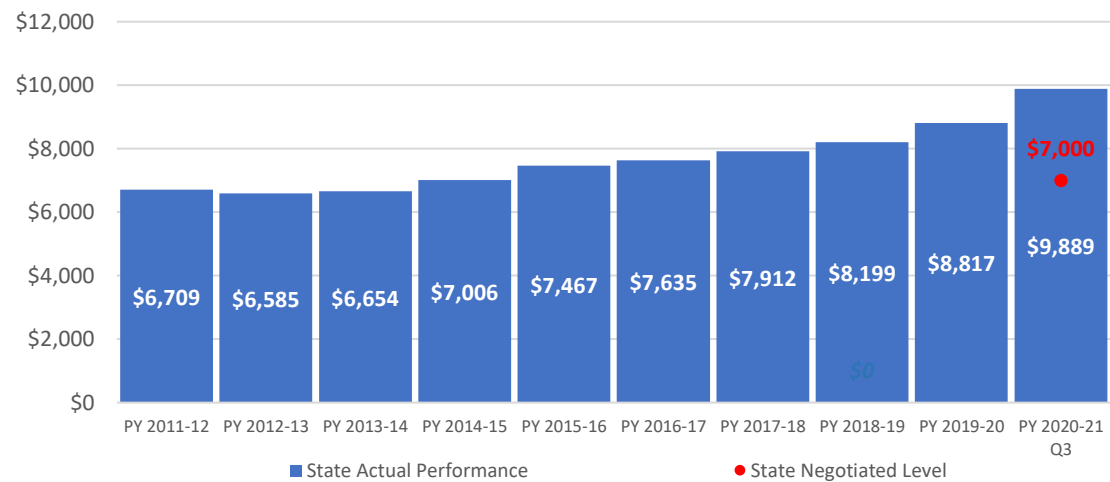


Program Year (PY)	Actual Performance	Participants (n)
PY 2011-12	\$8,392	12,132
PY 2012-13	\$7,669	10,028
PY 2013-14	\$7,842	11,633
PY 2014-15	\$8,272	11,664
PY 2015-16	\$8,213	12,541
PY 2016-17	\$7,999	8,385
PY 2017-18	\$7,605	12,065
PY 2018-19	\$8,272	8,453
PY 2019-20	\$8,277	8,978
PY 2020-21 Q3	\$8,386	8,096

WIOA Category:

WIOA Metric:

Dislocated Worker
Median Earnings (2nd Qtr after exit)

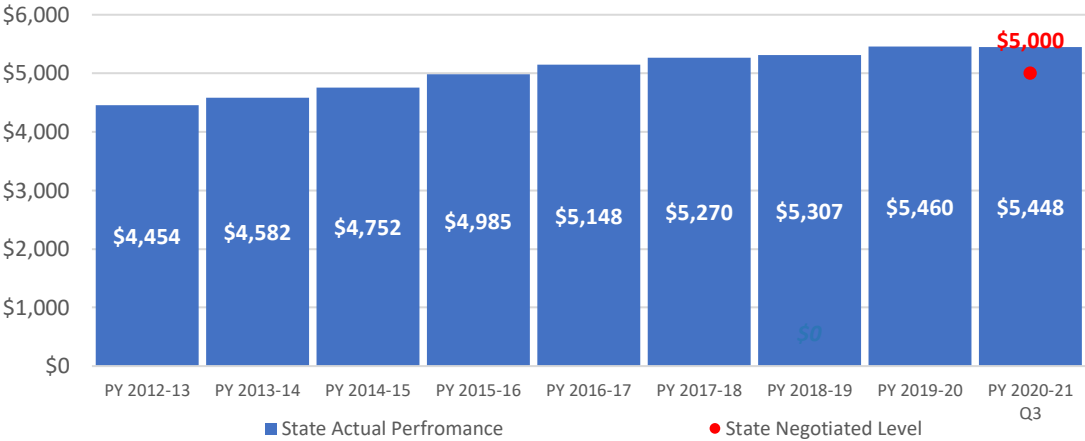


Program Year (PY)	Actual Performance	Participants (n)
PY 2011-12	\$6,709	6,408
PY 2012-13	\$6,585	6,496
PY 2013-14	\$6,654	5,674
PY 2014-15	\$7,006	4,965
PY 2015-16	\$7,467	4,401
PY 2016-17	\$7,635	2,348
PY 2017-18	\$7,912	2,861
PY 2018-19	\$8,199	2,354
PY 2019-20	\$8,817	1,955
PY 2020-21 Q3	\$9,889	1,495

WIOA Category:

WIOA Metric:

Wagner-Peyser
Median Earnings (2nd Qtr after exit)

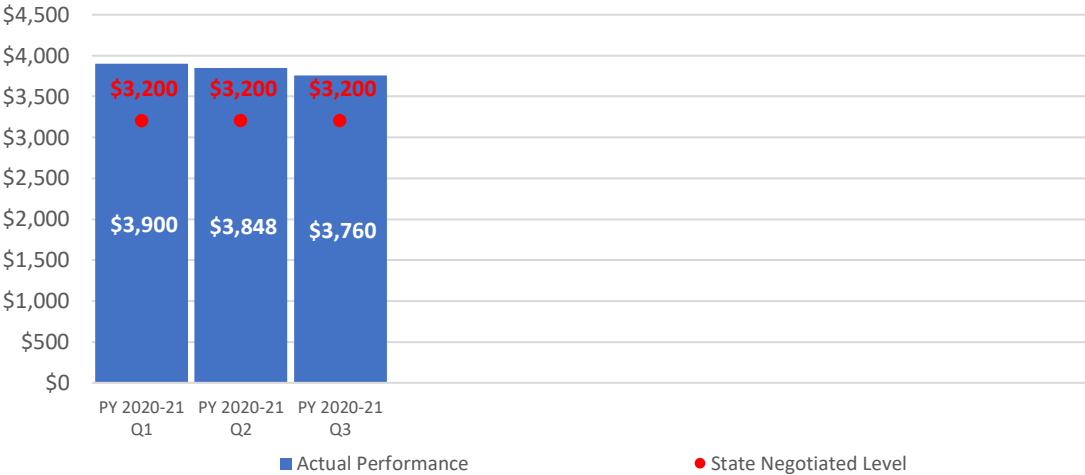


Program Year (PY)	Actual Performance	Participants (n)
PY 2012-13	\$4,454	337,075
PY 2013-14	\$4,582	418,960
PY 2014-15	\$4,752	409,628
PY 2015-16	\$4,985	396,175
PY 2016-17	\$5,148	363,830
PY 2017-18	\$5,270	319,675
PY 2018-19	\$5,307	210,397
PY 2019-20	\$5,460	204,725
PY 2020-21 Q3	\$5,448	168,339

WIOA Category:

WIOA Metric:

Youth
Median Earnings (2nd Qtr after exit)



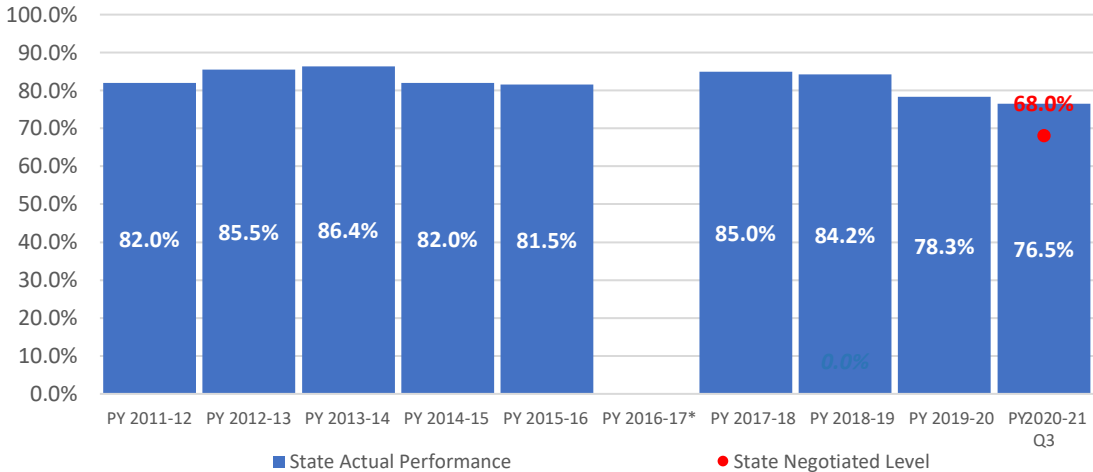
Program Year (PY)	Actual Performance	Participants (n)
PY 2020-21 Q1	\$3,900	2,738
PY 2020-21 Q2	\$3,848	2,769
PY 2020-21 Q3	\$3,760	2,574

Note: PY 2020-21 Q1 is the first reported quarter for this measure.

WIOA Category:

Adult
Credential Attainment Rate

WIOA Metric:



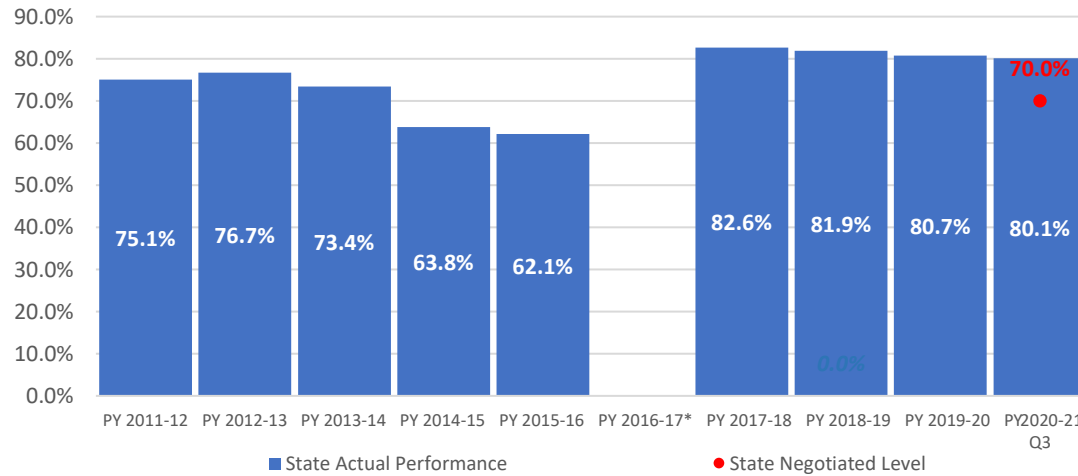
Program Year (PY)	Actual Performance	Participants (n)
PY 2011-12	82.0%	10,525
PY 2012-13	85.5%	9,012
PY 2013-14	86.4%	10,912
PY 2014-15	82.0%	11,437
PY 2015-16	81.5%	12,054
PY 2016-17	*	*
PY 2017-18	85.0%	2,325
PY 2018-19	84.2%	4,945
PY 2019-20	78.3%	4,857
PY 2020-21 Q3	76.5%	5,353

* PY 2016-17 WIOA Credential Attainment Rate baseline data collection period. Target not set and performance not reported due to Workforce Investment Act (WIA) reporting requirements ending June 30, 2016.

WIOA Category:

WIOA Metric:

Dislocated Worker Credential Attainment Rate



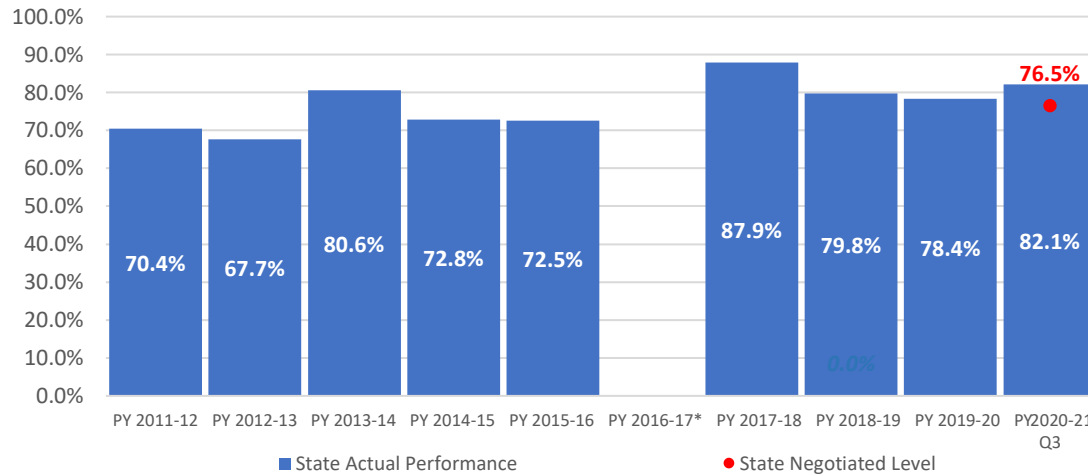
Program Year (PY)	Actual Performance	Participants (n)
PY 2011-12	75.1%	6,595
PY 2012-13	76.7%	5,667
PY 2013-14	73.4%	5,879
PY 2014-15	63.8%	4,932
PY 2015-16	62.1%	3,983
PY 2016-17	*	*
PY 2017-18	82.6%	625
PY 2018-19	81.9%	1,319
PY 2019-20	80.7%	1,081
PY 2020-21 Q3	80.1%	1,113

* PY 2016-17 WIOA Credential Attainment Rate baseline data collection period. Target not set and performance not reported due to Workforce Investment Act (WIA) reporting requirements ending June 30, 2016.

WIOA Category:

WIOA Metric:

Youth Credential Attainment Rate



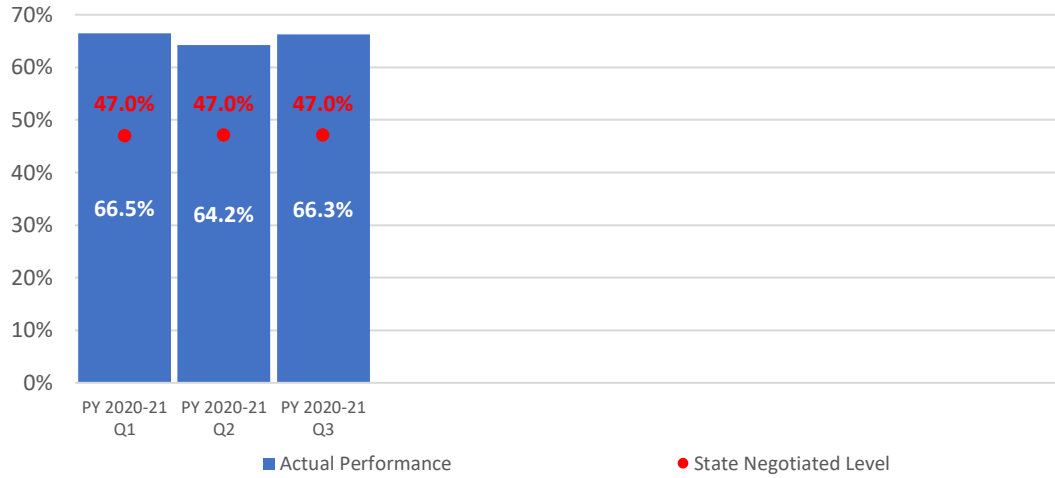
Program Year (PY)	Actual Performance	Participants (n)
PY 2011-12	70.4%	5,205
PY 2012-13	67.7%	4,595
PY 2013-14	80.6%	5,271
PY 2014-15	72.8%	4,398
PY 2015-16	72.5%	6,345
PY 2016-17	*	*
PY 2017-18	87.9%	1,695
PY 2018-19	79.8%	3,581
PY 2019-20	78.4%	3,580
PY 2020-21 Q3	82.1%	3,084

* PY 2016-17 WIOA Credential Attainment Rate baseline data collection period. Target not set and performance not reported due to Workforce Investment Act (WIA) reporting requirements ending June 30, 2016.

WIOA Category:

WIOA Metric:

Adult Measurable Skills Gain



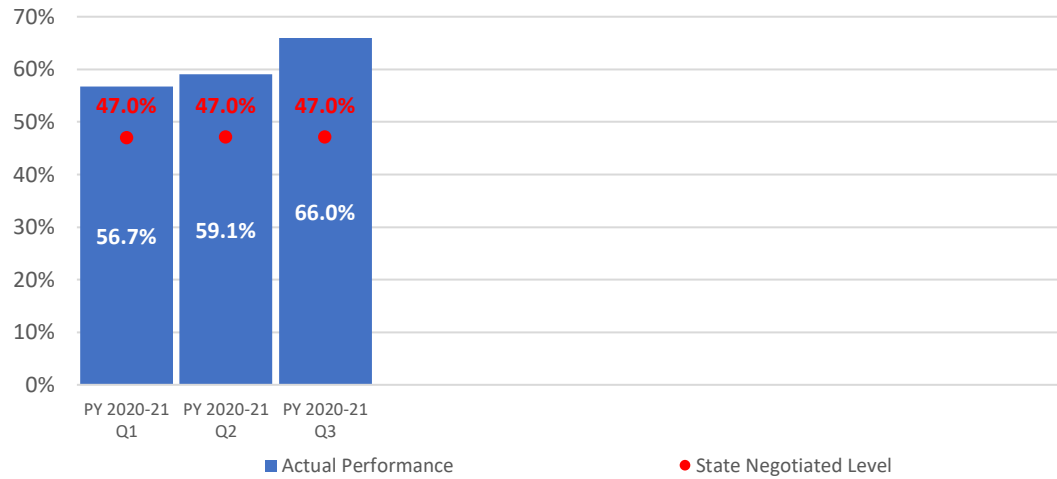
Program Year (PY)	Actual Performance	Participants (n)
PY 2020-21 Q1	66.5%	9,311
PY 2020-21 Q2	64.2%	8,444
PY 2020-21 Q3	66.3%	7,918

Note: PY 2020-21 Q1 is the first reported quarter for this measure.

WIOA Category:

Dislocated Worker Measurable Skills Gain

WIOA Metric:



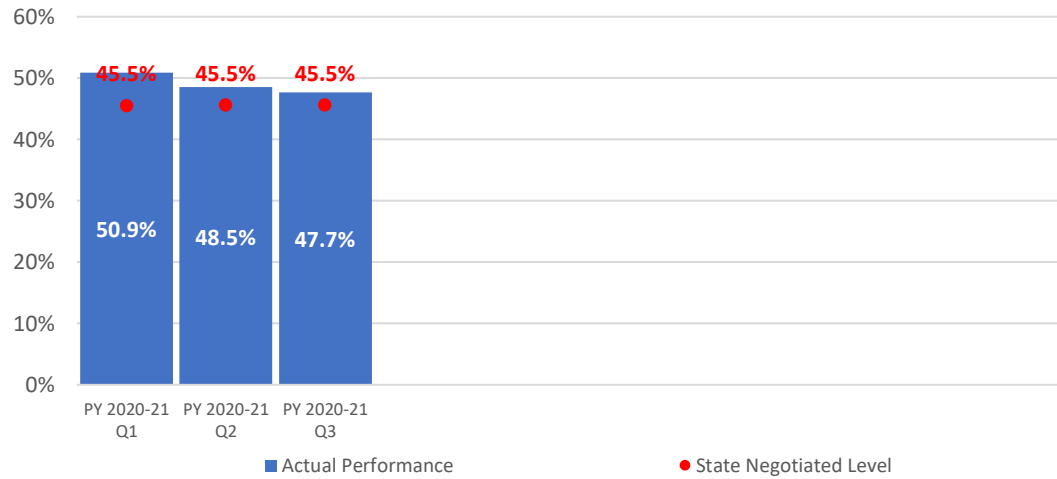
Program Year (PY)	Actual Performance	Participants (n)
PY 2020-21 Q1	56.7%	1,883
PY 2020-21 Q2	59.1%	1,889
PY 2020-21 Q3	66.0%	2,030

Note: PY 2020-21 Q1 is the first reported quarter for this measure.

WIOA Category:

WIOA Metric:

Youth Measurable Skills Gain



Program Year (PY)	Actual Performance	Participants (n)
PY 2020-21 Q1	50.9%	7,994
PY 2020-21 Q2	48.5%	7,805
PY 2020-21 Q3	47.7%	7,665

Note: PY 2020-21 Q1 is the first reported quarter for this measure.