

Joint Strategic Policy and Performance and Finance Council Meeting Agenda

AUGUST 20, 2025 • 10:00 A.M. – 12:00 P.M., ET
WORLD EQUESTRIAN CENTER OCALA
MEETING ROOM: EXPO CENTER 1

Chair's Welcome and Remarks

Sophia Eccleston

Finance Council Consent Item

1. May 20, 2025, Finance Council Meeting Minutes

Strategic Policy and Performance Council Consent Agenda

1. May 20, 2025, Strategic Policy and Performance Council Meeting Minutes
2. Recommendation to Sunset 4 Workforce Policies and Guidance Documents
 - Workforce Policy 30 – Supplemental Funding for Dislocated Worker Services
 - Workforce Policy 4 – Professional or Other Organizational Membership Dues-Procedures
 - Workforce Policy 113 – Disaster Recovery Dislocated Worker Grants Program Administration
 - Final Guidance 00-017 – Procedures for the Closure of the One-Stop Delivery System Centers Due to Natural Disasters or Other Emergency Conditions

Action Items

Victoria Gaitanis

1. Sunset Workforce Policy O106 - Memorandums of Understanding and Infrastructure Funding Agreements
2. Revisions to Workforce Policy P9 - Availability of Services to Floridians
3. Revisions to Workforce Policy O15 -Emergency Response and Disaster Recovery
4. Revisions to Workforce Policy O122 - WIOA Adult and Dislocated Worker Program Eligibility
5. SNAP E&T Program Components and Case Management (New)

Financial Operations Update

Dana Davis

Training Grants Update

Malissa Counts

Workforce Program Development Initiatives Update

- Master Credentials List & Credential Inventory Database
- 2024-25 State-level 15% Set-aside Funding Initiatives

Liz Glenn
Erin Sampson

LWDB Performance Accountability

Daniel Harper
Workforce Program Research & Analysis Manager
FloridaCommerce
Mark Baird
Deputy Director, REACH Office

Monitoring Findings Update

Victoria Gaitanis
Karmyn Hill
Bureau Chief, One-Stop and Program Support
FloridaCommerce

Open Discussion/Public Comment**Chair's Closing Remarks**

Sophia Eccleston

Consent Item 1

Approved _____
Disapproved _____

Consent Item 1

May 20, 2025, FINANCE COUNCIL MEETING MINUTES

In accordance with Article VII, Section 7.3 of the approved bylaws, the corporation is required to keep correct and complete books and records of accounts and shall keep minutes on the proceedings of the board of directors.

FOR CONSIDERATION

- **Approval of May 20, 2025, Finance Council Meeting Minutes, to include any modifications or changes noted by the council.**

**CareerSource Florida
Finance Council Meeting Minutes
May 20, 2025**

I. Call to Order

Chair Kevin McDonald called the Finance Council meeting to order at 1:30 p.m. on May 20, 2025.

II. Roll Call

Chair McDonald introduced CareerSource Florida Board Relations Director Madison Frazee and invited her to conduct a roll call. The following members were present:

Kevin McDonald
John Adams
Jennifer O’Flannery Anderson
Robert Salonen
Les Sims
Meredith Standfield

A quorum was present.

III. Chief Financial Officer Introduction and Welcome

Chief Financial Officer Dana Davis introduced herself to the council as the newly hired CareerSource Florida CFO, telling the council about her background and noting she is grateful to be a part of the CareerSource Florida team.

IV. Consent Item

1. Approval of February 19, 2025, Joint Council Meeting Minutes, to include any modifications or changes noted by the council.

Chair McDonald called for a vote to approve the consent agenda.

Motion: Les Sims

Second: Robert Salonen

The consent item passed unanimously. There were no comments from the public.

V. CareerSource Florida Financial Operations Update

Chief Financial Officer Dana Davis provided an update on CareerSource Florida’s projected operational expenditures and budgets for fiscal year 2024-2025. She went over major funding sources including WIOA, TANF, Wagner-Peyser Act, and Quick Response Training.

VI. Action Item

1. Approval to establish the Program Year 2025 WIOA state-level projects.

2. Approval of the allocation methodology as proposed for the distribution of TANF funding for Fiscal Year 2025/26.

3. Approval of the Program Year 2025 Wagner-Peyser 7(b) state-level activities.

Chair McDonald called for a vote to approve the action item.

Motion: Les Sims

Second: Robert Salonen

The action item passed unanimously. There were no comments from the public.

VII. Programmatic Funding Sources Analysis

CareerSource Florida Senior Program Manager Garrick Wright provided an update on system-wide improvements efforts, highlighting the Programmatic Funding Sources Analysis. He went over the five phased approach for the analysis, noting gained insight and recommendations for CareerSource Florida's leadership.

VIII. CareerSource Florida Grants Management Update

CareerSource Florida Grants and Office Services Manager Malissa Counts shared an update on CareerSource Florida's workforce training grants allocation.

The Quick Response Training (QRT) and Incumbent Worker Training (IWT) grant programs assist businesses with training costs to increase business productivity and job retention.

IX. Open Discussion/Public Comment

Chair McDonald asked if any board members or members of the public wished to comment.

There were no public comments.

X. Chair's Closing Remarks

Chair McDonald thanked council members for their time and attention and reminded them of upcoming meetings. He adjourned the meeting at 2:18 p.m.

Additional meeting dialogue is recorded and available online at [this link](#).

Consent Item 1

Approved _____
Disapproved _____

Consent Item 1

May 20, 2025, SPPC MEETING MINUTES

In accordance with Article VII, Section 7.3 of the approved bylaws, the corporation is required to keep correct and complete books and records of accounts and shall keep minutes on the proceedings of the board of directors.

FOR CONSIDERATION

- **Approval of May 20, 2025, Strategic Policy and Performance Council Meeting Minutes, to include any modifications or changes noted by the council.**

**CareerSource Florida
Strategic Policy and Performance Council Meeting Minutes
May 20, 2025**

I. Call to Order

Chair Sophia Eccleston called the Strategic Policy and Performance Council meeting to order at 10:00 a.m. on May 20, 2025.

II. Roll Call

CareerSource Florida Board Relations Director Madison Frazee conducted a roll call. The following members were present:

Sophia Eccleston
Erik Arroyo
Bayne Beecher
Robert Doyle
Casey Penn
Tim Hinson
Laurie Sallarulo
Brian Sartain
Scott Singer

III. Consent Agenda

Chair Eccleston called for a vote to approve the Consent Agenda.

1. February 19, 2025, Joint Council Meeting Minutes

2. Sunset Policies:

- **Statewide Workforce Development Board Policymaking Authority and Delegation**
- **Contract Payment Documentation**
- **Close-out of State Level Contracts/Grants**
- **Accounting, Reporting, and Disposition Requirements for Property**
- **Final Guidance: Prepayment of Costs**
- **Final Guidance: Responsibilities Following Theft of Federal Funds**

Motion: Erik Arroyo

Second: Tim Hinson

The consent agenda passed unanimously. There were no public comments.

IV. Action Items

CareerSource Florida Director of Workforce Program Development Erin Sampson presented five action items for the council's consideration.

1. State Workforce Development Board Roles and Responsibilities Policy

Chair Eccleston called for a vote to approve the action item.

Motion: Robert Doyle

Second: Brian Sartain

The action item passed unanimously. There were no public comments.

2. Adult and Dislocated Worker Program Design and Framework Policy

Chair Eccleston called for a vote to approve the action item.

Motion: Tim Hinson

Second: Brian Sartain

The action item passed unanimously. There were no public comments.

3. Reemployment Services Eligibility and Assessments Design and Framework Policy

Chair Eccleston called for a vote to approve the action item.

Motion: Erik Arroyo

Second: Robert Doyle

The action item passed unanimously.

CareerSource Palm Beach County COO Steven Gustafson had a public comment, noting he had a point of contention with the policy due to requiring usage of the CLIFF Dashboard. Erik Arroyo and Brian Sartain requested a follow up to ensure no detrimental effects based on the approval of action item 3.

4. On-the-Job Training Policy

Chair Eccleston called for a vote to approve the action item.

Motion: Erik Arroyo

Second: Brian Sartain

The action item passed unanimously. There were no public comments.

5. WIOA Waiver Request

Chair Eccleston called for a vote to approve the action item.

Motion: Scott Singer

Second: Tim Hinson

The action item passed unanimously. There were no public comments.

V. Workforce Initiatives Update

CareerSource Florida Director of Workforce Program Development Liz Glenn gave an update on 2026-2026 Master Credentials List applications as well as the Credential Inventory Database (CID) Update.

CareerSource Florida Program Manager Dehryl McCall provided updates on the 2024-2025 state-level 15% set-aside funding initiatives, including the sector-based training initiative and the Get There Faster Veterans and Military Spouses initiative.

CareerSource Florida Director of Workforce Program Development Erin Sampson wrapped up by providing an update on letter grades, noting what changes have been made to the 2025-2026 scoring system.

VI. WIOA Combined Plan Two-year Modification

CareerSource Florida Director of Workforce Program Development Erin Sampson gave an update on the WIOA Two-year Modification Plan vision and additional plan performance goals by 2030.

CareerSource Florida Policy Development Manager Warren Davis discussed an information collection request and guidance and the timeline for the WIOA Combined Plan Two-year Modification.

VII. Digital Literacy Engagement

CareerSource Florida Senior Program Manager Garrick Wright briefed the board on the Foundational Skills and Digital Literacy project, beginning by providing context and an overview of the initiative. He went on to cover Florida's digital literacy skills and foundational employability skills before going over key findings from the final report and recommendations and next steps.

VIII. Statewide Labor Market & Program Performance Analysis

FloridaCommerce Economic Research and Analysis Administrator Kristy Farina updated the council on most recent program performance.

FloridaCommerce Bureau Chief of Workforce Statistics and Economic Research Jimmy Heckman provided a labor market information update for the state.

IX. Open Discussion/Public Comment

Chair Eccleston thanked the members for their time and participation before asking if any council members or members of the public wished to comment.

There were no public comments.

X. Chair's Closing Remarks

Chair Eccleston thanked the council for their participation, noting their input and perspectives provide valuable information for consideration.

The meeting was adjourned at 11:44 a.m.

Additional meeting dialogue is recorded and available online at [this link](#).

Approved _____
Disapproved _____

Consent Item 2

RECOMMENDATION TO SUNSET FOUR CAREERSOURCE FLORIDA WORKFORCE POLICIES AND TECHNICAL ASSISTANCE LETTERS

The CareerSource Florida Board of Directors serves as the principal workforce policy organization and State Workforce Development Board for the state as described in Chapter 445.004(2), Florida Statutes. The state board establishes and directs the vision for the state workforce system. 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; however federal and state law describes what items the state workforce development board (SWDB) must review, approve, or consider, including workforce development policies.

CareerSource Florida and the Florida Department of Commerce (FloridaCommerce) review policies for their effectiveness and efficiency and recommend the rescission of policies, as necessary. CareerSource Florida and FloridaCommerce reviewed the policies described below.

Workforce Policy 30 – Supplemental Funding for Dislocated Services

This policy was developed in February 2005 to provide guidance to regional workforce boards and other entities operating programs under Title I of the Workforce Investment Act (WIA) of 1998, and the Workforce Innovation Act of 2000. Public Law 113-128, the Workforce Innovation and Opportunity Act (WIOA) was signed into law in 2014 and takes the place of the previous acts of 1998 and 2000. This policy is obsolete, and it should be removed from the CareerSource Florida Policy Portfolio.

Workforce Policy 004 - Professional or Other Organizational Membership Dues

This policy was developed in 1999 to provide guidance to workforce and employment opportunity regional local offices on the use of state funds for the purpose of paying dues for membership in professional and other organizations. Changes to law and subsequent guidance has made this policy obsolete and it should be removed from the CareerSource Florida Policy Portfolio.

Workforce Policy P113 - Disaster-Recovery Dislocated Worker Grants Program Administration

This policy was developed in 2021 and subsequently revised in 2023 to provide local workforce development boards (LWDBs) the minimum requirements for administering Disaster Recovery Dislocated Worker Grants (DWGs). Elements of this policy including key program objectives, measurable performance outcomes, implementation and monitoring information have been incorporated into CareerSource Florida Workforce Policy – Emergency Response and Disaster Recovery. This policy is now obsolete and should be removed from the CareerSource Florida Policy Portfolio.

Workforce Policy 017 – Procedures on One-Stop Closures

This final guidance document was developed in 2000 to establish guidance for the closure of local Agency for Workforce Innovation (now FloridaCommerce), regional workforce boards (now LWDBs), and One-Stop Delivery Centers during natural disasters or other emergency conditions. Elements of this policy are now obsolete, and other elements are incorporated into CareerSource Florida Workforce Policy – Emergency Response and Disaster Recovery. This policy should be removed from the CareerSource Florida Policy Portfolio.

CareerSource Florida and FloridaCommerce thoroughly reviewed these policies and recommend the sunset of these four (4) policies and their removal from the CareerSource Florida Policy Portfolio.

FOR CONSIDERATION

- **Approve sunset of four (4) CareerSource Florida policies and their removal from the CareerSource Florida Policy Portfolio.**

Action Item 1

RECOMMENDATION TO SUNSET CAREERSOURCE FLORIDA ADMINISTRATIVE POLICY 106 – MEMORANDUMS OF UNDERSTANDING AND INFRASTRUCTURE FUNDING AGREEMENTS

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 state board establishes and directs the vision for the state workforce system. 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; however federal and state law describes what items the state workforce development board (SWDB) must review, approve, or consider, including workforce development policies.

CareerSource Florida and the Florida Department of Commerce (FloridaCommerce) reviews policies for their effectiveness and efficiency and recommend the recission of policies, as necessary. CareerSource Florida and FloridaCommerce reviewed the policies described below.

The U.S. Department of Labor developed a uniform policy to ensure fair cost allocation and resource sharing for local career centers, known as the one-stop delivery system. Each partner program that uses these centers must contribute to operating and infrastructure costs based on how much they use the system and the benefits they receive. Local Workforce Development Boards (LWDBs), working with local elected officials, are responsible for creating agreements with required partners that explain how the system will run. These agreements must include a detailed plan, called an Infrastructure Funding Agreement (IFA), outlining how costs will be shared. Workforce Innovation and Opportunity Act (WIOA) Core and Required Partners are expected to negotiate these costs openly and in good faith.

The CareerSource Florida Board of Directors approved [CareerSource Florida Administrative Policy 106 – Memorandums of Understanding and Infrastructure Funding Agreements](#) to provide LWDBs with the requirements and procedures for developing Memorandums of Understanding (MOU) and IFAs under WIOA. As part of Florida's Workforce System Transformation and efforts to standardize and streamline policies and templates used by LWDBs and stakeholders, CareerSource Florida and

FloridaCommerce reviewed this policy to ensure it aligns with federal and state laws, regulations, and guidance.

It is the determination of CareerSource Florida and FloridaCommerce that this policy does not align with existing federal guidance related to MOUs and IFAs. Existing regulations, and Training and Employment Guidance Letters (TEGL) issued by the U.S. Department of Labor and U.S. Employment and Training Administration, in combination with planned technical assistance in development now, are sufficient guidance for use by WIOA Core and Required Partners, LWDBs, their leadership, and the career centers they operate. CareerSource Florida and FloridaCommerce recommend the sunset of CareerSource Florida Administrative Policy 106 – Memorandums of Understanding and Infrastructure Funding Agreements.

CareerSource Florida and FloridaCommerce will continue working with WIOA Core and Required Partners, and LWDBs to provide technical assistance on this topic and ensure the timely execution of MOUs and IFAs using standardized templates.

FOR CONSIDERATION

- **Sunset one CareerSource Florida policy and remove the policy from the CareerSource Florida Policy Portfolio.**

Resources:

Public Law 113-128, Workforce Innovation and Opportunity Act, Sections 121(c) and (h)

[2 Code of Federal Regulations \(CFR\) Part 200](#) Federal Cost Principles

[20 CFR 678.400](#) Required One-Stop Partners

[20 CFR 678 Subpart C](#) Memorandum of Understanding for One-Stop Delivery System

[20 CFR. 678.700 - 678.760 Subpart E](#) One-Stop Operating Costs

Training and Employment Guidance Letters ([TEGL No. 16-16](#)); ([TEGL No. 16-16, Change 1](#)) and ([TEGL No. 17-16](#))

Section [445.009\(2\)\(c\)](#), Florida Statutes

Approved _____
Disapproved _____

Action Item 2

REVISIONS TO THE AVAILABILITY OF SERVICES TO FLORIDIANS WORKFORCE POLICY

The Governor and the CareerSource Florida Board of Directors, as the State Workforce Development Board, recognize the vital role local workforce development boards play in ensuring Floridians have access to the resources and services needed to obtain meaningful employment. Consistent with requirements outlined within both state and federal law, requiring local workforce development boards (LWDBs) to provide universal access to workforce services for both job-seekers and employer customers (section [445.003, Florida Statutes](#) and [20 CFR Part 678](#)) CareerSource Florida, and the Florida Department of Commerce (FloridaCommerce) collaborated to revise Workforce Policy P9 – Availability of Services to Floridians. This policy was approved by action of the CareerSource Florida Board of Directors in September 2021.

This policy is revised to set clear expectations for local workforce development boards (LWDBs) and career centers, focusing on improved support for jobseekers and now includes expectations specific to LWDB outreach to Florida businesses. Boards are required to publicly post one-stop career center hours, respond quickly and effectively to customers, and communicate clearly across services and programs. Aligned with the [REACH Act's](#) goals to improve workforce coordination and expand opportunities for meaningful employment and economic freedom for Floridians, this policy:

1. Guides LWDBs in delivering fast and effective services to Floridians, and
2. Strengthens accountability and transparency to ensure consistency for customers and improved leveraging of public funds.

CareerSource Florida and FloridaCommerce worked closely with LWDBs to refine policy goals, establish measurable outcomes, and build in systems to implement and monitor progress. These updates also ensure that customer service standards are met, local procedures are aligned, and service delivery is consistent statewide. This policy helps ensure workforce services are more efficient and accessible – connecting jobseekers with opportunities and helping businesses find the talent they need to grow Florida's economy.

This policy applies to CareerSource Florida, FloridaCommerce, all 21 LWDBs and all regional workforce development areas. Local workforce development boards shall address local strategies and their policies on availability of services in their local workforce development board plans.

FOR CONSIDERATION

- **Approve revisions to CareerSource Florida Workforce Policy P9 – Availability of Services to Floridians.**



P9

Workforce Policy

Title:	Availability of Services to Floridians		
Type:	Operational		
Program:	One-Stop Career Centers		
Effective:	September 21, 2021	Revised:	TBD

I. PURPOSE AND SCOPE

Local workforce development boards (LWDBs) are required by law to provide universal access to workforce services for both job-seeker and employer customers.¹ This policy outlines statewide expectations for LWDBs, including setting and publicly posting one-stop career center hours, enhancing customer responsiveness, and maintaining clear, comprehensive communication to create a system that supports individuals in finding employment, assisting businesses in finding talent, and advances economic opportunities across Florida. Aligned with the REACH Act's goals to improve workforce coordination and expand opportunities for meaningful employment and economic freedom for Floridians², this policy:

1. Guides LWDBs in delivering fast and effective services to Floridians, and
2. Strengthens accountability and transparency to ensure consistency for customers and improved leveraging of public funds.

II. KEY PROGRAM OBJECTIVES

1. Provide high-quality, responsive, timely, and effective customer service that meets the needs of job seekers and employers.
2. Provide planned, targeted outreach to engage jobseekers and employers to increase community engagement, improve access to workforce services, strengthen business partnerships, and align with the needs of local employers to improve employment outcomes for those with barriers to employment within the local area.

¹ [20 CFR Part 678; § 445.004\(10\), Fla. Stat.](#)

² [Chapter 14.36, F.S](#)

3. Ensure availability of services to all Floridians—including Florida businesses, jobseekers with disabilities, limited English skills, those receiving public assistance, or other employment barriers—using universal design in physical and digital spaces.
4. Coordinate seamlessly across WIOA core and combined partner programs to deliver integrated services that support high-quality education, training, and employment outcomes.
5. Maintain transparency and accountability by clearly posting service hours, available resources, and accessibility information at career centers and on LWDB websites.
6. Foster continuous improvement by using customer feedback, data (including complaint resolution data), and staff input to enhance service delivery and ensure positive employment outcomes.

III. MEASURABLE PERFORMANCE OUTCOMES

1. Performance Measures to include:

a. For Job Seekers

- i. Outreach to potential participants (numbers by area, population type and identified barriers).
- ii. Time to determine eligibility.
- iii. Time to service provision.
- iv. Training and employment outcomes.
- v. Customer satisfaction ratings at least twice a year utilizing a variety of formats including one that is electronically accessible.

b. For Employers

- i. Business outreach (numbers by industry sector and business size)
- ii. Number of active partnerships (including apprenticeships, preapprenticeships, customized training, incumbent worker training, internships, work experience, and On-the-Job Training (OJT))
- iii. Number of active partnerships by industry sector
- iv. Time to execution of partnership agreements or contracts (including OJT)
- v. Business satisfaction ratings at least twice a year utilizing a variety of formats including one that is electronically accessible.

2. Compliance Measures to include:

- a. Posted hours, signage, and communication in compliance with state and federal regulations and [Florida Workforce System Statewide Brand Policy](#)
- b. Digital, physical, and telephonic accessibility in compliance with federal and state regulations

IV. POLICIES AND PROCEDURES

Each LWDB shall maintain service delivery standards in accordance with its Grantee-Subgrantee Agreement, the following policies and procedures, and all other applicable laws, rules, and guidelines.

The Governor sets statewide service delivery standards, requiring LWDBs to submit WIOA Local Plans that align with Florida's WIOA Combined Plan. Consistent with [Chapter 73B-7, Florida Administrative Code](#) and as directed by FloridaCommerce:

1. WIOA Regional and Local Plan Instructions mandate that career centers provide services during standard business hours at designated locations.
2. Each local workforce board signs a Grantee-Subgrantee Agreement with FloridaCommerce.
 - a. LWDBs must adopt and publicly post annual schedules of operations, covering daily hours, holidays, and service availability.
 - b. Centers affiliated with colleges or universities may align their schedules with the academic calendar.
3. FloridaCommerce and CareerSource Florida must be notified of schedule changes impacting the availability of walk-up services to Floridians as soon as possible.
 - a. Schedule changes must be approved in advance by FloridaCommerce, except in cases of emergencies, such as natural disasters or government directives.
 - b. If an emergency closure occurs, boards must notify FloridaCommerce and CareerSource Florida within 48 hours to ensure continuity of services using a method designated by FloridaCommerce.

A. Customer Service Expectations for One-Stop Centers and LWDBs Serving Job Seekers

LWDBs and career centers shall maintain a welcoming and safe environment that:

1. Has readily available options to support job seekers with challenges or barriers impeding meaningful participation.
2. Ensures all signage and communication follow the Florida Workforce System Statewide Brand Policy and encourage job seekers, including those with barriers to employment (childcare, transportation, homelessness, and other needs) to participate in person or online.
3. Does not employ any policy, procedure or signage at a LWDB site that functions as a bar to job seekers with children, or other identified barriers, from entry to those sites.
4. Engages potential customers in the community to ensure that job seekers are aware of available services.
5. Communicates in a timely, responsive, and respectful way when responding to requests from job seekers.

6. Determines jobseeker customer eligibility promptly and delivers services efficiently with a high level of communication and opportunities for feedback.
7. Gathers and shares data on job seeker satisfaction to inform training and supports increased job-seeker satisfaction, including:
 - a. timeliness of interactions;
 - b. provision of service and support;
 - c. clarity of communication; and
 - d. results from services provided.
8. Has a publicly available process that tracks and resolves customer complaints.
9. Provides training to employees on improving customer service and the roles of career center employees designated to resolve customer complaints.
10. Includes program outlines and descriptions of customer service goals in the LWDB WIOA Local and Regional Plans³.
11. Implements LOPs that align with customer service standards and other goals identified in the LWDB WIOA Four-year and Two-Year plans⁴.

B. Customer Service Expectations for One-Stop Centers and LWDBs Serving Employers

LWDBs and career centers shall:

1. Engage in strategic, data-driven outreach with employers and businesses within the community to ensure awareness of available services.
2. Communicate in a timely, responsive and respectful way when responding to requests from businesses.
3. Provide timely and efficient services and support.
4. Gather and share data on business customer satisfaction that inform training and supports increased business and community satisfaction, including:
 - a. timeliness of interactions
 - b. provision of service and support;
 - c. clarity of communication; and
 - d. results from services provided.
5. Have a publicly available process that tracks and resolves business customer complaints.
6. Train employees in improving customer service and on the role of career center employees designated to resolve customer complaints.
7. Include a program outline and customer service goals in the LWDB WIOA Four-year and Two-Year plans.
8. Implement LOPs that align with goals identified in the LWDB WIOA Four-year and Two-Year plans.

C. Availability and Hours of Operation

³ [Chapter 73B-7, F.A.C.](#)

⁴ [Chapter 73B-7, F.A.C.](#)

168 Comprehensive one-stop career centers must be open to the public for walk-up
169 service during regular business hours and at least eight hours a day, Monday
170 through Friday.⁵ As is common practice across the state, local career centers may
171 offer additional service hours, in-person, or virtual appointments to accommodate
172 individuals who work during regular business hours. Customers seeking in-person
173 services at one-stop career centers should not be denied entry or access to
174 services at those centers based on physical appearance, presence of children, or
175 any other indicator that may be associated with the existence of a barrier to
176 employment.

178 Career centers must clearly display their hours of operation on-site. Additionally,
179 each LWDB, workforce area, and career center staff must provide customers with
180 information on hours of operation and services available at other career centers in
181 their local area. The schedule of operations, including standard hours and holiday
182 closures (following state holidays), must be posted prominently on the LWDB's
183 website in an easily accessible format.

185 Any restrictions to, or changes in standard availability or hours of operation must
186 be communicated to and approved by CareerSource Florida and
187 FloridaCommerce prior to the change occurring and using a method designated
188 by FloridaCommerce.⁶

190 **V. IMPLEMENTATION**

192 LWDBs must include applicable local strategies in their WIOA Local and Regional Plans
193 and operating policies. FloridaCommerce will monitor implementation.

195 **VI. AUTHORITIES**

197 [Public Law 113-128, The Workforce Innovation and Opportunity Act \(WIOA\)](#), Sections
198 107-108.

200 [20 CFR Part 678 and 20 CFR 679.500](#)

202 [Training and Employment Guidance Letter 04-15](#)

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

206 Agreement Between Local Workforce Development Boards and the Florida Department
207 of Commerce ([The Grantee-Subgrantee Agreement](#))

209 [CareerSource Florida Administrative Policy 93 – One-Stop Career Center Certification](#)
210 [Requirements](#)

212 [Florida Workforce System Statewide Brand Policy](#)

⁵ See [20 CFR § 678.305\(c\)](#).

⁶ Notifications of emergency closures must be consistent with [Insert Link to Workforce Policy – Emergency Response and Disaster Recovery].

214 **VII. HISTORY**
215

TBD	Revised to incorporate Key Program Objectives, Measurable Performance Outcomes, and Implementation elements that require strategies and local operating procedures, including description of customer service standards and complaint resolution to be incorporated into WIOA Local Four-Year Plans and Two-Year Modifications; Emphasizes supporting individuals in finding employment, assisting businesses in finding talent, and advancing economic opportunities.
09/21/2021	Approved by CareerSource Florida Board of Directors

216 **VIII. RESOURCES**
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218

219 [WorkforceGPS - Using Data to Help Open Doors for Universal Access and Outstanding](#)
220 [Customer Service](#)

AVAILABILITY OF SERVICES TO FLORIDIANS WORKFORCE POLICY DEVELOPMENT TRACKER

A. GENERAL INFORMATION

Policy Name: [Workforce Policy P9 - Availability of Services to Floridians \(2021\)](#)
Policy Type: Programmatic
Program: One-Stop Career Centers
Policy Rationale: This policy requires revisions to clarify key objectives, define measurable performance outcomes, and incorporate implementation and monitoring processes. Additional updates should ensure compliance with customer service standards, integrate local operating procedures, standardize service delivery, and improve access to one-stop career centers. These changes aim to enhance efficiency, consistency, and accessibility within workforce development services.
Date to Publish: August 22 – August 29

B. PROJECT SUMMARY

Consistent with requirements outlined within both state and federal law, local workforce development boards (LWDBs) are to provide universal access to workforce services for both jobseeker and employer customers (section 445.004, Florida Statutes and 20 CFR Part 678). This policy outlines statewide expectations for LWDBs including setting and publicly posting one-stop career center hours, enhancing customer responsiveness, and maintaining clear, comprehensive communication to create a system that supports individuals in finding employment, assisting businesses in finding talent, and advancing economic opportunities across Florida.

CareerSource Florida and FloridaCommerce worked with executive directors and staff of local workforce development boards, and CareerSource Florida leadership to align the updated policy with the law, and existing policies.

C. OVERVIEW OF CHANGES

	Substantive Change	Location	Reason
1	The Purpose and Scope is clarified to emphasize universal access and customer responsiveness and to better align to the REACH Act to strengthen accountability and transparency to ensure consistency for customers and improved leveraging of public funds	Section I. Purpose and Scope (Page 1)	This strengthens the focus on clear communication and economic opportunity. 20 CFR Part 678 445.004(10), Fla. Stat.
2	Key Program Objectives added to include targeted outreach to job seekers and employers, enhanced accessibility for individuals with barriers including those with disabilities, language barriers, and customers on public assistance; emphasis on high-quality	Section II. Key Program Objectives (Page 1-2)	Key objectives serve as guiding principles that define the strategic and operational goals of the policy. This helps ensure clarity, consistency, and effectiveness by outlining

	customer service, integrated service delivery across WIOA partners; transparency in service hours and available resources; and focus on continuous improvement using feedback and data (including complaint resolution data).		what the policy aims to achieve.
3	Measurable Performance Outcomes added to include job seeker metrics related to WIOA indicators of performance, employer metrics related to outreach, partnerships, and business customer satisfaction ratings; and inclusion of compliance metrics; jobseeker and employer customer satisfaction ratings must be completed at least twice a year utilizing variety of formats including one that is electronically accessible.	Section III. Measurable Performance Outcomes (Page 2)	Measurable outcomes serve as key indicators of success and effectiveness allowing the SWDB, LWDBs, and stakeholders to assess whether the policy achieves its intended purpose.
4	Background Section Removed	Section IV. Background	Removed.
5	For changes in the availability of walk-up service hours at any CareerSource location in Florida, officials must get prior approval from FloridaCommerce. The only exception is for emergencies such as hurricanes or government directives. LWDBs must notify FloridaCommerce and CareerSource Florida within 48 hours, methods designated by FloridaCommerce.	Section IV(3)(a). Policies and Procedures (Page 3)	Notifying and obtaining approval from CareerSource Florida and FloridaCommerce of hours of operation and availability ensures consistency, accountability, and coordination across CareerSource locations and provides awareness of changes to public service availability. By requiring prior approval (except in emergencies) and timely notification, it helps maintain reliable access to services for job seekers and protects against disruptions in workforce support. It also ensures emergency decisions are properly documented and communicated, reinforcing transparency and continuity in operations statewide.
6	Career centers and LWDBs must create a safe, welcoming space for all job seekers, especially those facing barriers like childcare, transportation, or homelessness—by providing comprehensive, helpful support, clear communication, and access to services in person or online. Career center staff must respond respectfully and promptly to inquiries, evaluate eligibility timely, track customer satisfaction and	Section IV(A), Policies and Procedures, Customer Service Expectations for One-Stop Centers and LWDBs Serving Job Seekers (Pages 3-4)	Reflects core principles of the Florida Workforce Development System and implementation of local workforce plans. Chapter 73B-7, F.A.C. Chapter 73B-7, F.A.C.

	complaints, train staff on service improvement, and align goals with workforce plans to ensure consistently high-quality service.		
7	Career centers and LWDBs are expected to actively connect with employers through targeted, data-informed outreach and provide fast, respectful, and effective service. LWDBs must gather feedback from businesses to improve customer satisfaction, offer transparent complaint resolution processes, train staff on handling employer concerns, and ensure all customer service goals are clearly outlined and aligned with strategic workforce plans.	Section IV(B): Policies and Procedures, Customer Service Expectations for One-Stop Centers and LWDBs Serving Employers (Page 4)	Career centers and workforce boards are expected to build stronger partnerships with employers by using data, feedback, and strategic planning. This helps them quickly respond to labor market needs, improve training programs, boost job placements, and close skill gaps and transform career centers into proactive leaders in growing and supporting the regional workforce.
8	Career centers in Florida must be open for walk-in services at least eight hours a day, Monday through Friday, and may offer additional hours or virtual appointments to serve those with scheduling challenges. These centers must not turn away customers based on appearance, presence of children, or other potential barriers to employment. Hours of operation must be clearly displayed on-site and online, and any changes to availability must be approved in advance by CareerSource Florida and FloridaCommerce.	Section IV(c), Policies and Procedures, Availability and Hours of Operation (Page 4-5)	Grantee-Subgrantee Agreement requires boards to adopt and publicly post annual schedules of operations, covering daily hours, holidays, and service availability. 20 CFR § 678.305(c) .
9	Local Operating Procedures (LOPs) are required and must be written into local Four-Year WIOA Plans and monitored by FloridaCommerce.	Section V. Implementation (Page 5).	LOPs help local areas provide guidance for career center staff and further define and clarify how programs are operated locally.
10	Section VI. Implementation describes monitoring requirements.	Section V. Implementation (Page 5).	This policy requires FloridaCommerce to monitor the requirements outlined in this policy and LOPs. LWDBs must establish local monitoring policies and procedures aligned with this policy.

C. LEGAL REFERENCES AND APPLICABLE GUIDANCE

[Public Law 113-128, The Workforce Innovation and Opportunity Act \(WIOA\)](#), Sections 107-108.

[20 CFR Part 678 and 20 CFR 679.500](#)

[Training and Employment Guidance Letter 04-15](#)

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

Agreement Between Local Workforce Development Boards and the Florida Department of Commerce ([The Grantee-Subgrantee Agreement](#))

[CareerSource Florida Administrative Policy 93 – One-Stop Career Center Certification Requirements](#)

[Florida Workforce System Statewide Brand Policy](#)

[WorkforceGPS - Using Data to Help Open Doors for Universal Access and Outstanding Customer Service](#)

Approved _____
Disapproved _____

Action Item 3

EMERGENCY RESPONSE AND DISASTER RECOVERY WORKFORCE POLICY

The CareerSource Florida network and its federal, state and local partners play a key role in supporting businesses and job seekers affected by natural disasters and emergency events. As disasters become more frequent, severe, and complex, it is critical to ensure the demands placed upon the emergency management community and workforce development system are managed strategically and workforce system operations are structured to be both flexible and maximize assistance across the CareerSource Florida network.

Three workforce policies were created to support statewide and local emergency response and disaster recovery including CareerSource Florida Policy 004 – Procedures on One-Stop Closures; CareerSource Florida Policy 113 – Disaster-Recovery Dislocated Worker Grants; and CareerSource Florida Workforce Policy O15 – State Workforce Development Board Emergency Response Strategy. To simplify and strengthen the Florida Workforce System’s response to emergencies and disaster recovery, CareerSource Florida and the Florida Department of Commerce (FloridaCommerce) worked with local workforce development boards (LWDBs) to merge three separate policies into one. The revised policy provides an efficient and unified framework that clearly defines program goals, measurable outcomes, and how the policy should be implemented and monitored. This policy gives LWDBs clear guidance on how to prepare for and respond to disasters, including how to use disaster-related dislocated worker grants. The policy also requires cybersecurity planning to help protect critical systems and data. These updates are designed to improve coordination, increase efficiency, and ensure a faster, more effective response to workforce disruptions across the state.

The Emergency Response and Disaster Recovery Workforce Policy applies to CareerSource Florida, FloridaCommerce, all 21 local workforce development boards, and local workforce development regions.

FOR CONSIDERATION

- **Approve revisions to Workforce Policy O15 – State Workforce Development Board Emergency Response Strategy**
- **Approve retitling the policy Emergency Response and Disaster Recovery.**



Workforce Policy

Title:	Emergency Response and Disaster Recovery
Type:	Operational
Program:	Workforce Innovation and Opportunity Act
Effective	TBD

I. PURPOSE AND SCOPE

This policy outlines roles and responsibilities of the CareerSource Florida network before, during, and after disasters and states of emergency. It provides a framework for coordinating services with federal, state, and local partners, including the Florida Department of Commerce (FloridaCommerce) and local workforce development boards (LWDBs), Regional Planning Areas, and career centers and establishes guidance for LWDBs to administer Disaster Recovery Dislocated Worker Grants (DWGs), while ensuring compliance with the Workforce Innovation and Opportunity Act (WIOA), U.S. Department of Labor (USDOL) regulations and state requirements.

This policy applies to CareerSource Florida, FloridaCommerce and all LWDBs and regional planning areas.

II. KEY OBJECTIVES

To provide clear guidance and support to LWDBs on operations and considerations during an emergency and outline clear expectations to guide data-based, responsive and comprehensive planning, response, and recovery in the event of a disaster or emergency, including expectations for the following:

1. Continuity of Operations Plans (COOP)
2. Activation and utilization of state and local Rapid Response Teams
3. Provision of services and supports.
4. Disaster Recovery Dislocated Worker Grant application and utilization
5. Emergency Response and Disaster training for staff

III. MEASURABLE PERFORMANCE OUTCOMES

Measurable outcomes identified by activity are outlined below:

1. Continuity of Operations Plans (COOP) compliance
2. Disaster Recovery Dislocated Worker Grant
 - a. The negotiated primary indicators of performance for the WIOA Dislocated Worker program serve as the performance measures for participants receiving career or training services through the Disaster Recovery DWG program.
3. Provision of required services and support:
 - a. Use of mobile career center units or career center services support at community partner locations
 - b. Number and percentage of one-stop customers receiving services during a disaster, including those served in mobile units or at community partner locations.
 - c. Time to provision of requested support for one-stop customers during a disaster.
 - d. Percentage of participants enrolled in short-term training programs offered during disaster recovery.
 - e. Employer satisfaction and engagement with services provided during and after a disaster including satisfaction with Dislocated Worker Grant funded programs, layoff aversion, short-time compensation.

Note: Participants who only receive disaster-relief employment are excluded from WIOA performance indicators unless they also receive career or training services through the grant or are co-enrolled in another WIOA program with a common exit. For more information, refer to [Administrative Policy 115, Common Exit](#).

IV. BACKGROUND

The Florida Division of Emergency Management leads the State Emergency Response Team (SERT), which coordinates disaster response across state agencies, nonprofits, and federal partners. FloridaCommerce leads SERT's Emergency Support Function 18 (ESF 18), which helps businesses recover and stabilize the economy.

CareerSource Florida partners with FloridaCommerce, LWDBs, career centers, and WIOA combined planning partners to support job seekers and businesses during emergencies. Together, they coordinate office closures, assess workforce needs, and deliver services such as Disaster Dislocated Worker Grants. The goal is to ensure quick, easy access to services that help communities recover and people return to work.

V. POLICIES AND PROCEDURES

A. CareerSource Florida Network Coordination

CareerSource Florida and FloridaCommerce collaborate systematically to support activities and the workforce recovery needs of the state before, during, and after an emergency.

B. Office Closures and Emergency Notifications

Local governments manage emergency declarations and evacuations under section [252.38, Florida Statutes](#). Counties and municipalities coordinate emergency management plans, which guide office closure decisions. LWDBs must follow local directives and report closures

81 exceeding two days to FloridaCommerce.

82
83 Each LWDB office or center must designate a contact person responsible for notifying
84 CareerSource Florida, FloridaCommerce, and the Local Emergency Operations Center of
85 office closures. Updated contact details, including name, phone number, fax, and email, must
86 be provided to FloridaCommerce and CareerSource Florida.

87
88 **C. State-owned Facility Closures**

89 FloridaCommerce will close state-owned workforce facilities in affected counties during
90 disaster or emergency situations based on the following criteria:

- 91
92 1. Local government decision to close offices
93 2. Mandatory evacuation orders
94 3. Declaration of a local state of emergency

95
96 When state-owned facilities are closed due to an emergency, employees assigned to those
97 facilities will be released from duty and granted administrative leave for the duration of the
98 closure. Employees required to remain on duty to provide essential services will receive
99 special compensatory leave credits for hours worked during the closure. Essential services
100 are normally considered to be services directly related to the preservation of life, health, or
101 property.

102
103 **D. Non-State-Owned Facility Closures**

104 LWDBs and career centers must follow local and state emergency management directives and
105 close offices accordingly.

106
107 LWDBs must notify FloridaCommerce of emergency office closures exceeding two days,
108 unless a state of emergency has been declared for a specified period.

109
110 **E. Notification Protocols**

111 LWDBs must notify FloridaCommerce of office closures as soon as possible, and within 48
112 hours of the event, as feasible, using approved communication channels. Closure information
113 will be posted and made available to the public.

114
115 **F. Operational Requirements**

116 LWDBs shall support business and jobseeker customers through a combination of activities,
117 including but not limited to:

- 118
119 1. Providing access as available to career centers and dedicated staff through on-site, virtual,
120 and electronic interactions.
121 2. Providing access to career center mobile units as directed and coordinated by
122 CareerSource Florida and FloridaCommerce in consultation with federal and state partners.
123 3. Providing access to quality customer service and direct services to affected workers
124 including:
125
126 a. job training services.
127 b. filing of reemployment assistance claims
128 c. resume preparation and job-readiness workshops.
129 d. job placement services.
130 e. career and skills assessment services
131 f. labor market information
132 g. referrals to community programs

- h. information on the impacts of layoffs on health coverage and other benefits
- i. community resource workshops
- j. veterans' programs and services for those with barriers to employment
- k. supportive services¹
- l. job fairs and other special events.

a. Cybersecurity and Protection of Electronic Data

Operational emergency planning must include cybersecurity measures consistent with guidance provided by FloridaCommerce and grantee-subgrantee agreements. A LWDB must notify Florida Commerce via the approved method when a cyberattack occurs and must have a local operating procedure (LOP) that includes the following:

1. Data protection
2. Authentication using MFA or passkeys.
3. Staff responsibilities
4. Incident response
5. Device management

The incident response plan should outline the steps to be taken during a breach in security. This plan must also include clear direction on roles and responsibilities of specific LWDB staff through access control measures, establish communication channels, and define escalation procedures.

LWDBs should conduct and document periodic cybersecurity assessments and audits to identify vulnerabilities and weaknesses that include penetration testing and vulnerability scanning to uncover potential flaws in the organization's systems. LWDBs should implement a strategy to ensure all systems receive OS, application, driver and firmware updates at a regular cadence and should ensure critical data and systems are recoverable in a manner consistent with their approved LOP for continuity of operations to ensure essential functions continue during and after a disruption or crisis.

LWDBs are required to take reasonable measures to protect and secure electronic data containing personal information. LWDBs must follow the requirements set forth in their agreements with FloridaCommerce regarding any breach of security and must follow the requirements in section [501.171, Florida Statutes](#), and FloridaCommerce's directions as specified in the agreement.²

G. Disaster Recovery Jobs Portal

LWDBs shall provide expedited access to individuals whose employment has been either lost or interrupted as a direct result of a major disaster and instruction on navigating the Disaster Recovery Jobs Portal linked from the Employ Florida website to find job opportunities or post disaster-related jobs to assist in rebuilding affected communities.

H. Rapid Response and Layoff Aversion Activities and Short-Time Compensation

LWDBs shall provide access to Rapid Response and Layoff Aversion activities authorized under WIOA and described in [CareerSource Florida Workforce Policy 2021.06.09.A.2 – Rapid Response and Layoff Aversion System](#) and [Training and Employment Guidance Letter No. 19-16](#), to assist employers and impacted workers prior to and immediately following announcement of layoff or natural or other disaster resulting in a mass job dislocation.

¹ Supportive Services described in [20 CFR 680.900](#) for Adult and Dislocated Workers and [20 CFR 681.570](#) for Youth.

² [Grantee-Subgrantee Agreement](#)

182
183 **I. Business Damage Assessment Surveys**

184 Encouraging business owners to navigate [FloridaDisaster.biz](https://floridadisaster.biz) to obtain information about
185 preparedness resources, current disaster updates, recovery programs, and to complete the
186 Florida Business Damage Assessment Survey, which helps FloridaCommerce to determine
187 damage related to disaster impacts, understand individual business needs, and to inform relief
188 efforts.
189

190 **J. Local Operating Procedures and Continuity of Operation Plans (COOP)**

191 LWDBs, regional planning areas, and their career center staff shall consult with local
192 government, chief local elected officials, and other stakeholders to develop streamlined
193 strategies, policies, and a comprehensive Continuity of Operations Plan (COOP) that
194 describes engagement in systematic processes that accomplish the following:
195

- 196 1. Creation of local board-led strategies and policies that ensure uninterrupted
197 communication with federal, state, and local partners and designation of trained
198 employees to communicate with state and local partners, leadership, and board members
199 before, during, and after a state of emergency.
- 200 2. A published plan that ensures the safety and availability of staff, minimizes disruption of
201 service delivery, and maximizes cooperation with all partners.
- 202 3. Includes emergency contacts, a disaster response checklist, and service delivery options
203 that include virtual and mobile service delivery. Plans must outline how customer services
204 will be provided within 24 hours, or as soon as practicably possible, of a disaster
205 declaration. LWDBs must update and submit COOPs biennially to CareerSource Florida
206 and FloridaCommerce. COOP plans may be included as part of WIOA local plans and
207 two-year modifications.
- 208 4. Includes ongoing training of incumbent and new staff to ensure current and sufficient
209 levels of awareness of operational activities before, during, and after a state of
210 emergency.
- 211 5. Outlines outreach, including surveys of existing and potential business customers before
212 and after states of emergency to obtain business intelligence and information about
213 community business needs resulting from disasters and other emergencies.
214

215 **K. Use of Disaster Recovery Dislocated Worker Grants**

216 Pursuant to [Training and Employment Guidance Letter \(TEGL\) 09-24](#),³ FloridaCommerce has
217 the authority to apply for Disaster Recovery Dislocated Worker Grants (DWGs) to help
218 communities affected by a natural disaster or emergency recovery from the impacts of these
219 events and to help develop a workforce better equipped for resiliency to disaster events in the
220 future
221

222 A LWDB shall administer and deliver services under the Disaster Recovery DWG funding
223 associated with the Disaster/Emergency Declaration that impacts its area, including but not
224 limited to the following:
225

- 226 1. Working with state and local governmental agencies to assess the need for temporary
227 disaster-relief workers and developing worksite agreements to address these needs.
- 228 2. Working with local employers to address talent needs in the wake of the
229 disaster/emergency; and
- 230 3. Conducting outreach and eligibility determination of individuals applying for workforce
231 services and providing eligible participants appropriate grant services.

³ [TEGL 09-24](#)

232
233 **a. Before Qualifying Events**

234 Disaster recovery efforts are primarily managed at the local level and, as the
235 subrecipients of Disaster Recovery DWG funding, LWDBs play a pivotal role in
236 supporting the economic and overall recovery of their region.

237
238 LWDBs shall participate in pre-disaster planning efforts organized by FloridaCommerce
239 to:

- 240
241 i. Identify existing recovery stakeholders (local agencies or organizations that
242 would be critical to support the recovery process after a disaster).
- 243 ii. Coordinate with existing recovery stakeholders and local government officials to
244 develop communication plans and memorandums of understanding.
- 245 iii. Develop public engagement strategies to effectively communicate Disaster
246 Recovery DWG funding availability, flexibilities, and limitations.
- 247 iv. Identify organizations, such as recovery stakeholders, who may operate as
248 worksite sponsors and develop worksite agreements with such organizations.
- 249 v. Prepare position descriptions that encompass anticipated cleanup and
250 restoration activities and providing humanitarian assistance.
- 251 vi. Identify training programs to help local businesses and their workers recover
252 from the disaster.
- 253 vii. Develop general processes and point people for managing Disaster Recovery
254 DWGs; and
- 255 viii. Train appropriate staff on Disaster Recovery DWG participant eligibility, worksite
256 prioritization, and allowable costs.

257
258 **b. Determining a Need for a Disaster Recovery DWG**

259 FloridaCommerce will assess the need for disaster-relief employment, determine
260 funding needs, decide whether to apply for a Disaster Recovery DWG, and will make
261 Disaster Recovery DWG awards to impacted LWDBs.

262
263 **c. Disaster Recovery DWG Application Submittal**

264 If a need for Disaster Recovery DWG funding is identified, FloridaCommerce will assist
265 impacted LWDBs in submitting an application in accordance with [TEGL 09-24](#), which
266 must include:

- 267
268 i. An abstract that identifies impacts of the qualifying event, an overview of
269 activities anticipated, type of participants to be enrolled, a list of project operators
270 or subrecipients and any deliverables or expected outcomes.
- 271 ii. A summary of emergency management agency coordination or anticipation of
272 such activities.
- 273 iii. A project overview to include the project's scope and priorities, as well as plans
274 to identify, recruit, and enroll eligible participants.
- 275 iv. A Community Needs Assessment for each project.
- 276 v. Projected enrollment and cost breakdown by type of activity.
- 277 vi. A project timeline that includes major goals and objectives over the period of
278 performance; and
- 279 vii. A line-item budget.

280
281 **d. Community Needs Assessment**

282 As a part of the application process, FloridaCommerce submits a Community Needs
283 Assessment to USDOL. The assessment provides the context for the effects of the

qualifying event and sets the scope of the planned response.

The Community Needs Assessment must describe:

- i. The impacts of the declared emergency or disaster event, including how the proposed grant will prioritize projects from communities and individuals most in need due to the effects of the declared disaster or emergency situation, or due to economic or other disadvantage.
- ii. How the proposed projects will address the cleanup, or humanitarian needs that stem from the impacts of the declared emergency or disaster.
- iii. How proposed disaster-relief employment projects will address the needs and help mitigate the effects of the declared emergency or disaster event, and promote community recovery, including through creating high-quality employment opportunities; and
- iv. How Disaster Recovery DWG funds will provide opportunities for individuals to return to unsubsidized employment as a result of grant activities.

For emergencies or disasters of national significance, the Community Needs Assessment should also demonstrate that the declared emergency or disaster could result in the loss of at least 50 jobs in the area covered by the declaration.

For Disaster Recovery DWGs that include employment and training activities in addition to disaster-relief employment, the Community Needs Assessment must include:

- i. A description of the resulting economic impacts of the qualifying event as well as any broader or additional economic effects or challenges including secondary or related layoffs, increases in unemployment, or other factors where applicable, that impact the community or communities to be covered by the proposed projects.
- ii. An explanation of why existing formula and/or other funds are unable to meet the employment and training needs created by the qualifying event.
- iii. An overview of the current economic situation, layoff impacts or other challenges impacting the ability of the grant recipient and any subrecipients to effectively serve eligible dislocated workers; and
- iv. The identification of populations to be targeted for services, including those who had previous barriers to employment, such as the need for supportive services (to include childcare or transportation), to enable participants to successfully enroll, participate in, and complete grant-funded activities.

LWDBs and Regional Planning Areas affected by a declared disaster must coordinate with county and city emergency management offices and other agencies involved in disaster recovery in the affected areas⁴, to complete the Community Needs Assessment.

e. Funding of Disaster Recovery DWGs

USDOL issues its funding decision within 45 calendar days of receiving a valid application. If the application is approved, USDOL will issue Disaster Recovery DWG funds to FloridaCommerce in full or incrementally.

FloridaCommerce will use state and federal disaster declarations, the Business Damage Assessment Survey and local recovery stakeholder feedback to determine

⁴ Such agencies will include FEMA, Small Business Administration, voluntary organizations active in disaster (VOAD) in the affected area, and others.

334 areas of the state that have significant disaster recovery needs. LWDBs are expected
335 to use Disaster Recovery DWG funds when areas within their region demonstrate
336 significant disaster recovery needs.

337
338 FloridaCommerce will distribute funds to participating LWDBs based on identified needs
339 and availability of funds. Funds are released to LWDBs by FloridaCommerce through
340 NFAs that describe special grant conditions.

341
342 Requests for additional funds must be submitted by LWDBs to FloridaCommerce when
343 needed and must be supported by information that details enrollments, completion of
344 work goals, remaining program activities, and expenditures.

345
346 FloridaCommerce is responsible for ensuring that funds are expended in compliance
347 with Disaster Recovery DWG requirements and for the de-obligation and re-obligation
348 of funds to meet ongoing needs. Failure to meet planned Disaster Recovery DWG
349 enrollments and/or expenditures may result in sanctions for LWDB failure to meet
350 federal and state standards.⁵

351
352 **f. Participant Eligibility**

353 LWDBs must ensure that individuals receiving services funded by a Disaster Recovery
354 DWG meet at least one of the following eligibility requirements:

- 355
356 i. Temporarily or permanently laid off as a consequence of the emergency or
357 disaster;⁶
358 ii. A dislocated worker as defined in WIOA Section 3(15), including displaced
359 homemakers as defined in WIOA Section 3(16).
360 iii. A long-term unemployed individual;⁷ or
361 iv. A self-employed individual who became unemployed or significantly
362 underemployed⁸ as a result of the emergency or disaster.

363
364 **g. Eligibility Documentation**

365 LWDBs must document eligibility in the participant's Employ Florida program
366 application, including, but not limited to the participant's:

- 367
368 i. Verification of Work Authorization Status⁹
369 ii. Citizenship or right to work;¹⁰
370 iii. Compliance with the Selective Service Act; and

⁵ [Workforce Policy 104 – Sanctions for Local Workforce Development Boards' Failure to Meet Federal and State Standards](#)

⁶ The term "laid off as a consequence of the emergency or disaster" includes any job separation that can be reasonably linked, directly or indirectly, to the disaster or emergency. May include individuals who were forced to leave their employment following the disaster due to reductions in time or wages, as well as external circumstances caused by the disaster that prevents them from remaining at their pre-disaster job. For example, a worker may have to leave a job to take care of problems caused by the emergency or disaster, to take care of themselves or a relative during the emergency or disaster or dealing with temporary or permanent homelessness due to the emergency or disaster. May include individuals whose offers of employment were rescinded or whose ability to work was delayed or canceled due to the disaster.

⁷ A Long-term Unemployed Individual has been unemployed for six (6) out of the last 13 weeks. An individual is considered unemployed if they were not employed during the weeks in question or were employed in irregular jobs, such as day labor, or in part-time positions, (i.e., an average of 20 hours or less for the six weeks).

⁸ An individual is significantly underemployed when their income from self-employment is no longer adequate to maintain self-sufficiency or meet living expenses.

⁹ [TEGL 10-23, Change 2](#)

¹⁰ A copy of the completed Form I-9 and E-Verify documentation must be maintained in the file of a participant placed into a temporary disaster-relief position.

iv. Status as one of the four grant-specific eligibility categories listed above.¹¹

Each LWDB is required to collect supporting eligibility documentation used to determine eligibility and retain such documentation in the participants' electronic and/or hard-copy case files, in accordance with local operating procedures, and upload this documentation into Employ Florida, as soon as is practicably possible. Additionally, LWDBs must obtain and maintain documentation that supports the determination for eligibility and continued participation, including utilizing the E-Verify system pursuant to [Section 448.095, F.S.](#)

Circumstances surrounding the disaster may make documentation of eligibility difficult for participants to obtain during the initial stages following the disaster. Self-attestation is an allowable method for documenting employment-related eligibility requirements when other documentation is not available. If the LWDB subsequently discovers through monitoring that it has served an ineligible participant, the participant must be terminated from the program and a case note must be recorded in Employ Florida describing the review process and subsequent determination of ineligibility. This situation will not result in disallowed costs.

h. Veterans and Eligible Spouse Priority of Service

As covered persons, veterans and eligible spouses determined eligible for services under a Disaster Recovery DWG must receive priority over non-covered persons in accordance with [Workforce Policy 111, Priority of Service for Veterans and Eligible Spouses](#).

i. Allowable Activities

In most cases, Disaster Recovery DWG projects must include a disaster-relief employment component.¹² Participants may be enrolled in disaster-relief employment activities, as well as employment and training activities, concurrently, sequentially, or as stand-alone services. However, certain Disaster Recovery DWG awards may limit the availability of certain activities as specified within the accompanying NFA.

Prioritization of types of services must be determined in coordination with local emergency planning and recovery agencies as further discussed in Section V.K.x. of this policy. Please see Attachment for additional information on allowable activities.

j. Disallowed Activities

The following are not allowable uses of Disaster Recovery DWG funds:

- i. Activities that are in preparation for future disasters;¹³
- ii. Incumbent Worker Training (IWT)¹⁴ and Customized Training for employed workers.
- iii. Purchasing humanitarian supplies such as food, clothing, and hygiene

¹¹ Such documentation may include a notice of separation from previous employer; documentation of Reemployment Assistance benefits or other unemployment compensation; federal income tax returns; business ledgers; and client information for self-employed individuals.

¹² Disaster Recovery DWGs awarded due to an influx of individuals relocated from a disaster-affected area to another geographic area may not require a temporary disaster-relief employment component.

¹³ DWG activities must be designed to mitigate the effects of the current declared disaster for which the grant was awarded; activities that may prevent future disasters or their impacts are permissible only where such activities are incidental to addressing the impacts of the current disaster or emergency.

¹⁴ IWT is generally not allowable for DWGs but may be made available for certain specified funding opportunities.

- 411 products;¹⁵
412 iv. Purchasing materials to do repairs.
413 v. Matching FEMA funds.
414 vi. Membership dues for local economic development organizations; and
415 vii. Paying for LWDB staff education not directly related to the performance of their
416 job duties in managing the Disaster Recovery DWG.
417

418 **k. Disaster-Relief Employment**

419 LWDBs must demonstrate that disaster-relief employment created under a Disaster
420 Recovery DWG aligns with the following categories:

- 421 i. Cleanup and recovery efforts; or
422 ii. Delivery of appropriate humanitarian assistance in the aftermath of the
423 emergency or disaster.

424 Post-disaster response and recovery activities address needs associated with mass
425 care/sheltering, public health and health care, (re)housing, debris/infrastructure removal
426 and repair, support to business owners, emotional/psychological support, public health
427 and health care, and mitigation activities that are directed at correcting existing damage.

428 Humanitarian assistance provided by temporary disaster-relief workers generally
429 includes actions designed to alleviate suffering and maintain human dignity in the
430 aftermath¹⁶ of disasters. The humanitarian assistance provided by disaster-relief
431 workers must relate directly to needs created by the disaster or emergency, and
432 physical, emotional, and economic consequences of the disaster or emergency.

433 **l. Disaster-Relief Employment Duration**

434 Eligible participants may be enrolled into disaster-relief employment under a Disaster
435 Recovery DWG for up to 12 months or 2,080 hours (whichever is longer).
436

437 USDOL may approve an extension for up to an additional 12 months/2,080 hours
438 through a grant modification. When an extension is granted, FloridaCommerce will
439 notify the impacted LWDBs by modifying the NFAs to reflect the extension.

440 **m. Participant Wages and Fringe Benefits**

441 In accordance with WIOA Section 181(a)(1)(A), participants must be compensated at
442 the same rates, including periodic increases, as employees who are similarly situated
443 in similar occupations doing the same type of work, and who have similar training,
444 experience, and skills.

445 However, in cases where the worksite does not have employees doing the same or
446 similar work and with similar training, experience, and skills, LWDBs must ensure that
447 the wages paid to participants:

- 448 i. Are in line with the industry standard for that type of work in the area where the
449 work is to be performed, supported by documentation; or

¹⁵ For example, Disaster Recovery DWG funding could be used to support food delivery workers through disaster-relief employment at food shelters but not to purchase the food itself.

¹⁶ The 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. Temporary disaster-relief workers may be provided to help deal with these crises since they are the consequence of the disaster for the time necessary to help affected individuals recover.

- ii. Are paid at least \$15 per hour in the absence of a determinable industry standards for the area where the type of work is to be performed.¹⁷

Where applicable, fringe benefits must be paid in accordance with the policies of the Disaster-Relief Employer.¹⁸ If employees at the worksite are doing similar work and receiving hazard pay, disaster-relief workers may also be paid hazard pay rates for their work.¹⁹

n. Training and Pre-vocational Activities

To meet the disaster-recovery needs of affected areas, LWDBs may provide short-term training and pre-vocational activities that allow a disaster-relief worker to obtain the skills needed to conduct the disaster-relief work.²⁰ For example, this may include training in the use of heavy equipment. During involvement in these activities, for a participant who has been hired in a disaster-relief position that requires attainment of specific skills, the participant may receive wages under the Disaster Recovery DWG.

o. Employment and Training Activities

Pursuant to WIOA Section 170(d)(1)(C), LWDBs may use Disaster Recovery DWG funding to provide employment and training activities to participants to help them obtain (re)employment that leads to self-sufficiency when they are unlikely to return to their prior employment. These services may include job search/job readiness activities, literacy instruction, including English as a Second Language (ESL) instruction, and occupational skills training and/or work-based training for career pathways that lead to high-demand jobs in high-growth industries.

An Individual Employability Plan must be developed in Employ Florida, detailing the need for training services as well as certain individualized career services such as work experiences, literacy/GED prep/ESL instruction, short-term pre-vocational services, and out-of-area job searches/relocation.

p. Supportive Services

LWDBs must provide supportive services when needed to enable individuals to participate in disaster-relief employment and employment and training activities. Supportive services provided to participants in disaster-relief employment must be designed to enable the participant to safely and effectively carry out the job for which they have been hired. Any supportive service provided must enable the individuals to participate in grant-funded employment and training activities. Any supportive services provided must be consistent with WIOA and applicable regulations, as well as [Workforce Policy 109, Supportive Services and Needs Related Payments](#). LWDBs must ensure their local operating procedures governing supportive services and needs-related payments include the provision of such services to individuals participating in disaster-relief employment and employment and training activities.

Note: Participants who receive wages from disaster-relief employment are not eligible for needs-related payments.

¹⁷ [TEGL 09-24](#)

¹⁸ Disaster-Relief Employers are entities designated by FloridaCommerce or LWDBs to carry out day-to-day human resources and payroll activities of a Disaster Recovery DWG. The role of the Disaster-Relief Employer is described in Section V.K.q-r.

¹⁹ Overtime is allowable.

²⁰ Such training is not required to be included in state or local eligible training provider/program list, nor is the occupation required to be on the local targeted occupation list.

490 **q. Disaster-Relief Employers and Worksites**

491 LWDBs must identify appropriate Disaster-Relief Employers based on the nature and
492 scope of the disaster or emergency and the types of disaster-relief activities that
493 projects will be carrying out. LWDBs must have contracts or agreements in place with
494 Disaster-Relief Employers to ensure that they comply with all Disaster Recovery DWG
495 and other relevant rules and requirements, including with regard to employment
496 activities, participant eligibility, participant safety and health (including Occupational
497 Safety and Health Administration (OSHA) safety and work condition standards),
498 supervision and attendance, and any other worksite requirements.

499 Similarly, LWDBs must identify appropriate Worksite Sponsors based on the nature and
500 scope of the disaster or emergency and the types of disaster-relief activities that
501 projects will be carrying out. Worksite Sponsors are entities²¹ that preferably have
502 experience in disaster recovery and enter into worksite agreements with LWDBs to
503 develop position descriptions and to support participant placement on worksites.
504 LWDBs must ensure that the Worksite Sponsor complies with all Disaster Recovery
505 DWG and other relevant rules and requirements.

506 **r. Eligible Disaster-Relief Employers**

507 Each disaster-relief worker must have an employer of record, referred to as the
508 Disaster-Relief Employer. There is no limitation on what type of entity or organization
509 may be a Disaster-Relief Employer. The LWDB, a staffing agency, or another entity
510 may be the Disaster-Relief Employer. The Disaster-Relief Employer is responsible for
511 maintaining all personnel and payroll records related to the employment of disaster-
512 relief workers, including employer and employee withholdings and other benefits, if
513 applicable. The Disaster-Relief Employer may be responsible for unemployment claims
514 filed by temporary disaster-relief workers when their assignment ends.

515 **s. Worksite Selection**

516 Disaster-relief worksites must be in the geographic area covered by the qualifying event
517 for the Disaster Recovery DWG and within the LWDB's jurisdiction.²² LWDBs must give
518 the highest priority to cleanup of the disaster area's most severely damaged public
519 communities, facilities, and property, and to the cleanup of and provision of
520 humanitarian assistance to economically disadvantaged portions of the disaster area.

521 The administration of Disaster Recovery DWG funds must be in coordination with
522 projects administered by emergency management and disaster recovery agencies. The
523 funding of temporary disaster-relief positions shall not duplicate or supplant other
524 funding.

525 Projects may perform work on private property when the following conditions are met:

- 526 i. The work must be intended to remove health and safety hazards to the larger
527 community, or to address or alleviate specific economic or employment-related
528 impacts of the disaster, such as cleanup work needed for disaster-affected
529 employers to resume or continue operations.
530 ii. The activities are necessary to remove health and safety hazards on private

²¹ Worksite Sponsors are entities with which participants are placed to engage in disaster-relief employment and are often governmental or nonprofit entities to avoid potential conflicts of interest.

²² In extraordinary cases, LWDBs may develop and staff worksites outside of their jurisdiction with approval from FloridaCommerce.

- 531 lands or around homes or other structures and may only return the land or
532 structure(s) to a safe and habitable level, or operational status, and will not
533 improve the original land or structure(s); and
534 iii. The LWDB establishes a priority of disaster-relief activities in coordination with
535 the local area's disaster-recovery team²³ that identifies the need for and use of
536 private for-profit worksites, as applicable.

537 **t. Health and Safety Standards**

538 In all Disaster Recovery DWG projects, LWDBs must establish written policies
539 specifying that Disaster-Relief Employers ensure that project participants are afforded
540 the same health and safety standards established under federal and state law
541 applicable to working conditions of permanent employees. LWDBs must also ensure
542 that participants receive appropriate safety training and ensure safe working conditions
543 in accordance with the OSH Act of 1970, as amended. LWDBs are responsible for
544 ensuring and maintaining documentation that worker orientation and OSHA/safety
545 training has occurred.

546 Note: Certificates awarded for completion of basic safety training (i.e., OSHA 10) are
547 not recognized postsecondary credentials under WIOA.

548 **u. Prioritizing Disaster-Relief Worksites**

549 LWDBs must be prepared to deploy the most appropriate disaster-relief jobs based on
550 the criteria listed in [TEGL 09-24](#), as well as through consultation with local government,
551 community and faith-based organizations, economic development and industry
552 stakeholders, etc. Priorities for the types of disaster-relief jobs should be based on an
553 assessment of the following factors:

- 554 i. Physical impact on public properties.
555 ii. Physical and human impact on the elderly, people with disabilities, low-income
556 and other special needs populations.
557 iii. Impact on organizations that are needed to respond to the disaster or
558 emergency (governmental, community, and faith-based); and
559 iv. Impact on local businesses, industry sectors, and the overall economic health of
560 the area.

561 **v. Approval and Tracking of Worksites**

562 LWDBs are responsible for approving temporary disaster-relief worksites and job duties
563 for disaster-relief workers. Worksite Reports containing worksite and job description
564 information must be maintained and reported to FloridaCommerce according to a
565 schedule and in a format provided by FloridaCommerce for each Disaster Recovery
566 DWG.

567 Worksite files must be maintained for each worksite and must include:

- 568 i. The agreement between the LWDB, the Worksite Sponsor, and the Disaster-
569 Relief Employer, including non-duplication requirements (see Subsection V.K.x.
570 below).
571 ii. Approved job descriptions.

²³ 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.)

- 572 iii. Evidence of appropriate OSHA/safety training.
573 iv. Evidence that supervisor orientation²⁴ has taken place at the worksite.
574 v. Description of supplies and equipment needed and responsibility for providing
575 such;²⁵ and
576 vi. Copies of attendance records.

577 Worksite files will be reviewed on a semi-annual basis by FloridaCommerce staff and
578 must be provided upon request.

579 **w. Use of Equipment for Temporary Disaster-Relief Workers**

580 Generally, Disaster Recovery DWG funds may not be used to purchase equipment.²⁶
581 [Workforce Policy 87, Prior Approval Administrative Policy for Local Workforce](#)
582 [Development Boards](#) requires prior approval from FloridaCommerce before funds
583 awarded to a LWDB may be used to purchase equipment for such cases, which may
584 be subject to exception.

585 If equipment needed for the temporary disaster-relief workers to complete their
586 assigned task is not available at the worksite, such equipment may be rented.
587 Equipment rental expenses must be detailed as a separate line item in the budget(s)
588 submitted by the LWDB to FloridaCommerce.

589 **x. Coordination with FEMA and Non-Duplication of Funds**

590 Disaster-relief activities must be coordinated with the appropriate local emergency
591 management agencies to avoid duplication of benefits²⁷ and ensure that grant activities
592 appropriately respond to the affected community's needs after a disaster. LWDBs must
593 also coordinate with federal agencies responding to the disaster, either through direct
594 contact or through state or local agencies working with the federal agencies.

595 As FEMA and Disaster Recovery DWG funds can pay for similar services, the best way
596 to ensure that the LWDB is not duplicating FEMA funding is to obtain a written statement
597 from the county, city, and/or non-profit as to what services and/or funding FEMA is or
598 will be supplying to the entity and what disaster-recovery services will be provided by
599 disaster-relief temporary workers. This will provide documentation to show that Disaster
600 Recovery DWG funds are not duplicated with FEMA funded services/activities. The
601 written statement should include a brief description of what staff, equipment, supplies,
602 etc., are being paid through FEMA vs. Disaster Recovery DWGs. When a Disaster
603 Recovery DWG funded disaster-relief temporary job participant works at a site which is
604 later approved for FEMA reimbursement, and it is time for FEMA to reimburse the costs
605 of the project, the wages of the temporary job participants must be deducted from the
606 cost of the project before FEMA reimburses 75% of the cost of the project to the local
607 government.

608 LWDBs must establish policies and procedures that describe how the LWDB will assess

²⁴ Worksite supervisor orientation includes an overview of their responsibilities under the grant, allowable activities, timekeeping, discipline, etc.

²⁵ The worksite file identifies the supplies and equipment that will be needed for the temporary disaster-relief worker(s) to fulfill their job duties. As supplies are provided to individual participants, these are recorded as supportive services in Employ Florida.

²⁶ Equipment means tangible [personal property](#) (including information technology systems) having a useful life of more than one year and a per-unit [acquisition cost](#) that equals or exceeds the lesser of the capitalization level established by the [non-Federal entity](#) for financial statement purposes, or \$10,000. See [2 CFR 200.1](#).

²⁷ Duplication occurs when a beneficiary receives assistance for the same purpose from multiple sources resulting in the total assistance exceeding the actual need.

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.

y. Local Operating Procedures

Local Operating Procedures (LOPs) help local areas further define and clarify how programs will operate locally and are unique to each LWDB. LOPs govern procedures for the Disaster Recovery DWG program and must specifically address how the program will be administered locally. The LOPs must align with this policy. LWDBs must develop LOPS that:

- i. Define what constitutes a participant as being “unlikely to return to previous employment.”
- ii. Establish a local process for collecting and maintaining eligibility verification documentation, including ensuring that documentation collected is made available for monitoring by federal, state, and other auditors.
- iii. Outline how the LWDB will ensure the wages paid to participants enrolled in the disaster-relief employment are in line with the industry standard for that type of work in the area where the work is to be performed.
- iv. Ensure that supportive services are provided when needed to enable individuals to participate in disaster-relief employment and employment and training activities.
- v. Specify that Disaster-Relief Employers must ensure that participants are afforded the same health and safety standards established under federal and state law applicable to working conditions of other employees at the worksite.
- vi. Describe how the LWDB 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.

Local policies relating to program services must be updated to allow for the full array of services needed to operate DWGs. A written process must be developed that describes variations from the local policies. LWDBs must also ensure that LOPs related to the provision of supportive services and needs-related payments include how these services will be provided to Disaster Recovery DWG participants.

LOPs may be submitted to FloridaCommerce to provide feedback and ensure compliance with WIOA, USDOL regulations, and this policy.

VI.IMPLEMENTATION AND MONITORING

a. Florida Commerce Oversight

FloridaCommerce oversees the programmatic and financial management of Disaster Recovery DWGs to ensure effective support for businesses, individuals, and communities impacted by disasters.

Monitoring may occur on-site or virtually and will focus on:

- i. Outreach and recruitment

- ii. Participant eligibility
- iii. Career services and training
- iv. Performance and expenditure management
- v. Business services
- vi. Disaster-relief strategies
- vii. Coordination with federal, state, and local partners

Deficiencies, including the failure of an LWDB to meet Disaster Recovery DWG enrollments and/or expenditures, or failure to meet performance requirements, may result in sanctions and Performance Improvement Plans (PIP) identified in [Workforce Policy P104 – Sanctions for Local Workforce Development Boards’ Failure to Meet Federal and State Standards](#) and [Workforce Policy P88 – Performance Requirements for Local Workforce Development Boards](#).

b. Local Workforce Development Board Responsibilities

LWDBs must establish local policies and procedures to meet state and federal requirements. Each worksite must be included in the LWDB's formal monitoring plan.

- i. **Monitoring Schedule:** Conduct the first monitoring visit within three months of a participant's placement, and at least every six months thereafter.
- ii. **Monitoring Standards:** An independent staff member or third party unaffiliated with worksite or case management must conduct the monitoring. The monitor must engage directly with worksite supervisors²⁸ and disaster-relief workers.
- iii. **Documentation:** Each visit must be documented in a written report, including any required corrective actions. LWDBs must provide monitoring tools and documentation to FloridaCommerce upon request.
- iv. **Compliance:** If LWDBs discover that workers are engaged in non-disaster-related activities, they must take immediate corrective action, which may include terminating the worksite agreement.
- v. **Strategic Planning:** LWDBs must use information gathered from their monitoring activities to refine their disaster response strategies, including for business engagement, staff training, and integration of disaster response into service delivery.

c. Statewide Monitoring

CareerSource Florida and FloridaCommerce will monitor the implementation of this policy, including:

- i. Local operating procedures
- ii. Continuity of Operations (COOP) plans
- iii. Emergency service delivery logs
- iv. Mobile unit deployment
- v. Supportive service distribution
- vi. Post-disaster performance data

FloridaCommerce will review each LWDB's COOP and operating procedures every two years to ensure alignment with state protocols. LWDBs must submit a disaster response summary within 30 days of the event's closure, detailing services provided, and individuals served.

²⁸ Worksite Supervisors are individuals at a temporary disaster-recovery worksite who are responsible for overseeing the day-to-day work of temporary disaster-relief workers assigned to the worksite.

VII. AUTHORITIES

[Public Law 113-128, The Workforce Innovation and Opportunity Act \(WIOA\), WIOA Sections 3\(15\); 134; 170; 181; 184; 185; 188; 189](#)

[20 CFR Sections 679.100 - 130 20 CFR Part 680, Subpart C, Section 682.300 – Section 682.370 20 Code of Federal Regulations \(CFR\) Part 687, National Dislocated Worker Grants](#)

[TEGL 19-16, Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act \(WIOA\) and the Wagner-Peyser Act Employment Service \(ES\), as amended by Title III of WIOA, and for Implementation of the WIOA Final Rules](#)

[TEGL 14-18, Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor \(DOL\)](#)

[TEGL 09-24, Updated National Dislocated Worker Grant Program Guidance](#)

[Chapter 252, Florida Statutes](#)

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

[Section 448.095, Florida Statutes](#)

[CareerSource Florida Workforce Policy G1 – State Workforce Development Board Roles and Responsibilities](#)

[CareerSource Florida Workforce Policy 2021.06.09.A.2 – Rapid Response and Layoff Aversion System](#)

[CareerSource Florida Workforce Policy P114 – Rapid Response Program Administration](#)

Florida Administrative Code (FAC), Chapter 60K-5, and Chapter [252.38, Florida Statutes](#)

VIII. HISTORY

Date	Description
TBD	AWI Final Guidance 00-017, CareerSource Florida Workforce Policy Disaster Recovery Dislocated Worker Grants Program Administration Policy, and CareerSource Florida Emergency Response Strategy consolidated into a single policy to provide strategic and operational guidance.
06/18/2024	CareerSource Florida Emergency Response Strategic Policy approved by the CareerSource Florida Board of Directors
08/16/2023	CareerSource Florida Workforce Policy Disaster Recovery Dislocated Worker Grants Program Administration Policy updated to conform to TEGL 16-21 ²⁹ and re-issued by FloridaCommerce.

²⁹ Note: TEGL 16-21 rescinded.

06/09/2021	CareerSource Florida Workforce Policy Disaster Recovery Dislocated Worker Grants Program Administration approved by CareerSource Florida Board of Directors to provide LWDBs with the minimum requirements for administering Disaster Recovery Dislocated Worker Grants.
11/27/2000	AWI Final Guidance 00-017 – Procedures for the Closure of the One-Stop Delivery System Centers Due to Natural Disasters or Other Emergency Conditions issued by the Florida Agency for Workforce Innovation

IX. RESOURCES

[Florida Virtual Business Emergency Operations Center - FloridaDisaster.biz](https://www.floridadisaster.biz)

[Workforce Services Quick Facts: Mobile Unit](#)

[Workforce Services Quick Facts: State Rapid Response Program](#)

[Disaster Recovery Dislocated Worker Grants](#)

[State of Florida Comprehensive Emergency Management Plan](#)

[ESF 18: Business, Industry and Economic Stabilization Annex](#)

[Employ Florida Disaster Recovery Jobs Portal](#)

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

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

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Attachment: Disaster Recovery Projects Allowable Activities

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Activity Type	Description	Allowable/Disallowed	Citation (CFR/TEGL)
Disaster Relief Employment	Temporary jobs created to assist with clean-up, humanitarian aid, and recovery efforts in areas affected by a federally declared disaster or emergency. These jobs must be related to disaster recovery and are time limited.	Allowable	<u>20 CFR 687.180(b)(1)</u>
Employment and Training Activities	Services such as job search assistance, career counseling, occupational skills training, and on-the-job training provided to help dislocated workers re-enter the workforce.	Allowable	<u>20 CFR 687.180(b)(1)</u>
Pre-vocational Activities	Services that prepare individuals for employment or training, including basic skills instruction, English language acquisition, and work readiness training.	Allowable	<u>TEGL 09-24 Attachment II</u>
Supportive Services	Services that enable individuals to participate in disaster relief employment or training, such as transportation, childcare, housing assistance, and work-related tools or clothing.	Allowable	<u>TEGL 09-24 Attachment II</u>
Preparation for Future Disasters	Activities focused on planning, training, or equipping for future disasters rather than responding to a current declared disaster.	Disallowed	<u>TEGL 09-24 Attachment II</u>
Incumbent Worker Training	Training for workers who are currently employed and not dislocated, which is not allowable under Disaster Recovery DWGs.	Disallowed	<u>TEGL 09-24 Attachment II</u>
Customized Training for Employed Workers	Employer-specific training for currently employed individuals, which is not aligned with the intent of serving dislocated workers.	Disallowed	<u>TEGL 09-24 Attachment II</u>

Purchasing Humanitarian Supplies (e.g., food, clothing, hygiene products)	Buying food, clothing, hygiene products, or other humanitarian aid items is not an allowable use of DWG funds because these are not employment related services, other federal programs cover humanitarian needs and WIOA Title I funds must align with workforce outcomes.	Disallowed	<u>TEGL 09-24 Attachment II</u>
Purchasing Materials for Repairs	Using DWG funds to buy construction materials or supplies for physical repairs is not permitted because this is not a workforce activity. Other federal programs are designed to fund infrastructure and material recovery. Under WIOA, all expenditures must be tied to employment outcomes. Allowing material purchases could lead to misallocation of funds.	Disallowed	<u>TEGL 09-24 Attachment II</u>
Matching FEMA Funds	Dislocated Worker Grant funds cannot be used to match or supplement FEMA disaster relief funds. DWG funds are intended to supplement workforce development efforts, not to serve as a match or cost-share for other federal programs like FEMA's Public Assistance. Federal cost principles prohibit the use of one federal grant to match another unless explicitly authorized.	Disallowed	<u>TEGL 09-24 Attachment II</u>
Membership Dues for Local Economic Development Organizations	Paying dues or fees to join local economic development groups is not an allowable cost because this is not an employment or training activity and paying membership dues to economic development organizations does not provide a direct benefit to	Disallowed	<u>TEGL 09-24 Attachment II</u>

	dislocated workers nor does it contribute to measurable employment outcomes. Under WIOA, administrative costs must be reasonable, necessary and allocable to the grant's purpose.		
Education for Local Workforce Board Staff (not job-related)	TEGL 09-24 explicitly lists training or education for staff that is not directly tied to managing the Dislocated Worker Grant as a disallowed activity. Training that helps staff administer the grant, comply with federal reporting requirements, and manage disaster relief employment or training programs that support effective delivery of grant-funded services may be allowable.	Disallowed	TEGL 09-24 Attachment II

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EMERGENCY RESPONSE AND DISASTER RECOVERY WORKFORCE POLICY DEVELOPMENT TRACKER

A. GENERAL INFORMATION

Policy Name:	Emergency Response and Disaster Recovery
Policy Type:	Operational/Programmatic
Program:	Workforce Development Board/WIOA
Policy Rationale:	The Emergency Response and Disaster Recovery Workforce Policy consolidates three policies and updates and strengthens Florida's workforce system response during emergencies. Merging three policies into one provides a unified framework that defines program goals, measurable outcomes, and how the policy should be implemented and monitored. This single policy gives local workforce boards (LWDBs) guidance on how to prepare for and respond to disasters, including how to use disaster-related dislocated worker grants. To further support readiness, the policy includes cybersecurity planning requirements to help protect systems and data during emergencies. These updates are designed to improve coordination, increase efficiency, and ensure a faster, more effective response to workforce disruptions across the state.
Policies:	CareerSource Florida Policy – Emergency Response CareerSource Florida Policy 113 – Disaster-Recovery Dislocated Worker Grants CareerSource Florida Policy 004 - Procedures on One-Stop Closures
Date to Publish:	August 22 – August 29

B. PROJECT SUMMARY

This policy outlines roles and responsibilities of the CareerSource Florida network before, during, and after disasters and states of emergency. It provides a framework for coordinating services with federal, state, and local partners, including the Florida Department of Commerce (FloridaCommerce) and local workforce development boards (LWDBs), Regional Planning Areas, and career centers and establishes guidance for LWDBs to administer Disaster Recovery Dislocated Worker Grants (DWGs), while ensuring compliance with the Workforce Innovation and Opportunity Act (WIOA), U.S. Department of Labor (USDOL) regulations and state requirements.

C. OVERVIEW OF CHANGES

	Substantive Change	Location	Reason
1	Defines the policy's applicability to CareerSource Florida, FloridaCommerce, LWDBs, regional	Section I. Purpose and Scope (Page 1)	The purposes section explains why the policy exists and helps align stakeholders on the policy's

	planning areas, and career centers; Establishes a framework for coordination before, during, and after disasters; Emphasizes compliance with WIOA, USDOL regulations, and state requirements.		intent, ensures consistent interpretation and application, and provides context for decision-making and implementation. The scope of the policy identifies who and what the policy applies to.
2	Clarifies expectations for: • Continuity of Operations Plans (COOP) • Activation of state and local rapid response teams • Service provision • Disaster Recovery Dislocated Worker Grant application and use • Staff Training	Section II. Key Objectives (Page 1)	Key objectives describe the core goals and priorities the policy is designed to achieve. These objectives serve as a bridge between the policy's purpose and its implementation and help guide decision making, resource allocation, and performance allocation. Key objectives identify the strategic intent of the policy that align with the organization's mission and vision and the operational focus of the policy including specific areas of action or emphasis for implementation.
3	Introduces quantifiable metrics, including: • COOP compliance • Use of Disaster Recovery Dislocated Worker Grants • Use of mobile units • Supportive services delivery • Reemployment assistance rates • Time to provision of requested support for one-stop customers during a disaster • Employer Satisfaction	Section III. Measurable Performance Outcomes (Page 2)	Measurable outcomes hold CareerSource Florida, FloridaCommerce, LWDBs, regional planning areas, and stakeholders accountable for results such as WIOA Indicators of Performance and P88 – Performance Requirements for Local Workforce Development Boards Workforce Policy 115 – Common Exit
4	Describes the roles of SERT, ESF 18 and CareerSource Florida in disaster response and highlights collaboration with local and federal partners	Section IV. Background (Page 2)	Florida's Division of Emergency Management leads statewide disaster response through the State Emergency Response Team (SERT), which coordinates efforts across state agencies, nonprofits, and federal partners. FloridaCommerce leads SERT's Emergency Support Function 18 (ESF 18), focusing on helping businesses and the economy recover. CareerSource Florida collaborates with FloridaCommerce, local workforce boards, and career centers to assess workforce needs, provide training, and deliver services that help businesses and workers recover quickly. To support these efforts, Disaster Recovery

			Dislocated Worker Grants (DWGs), authorized under WIOA, provide temporary funding for disaster-relief jobs and employment services in areas affected by significant job loss due to declared disasters.
5	CareerSource Florida and FloridaCommerce collaborate systematically.	Section V(A) Policies and Procedures, Network Coordination (Page 2)	
6	Local Workforce Development Boards (LWDBs) must follow local emergency plans and report closures over two days to FloridaCommerce. Each office must name a contact person to notify CareerSource Florida, FloridaCommerce, and local emergency centers, and keep their contact info updated. State-owned facilities will close based on local decisions, evacuation orders, or emergency declarations, and affected employees may get administrative or compensatory leave.	Section V(B)-(D) Policies and Procedures (Page 2-3)	Ensures continuity, safety, and coordination across the statewide system during emergencies—protecting both staff and the public while maintaining access to critical employment services. The requirement for approval of closures beyond two days safeguards public access to critical employment services while also allowing flexibility when a formal state of emergency is in place.
7	LWDBs must notify FloridaCommerce of office closures using approved communication channels. Closure information will be posted and made available to the public.	Section V(E), Policies and Procedures, Notification Protocols (Page 3)	Ensures LWDBs keep FloridaCommerce and the public informed about office closures. This supports transparency, continuity of services, and helps maintain access to workforce programs during emergencies or disruptions.
8	This section includes expanded guidance on mobile unit deployment, cybersecurity planning and incident response, and virtual and mobile service delivery.	Section V(F) Policies and Procedures, Operational Requirements (Page 3-4)	Outlines the operational responsibilities LWDBs must fulfill to ensure accessible, and high-quality service delivery for both employers and job seekers. By offering a range of services through flexible formats—including mobile units and virtual access—LWDBs effectively respond to local labor market disruptions and meet customer needs. These provisions promote economic recovery, help displaced workers transition back into employment and reinforce Florida's commitment to a responsive workforce system.

8	Local Workforce Development Boards (LWDBs) must include strong cybersecurity protocols in their emergency plans, including data protection, multi-factor authentication, staff roles, and incident response procedures. They are required to notify FloridaCommerce of any cyberattacks and conduct regular security audits, such as vulnerability scans and penetration tests. LWDBs must also ensure timely system updates and data recovery strategies to maintain operations during disruptions, and comply with FloridaCommerce agreements and Florida Statutes section 501.171 regarding the protection and reporting of personal data breaches	Section V(F)(a), Policies and Procedures, Operational Requirements, Cybersecurity and Protection of Electronic Data (Page 4)	Cybersecurity directly affects the integrity and continuity of workforce operations and strong safeguards protect individuals from identity theft and data misuse. 501.171, Florida Statutes , Grantee-Subgrantee Agreement
10	LWDBs must provide access and guidance to the Disaster Recovery Jobs Portal linked from the Employ Florida Website.	Section V(G) Policies and Procedures, Disaster Recovery Jobs Portal (Page 4)	Ensures rapid employment support for individuals affected by major disasters, helping them reenter the workforce quickly.
11	LWDBs shall provide access to Rapid Response and Layoff Aversion activities authorized under WIOA.	Section V(H), Policies and Procedures, Rapid Response and Layoff Aversion (Page 4)	Ensures LWDBs are prepared to respond quickly and effectively to layoffs or disasters that disrupt employment; Aligns with Workforce Policy – Rapid Response and Layoff Aversion System , P114 – Rapid Response Program Administration , and TEGL No. 19-16 .
12	Encourages use of FloridaDisaster.biz and survey participation.	Section V(I), Policies and Procedures, Business Damage Assessment (Page 5)	Business Damage Assessment Surveys and collected data help FloridaCommerce quickly evaluate how disasters affect local businesses, identify their recovery needs, and guide targeted support efforts.
13	This section provides new emphasis on COOP Plans and Local Operating Procedures including: • Biennial updates • 24-hour service delivery window post-disaster to be coordinated with regional workforce area as necessary • Staff training and outreach surveys	Section V(J), Policies and Procedures, COOP and Local Operating Procedures (Page 5)	Ensures workforce services remain safe, coordinated, and uninterrupted during emergencies through proactive planning, communication with state, regional, and local stakeholders; and, staff training.
14	This section outlines detailed responsibilities for: • Worksite agreements • Employer engagement	Section V(K), Policies and Procedures, Use of DWG Funds (Page 5-15)	Ensures LWDBs) can quickly mobilize resources and connect displaced workers with disaster-relief jobs, supporting both

	Participant eligibility and outreach		economic recovery and community rebuilding efforts.
15	The use of Disaster Related Dislocated Worker Grants is critical to the workforce system's recovery from an emergency or disaster. Before disasters occur, LWDBs must prepare by identifying key recovery partners, setting up communication plans, engaging the public about available funding, arranging worksite agreements for recovery jobs, drafting job descriptions, locating relevant training programs, and training staff to manage Disaster Recovery Dislocated Worker Grants (DWGs); After a disaster, FloridaCommerce will assess the need for disaster-relief jobs, determine if enough eligible workers are available, and decide whether to apply for DWG funding.	Section V(K)(a-b), Policies and Procedures, Use of Disaster Recovery Dislocated Worker Grants, Pre-Disaster Planning, Determining a Need for a Disaster Recovery Dislocated Worker Grant (Pages 5-6)	Ensures LWDBs are strategically prepared in advance to coordinate disaster recovery efforts, mobilize funding and resources including the use of Disaster Related Dislocated Worker Grants, and quickly connect impacted individuals with employment and training opportunities to support economic recovery.
16	If Disaster Recovery DWG funding is needed, FloridaCommerce will help LWDBs submit an application following TEGL 09-24. The application must include a summary of the disaster's impact, planned activities, participant details, coordination with emergency agencies, project scope and priorities, a community needs assessment, projected costs and enrollment, a timeline of goals, and a detailed budget.	Section V(K)(c): Policies and Procedures, Use of Disaster Recovery Dislocated Worker Grants Disaster Recovery Dislocated Worker Grant Application Submittal (Page 6)	Ensures Disaster Recovery DWG applications are thorough, coordinated, and aligned with federal guidance—allowing Local Workforce Development Boards (LWDBs) to secure timely funding and deliver targeted employment services that support disaster-impacted communities. TEGL 09-24
17	The Community Needs Assessment is a required part of the Disaster Recovery DWG application process and helps define the scope of the response to a declared emergency or disaster. It must include: - A description of the disaster's impact and how the grant will prioritize support for the most affected or disadvantaged communities. - An explanation of how proposed projects will address cleanup, humanitarian needs, and promote recovery through quality employment.	Section V(K)(d), Policies and Procedures, Use of Disaster Recovery Dislocated Worker Grants, DWG Application and Community Needs Assessments (Page 7-8)	Ensures Disaster Recovery DWG funding is targeted to the areas and populations most affected by a declared emergency; Provides a data-driven foundation for identifying economic impacts, prioritizing recovery efforts, and designing employment and training services that promote long-term workforce stability. Coordination with local and regional partners including emergency agencies, strengthens alignment between workforce systems and broader disaster recovery strategies.

	- Details on how the grant will help individuals return to unsubsidized employment. For nationally significant disasters, the assessment must show that at least 50 jobs could be lost in the affected area. If the grant includes employment and training activities, the assessment must also include: - Economic impacts and related challenges such as layoffs or rising unemployment. - Justification for why existing funding cannot meet the new employment and training needs. - A summary of current economic conditions and barriers to serving dislocated workers. - Identification of target populations, especially those with barriers like childcare or transportation needs. LWDBs and Regional Planning Areas must work with local emergency management agencies to complete the assessment.		
18	FloridaCommerce evaluates disaster recovery needs across the state and distributes Disaster Recovery DWG funds to LWDBs based on those needs; LWDBs must use the funds to support eligible individuals affected by disasters, including laid-off, long-term unemployed, and self-employed workers impacted by the event; LWDBs must document eligibility, prioritize veterans and eligible spouses for services, and ensure proper recordkeeping; Activities may include disaster-relief employment and training, which must be coordinated with local emergency agencies and comply with federal and state requirements. Failure to meet planned Disaster Recovery FWG enrollments and/or expenditures may result in sanctions for LWDB failure to meet federal and state standards.	Section V(K)(e-h) Policies and Procedures, Use of Disaster Recovery Dislocated Worker Grants, Funding and Participant Eligibility (Page 7-9)	Ensures Disaster Recovery DWG funds are distributed quickly and strategically to areas with the greatest need, while enforcing strict eligibility and documentation standards to maintain program integrity, accountability, and access—especially for veterans and other priority populations. TEGL 10023, Change 2 Workforce Policy 111 – Priority of Service for Veterans and Eligible Spouses P7 – Recapture and Reallocation of WIOA Funds P104 – Sanctions for Local Workforce Development Boards Failure to Meet Federal and State Standards

19	Disaster Recovery DWG projects must primarily include disaster-relief employment and may also offer training and employment services based on coordination with local emergency partners, though limitations may apply per the grant award; Funds cannot be used for future preparedness activities, training for currently employed workers, humanitarian supply purchases, repair materials, FEMA fund matching, organization membership dues, or unrelated LWDB staff education	Section V(K)(i-j) Policies and Procedures, Use of Disaster Recovery Dislocated Worker Grants, Allowable and Disallowed Activities (Page 9-10)	This distinction between allowable and disallowed activities ensures that Disaster Recovery DWG funds are used effectively and in full compliance with federal guidelines—focusing resources on direct employment and training support for disaster-impacted individuals rather than unrelated or ineligible costs. It helps maintain program integrity, maximizes impact, and prevents misuse of limited workforce development funding.
20	LWDBs must ensure disaster-relief employment supports cleanup, recovery, or humanitarian assistance directly related to disaster impacts. Activities may include sheltering, health care, housing repairs, debris removal, and emotional support. Eligible participants can work up to 12 months or 2,080 hours, with possible extensions granted by USDOL and communicated through modified funding notices.	Section V(K)(k-l) Policies and Procedures, Use of Disaster Recovery Dislocated Worker Grants, Disaster-Relief Employment (Page 10)	Ensures disaster-relief employment funded through Disaster Recovery DWGs directly supports urgent community recovery needs while providing temporary work opportunities for eligible individuals. Clear guidelines on duration and scope help maintain program accountability and align workforce services with broader goals of economic recovery.
21	Participants in disaster-relief positions must be paid wages equal to those of similarly qualified employees doing comparable work, or at least \$15/hour if no standard exists, with fringe benefits and hazard pay provided when applicable. LWDBs may offer short-term training to help workers gain necessary skills for disaster-relief roles, and wages may be paid during this training. Additionally, Disaster Recovery DWG funds can support broader employment and training services—such as job readiness, ESL, and occupational skills training—for individuals unlikely to return to their previous jobs, guided by a personalized Employability Plan in Employ Florida.	Section V(K)(m-o), Policies and Procedures, Use of Disaster Recovery Dislocated Worker Grants, Participant Wages and Fringe Benefits, Training and Pre-Vocational Activities, Employment and Training Activities (Pages 10-11)	Ensures disaster-relief workers are compensated and properly trained, while also allowing affected individuals to access employment and skill-building opportunities that support immediate recovery and long-term workforce development.
22	Local Workforce Development Boards (LWDBs) must provide supportive services to help individuals participate in disaster-relief employment and related training activities. These services must be tailored to ensure participants can perform their jobs safely and effectively, comply with WIOA	Section V(K)(p), Policies and Procedures, Use of Disaster Recovery Dislocated Worker Grants, Supportive Services (Page 11)	Supportive services remove barriers that prevent individuals from participating in disaster-relief employment and training activities, ensuring equitable access to workforce opportunities and promoting successful outcomes for affected workers.

	regulations and Workforce Policy 109, and be included in each LWDB's local operating procedures. Participants earning wages from disaster-relief employment are not eligible for needs-related payments.		Workforce Policy 109, Supportive Services and Needs Related Payments
23	LWDBs must select disaster-relief employers and worksite sponsors that match the scope of the emergency and ensure they follow all rules, including safety standards and participant oversight; Disaster-relief worksites must be located in the affected area and prioritized based on damage, vulnerable populations, and economic impact, with some work allowed on private property under strict conditions; LWDBs must maintain detailed records for each worksite, including agreements, job descriptions, safety training, and attendance, and submit reports to FloridaCommerce; Equipment purchases require prior approval, but rentals are allowed if necessary and must be clearly budgeted.	Section V(K)(q-w), Policies and Procedures, Use of Disaster Recovery Dislocated Worker Grants, Disaster-Relief Employers and Worksites, Eligible Disaster Relief Employers, Worksite Selection, Health and Safety Standards, Prioritizing Disaster-Relief Worksites, Approval and Tracking of Worksites, Use of Equipment for Temporary Disaster-Relief Workers (Pages 12-14)	Ensures disaster-relief jobs are deployed safely, effectively, and in coordination with local recovery priorities—allowing LWDBs to create meaningful employment opportunities while supporting community recovery. Clear standards for employer agreements, worksite selection, safety protocols, and documentation help maintain program integrity and align workforce efforts with emergency management strategies.
24	LWDBs must coordinate disaster-relief efforts with emergency management and federal agencies to avoid duplicating services funded by FEMA; LWDBs should obtain written documentation from local entities detailing what FEMA will cover versus what DWG-funded workers will provide; If FEMA later reimburses a project, LWDBs must deduct DWG-funded wages from the reimbursement amount; LWDBs must develop policies to assess other available resources and recover DWG funds if overlapping funding becomes available.	Section V(K)(x), Policies and Procedures, Use of Disaster Recovery Dislocated Worker Grants, Coordination with FEMA and Non-Duplication of Funds (Pages 14-15)	Ensures Disaster Recovery DWG funds are used efficiently and do not duplicate services already covered by FEMA or other sources—allowing workforce programs to target unmet needs and maximize impact; Reinforces fiscal accountability and supports strategic alignment between workforce recovery efforts and broader emergency response systems.
25	Local Operating Procedures (LOPs) guide how each LWDB administers the Disaster Recovery DWG program and must align with state and federal policy; LWDBs must define key terms like “unlikely to return to previous employment,” establish processes for verifying and documenting participant eligibility, and ensure wages meet industry standards; LOPs must also address the provision of supportive services, enforce health and safety	Section V(K)(y), Policies and Procedures, Use of Disaster Recovery Dislocated Worker Grants, Local Operating Procedures (Page 15)	LOPs ensure that each LWDBs administer Disaster Recovery DWG programs consistently, transparently, and in alignment with federal and state requirements. By defining key processes—such as eligibility verification, wage standards, supportive services, and coordination with other funding sources—LOPs help safeguard program integrity, promote

	standards at worksites, and outline how to avoid duplicating funding from other sources like FEMA; Updated local policies must reflect the full range of DWG services, and LWDBs may submit LOPs to FloridaCommerce for review and feedback.		equitable access, and support effective service delivery tailored to local needs.
26	FloridaCommerce manages the Disaster Recovery DWG program, ensuring proper outreach, training, and financial oversight to support disaster-impacted communities; LWDBs are responsible for creating compliant policies and routinely monitoring disaster worksites, with corrective action required for any non-disaster-related activity; Statewide, FloridaCommerce and CareerSource Florida review procedures, emergency operations, and performance data, with LWDBs submitting post-disaster summaries and undergoing biennial plan reviews Deficiencies, including the failure of an LWDB to meet Disaster Recovery DWG enrollments and/or expenditures, may result sanctions.	Section VI. Implementation and Monitoring (Page 15 – 16)	By clearly assigning roles to FloridaCommerce and LWDBs, the policy promotes the delivery of effective career services and job training to individuals impacted by disasters. It also helps safeguard public resources through monitoring, requiring measurable outcomes and transparency. Strategic planning requirements further embed disaster preparedness and economic resilience into the broader workforce system, making it more adaptive to future emergencies and capable of sustaining recovery. Workforce Policy P104 – Sanctions for Local Workforce Development Boards' Failure to Meet Federal and State Standards. Workforce Policy P88 – Performance Requirements for Local Workforce Development Boards.
27	This section lists federal and state statutes, regulations, and guidance letters that provide the legal foundation for the policy.	Section VII. Authorities (Pages 16-17)	Cited authorities establish legal and regulatory foundation, enhance credibility and transparency for development of local operating procedures and support consistency and alignment with federal and state law, federal and state guidance, and the WIOA Combined Plan.
28	This section documents the evolution of the policy from 2000 to the present including the consolidation of previous policies.	Section VIII. History (Page 17)	Policy history identifies policies consolidated into a single policy, explains the policy's origin and rationale, builds institutional knowledge of policy development, and guides future updates.
29	This section provides links to additional sources of information helpful in administering the requirements of this policy.	Section IX. Resources (Page 18)	Authorities and resources can be used to facilitate monitoring and auditing, guide future policy and local operating procedure

			updates, and educate operational staff and stakeholders.
30	This attachment identifies allowable activities, a description of the activities, whether they are allowed or disallowed, and the federal regulations or guidance cited.	Attachment: Disaster Recovery Projects Allowable Activities (Page 19-21)	The simplified attachment of allowable and disallowable activities improves execution by making the policy more accessible, actionable and enforceable. Standardization and streamlining policies and related attachments help ensure uniformity in the delivery of services.

C. LEGAL REFERENCES AND APPLICABLE GUIDANCE

[Public Law 113-128, The Workforce Innovation and Opportunity Act \(WIOA\), WIOA Sections 3\(15\); 134; 170; 181; 184; 185; 188; 189](#)

[20 CFR Sections 679.100 - 130 20 CFR Part 680, Subpart C, Section 682.300 – Section 682.370 20 Code of Federal Regulations \(CFR\) Part 687, National Dislocated Worker Grants](#)

[TEGL 19-16, Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act \(WIOA\) and the Wagner-Peyser Act Employment Service \(ES\), as amended by Title III of WIOA, and for Implementation of the WIOA Final Rules](#)

[TEGL 14-18, Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor \(DOL\)](#)

[TEGL 09-24, Updated National Dislocated Worker Grant Program Guidance](#)

[Chapter 252, Florida Statutes](#)

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

[Section 448.095, Florida Statutes](#)

[CareerSource Florida Workforce Policy G1 – State Workforce Development Board Roles and Responsibilities](#)

[CareerSource Florida Workforce Policy 2021.06.09.A.2 – Rapid Response and Layoff Aversion System](#)

[CareerSource Florida Workforce Policy P114 – Rapid Response Program Administration](#)

Florida Administrative Code (FAC), Chapter 60K-5, and Chapter [252.38, Florida Statutes](#)

[Florida Virtual Business Emergency Operations Center - FloridaDisaster.biz](#)

[Workforce Services Quick Facts: Mobile Unit](#)

[Workforce Services Quick Facts: State Rapid Response Program](#)

[Disaster Recovery Dislocated Worker Grants](#)

[State of Florida Comprehensive Emergency Management Plan](#)

[ESF 18: Business, Industry and Economic Stabilization Annex](#)

[Employ Florida Disaster Recovery Jobs Portal](#)

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

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

Approved _____
Disapproved _____

Action Item 4

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) ADULT AND DISLOCATED WORKER PROGRAM ELIGIBILITY

Public Law 113-128, the Workforce Innovation and Opportunity Act (WIOA) supports Adult and Dislocated Worker programs to help Floridians find stable jobs and meet employer demands. The Adult program targets individuals 18 and older, especially those with low income, limited education, or receiving public assistance, by offering job search support, skills training, and career counseling. The Dislocated Worker program focuses on those who lost their jobs due to layoffs or economic changes and helps them quickly return to work with training and job placement services. Both are available through American Job Centers.

CareerSource Florida Workforce Policy 122 – Adult and Dislocated Worker Program Eligibility was approved by the CareerSource Florida Board of Directors in December 2022 to provide policy direction on participant eligibility for the WIOA Adult and Dislocated Worker program and guide Local Workforce Development Boards (LWDBs) and service providers in offering swift, coordinated support to eligible individuals. CareerSource Florida and the Florida Department of Commerce (FloridaCommerce) worked with local LWDBs to revise the policy to align with customer service expectations in Workforce Policy P9 – Availability of Services to Floridians, streamline processes, and include key program objectives, measurable performance outcomes, and implementation and monitoring elements, which includes the following:

- The tracking related to the time to eligibility determination and service delivery for participants,
- An emphasis on activities designed to increase coordination and co-enrollment across programs to maximize support for participation, and
- A requirement specific to storing related and required documentation within the state-adopted case management system.

This revised policy adds a standardized process, in alignment with federal and state law, regulations and guidance for all LWDBs and regional workforce areas to deliver timely, effective services to eligible individuals.

FOR CONSIDERATION

- **Approve revisions to Workforce Policy P122 – Adult and Dislocated Worker Program Eligibility**



**POLICY
NUMBER
P122**

Workforce Policy

Title:	Adult and Dislocated Worker Program Eligibility
Program:	Workforce Innovation and Opportunity Act
Type:	Programmatic
Effective:	TBD

I. PURPOSE AND SCOPE

The purpose of this policy is to provide the Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated Worker program eligibility requirements to Local Workforce Development Boards (LWDBs) and program service providers and to ensure timely, efficient, and aligned services are provided to all seeking eligibility in this program.

II. KEY OBJECTIVES

1. Expand timely access to career services so eligible adults and dislocated workers can get the help they need through the one-stop system.
2. Improve employment outcomes by helping participants find and keep good jobs with competitive wages.
3. Promote skill development through training that leads to recognized credentials and prepares workers for in-demand industries.
4. Strengthen partnerships by working with required and additional partners to deliver coordinated services.
5. Ensure compliance and accountability by tracking performance.

III. MEASURABLE PERFORMANCE OUTCOMES

WIOA outlines six primary performance indicators for the Adult and Dislocated Worker programs, as defined in Section 116(b)(2)(A) of WIOA and [20 CFR Part 677](#). Additional measures of performance for this policy include:

1. Aligned, clearly written and posted local operating procedures outlining processes for Adult and Dislocated Worker program eligibility.
2. Average time to eligibility determination and service delivery.

IV. POLICIES AND PROCEDURES

A. Eligibility for Career Services

WIOA section (sec.) 3(2) defines an individual who is considered an adult and WIOA sec. 3(15) defines an individual who is considered a dislocated worker for eligibility purposes to participate in the WIOA Adult or Dislocated Worker programs. LWDBs must ensure that every individual receiving services under the WIOA Adult or Dislocated Worker programs meets the applicable eligibility criteria and is subsequently enrolled in the program.

An individual's eligibility status is fixed at the time of eligibility determination, and individuals remain eligible for the Adult/Dislocated Worker Program even if there are changes in the original circumstances that were used as the basis to establish eligibility. For example, an individual determined eligible as a dislocated worker on the basis of an anticipated layoff or termination remains eligible even if the layoff or termination does not take place.

Pursuant to the definition of dislocated worker, RESEA participants and those in stop-gap employment may also be eligible for services through the WIOA Dislocated Worker Program.

B. Eligibility for Training Services

Training services may be made available to employed and unemployed adults and dislocated workers consistent with federal regulations¹. Additional considerations include:

- i. Economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services serve as part of the determination consistent with local plans;²
- ii. Individuals unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as state-funded training funds or Federal Pell Grants established under Title IV of the Higher Education Act of 1965, or who require WIOA assistance in addition to other sources of grant assistance, including Federal Pell Grants may be eligible. Veteran Assistance (VA) benefits for education and training services do not constitute "other grant assistance" under WIOA's eligibility requirements and do not preclude eligibility or need to be exhausted or

¹ [20 CFR 680.220](#), [20 CFR 680.210\(2\)](#), [20 CFR 680.210\(3\)](#), [20 CFR 680.210\(b\)](#)

² The Florida Department of Commerce publishes the Adjusted Lower Living Standard Income Level (LLSIL) Wage Rates each year upon converting the LLSIL to an hourly wage. The hourly wage rates are used as baseline data in state-generated performance reports such as the monthly management report and may be used by local workforce development boards for other purposes such as the locally required definition for employment that leads to self-sufficiency. Each LWDB must describe the definition of "self-sufficiency" used by the local area in its WIOA local plan.

- 68 depleted for eligibility to be determined.; and³
- 69 iii. Need financial support to cover training costs that have not been paid.
- 70 Reimbursement for training services already paid for is not allowed.
- 71 iv. If training services are provided through the adult funding stream, are
- 72 determined eligible in accordance with the state and local priority
- 73 system in effect for adults, as prescribed in [Workforce Policy 105 –](#)
- 74 [Priority of Service.](#)⁴

75

76 C. Statutory Priority for Adult Funds

77

78 WIOA establishes a priority requirement with respect to funds allocated to a local area

79 for the Adult program.⁵ When using WIOA Adult funds to provide individualized career

80 services and training services, LWDBs must give priority to recipients of public

81 assistance consistent with [Workforce Policy 105 – Priority of Service](#) and [Workforce](#)

82 [Policy P111 – Priority of Service for Veterans and Eligible Spouses](#) for the

83 requirements for providing priority of service under WIOA.

84

85 D. Eligibility Documentation

86

87 Upon issuance of this policy, all LWDB are required to collect supporting eligibility

88 documentation used to determine eligibility and retain such documentation in Employ

89 Florida. LWDBs must ensure the documentation collected is appropriate and available

90 for review by auditors and federal, state, and local representatives. Adult and dislocated

91 worker service providers must obtain and maintain documentation that supports the

92 determination for eligibility and continuous participation. Please see [Section VI.](#)

93 [Resources: Source Documentation for Core/Non- Core Programs DOL-only Data](#)

94 [Element Validation.](#)

95

96 E. Enrollment

97 1. Employ Florida Requirements

98 Individuals seeking WIOA services, aside from self-service or information-only

99 services or activities, through the Adult and Dislocated Worker program must be

100 registered in [Employ Florida.](#)⁶ Once an individual is determined to be eligible for the

101 WIOA Adult or Dislocated Worker program, staff are required to complete a WIOA

102 Adult or Dislocated Worker program application in Employ Florida and enter all

103 required information, including that required by [29 CFR 38.41\(b\).](#)

104

105 2. Enrollment Process Requirements

106 Individuals interested in consideration for WIOA Title I Adult or Dislocated

107 Worker program services must be allowed to apply for services. However, an

108 application alone is not equivalent to enrollment into the program. LWDBs must

³ [20 CFR 680.210\(c\)](#), [20 CFR 680.230](#)

⁴ [20 CFR 680.210\(d\)](#)

⁵ [WIOA sec. 134\(c\)\(3\)\(E\)](#)

⁶ [20 CFR 680.110\(b\)](#)

109 ensure that every individual receiving services under this program is determined
110 eligible as an adult or dislocated worker and formally enrolled in the program as
111 soon as possible but no later than 90 days after eligibility determination. When
112 enrollment is not completed within 90 days of eligibility determination, a
113 redetermination must occur. Enrollment into the program(s) requires assigning an
114 appropriate service in Employ Florida that initiates participation.⁷ Note that while
115 LWDBs must meet the 90 days requirement above, LWDBs should strive to ensure
116 that every individual seeking to receive services under the Dislocated Worker
117 program is determined eligible as a dislocated worker and formally enrolled in the
118 program no later than 30 days after eligibility determination.
119

120 **3. Enrollment in the Adult Program, the Youth Program, or Both**

121
122 Individuals between the ages of 18 to 24 who meet the respective program
123 eligibility requirements may participate in either the WIOA Adult or Youth
124 program or participate in both concurrently. Such individuals must meet the youth
125 or adult eligibility criteria applicable to the services provided. If such concurrent
126 enrollment occurs, LWDBs must track expenditures separately by program and the
127 delineation of services must be clearly identified in the service plan for activities in
128 Employ Florida.

129
130 See [Workforce Policy 095 - Youth Eligibility](#) for specific details about co-
131 enrollment.
132

133 **4. Timely, Efficient, and Aligned Determinations**

134 LWDBs must engage all customers by following the standards established in
135 CareerSource Florida Workforce Policy P9 - Availability of Services to Floridians.
136 For job seekers, LWDBs prioritize customer-centered approaches that ensure a
137 smooth transition from self-service to staff-assisted support, guiding individuals
138 through intake, eligibility assessment, service delivery, and ultimately into quality
139 employment. Additionally, customer eligibility determination should allow for the
140 provision of services and support as quickly as possible, and LWDBs should deliver
141 services efficiently with a high level of communication and opportunity for
142 feedback.
143

144 **F. State and Local Monitoring**

145
146 LWDBs must create and publicly post local operating procedures or LOPs that align
147 with federal and state requirements. Service providers must fully cooperate with all
148 state and LWDB monitoring and follow all applicable laws and policies.
149 FloridaCommerce will monitor activities associated with this policy consistent with 2
150 CFR 200 and as required by 20 CFR 683.410.
151

152 **V. IMPLEMENTATION**

153

⁷ [Employ Florida Service Code Guide](#)

LWDBs must implement this policy through written LOPs that align with federal and state requirements. LOPs must define local eligibility and enrollment processes, including intake procedures, and service timelines and must not include criteria beyond those set forth in WIOA Section 134(c)(3) and [20 CFR 680.210](#) regarding eligibility or “suitability” for training services. LWDBs must clearly define and apply key eligibility terms and ensure all determinations are supported by documentation that meets the required standards⁸. Documentation must be uploaded to Employ Florida and retained per [2 CFR 200.334](#).

Each LWDB must establish internal controls and a local monitoring plan to ensure timely eligibility determinations and compliance with WIOA requirements. Monitoring must occur at least annually, include a statistically valid sample of participant files, and assess compliance with eligibility, documentation, and priority of service requirements. LWDBs must also track service delivery timelines and use results to improve customer flow.

LWDBs must evaluate the effectiveness of eligibility and enrollment processes using WIOA performance indicators under [Section 116\(b\)\(2\)\(A\)](#) and [20 CFR 677.155](#). Performance data should inform adjustments to LOPs, local policies, and service strategies. Service providers must cooperate with all monitoring activities and correct any deficiencies.

This policy is effective upon approval. FloridaCommerce will monitor implementation of this policy and related LOPs for compliance with applicable statutes and regulations, including [20 CFR 683.410\(b\)\(2\)](#).

VI. AUTHORITY

Workforce Innovation and Opportunity Act of 2014, [Public Law 113-128](#)

Code of Federal Regulations (CFR), [Title 20 Part 680](#), *Adult and Dislocated Worker Activities Under Title I of the Workforce Innovation and Opportunity Act*

[TEGL No. 11-11, Change 2](#), *Selective Service Registration Requirements for Employment and Training Administration Funded Programs*

[TEGL No. 19-16](#), *Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by Title III of WIOA, and for Implementation of the WIOA Final Rules*

[TEGL 07-20](#), *Effective Implementation of Priority of Service Provisions for Most in Need Individuals in the Workforce Innovation and Opportunity Act (WIOA) Adult Program*

⁸ [TEGL 23-19, Change 1](#)

VII. REVISION HISTORY

Date	Revision
TBD	Revised to add measurable performance outcomes. Revisions included the requirement that LWDBs track how long it takes to determine WIOA eligibility and provide services, updates reflecting federal guidance on requirements for verifying work authorization, based on TEGL 10-23, Change 2 and selective service verification, and providing guidance on the retention of eligibility proof in Employ Florida. This policy also provides guidance on what must be included in internal procedures and local policies for LWDBs on this topic.
12/19/2022	Approved as CareerSource Florida Administrative Policy 122 and implemented.

VIII.RESOURCES/ATTACHMENTS

[Source Documentation for Core/Non-Core Programs DOL-only Data Element Validation](#)

[Implementing Priority of Service Provisions for Most in Need Individuals in the WIOA Adult Program](#)

[WIOA Desk Reference-Priority of Service for WIOA Adult Funds](#)

[Promising Practices in Achieving Universal Access and Equal Opportunity: A Section 188 Disability Reference Guide](#)

[Selective Service - Who Must Register](#)

[Includable/Excludable Income](#)

WIOA ADULT, DISLOCATED WORKER ELIGIBILITY POLICY DEVELOPMENT TRACKER

A. GENERAL INFORMATION

Policy Name: CareerSource Florida Workforce Policy P122 - WIOA Adult, Dislocated Worker Eligibility
Policy Type: Programmatic
Program: WIOA
Date to Publish: August 22 – August 29

B. PROJECT SUMMARY

The purpose of this policy is to provide the Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated Worker program eligibility requirements to Local Workforce Development Boards (LWDBs) and program service providers and to ensure timely, efficient, and aligned services are provided to all seeking eligibility in this program.

C. OVERVIEW OF CHANGES

	Substantive Change	Location	Reason
1	This section is revised and expanded to include “timely, efficient, and aligned services are provided to all seeking eligibility in this program.”	Section I. Purpose and Scope (Page 1)	Ensures that LWDBs and service providers follow consistent eligibility requirements for the WIOA Adult and Dislocated Worker programs, enabling timely and effective support for individuals seeking employment assistance. It’s designed to streamline services and strengthen workforce system coordination consistent with the REACH Act and updates to Policy 9, Availability of Services to Floridians.
2	This new section outlines five strategic goals for Title I program delivery.	Section II. Key Objectives (Page 1)	Key objectives prioritize access to career services, support individuals in securing sustainable employment, and invest in skills that meet the demands of evolving industries; Promoting collaboration across partner

			organizations and upholding standards for performance, lays a foundation for a responsive and accountable workforce system.
3	Measurable outcomes reference the six existing WIOA performance indicators that apply to the WIOA Adult, Dislocated Worker Program; Revisions include requirements for local operating procedures for the Adult and Dislocated Worker programs that are clearly documented and publicly available, with efficient eligibility determinations and timely service delivery; Strategic planning efforts must incorporate data on applicant eligibility to guide program effectiveness	Section III. Measurable Performance Outcomes (Pages 1-2)	Ensures transparency, timeliness, and strategic alignment within workforce development systems; tracking clear procedures, service efficiency, and strategic planning metrics, policymakers and program administrators can evaluate how WIOA programs serve eligible individuals—helping to improve delivery, accountability, and overall impact on employment outcomes. WIOA Sec. 116(b)(2)(a) 20 CFR 677
4	Eliminated from the Policy	Section IV. Background	
5	Requires individuals to meet specific criteria to enroll in the Adult or Dislocated Worker programs. Adults must be 18 or older, have legal work status, meet Selective Service rules, and follow nondiscrimination rules in WIOA; Dislocated workers, including RESEA participants and those in temporary jobs after losing a previous one, may qualify even if their expected layoff doesn't happen; Once someone is found eligible, their status stays valid even if their situation changes. Local Workforce Development Boards must confirm eligibility before enrollment.	Section IV.A. Policies and Procedures, Eligibility for Career Services (Page 2)	Outlines who can enroll in the Adult or Dislocated Worker programs under WIOA. WIOA Sec. 3(2), 3(15) 20 CFR 680.120 TEGL 02-14 TEGL 10-23, Change 2 TEGL 11-11, Change 2
6	Defines Selective Service registration exemptions compliant with federal guidance; Revisions establish documentation requirements and procedures for reviewing cases of non-registration—especially assessing whether the failure was knowing and willful.	Section IV(B). Policies and Procedures, Eligibility for Training Services, Selective Service Requirement Exemptions (Page 2-3)	This supports consistent decision-making across local areas and protects access to services for otherwise eligible individuals. 20 CFR 680.210 20 CFR 680.230 WIOA Sec. 134(c)(3)(B)

7	Spouses of active-duty U.S. Armed Forces members may qualify as dislocated workers if they lose their job due to relocation for a permanent change in duty station, or if they are unemployed or underemployed and struggling to find suitable work. Those who take temporary or lower-paying jobs after losing their main job may still be eligible if the job doesn't match their skills or pay level, and if the local workforce board has criteria to support this. These individuals may also qualify for services under the WIOA Dislocated Worker Program through RESEA.	Section IV(B)(2)(e), Policies and Procedures, Dislocated Worker Program, Category 5 – Spouse of a Separating or Separated Members of the U.S. Armed Forces. (Page 4)	Recognizing military spouses under Category 5 ensures access for Floridians to efficient and aligned Dislocated Worker services for individuals impacted by military-related employment disruptions. Fixing eligibility status at determination and allowing expedited access for RESEA claimants supports timely service delivery and reinforces program responsiveness to transitional workforce needs.
8	Eligibility for training services under WIOA requires that adults and dislocated workers demonstrate a need for training to achieve economic self-sufficiency and be unable to secure employment through career services alone; LWDBs must ensure training is linked to available job opportunities and coordinated with other sources of financial assistance, while not limiting access for veterans or their eligible spouses based on the use of VA educational benefits	Section IV(B) Policies and Procedures, Eligibility for Training Services (Pages 4-5)	20 CFR 680.230 Workforce Policy 105 – Priority of Service
9	WIOA Adult program funds must prioritize public assistance recipients, low-income individuals, and those with basic skills deficiencies, while veterans, eligible spouses, and qualified separating service members also receive service priority under federal law and specific policies; these priorities apply regardless of funding levels or resource availability.	Section IV(C), Policies and Procedures, Statutory Priority for Adult Funds (Page 5)	Public Law 107-288 (38 USC 3215(a)) Workforce Policy 105 – Priority of Service Workforce Policy P111- Priority of Service for Veterans and Eligible Spouses
10	Under WIOA, an individual qualifies as low-income—and is prioritized for Adult program services—if they meet specific criteria, such as receiving public assistance, being homeless, having limited family income, qualifying for free or reduced lunch, being a foster child, or having a disability with personal income below poverty thresholds.	Section IV(D) – Policies and Procedures, Determining Low-Income Status for Adult Funds (Page 6)	WIOA, Section 3(36) 2 USC 2011 et Seq 42 USC 601
11	To determine low-income status for WIOA Adult programs, LWDBs must annualize family income from the six months prior to application and compare it to the poverty line or LLSIL;	Section IV(E), Policies and Procedures, Calculating Family Income for the Adult Program (Page 6)	38 USC 4213

	certain types of income, such as military pay for veterans, are excluded from this calculation, while others like child support and Reemployment Assistance are included.		
12	Upon issuance of this revised policy, all LWDBs are required to collect supporting eligibility documentation used to determine WIOA eligibility and retain such documentation in Employ Florida.	Section IV(F), Policies and Procedures, Eligibility Documentation; (Page 7)	Source Documentation for Core/Non-Core Programs DOL-only Data Element Validation.
13	Revised to state that individuals seeking WIOA services, aside from self-service or information-only services or activities, through the Adult and Dislocated Worker Program must be registered in Employ Florida. Enrollment Process Requirements revised to state that “LWDBs must ensure that every individual receiving services under the WIOA Title I Adult or Dislocated Worker program are determined eligible as an adult or dislocated worker and formally enrolled in the program as soon as possible but no later than 90 days after eligibility determination. When enrollment is not completed within 90 days of eligibility determination, a redetermination must occur. Enrollment into the program(s) requires assigning an appropriate service in Employ Florida that initiates participation.”	Section IV(G)(1)-(2), Policies and Procedures, Enrollment (Page 7)	Clear enrollment procedures are essential to ensure eligible individuals are properly registered, assessed, and matched with appropriate WIOA services. Tracking EO data and managing timely enrollment in Employ Florida supports compliance and high-quality, customer-focused service delivery. This structure enables local workforce boards to offer efficient, individualized support that leads to meaningful employment outcomes. 20 CFR 680.11(b) 29 CFR 38 Workforce Policy 095 – Youth Eligibility
14	LWDBs must engage all customers by following the standards established in revised Workforce Policy P9 – Availability of Services to Floridians.	Section IV(G)(1), Policies and Procedures, Enrollment, Timely, Efficient and Aligned Determinations (Page 8)	Ensures job seekers receive support quickly and effectively, which strengthens trust, improves outcomes, and aligns workforce strategies with the broader goal of economic opportunity; Reinforces accountability and responsiveness within workforce systems.
15	LWDBs must create and post local operating procedures to monitor eligibility and enrollment, including statutory adult priority, to ensure compliance with federal and state requirements. Revised to state that	Section IV(H), Policies and Procedures, State and Local Monitoring (Page 12)	2 CFR 200 20 CFR 683.410

	FloridaCommerce will monitor activities associated with this policy.		
16	New section requires LWDBs to implement written procedures that define eligibility and enrollment standards, monitor compliance and performance, and use data to improve services, ensuring alignment with federal and state WIOA requirements. FloridaCommerce will oversee policy implementation to ensure accountability and timely service delivery.	Section V. Implementation (Pages 8-9)	WIOA Section 116(b)(2)(A) 2 CFR 200.334 20 CFR 677.155 20 CFR 683.410(b)(2) TEGL 23-19
17	Cites federal laws and guidance letters (see below)	Section VI – Authority (Page 9)	WIOA 20 CFR 680.29 CFR 38 TEGLs
18	Clarifies terminology used in workforce policy.	Section VII – Definitions (Pages 9-10)	WIOA Section 3 and Section 203 20 CFR 677.150 TEGL 19-16, Attachment III
19	Tracks policy updates from original policy approval and implementation to present policy.	Section VIII– Revision History (Page 10)	
20	Links to federal guidance and tools (See below)	Section X – Resources/Attachments (Page 15)	

C. LEGAL REFERENCES AND APPLICABLE GUIDANCE

Workforce Innovation and Opportunity Act of 2014, [Public Law 113-128](#)

Code of Federal Regulations (CFR), [Title 20 Part 680](#), *Adult and Dislocated Worker Activities Under Title I of the Workforce Innovation and Opportunity Act*

[TEGL No. 11-11, Change 2](#), *Selective Service Registration Requirements for Employment and Training Administration Funded Programs*

[TEGL No. 19-16](#), *Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by Title III of WIOA, and for Implementation of the WIOA Final Rules*

[TEGL 07-20](#), *Effective Implementation of Priority of Service Provisions for Most in Need Individuals in the Workforce Innovation and Opportunity Act (WIOA) Adult Program*

RESOURCES/ATTACHMENTS

[Source Documentation for Core/Non-Core Programs DOL-only Data Element Validation](#)

[Implementing Priority of Service Provisions for Most in Need Individuals in the WIOA Adult Program](#)

[WIOA Desk Reference-Priority of Service for WIOA Adult Funds](#)

[Promising Practices in Achieving Universal Access and Equal Opportunity: A Section 188 Disability Reference Guide](#)

[Selective Service - Who Must Register](#)

[Includable/Excludable Income](#)

Approved _____
Disapproved _____

Action Item 5

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM EMPLOYMENT AND TRAINING (SNAP E&T) COMPONENTS AND CASE MANAGEMENT WORKFORCE POLICY

The Fiscal Responsibility Act of 2023 introduced major updates to SNAP Employment and Training work requirements, particularly for Able-Bodied Adults Without Dependents (ABAWDs). Local Workforce Development Boards (LWDBs) and career centers must manage SNAP Education and Training (E&T) services, which include job search support, skills training, and work experience. These services aim to help participants overcome employment barriers and secure meaningful work.

Consistent with [29 U.S.C. § 3101](#) and [20 CFR §§ 676–681](#), CareerSource Florida and FloridaCommerce worked with LWDBs to develop a Workforce Policy that addresses SNAP E&T Program Components and Case Management. This new policy outlines how LWDBs must operate the SNAP E&T program in line with Florida's SNAP E&T Plan and the Florida's Workforce Innovation and Opportunity Act (WIOA) Plan. This ensures a focus on long-term job success and self-sufficiency. Case managers must create Individual Employment Plans (IEPs) tailored to each participant's career goals, guiding service delivery and resource use while maintaining accountability and alignment with both state and federal objectives.

This policy applies to CareerSource Florida, FloridaCommerce, and all 21 LWDBs that provide access to SNAP E&T benefits and services.

FOR CONSIDERATION

- **Approve Workforce Policy – Supplemental Nutrition Assistance Program Employment and Training Program Components and Case Management.**



**POLICY
NUMBER**
WT073

Workforce Policy

Title:	Supplemental Nutrition Assistance Program (SNAP) Employment and Training Program Components and Case Management Policy.
Type:	Operational
Program:	SNAP E&T
Effective:	TBD

I. PURPOSE AND SCOPE

ABAWDs and mandatory work participants in the SNAP Education and Training (E&T) program are required to participate in activities operated by Local Workforce Development Boards (LWDBs) and local career centers. LWDBs deliver SNAP E&T components, including supervised job search, job search training, vocational and basic education, work experience, and job retention services. Timely access to SNAP E&T and other services is critical to removing barriers to participation and supporting successful employment outcomes.

This policy provides LWDBs with a comprehensive description of program components and activities required for operating the SNAP E&T program and requires LWDBs to ensure local SNAP E&T strategies and operations align with the Florida SNAP E&T Plan and the Workforce Innovation and Opportunity Act (WIOA) Combined Plan. LWDBs are also expected to align with Florida's workforce development priorities, focus on employment and training for ABAWDs and other mandatory work participants that lead to self-sustaining jobs, and implement data-driven accountability measures to enhance service delivery and outcomes.

II. KEY PROGRAM OBJECTIVES

Objectives of this policy include:

1. Promote economic self-sufficiency for SNAP E&T recipients, particularly those with barriers to employment, and the achievement of long-term economic independence through access to employment, education, training, and support services.
2. Align with the State's identified SNAP E&T services with Florida's broader workforce development system and ensure strategic alignment with WIOA's six core programs, including adult education, vocational rehabilitation, and employment services.
3. Support Job-Driven Training that prioritizes training and education programs that are responsive to labor market demands and equip participants with skills that lead to in-demand occupations and sustainable employment.
4. Enhance Service Delivery that leverages the expertise and infrastructure of Florida's LWDBs to deliver high quality and timely SNAP E&T services that are regionally tailored, accessible, and effective.
5. Ensure Simplified Access and High-Quality Customer Service for all eligible SNAP recipients, including youth and those facing barriers to employment.
6. Foster Innovation and Continuous Improvement including data-driven decision-making, and strategies that enhance program outcomes and participant success.
7. Comply with Federal and State Accountability Standards by maintaining rigorous documentation, performance tracking, and reporting in alignment with federal and state requirements to ensure transparency, accountability, and program integrity.

III. MEASURABLE PERFORMANCE OUTCOMES

Consistent with the requirements identified in Florida's approved SNAP E&T State Plan, all performance outcomes associated with this policy include:

1. Ensure SNAP participants who receive Supervised Job Search services are within monthly allowable hours targets of 39 hours for ABAWD and 59 hours for Mandatory Work Participants (MWP).¹
2. Track and document all SNAP components delivered to participants, including:
 - a. Number of participants served in each component.
 - b. Number of participants who complete these services and, in fact, move toward employment; and
 - c. Number of participants who receive work-related training services and offered participant reimbursements.

¹ [7 CFR 273.7\(e\)\(2\)](#) ("However, job search, including supervised job search, or job search training activities, when offered as part of other E&T program components, are acceptable as long as those activities comprise less than half the total required time spent in the components.").

- 66 3. Maintain documentation and methodology for all administrative costs, including
67 the certification of the percentage of time and effort for staff working on the
68 provision of SNAP E&T components and services.
69

70 LWDBs component activities performance data may be subject to technical
71 assistance in the event individual LWDB data is inconsistent with the state's
72 historical FNS-583 quarterly or annual reporting.
73

74 75 **IV. BACKGROUND**

76
77 The Florida SNAP E&T Program is a federally funded initiative that helps recipients
78 gain skills, training, and work experience for long-term employment and economic
79 self-sufficiency. The program is administered by the Florida Department of
80 Children and Families (DCF), which determines eligibility and refers participants to
81 LWDBs for services. The Florida Department of Commerce (FloridaCommerce)
82 oversees service delivery through LWDBs and career centers. CareerSource
83 Florida, the State Workforce Development Board, ensures alignment with
84 statewide workforce goals, while LWDBs and career centers deliver program
85 services, provide assessments, employment planning, component assignments,
86 and other services. Collaborative efforts enhance engagement, compliance with
87 federal and state requirements, and effective service delivery to support participant
88 success and program accountability.
89

90 Under Title 7, Code of Federal Regulations (CFR), [sections 273.7](#) and [273.24](#), and
91 [Chapter 414.455, F.S.](#), Florida operates a mandatory SNAP E&T program for Able-
92 Bodied Adults Without Dependents (ABAWDs) and Mandatory Work Participants
93 who do not meet an exemption. ABAWDs must meet specific work requirements
94 to maintain benefits.²
95

96 **V. POLICIES AND PROCEDURES**

97 98 **A. Program Access and Participant Engagement**

99 100 **1. Referral Process**

101
102 Consistent with [7 CFR 273.7\(c\)\(1\)](#)³ DCF screens SNAP recipients and
103 refers eligible individuals to LWDBs via the One-Stop Service Tracking
104 (OSST) system. LWDBs must review referrals daily and initiate contact
105 within 10 calendar days for ABAWDs. This process must be documented.
106

107 LWDBs should establish referral protocols with local DCF offices and
108 relevant DCF staff, to ensure timely and accurate referrals to connect
109 participants to wraparound services (e.g., housing, mental health, and

² [7 CFR 273.7\(l\)\(1\)\(i\)\(C\)](#)

³ [7 CFR 273.7\(c\)\(1\)](#).

substance abuse recovery) and promote a holistic approach to economic self-sufficiency. Staff must maintain regular communication with DCF partners and document referrals and outcomes in OSST.

2. Orientation and Initial Engagement

Individuals referred to the SNAP E&T program will receive an Employment and Training Referral (ETR) notification letter instructing the participant to complete specific steps via OSST within seven (7) days. The ETR provides participants with information to complete the orientation, assessment, and schedule options for the initial engagement appointment with a case manager. All steps must be completed within the seven (7) day window to avoid OSST beginning the automated consideration process with DCF to determine if the reason for being non-compliant is related to good cause. The orientation and assessment may be completed online or in-person for individuals who are not computer literate or do not have access to a computer or internet.

The orientation must outline why the participant is referred to the program, an overview of the SNAP E&T program components, participation expectation/requirements, and available support services. The orientation is a required activity for newly referred or reopened referrals for participants who have not completed orientation within the previous 12 months. Participants may also be required to complete orientation if there have been significant program changes, regardless of the time frame of last attendance.

Career center staff must inform participants of grievance procedures, their rights, responsibilities, and the consequences of noncompliance. In addition, the participant must acknowledge receipt of this information by signing the Opportunities and Obligations Form. Staff should maintain a copy of the signed form in the participant's case file and provide a copy to the participant for their records.

3. Eligibility Verification

Career center staff should confirm the participant's eligibility using DCF referral data housed in their management information system and OSST records to ensure the individual has been properly referred and does not appear to meet an exemption as outlined in the most current programmatic guidance and current federal law.⁴ Staff should confirm this information at the time of the initial engagement appointment prior to assigning the participant to a program component. If it is determined the participant may meet an exemption, staff must instruct the participant to notify DCF of their

⁴ [7 CFR 273.7\(a\)](#).

household changes to allow DCF to determine whether the participant continues to meet the requirements for referral to the SNAP E&T program.

B. Assessment and Employability Planning

As part of the online assessment, participants will answer questions that provide information on the participant's:

- academic and occupational skills
- career goals and interests
- personal needs/barriers
- employability skills
- work history

Staff must review the assessment information with the participant during the initial engagement appointment to ensure accuracy. The information will be used throughout the employability planning process culminating in the creation of an Individual Employment Plan.

LWDBs may use other assessment tools, in addition to the OSST Initial Assessment, to assist with employability planning/case management, such as Test of Adult Basic Education (TABE), My Career Shines, Career Scope, and the CLIFF Dashboard. Additional assessments should be scheduled or conducted at the initial engagement appointment, as determined appropriate, prior to the participant being assigned to a program component. Further, LWDBs may conduct additional assessments during program participation as the participants' needs change, or a new program component is being considered. In the event of a system outage, staff may conduct the assessment manually by using the [OSST Initial Assessment Form](#).

LWDBs must ensure that staff are trained in techniques to facilitate a productive experience to include motivational interviewing, employability planning, coordination of services, and methods of ongoing progress monitoring.

C. Documentation and Compliance

Staff must document case management activities, participation hours, support services, participant reimbursements, supporting documentation, and outcomes in OSST and the participant's case file in a timely and accurate manner. It is recommended that documentation of activities occur within two days of provision. Case files must include verification of participation (i.e., timesheets, attendance records, check stubs, etc.), documentation supporting participant reimbursements, support service referrals, and any correspondence related to the participant's progress or challenges. Documentation may be submitted to

staff either in-person or virtually (i.e., email, upload to document management system, etc.).

1. IEP Development

To ensure effective service delivery and alignment with participant goals, all participants must have an Individual Employment Plan (IEP) developed and maintained in the participant case file and a summary documented via case notes in OSST. IEP development should use the S.M.A.R.T. (Specific. Measurable. Achievable. Relevant. Time-Bound) principles and include sector strategies and career pathways principles as described in CareerSource Florida Workforce Policies [O3 – Sector Strategies Policy](#) and P10 – Comprehensive Employment Education and Training Strategy, and implemented in WIOA Local Plans.

2. IEP Processing Steps and Completion Timeline

The IEP must identify appropriate SNAP E&T components, support services, and co-enrollment opportunities with WIOA or other workforce programs. IEPs should reflect both short-term and long-term employment and educational goals, informed by labor market information and participant interests. The IEP must be initiated during the initial engagement appointment. Completion of the IEP means the IEP has been signed by the participant and staff or otherwise documented in OSST. All contact attempts made to complete or update the IEP must also be documented in case notes.

D. SNAP E&T Components

A qualifying SNAP E&T component is considered standalone and can count for part or all of the monthly work requirement for ABAWDs and MWP. ⁵ Career center staff must assign participants to appropriate SNAP E&T components (upon completion of assessment), document component assignments in OSST, and update the IEP accordingly.

Work components and activities under the SNAP E&T program are outlined in [7 CFR 273.7](#) and further defined in the SNAP E&T State Plan. Participants may be enrolled in one or more qualified components each month to satisfy the program's mandatory work requirement.

Note: Supervised job search and job search training are non-qualifying components unless paired with a qualifying activity. ⁶ Supervised job search and job search training activities, when offered as part of other E&T program

⁵ See [7 CFR 273.24](#).

⁶ [7 CFR 273.7\(e\)\(2\)](#).

components, are acceptable as long as those activities comprise less than half the total required time spent in the components.⁷

Career center staff must assess participants for co-enrollment opportunities in WIOA and other workforce programs. Co-enrollment can fill service or funding gaps (e.g., training, support services), provide access to additional work-based learning (e.g., On-the-Job Training and apprenticeships), and maximize participant outcomes through layered support. Staff must document co-enrollment decisions in OSST and coordinate with WIOA case managers to align services.

Details on required components consistent with Florida's state plan include:

1. Supervised Job Search

Supervised Job Search (SJS) activities are guided and tailored to participant needs and employment goals and provide participants with increased opportunities to obtain employment. This component must occur at state-approved locations such as LWDB computer labs, LWDB community partner computer labs, public libraries, and on personal computers and/or devices while being supervised. Criteria that may be used to determine whether a location is deemed state-approved include:

- a. Locations that are open to the public with access to resources for job searching (i.e., computers/tablets, internet access, etc.)
- b. Locations that serve populations that are typically eligible for and/or recipients of food assistance benefits and fall into a barrier category such as ex-offenders, domestic violence victims, high school dropouts, disabled, etc.
- c. Locations that have an agreement with the state and/or LWDBs that defines mutually agreed upon services to SNAP eligible individuals.
- d. Locations that are willing to assist individuals who are actively seeking employment and have the means to monitor (supervise) and track time that an individual spends job searching.
- e. Locations that have qualified and sufficient staff to assist with job searching, as well as monitoring (supervising) and tracking the time an individual spends job searching.

⁷ *Id.*

Supervised Job Search may be conducted independently or within a group setting, and may also be conducted remotely, in-person, or a combination of both. LWDBs should tailor the delivery of supervised job search services to the needs of participants. Participation in this component must be tracked and reflected on the Job Participation Rate Screen and in case notes. Supervised Job Search activities must have a direct link to increasing the employment opportunities of participants. A participant in the Supervised Job Search program must be likely to find a job through the activity, and appropriate jobs must be available for that participant in the community. Effective case management requires that supervised job search is not established as continuous, year-round activity for the program participant.

Participants in supervised job search must have at least one meeting a month with a qualified staff member to review job search activities, get feedback, troubleshoot issues, and discuss next steps. This meeting may occur remotely or in-person and be synchronous with the job search activities or asynchronous and must be documented within OSST. Interactive software or other types of automated processes on a computer do not meet the requirement for engagement with a qualified staff person at least once a month. In between meetings with a qualified staff person, LWDBs may use other supervisory techniques, such as software that tracks time spent logged into a job search website or computer assessments that automatically identify next steps for the participant.

The hours assigned to Supervised Job Search for ABAWDs are limited to 39 hours monthly. If Supervised Job Search is combined with Job Search Training, the total combined hours cannot exceed 39 hours monthly. For MWP, the activity is limited to 59 hours monthly. If combined with Job Search Training, the total combined hours cannot exceed 59 hours monthly.

2. Job Search Training

Job Search Training is a component that enhances the job readiness of participants by teaching them job seeking techniques, increasing job search motivation, and boosting self-confidence. Job Search Training assists participants with development of essential job readiness/employability skills, through workshops or sessions to secure/retain employment. This component may consist of, but is not limited to, job skills assessments, classroom instruction, job development and placement services, and other direct training or support activities. It could also teach life and interpersonal skills, time management, decision making skills, appropriate dress for the workplace, career planning, and how to develop a resume.

The hours assigned to Job Search Training for ABAWDs are limited to 39 hours monthly. If combined with Supervised Job Search, the total combined

hours cannot exceed 39 hours monthly. For MWPs, the activity is limited to 59 hours monthly. If combined with Supervised Job Search, the total combined hours cannot exceed 59 hours monthly.

3. Basic Education and Vocational Training

The basic education component includes a wide range of activities that improve basic skills and the employability of participants. Such programs include Adult Basic Education (ABE), basic literacy, English as a Second Language (ESL), high school completion or general education equivalency (GED), career and technical education (CTE), and other post-secondary education.

Education components can offer participants an opportunity to earn postsecondary credentials valued by employers and industry, including certificates and degrees, industry-recognized credentials, and licensures.

Vocational Training helps to improve the employability of participants through training in a skill or trade that will allow the participant to move directly into employment. Training is offered at the career centers, through community partners, and training providers who are approved by the LWDBs and/or CareerSource Florida.

An ABAWD can complete 80 hours monthly in basic education and/or vocational training to meet the mandatory work requirement. An MWP can complete 120 hours monthly in basic education and/or vocational training to meet the mandatory work requirement.

Participants assigned to education components (basic education/vocational training), may be allowed one hour of study time⁸ for each hour of class time completed, as long as documented verification is provided of the actual time spent in the classroom. Education may be provided onsite or through online classes. OSST must be updated with the number of hours completed (including study time) and documentation maintained in the participant's case file.

Education components (basic education/vocational training) may be combined with the following components:

- a. Supervised Job Search
- b. Job Search Training
- c. Work Experience

⁸ Study time must be documented via time logs or signed study activity forms and must be verified before being approved.

LWDBs are strongly encouraged to review program participants who are interested in Vocational Training for co-enrollment in the WIOA program.

4. Work Experience

Work Experience programs include a planned, structured learning experience that takes place in a workplace for a limited amount of time. These activities are designed to connect participants with employers to build employability skills or job-related skills through actual work experience or training at a worksite. In lieu of wages, participants receive compensation in the form of their monthly food assistance allotment. Work experience sites can be developed with not-for-profit, for profit, private, and public employers. Worksite agreements, as well as job descriptions for each work experience position, must be obtained by staff prior to assigning participants to a worksite.

Participants may identify a worksite that aligns with their career path. However, the participant will not be assigned to work experience at the worksite until an agreement with the site has been executed.

When a participant is assigned to a worksite, the employer cannot replace regular employees with participants performing work experience.⁹ The employer must also provide participants with the same or similar work conditions and assignments as regular employees and is required to supervise work activities and complete time sheets for participants.

Hours assigned to work experience must not exceed the allowable hours derived from the benefit calculation. To determine the benefit calculation, staff will use the participant's monthly food assistance allotment divided by the current state minimum wage which equals the monthly required hours. If there is more than one participant within a household, the monthly required hours will be further divided by the number of participants to derive the number of hours that each career seeker will need to complete monthly. If the number of hours determined by the benefit calculation is not enough to satisfy the work requirement for the participant type, additional program components must be assigned.

Work experience may be combined with the following components:

- a. Supervised Job Search
- b. Job Search Training
- c. Education Basic Education
- d. Vocational Training

⁹⁷ [CFR 273.7\(e\)\(2\)\(iv\)\(B\).](#)

In case there are additional members in the household receiving SNAP benefit, LWDBs must verify with DCF for an accurate number of hours for assigning under Work Experience.

5. Job Retention Services/Employment Retention Services (ERS)

The Job Retention Services (commonly known as Employment Retention Services or ERS) components are continued supportive services to help a SNAP E&T participant continue in their first months on their job. The activities help participants even if their new employment income makes them no longer eligible to receive SNAP benefits. Participants are eligible for at least 30 days and up to 90 days after securing employment and within 30 days of successful completion of a SNAP E&T program component. Participants are not eligible to receive ERS if they are leaving the SNAP E&T program due to a failure to comply with the general work requirement or an intentional program violation.

All reimbursements considered under ERS must be reasonable, necessary, and directly related to the participant's employment, such as uniforms/clothing required for the job, equipment or tools required for the job, and/or transportation. Other items may be considered for ERS if they meet the criteria.

E. Support Services and Participant Reimbursements

Participants may be provided reimbursement for costs associated with program participation, including transportation, work-related expenses, costs for books, supplies and tools, digital supports, clothing and uniforms, and other expenses, as needed and allowable. Career center staff must document participation hours, support services, participant reimbursements, supporting documentation, outcomes and ensure services are reasonable, necessary, and directly related to participation in program components.

LWDBs must obtain and retain documentation, including receipts, for verification and audit purposes. Self-attestation may be used in some circumstances to document expenses; however, staff should use this option as a last resort and must include a justification documented in case notes. Self-attestation forms will be used for items in value of \$100.00 or less. LWDBs should use the [SNAP Self-Attestation Form](#) Template for documentation purposes.

LWDBs staff must ensure all necessary information is in case notes related to GCC request for an exemption. This will allow DCF staff to make an appropriate and accurate E&T decision for SNAP participants.

F. Braiding Funding and Leveraging Resources

LWDBs are encouraged to braid SNAP E&T funds with WIOA and other local, state, or community resources to expand access and supplement service capacity to training and support services, increase reimbursement opportunities, and support innovative service delivery models.

Career center staff and LWDBs must actively pursue opportunities to braid SNAP E&T funds with other workforce and community resources to maximize participant access to training, support services, and employment opportunities; fill service gaps not covered by a single funding source; and increase the efficiency and impact of program investments.

LWDBs should establish clear agreements with their partners, define roles and responsibilities, and track outcomes to ensure transparency and accountability. LWDBs should also maintain documentation of such agreements and a list of applicable partnerships.

G. Provider Determination

There may be instances where a participant may be ill-suited for a particular Education and Training component, despite the participant's best efforts to remain in the program. Based on the case manager's assessment of the participant's fit with the work component and after documented efforts to explore all available alternative program components, the case worker may record the participant as failing the work requirement. All assessments of fit and documented efforts to identify an alternative work component must be maintained as part of case management prior to this determination and must contain documented supervisor approval. The SNAP E&T program, in accordance with 7 CFR 273.7(c)(18)(i)(A), allows for LWDBs to process a provider determination for DCF to consider an exemption.

H. Case Management and Compliance Monitoring

1. Ongoing Case Management

LWDBs must maintain regular contact with SNAP E&T participants to monitor progress and address ongoing barriers. Career center staff must update OSST with customer participation hours, progress notes, and changes in status.

2. Participation Tracking

Career center staff must enter participation hours, support services, participant reimbursements, supporting documentation, outcomes and applicable documentation in OSST as soon as possible but no later than by

the 10th business day following the end of the month. LWDBs must outline in local operating procedures the frequency at which participant's documentation will be received and entered in OSST.

Participants in partial month participation are required to participate (in any combination) in a minimum of 4 work hours per day, or 20 hours per week and MWP's are required to participate in a minimum of 6 work hours per day, or 30 hours per week. In this instance, the ABAWD/MWP will not be required to complete the required monthly participation hours. Participants in partial month participation who complete the partial hours for the given month will be considered compliant. For example, an ABAWD was referred for participation on June 9th with 15 business days remaining in the month. The ABAWD must complete 60 hours (15 days multiplied by 4 hours daily) to be considered compliant; anything less will be considered non-compliance.

3. Targeted Case Management

Case management must be proactive, participant-centered, and focused on achieving measurable outcomes. Updates must be documented in OSST, including progress notes, participation hours, and any changes to service strategies. Case managers must review and update the IEP based on the LWDB's LOPs or when there is a significant change in the participant's status, goals, or assigned activities. The approved IEP form may be accessed on FloridaCommerce's website.

4. Noncompliance and Good Cause Consideration

If a SNAP E&T participant fails to comply with the requirements of the program, LWDBs must initiate good cause consideration (GCC) review and document all issues.¹⁰ GCC participant cases must be referred to DCF for determination.

I. Data Entry and Reporting

1. OSST System Use

Career center staff must record all case management activities for participants including participation hours, support services, participant reimbursements, supporting documentation, and outcomes in OSST. All data must be accurate and timely to support performance reporting. It is recommended that data entry is completed within 2 business days from provision.

¹⁰ [7 CFR 273.7\(i\).](#)

2. Employ Florida Integration

Career center staff working with SNAP E&T customers must ensure the participant registers in Employ Florida for job seeking, uploading resumes, exploring labor market services, and to document job referrals, placements, and employment outcomes.

J. Exemptions

In accordance with 7 CFR 273.7(i), DCF is responsible for determining outcomes from a good cause review for a SNAP recipient who does not complete applicable SNAP work requirements. Outcomes of the review may result in a determination of good cause or a sanction. Allowable exemptions are subject to change based on programmatic guidance.

VI. IMPLEMENTATION

Oversight of Florida's SNAP E&T program is shared among FloridaCommerce, which monitors LWDB operations and provides technical assistance; DCF, a WIOA Combined Planning Partner which manages participant eligibility, referrals, and good cause determinations; and the CareerSource Florida Board of Directors, which sets statewide workforce policy and ensures alignment with Florida's broader workforce development goals. SNAP E&T is a required one-stop partner and contributes to infrastructure funding and service delivery.

LWDBs must establish clear local policies and procedures to guide the delivery of SNAP E&T services. These procedures must be in alignment with the state plan and include:

1. Identifying and co-enrolling eligible SNAP E&T participants in WIOA and other workforce programs to maximize access to training, support services, and employment opportunities.
2. Approving, documenting, and tracking support services.
3. Ensuring accurate and timely data entry in OSST and Employ Florida, including participation hours, case notes, and service delivery records.
4. Maintaining documentation for all services provided, including receipts and attendance logs, to support audit readiness and performance reporting.

LWDBs must also document and implement internal monitoring processes to ensure compliance with federal and state requirements including:

1. Conducting regular internal reviews of case files, documentation, and data entries.
2. Participating in state-led monitoring and technical assistance.
3. Taking corrective action when necessary to address identified issues.

This policy and any subsequent changes are effective upon approval by the State Workforce Development Board and issuance to the CareerSource Florida Network.

VII. AUTHORITIES

[H.R. 1 – One Big Beautiful Bill Act 119th Congress \(2025-2026\)](#)

[7 CFR § 273.7](#) – Work provisions for SNAP recipients.

[7 CFR § 273.24](#) – Time limits for ABAWDs.

[20 CFR §§ 676–681](#) – WIOA performance accountability and planning.

[20 CFR 678.410\(3\)](#) – One Stop Partners

[29 U.S.C. § 3101](#) – Workforce Innovation and Opportunity Act.

[Section 445.033, Florida Statutes](#) – FloridaCommerce and Department of Children and Families local performance accountability and reporting.

VIII. RESOURCES

[Florida SNAP E&T Plan](#)

SNAP E&T PROGRAM COMPONENTS AND CASE MANAGEMENT POLICY DEVELOPMENT TRACKER

A. GENERAL INFORMATION

Policy Name: Supplemental Nutrition Assistance Program Employment and Training Work Components and Case Management

Policy Type: Programmatic

Program: SNAP E&T / Welfare Transition

Policy Rationale: This policy is necessary to ensure compliance with federal regulations and the statewide SNAP E&T Plan

Date to Publish: August 22 – August 29

B. PROJECT SUMMARY

This policy outlines the operational framework for implementing the Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) program across Florida's Local Workforce Development Boards (LWDBs) and career centers. It aligns with the Florida SNAP E&T State Plan, the Workforce Innovation and Opportunity Act (WIOA) Combined Plan, and federal regulations under 7 CFR § 273.7 and § 273.24. The policy emphasizes:

- Mandatory participation for Able-Bodied Adults Without Dependents (ABAWDs)
- Integration of case management across all E&T components
- Performance accountability and measurable outcomes
- Coordination with DCF and other partners
- Use of OSST and Employ Florida for tracking and reporting

CareerSource Florida and FloridaCommerce worked with executive directors and staff of LWDBs to align the updated policy with the law, and existing policies. The policy was sent for consultation from all LWDBs.

C. OVERVIEW OF CHANGES

	Substantive Change	Location	Reason
1	This section describes the policy's intent to guide LWDBs in delivering SNAP E&T services, emphasizes alignment with the Florida SNAP E&T State Plan and the WIOA Combined Plan.	Section I. Purpose and Scope (Page 1)	Ensures LWDBs deliver SNAP E&T services in a coordinated, strategic manner that aligns with statewide workforce goals outlined in the Florida SNAP E&T State Plan and the WIOA Combined Plan. 7 CFR 273.7 29 U.S.C. 3101

			20 CFR 676-681
2	This section describes key program objectives designed to promote economic self-sufficiency, job-driven training, and service integration. Key program objectives encourage innovation, simplified access, and compliance with accountability standards.	Section II. Key Program Objectives (Page 2)	Key program objectives are essential because they advance economic self-sufficiency through job-driven training, foster innovation and integrated service delivery, and uphold accountability—ensuring that workforce policies are both effective and accessible. Florida SNAP E&T State Plan 20 CFR 676-681
3	This section lists specific metrics such as job placement, retention, credential attainment, and participation hours and includes a table with outcomes and citations.	Section III. Measurable Performance Outcomes (Page 2)	Measurable performance outcomes provide data-driven insights into program effectiveness, ensure accountability, and support continuous improvement in achieving workforce development goals such as employment, retention, and skill attainment. 7 CFR 273.7(e)(2) Florida SNAP E&T State Plan, Table E.IV, Pages 44-46 Workforce Policy 88 – Performance Requirements for Local Workforce Development Boards
4	This section describes the roles of the Department of Children and Families, FloridaCommerce, and CareerSource Florida	Section IV. Background (Page 3)	Clarifies the distinct roles and responsibilities of key agencies—Department of Children and Families, FloridaCommerce, and CareerSource Florida, and LWDBs—ensuring coordinated implementation and accountability across the workforce development system. 7 CFR 273.7 7 CFR 273.24

			Chapter 414.455, F.S.
5	This section describes the referral process via OSST and initial contact within 10 days	Section V(A). Policies and Procedures, Program Access and Participant Engagement (Pages 3-4)	Referral processes must be timely to ensure consistent participant engagement, streamline service delivery, and maintain compliance with program timelines and performance standards. 7 CFR 273.7(c)(1)
6	Ensures participants are not receiving TANF and are work-capable.	Section V(A)(3). Policies and Procedures, Eligibility Verification	7 CFR 273.7(a)
7	Requires participants to complete an online assessment to identify their skills, goals, barriers, and work history, which staff review during the initial appointment to help build an Individual Employment Plan (IEP). The IEP must be updated at least every 30 days to reflect progress, changes in needs, or new program components. LWDBs may use tools like TABE, Career Scope, and the CLIFF Dashboard to support planning, and staff must be trained in motivational interviewing, service coordination, and progress tracking.	Section V(B). Policies and Procedures, Assessment and Employability Planning (Pages 4-5)	Updating individual Employment Plans ensures services remain aligned with participants' needs, support timely progress toward employment goals, and maintain compliance with the Florida SNAP E&T Plan's performance and accountability standards. 7 CFR 273.7(c)(2)
8	All participants must have an Individual Employment Plan (IEP) created during the initial engagement appointment, using S.M.A.R.T. goals and aligned with sector strategies and career pathways; the IEP should include SNAP E&T components, support services, and co-enrollment options, and must reflect both short- and long-term goals based on labor market data and participant interests. Completion requires participant and staff signatures or documentation in OSST, with all contact attempts and updates recorded in case notes.	Section V(C), Policies and Procedures, Documentation and Compliance (Pages 5-6)	CareerSource Florida Workforce Policy O3 – Sector Strategies Policy CareerSource Florida Workforce Policy P10 – Comprehensive Employment, Education and Training Strategy
9	Lists required components including supervised job search, job search training, education, workfare, work experience, self-employment training, and job retention.	Section V(D), Policies and Procedures, SNAP E&T Components (Page 6 - 10)	Describes allowable activities that support participant skill-building, employment readiness, and retention, ensuring program consistency, compliance, and alignment with workforce development goals. 7 CFR 273.7

10	Participants may receive reimbursements for allowable costs like transportation, work-related items, digital tools, and uniforms, with all expenses documented and verified by career center staff; Self-attestation is permitted for items under \$100 only when necessary, with justification noted in case files using the SNAP Self-Attestation Form; LWDBs are encouraged to braid SNAP E&T funds with WIOA and other resources to expand services, fill funding gaps, and improve program impact, with formal agreements and documentation required for transparency.	Section V(E)-(F), Policies and Procedures, Support Services and Participant Reimbursements and Braiding Funding and Leveraging Resources (Pages 10-11)	Ensures SNAP E&T participants can access the resources necessary to overcome barriers to employment, while enabling local boards to leverage partnerships and funding efficiently to sustain and expand service delivery. 2 CFR 200.403 2 CFR 200.404
11	If a participant is not a good fit for a specific Education and Training component, even after trying to stay in the program, the case manager may determine they have failed the work requirement. Before making this decision, staff must assess all other options, document their efforts, get supervisor approval, and keep records for DCF to consider an exemption under SNAP E&T rules.	Section V(G), Policies and Procedures, Provider Determination (Pages 11)	7 CFR 273.7(c)(18)(i)(A)
12	LWDBs must maintain regular contact with SNAP E&T participants, track participation, and update OSST with hours, progress notes, and changes by the 10th business day after each month. Participants must meet minimum work hour requirements based on their referral date, with partial month participation calculated accordingly; Case management should be proactive and centered on participant goals, with IEPs updated when status or activities change. If a participant is noncompliant, LWDBs must initiate a Good Cause Consideration (GCC) and refer the case to DCF for review.	Section V(H). Policies and Procedures, Case Management and Compliance Monitoring (Page 11)	Ensures accurate program monitoring, enforces accountability, and supports timely interventions that help SNAP E&T participants stay engaged and on track toward employment goals. 7 CFR 273.7(i) 7 CFR 273.24
13	Career center staff must enter all SNAP E&T case management activities—including participation hours, support services, reimbursements, and outcomes—into the OSST system accurately and within 2 business days to support performance reporting. Staff must also ensure participants are registered in Employ Florida to access job search tools, upload resumes, and track employment outcomes. Timely and complete data entry is essential for compliance and program effectiveness.	Section V(I), Policies and Procedures, Data Entry and Reporting (Page 12)	Timely and accurate data entry into the OSST system directly impacts federal and state performance reporting, which in turn affects funding and program accountability under WIOA and Florida Statutes. Ensuring SNAP E&T participants are registered in Employ Florida supports measurable employment outcomes and aligns with

			programmatic goals to promote self-sufficiency and labor market integration.
14	DCF is responsible for determining if a good cause exemption applies when a SNAP recipient does not complete applicable SNAP work requirements. Allowable exemptions are subject to change based on programmatic guidance.	Section V(J) Policies and Procedures, Exemptions (Page 13)	7 CFR 273.7(i)
15	This section outlines oversight responsibilities and local implementation requirements including local operating procedures; emphasizes internal monitoring and corrective action.	Section VI. Implementation (Pages 13-14)	Establishes clear oversight responsibilities, ensures consistent local execution through operating procedures, and reinforces accountability through internal monitoring and corrective action processes.
16	Legal authorities and citations.	Section VII. Authorities (Page 14)	7 CFR 273.7 7 CFR 273.24 29 U.S.C. 3101 Florida SNAP E&T Plan
17	Links to Florida SNAP E&T Plan, Able-Bodied Adults Without Dependents and Mandatory Work Participants FAQ, and Checklist.	Section VIII., Resources (Page 14)	Florida SNAP E&T Plan

C. LEGAL REFERENCES AND APPLICABLE GUIDANCE

[7 CFR 273.7](#) – Work provisions for SNAP recipients.

[7 CFR 273.24](#) – Time limits for ABAWDs.

[20 CFR 676–681](#) – WIOA performance accountability and planning.

[20 CFR 678.410\(3\)](#)

[29 U.S.C. 3101](#) – Workforce Innovation and Opportunity Act.

[Section 445.033, Florida Statutes](#) – Local performance accountability and reporting.

[Florida SNAP E&T Plan](#)

[Able-Bodied Adults Without Dependents and Mandatory Work Participants FAQ | Florida DCF](#)

Information Items



Speaker Bios

Mark Baird



Dr. Mark Baird is deputy director of the Reimagining Education and Career Help (REACH) Office where he oversees projects related to data and systems. The REACH Office facilitates alignment and coordination of entities responsible for Florida's workforce development system.

Prior to joining the REACH office, Baird was a chief legislative analyst at the Florida legislature's research office, OPPAGA. He has also worked in the Florida Department of Education's Division of Career and Adult Education as director of research and evaluation. Baird's first career was in international education, and he served as assistant director of International Programs at Valdosta State University. He lives in Tallahassee.

Daniel Harper



Daniel S. Harper has over 18 years of experience supporting Florida's workforce development delivery system. As the senior management analyst supervisor of the Data Analytics unit with FloridaCommerce, Harper supports the data needs of Florida's evolving workforce. Previously, Harper concentrated in data analysis, federal reporting, Workforce Innovation and Opportunity Act performance negotiations, workforce program administration, programmatic policy and monitoring, and case management system solutions.

Jimmy Heckman



Jimmy Heckman is an economist and bureau chief for Workforce Statistics and Economic Research (WSER) at FloridaCommerce. Heckman researches a variety of topics including reducing unemployment, long-term growth industries, and in-demand job skills.

Heckman is a Florida native and attended Florida State University where he earned a master's degree in applied economics.

Karmyn Hill



Karmyn Hill serves as the Bureau Chief for One-Stop Program and Support in the Division of Workforce Services at FloridaCommerce and has held several key positions at FloridaCommerce since joining the state of Florida in 2020. Prior to her current role, Hill served as the Director of Operations for the Division of Workforce Services, and the Deputy Director in the Office of Economic Accountability and Transparency, where she assisted in developing and promoting the improved delivery of the Reemployment Assistance Modernization Program.

Through her roles, Hill has provided leadership for the State's priority workforce initiatives, overseeing policy, management, and communications with the Department's internal and external partners. In Hill's first position at FloridaCommerce, she optimized claimant intake during the middle of the 2020 public health emergency. Hill is a Florida native and earned a Bachelor of Science degree from Florida Agricultural and Mechanical University.