

## Strategic Policy and Performance Council Meeting Agenda

NOVEMBER 12, 2025 • 10:00 A.M. – 12:00 P.M., ET  
JOIN THE MEETING VIA MICROSOFT TEAMS: [CLICK HERE](#)  
AUDIO ONLY: [850-629-7293](#), ID: 967 506 852#

---

### Chair's Welcome and Remarks

*Sophia Eccleston*

### Consent Agenda

*Sophia Eccleston*

1. August 2025 Joint Council Meeting Minutes
2. Sunset of Ten (10) Workforce Policies and Guidance Documents:
  - Workforce Policy P51 – Medical Incapacity
  - Workforce Policy P71 – Final Guidance Food and Beverage for WIA Youth
  - Workforce Policy P120 – Youth Service Provider Selection
  - Workforce Policy P102 – Veteran Intake at Career Centers
  - Workforce Policy P103 – Local Veteran Employment Representative (LVER) and Disabled Veteran Outreach (DVOP) Program
  - Workforce Policy P112 – Staffing Requirements
  - Workforce Policy P117 Employment and Advocacy
  - Workforce Policy P119 – Consolidated Position Operational Requirements
  - Workforce Policy 2023.10.12.A.1 – Standardization of Tools and Services
  - Workforce Policy 2023.06.07.A.5 – Career Ladder Identifier and Financial Forecaster (CLIFF) Strategy

### Action Items

*Victoria Gaitanis*

1. Workforce Policy - Policy O92 – Staff Training and Credentialing
2. Workforce Policy O124 – Statewide Standardization of Tools and Services
3. Workforce Policy P95 – WIOA Youth Program Eligibility and Service Provider Selection
4. Workforce Policy P111 – Services for Veterans, Members of the Military and Spouses

### Workforce Program Development Initiatives Update

- Master Credentials List & MCL Communications

*Liz Glenn*

### Statewide Program Performance Analysis and Labor Market Update

*Jimmy Heckman*

*Chief, Bureau of Workforce Statistics and Economic Research*

*FloridaCommerce*

*Kristy Farina*

*Economic Research and Analysis Administrator*

*FloridaCommerce*

### Open Discussion/Public Comment



**Chair's Closing Remarks**

***Sophia Eccleston***

collaborate.  
innovate.  
lead.



# **Consent Item 1**

## **August 20, 2025, JOINT 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 August 20, 2025, Joint Council Meeting Minutes, to include any modifications or changes noted by the council.**

**CareerSource Florida**  
**Joint Strategic Policy and Performance and Finance Council Meeting Minutes**  
**August 20, 2025**

**I. Call to Order**

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

**II. Roll Call**

CareerSource Florida Board Relations Director Madison Frazee conducted a roll call for each council, starting with the Strategic Policy and Performance Council. The following members were present:

Sophia Eccleston  
Erik Arroyo  
Bayne Beecher  
Tim Hinson  
Joe Marino  
Laurie Sallarulo  
Brian Sartain  
Scott Singer  
Eric Hall

Frazee then moved on to call roll for the Finance Council. The following members were present:

Kevin McDonald  
Jennifer Anderson  
Robert Salonen  
Les Sims  
Meredith Stanfield

**III. Finance Council Consent Item**

Chair Eccleston called for a vote to approve the Consent Item for the Finance Council.

**1. May 20, 2025, Finance Council Meeting Minutes**

**Motion:** Jennifer O'Flannery Anderson

**Second:** Meredith Stanfield

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

Chair Eccleston then moved on to the Strategic Policy and Performance Council for their Consent Agenda.

**IV. Strategic Policy and Performance Council Consent Agenda**

Chair Eccleston called for a vote to approve the Consent Agenda as presented for the Strategic Policy and Performance Council.

**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**

**Motion:** Scott Singer

**Second:** Eric Hall

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

## **V. Action Items**

CareerSource Florida Vice President of Workforce Program Development Victoria Gaitanis presented the following action items for the Strategic Policy and Performance Council's consideration:

### **1. Sunset Workforce Policy O106 - Memorandums of Understanding and Infrastructure Funding Agreements**

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

**Motion:** Joe Marino

**Second:** Laurie Sallarulo

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

### **2. Revisions to Workforce Policy P9 - Availability of Services to Floridians**

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

**Motion:** Bayne Beecher

**Second:** Joe Marino

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

### **3. Revisions to Workforce Policy O15 -Emergency Response and Disaster Recovery**

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

**Motion:** Joe Marino

**Second:** Laurie Sallarulo

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

#### **4. Revisions to Workforce Policy O122 - WIOA Adult and Dislocated Worker Program Eligibility**

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

**Motion:** Joe Marino

**Second:** Bayne Beecher

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

#### **5. SNAP E&T Program Components and Case Management (New)**

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

**Motion:** Brian Sartain

**Second:** Joe Marino

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

#### **VI. CareerSource Florida Financial Operations Update**

CareerSource Florida Chief Financial Officer Dana Davis provided an overview of FY 24-25 local workforce development board funding and expenditures for apprenticeship navigators, Hope Florida navigators, welfare transition, WIOA adult and youth, and set aside initiatives.

#### **VII. CareerSource Florida Grants Management Update**

CareerSource Florida Grants Manager Malissa Counts provided updates on executed contracts ending June 30, 2025, for CareerSource Florida's Incumbent Worker Training (IWT) Grant program as well as the Quick Response Training (QRT) Grant program before moving into FY 24-25 IWT funding priorities and an IWT training type breakdown. She also went over a QRT training type breakdown and target sector for FY 24-25 before concluding her presentation.

#### **VIII. Workforce Program Development Initiatives Update**

CareerSource Florida Director of Planning and Evaluation Elizabeth Glenn gave an update on CareerSource Florida's Master Credentials List and the Credential Inventory Database, before handing it over to CareerSource Florida Director of Workforce Program Development Erin Sampson.

Sampson provided the councils with an update on the 24-25 state-level 15% set-aside funding initiatives and shared success stories from local boards.

#### **IX. LWDB Performance Accountability**

Daniel Harper, workforce program research & analysis manager at FloridaCommerce, presented an overview of Florida's workforce performance results, noting that the state's system continues to perform strongly overall under the Workforce Innovation and Opportunity Act (WIOA) accountability measures. He highlighted that most local workforce boards met or exceeded their goals, with only a few areas identified for improvement, particularly in credential attainment and smaller programs with limited participation, before turning it over to Mark Baird, Deputy Director of the REACH Office.

Baird provided an overview of the LWDB letter grade system created under the REACH Act to strengthen accountability and continuous improvement across Florida's workforce system. He discussed how performance measures and grading criteria have evolved over time and shared preliminary statewide trend data for program year 2024. Due to time limitations, his presentation concluded before he could address potential future updates to the letter grade model, which will be revisited at a later date.

**X. Monitoring Findings Update**

Victoria Gaitanis and Karmyn Hill, Bureau Chief of One-Stop and Program Support at Florida Commerce, provided a high-level update on the state's evolving monitoring process, emphasizing a shift from compliance-based reviews to a collaborative, performance-focused approach. They highlighted the introduction of Performance Improvement Plans (PIPs), developed jointly with CareerSource Florida and local boards, to strengthen outcomes through data-driven support rather than corrective action. They concluded noting next steps with the commitment to continuous improvement and partnership across the workforce system.

**XI. Open Discussion/Public Comment**

Chair Eccleston opened the floor to any council members who wished to ask questions or make comments.

Rusty Skinner, CEO of CareerSource Citrus Levy Marion, made a public comment in reference to slide 77 regarding performance metrics for their board. He acknowledged the board's performance decline from an A-minus to a B under the letter grade metrics and noted ongoing challenges related to dislocated worker programs. Skinner clarified that while overall scores have dipped, many performance goals were still met or exceeded in prior years.

**XII. Chair's Closing Remarks**

Chair Eccleston thanked the councils for their participation and engagement.

Chair Eccleston noted the actions of these councils are instrumental in advancing Florida's workforce system and ensuring local workforce development boards are held to the highest performance standards.

The meeting was adjourned at 12:04 p.m.

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

Approved \_\_\_\_\_  
Disapproved \_\_\_\_\_

## Consent Item 2

### RECOMMENDATION TO SUNSET 10 CAREERSOURCE FLORIDA WORKFORCE POLICIES

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

CareerSource Florida and the Florida Department of Commerce (FloridaCommerce) review policies for effectiveness and efficiency. CareerSource Florida and FloridaCommerce reviewed 10 workforce policies and recommends to sunset these policies from the CareerSource Florida Policy Portfolio.

1. [Workforce Policy P51](#) Medical Incapacity
2. [Workforce Policy P71](#) Food and Beverage for WIA Youth
3. [Workforce Policy P120](#) Youth Service Provider Selection
4. [Workforce Policy P102](#) Veteran Intake at Career Centers
5. [Workforce Policy P103](#) Local Veteran Employment Representative & Disabled Veteran Outreach Program
6. [Workforce Policy P112](#) Staffing Requirements (VETS)
7. [Workforce Policy P117](#) Employment and Advocacy (VETS)
8. [Workforce Policy P119](#) Consolidated Position Operational Requirements (VETS)
9. [Workforce Policy 2023.10.12.A.1](#) Standardization of Tools and Services (Strategic)
10. [Workforce Policy 2023.06.07.A.5 Career Ladder Identifier and Financial Forecaster \(CLIFF\) Strategy](#)



1. [Workforce Policy P51 - Medical Incapacity](#) related to welfare transition was created in 2005 to clarify the requirements for documenting and verifying medical incapacity for all local workforce development boards (LWDBs), and other entities engaged in implementing programs under the Temporary Assistance for Needy Families Program and the Welfare Transition Program (TANF). This guidance is outdated and unnecessary to effectively implement programs. Upon sunset of this guidance, elements of the policy will be redeveloped and issued as technical assistance by FloridaCommerce in consultation with CareerSource Florida.
2. [Workforce Policy P71 Food and Beverage for Workforce Investment Act \(WIA\) Youth](#) This is a policy created in 2012 to provide guidance to LWDBs and One-Stop Career Center employees, and other workforce system partners on CareerSource Florida's policy on food and beverage for WIA Youth. Implementation of the Workforce Innovation and Opportunity Act (WIOA) and Florida Law require elements of this outdated guidance to be updated; however, it is no longer necessary as a strategic or operational workforce policy. Upon sunset of this guidance, elements of the policy will be issued as technical assistance by FloridaCommerce in consultation with CareerSource Florida.
3. [Workforce Policy P120 Youth Service Provider Selection](#) It was revised in 2022 to provide LWDBs with criteria for awarding grants and contracts for youth workforce services under WIOA. The policy outlined procurement requirements that govern youth service provider selection. Elements of this policy are revised and combined with **Workforce Policy P95 – WIOA Youth Program Eligibility and Service Provider Selection** creating a single, leaner policy related to WIOA Youth Services. Upon sunset of this guidance and approval of the updated Workforce Policy P95, technical assistance related to WIOA Youth Program Eligibility and Service Provider Selection will be developed and issued by FloridaCommerce in Consultation with CareerSource Florida.

#### **Veteran Services Policies:**

4. [Workforce Policy P102 - Veteran Intake at Career Centers](#) It was last revised in 2021 to provide LWDBs with the minimum requirements for establishing an initial intake process for transitioning service members, veterans, and eligible spouses at career centers throughout the CareerSource Florida Network.
5. [Workforce Policy P103 - Local Veteran Employment Representative & Disabled Veteran Outreach Program](#) was last revised in 2019 to provide guidance to LWDBs on the Disabled Veteran Outreach Program (DVOP) Specialist and Local Veteran Employment Representative (LVER) outreach process.
6. [Workforce Policy P112 Staffing Requirements \(VETS\)](#) - was last revised in 2021 to provide LWDBs with the minimum staffing requirements for staff supported by the Jobs for Veterans' State Grant (JVSG) Program.

7. [Workforce Policy P117 - Employment and Advocacy \(VETS\)](#) It was developed in 2021 to provide LWDBs with the minimum requirements for providing employment and advocacy services to participants of the JVSG program.
8. [Workforce Policy P119 - Consolidated Position Operational Requirements \(VETS\)](#) It was last revised in 2021 to provide LWDBs guidance for Consolidated Position (CP) staff supported by the JVSG program.

Workforce Policies 102, 103, 112, 117, and 119 are all lengthy operational policies that provide guidance for administering workforce programs serving veterans, military, and their families. Federal statutes, guidance, and other language are repeated across these five policies, in some cases making them difficult to navigate or unnecessary as standalone policies. CareerSource Florida and FloridaCommerce worked directly with subject matter experts from LWDBs to consolidate elements of these policies into a single, leaner, revised version of **Workforce Policy P111 - Services for Veterans, Members of the Military and Spouses**. The revised Workforce Policy P111 – provides LWDBs the minimum requirements for implementing priority of service and other services for veterans, military and eligible spouses for all U.S. Department of Labor (DOL) funded programs and services.

Upon sunset of these policies and approval of the updated Workforce Policy P111, a single policy will be issued. Technical assistance related to these critical workforce programs serving veterans, military, and spouses was developed by FloridaCommerce in consultation with CareerSource Florida and will be issued to LWDBs.

#### **Statewide Standardization of Tools and Services:**

9. [Workforce Policy 2023.10.12.A.1 Standardization of Tools and Services](#) It was approved by the CareerSource Florida Board of Directors in 2023 to support partnership, encourage predictability, and ensure attainment of shared performance goals. State procured technology, tools and services shall be used by all LWDBs, local workforce development areas, and regional planning areas.
10. [Workforce Policy 2023.06.07.A.5 CLIFF Strategy](#) It was approved by the CareerSource Florida Board of Directors in 2023. This policy directs that the [Florida CLIFF Dashboard](#) and associated suite of tools shall be leveraged by LWDB leadership, career center staff, and made available to extended partners and stakeholders to prioritize employment, emphasize education and training, reduce welfare dependency, increase economic self-sufficiency, and meet employer needs.

The Statewide Standardization of Tools and Services policy aimed to support partnership and shared goals. State-procured technology, tools, and services must be used by all workforce boards and planning areas. The operational guidance is now in a different policy, **Workforce Policy O14 – Statewide Standardization of Tools and Services** provide a framework for decision-making in the acquisition of tools and services and

explains how boards can request waivers for local needs. Only one policy is needed for standardization.

The Florida CLIFF Dashboard is one example of a tool procured by CareerSource Florida provided statewide to assist LWDBs, career center staff, and stakeholders to help customers how career choices affect income and public assistance. All boards should use the CLIFF Dashboard and related tools to help customers reach economic self-sufficiency.

CareerSource Florida and FloridaCommerce worked with subject-matter experts from LWDBs to revise Workforce Policy O14 – Statewide Standardization of Tools and Services and update guidance on procurement of tools and services and the required use of state-procured tools. This updated guidance eliminates the need for Workforce Policy 2023.10.12.A.1 – Standardization of Tools and Services and Workforce Policy 2023.06.07.A.5 – CLIFF Strategy.

Upon sunset of these policies from the CareerSource Florida Policy Portfolio and the implementation of the revised Workforce Policy O14 – Statewide Standardization of Tools and Services, technical assistance will be developed by FloridaCommerce in consultation with CareerSource Florida and will be issued to LWDBs.

## **FOR CONSIDERATION**

- **Sunset 10 CareerSource Florida Workforce Policies and move this policy forward to the CareerSource Florida Board of Directors for consideration by the full board.**

Date of Issue: October 5, 2005
Office of Issue: AWI FG 05-051
Reference: Medical Incapacity

## **Final Guidance Medical Incapacity Welfare Transition Program**

---

### **Of Interest To:**

Workforce Florida, Inc., all Regional Workforce Boards, and other entities engaged in implementing programs under the Temporary Assistance for Needy Families Program and the Welfare Transition Program.

### **Subject**

Revised Guidance pertaining to noncompliance related to medical incapacity, applicants for Social Security Income (SSI) or Social Security Disability Income (SSDI) and Outpatient Mental Health or Substance Abuse Treatment. The guidance is being revised to clarify the requirements for documenting and verifying medical incapacity. Specifically, physicians must be licensed under Florida Statutes Chapter 458 or 459. Physicians are not required to use the medical verification forms developed by AWI to document the individual's condition and limitations. The Regional Workforce Board (RWB) providers should accept any form of documentation that clearly documents the individual's medical incapacity and limitations. However, the medical verification forms provided by AWI include important information for both the individual and the physician as well as a request to the physician to provide required information. The RWB may use the medical verification forms provided by AWI as a format or any regionally verification form. The guidance also deletes all reference to substance abuse/mental health treatment earned months as a result of statutory changes. by the Florida legislature.

### **Background**

Florida Statute sections 414.065 and 414.105, were amended in 1999. Florida Statute, section 414.065 (4) (d), allows Welfare Transition (WT) participants to be excused from work activities contingent upon verification by a physician licensed under Chapter 458 or Chapter 459, F.S.. The provision allows for assignment of work activities consistent with a participant's medical limitations and gives the RWB authority to require an individual to cooperate in medical or vocational assessment necessary to evaluate the individual's ability to participate in work activities. The amendment also created sections 414.065 (4) (f) and 414.105 (11). These sections of the Florida Statutes provide for an exception from participation in work activities for those who have documented a current application, including an appeal, for SSI/SSDI. These sections require the assignment of program activities based on the participant's medical ability to comply and provides for time limit extensions for persons applying for SSI/SSDI.

## I. Program Guidance

Recipients of Temporary Cash Assistance (TCA) who are referred to the WT program as mandatory are required to participate in countable work activities (445.024, F.S.) unless an exception to the work activity requirement is met (414.065 (4), F.S.). Participants who meet an exception to noncompliance as defined in 414.065 (4) are not exempt from participation and therefore, must be referred to the WT program and participate based on his or her medical ability to comply.

### A. **Noncompliance Related to Medical Incapacity, Florida Statute 414.065 (4) (d):**

Participants may not be able to participate 30 hours per week in countable work activities due to medical issues. Participants who provide a signed statement from a physician licensed under Chapter 458 or 459 of the Florida Statutes may be *excepted (excused)* from work activities.

According to the Florida Administrative Code (FAC) 65A-4.206, individuals claiming a medical incapacity that prevents them from participating in work activities or limits their participation in work activities shall be required to provide a statement from a **physician licensed under Chapter 458 or 459, F.S.**, specifying the nature of the disability or incapacity, the duration of the disability or incapacity, the number of hours per week the individual can participate in activities, the percentage of the individual's disability and any other limitations on participation in work activities<sup>1</sup>.

- Participants may not be excused from work activity requirements unless the medical incapacity is verified (a signed statement) by a physician licensed under Chapter 458 or 459, F.S.
  - Physicians licensed under 458 have license numbers that begin with the **pre-fix “ME”**, and physicians licensed under 459 have license numbers that begin with the **prefix “DO”**.
  - **Participants may provide a letter or document from the physician rather than the medical verification forms provided for regional use by AWI.**
  - **The RWB provider must make the participant aware of the information required to meet program requirements:** a statement from a physician licensed under Chapter 458 or 459, F.S., specifying the nature of the disability or incapacity, the duration of the disability or incapacity, the number of hours per week the individual can participate in activities, the percentage of the individual's disability and any other limitations on participation in work activities<sup>2</sup>.
- The RWB provider must assist the participant in developing an Individual Responsibility Plan (IRP) or Alternative Requirement Plan (ARP) necessary for the individual to resume participation. The Medical Verification Form AWI-WTP 2288(a) was developed to assist the RWBs in securing information

---

<sup>1</sup> Florida Administrative Code 65A-4.206(1-3)

<sup>2</sup> Florida Administrative Code 65A-4.206(3)

regarding the participant's limitations in an attempt to engage the participant in a work activity; however, the participant may provide other documentation from the physician or assessment provider that meets the information requirements:

- Work activities shall be assigned consistent with documented limitations.
  - The ARP activities shall be assigned based on both limitations and the course of action necessary to resume participation.
- A deferral or "excuse" from work activity requirements is time limited and should be based on the medical documentation received.
  - The individual must be assigned to work activities consistent with documented limitations. The IRP or ARP should be updated to reflect medical assessment, vocational assessment, treatment plan progress, participation based on medical ability to comply. Subsequent medical documentation detailing the individual's limited abilities or inability to participate should be required every six months, at a minimum, based on local operating procedures (LOPs).

### **Evaluation of Limitations and Medical Ability to Comply**

Activities, including work activities, must be consistent with the limitations identified in the medical verification/documentation. The participant must be evaluated regarding his or her ability to participate. The RWB provider may require an evaluation, including a medical evaluation, a vocational assessment or a work evaluation to assess the participant's ability to participate in work activities. Evaluations assist in the process of developing a plan for moving the participant towards being able to comply with work activities, developing an ARP and developing a plan towards eventual self-sufficiency.

#### **1. Medical Verification Form and the Statement of Need for Care Form**

Two medical forms have been developed to assist the RWBs with securing documentation regarding the WT participant's medical incapacity, limitations and ability to comply. The Medical Verification Form has been modified and the Statement of Need for Care Form has been developed to include provisions of the Health Insurance Portability and Accountability Act (HIPAA). The Medical Verification Form, AWI-WTP 2288(a), is a three-page form that includes:

- A letter to the physician requesting the release of the client's information;
- A page disclosing the WT participant's rights and responsibilities regarding compliance;
- A page disclosing the WT participant's rights and responsibilities regarding the release of medical information;
- A request for the physician to provide information regarding restrictions on participation in both work and classroom activities; and

- A place for the physician to provide an estimated duration of the condition and the therapy or treatment plan prescribed for the participant.

The Statement of Need for Care Form, AWI-WTP 2288 (b), includes:

- A notice of rights and responsibilities for the WT participant;
- An authorization to release medical information for the individual requiring care to the RWB Provider;
- The rights and responsibilities of the individual receiving care regarding medical information and confidentiality; and
- A page to be completed by a physician licensed under Chapter 458 or 459, F.S. providing information regarding the amount of time the WT participant should be excused from work activities to provide care for the medically incapacitated adult/child.

## **2. Securing Medical Documentation**

Regions have reported that WT participants are having difficulty obtaining the completed medical documentation from the appropriate physicians. Physicians are frequently requiring payment for the completion of documents and/or requiring several visits/appointments to complete the medical form. Participants are also having difficulty scheduling timely appointments with their physicians.

### **a. Steps to assist participants in obtaining medical documentation:**

- Obtaining medical documentation could be included as a step to self-sufficiency on the IRP.
- The RWB can develop a working relationship with Medicaid physicians.
- Develop a LOP regarding the type of documentation the RWB provider may accept as suitable in lieu of the approved medical forms.

### **b. The WT program participant must secure documentation signed by a physician licensed under Chapter 458 or 459, F.S. that includes<sup>3</sup>:**

- The nature of the medical incapacity;
- The duration of the incapacity;
- The number of hours per week the individual can participate in activities;
- The percentage of the individual's disability;
- Other limitations on participation in work activities; and
- The course of treatment necessary to resume participation.

### **c. Payment for the completion of medical documentation:**

---

<sup>3</sup> 65A-4.206 Florida Administrative Code

Federal Law prohibits the use of TANF funds for medical services, However, because the completion of programmatic forms by physicians is not covered by Medicaid local funds may be used for this purpose if:

- The physician does not code the completion of the form as a medical appointment and does not submit the charge to Medicaid. The charge for completing the form must be a separate charge.
- The physician charges all patients for the completion of medical documentation for non-medical providers/purposes (there is no discrimination between Medicaid and Non-Medicaid clients).
- The physician provides a receipt for the purchase of medical documentation. The receipt must be retained in the participant's record for financial and programmatic monitoring.

**B. Noncompliance Due to Medical Incapacity by Applicants of SSI or SSDI, Florida Statutes, section 414.065 (4) (f):** Individuals who have applied for SSI/SSDI and have not received a final determination from the Social Security Administration (SSA) may be “exempted” or “temporarily excused” from *work requirements* while awaiting a final determination. The term “exempt” under this subsection in Florida Statutes is not to be confused with the term “exempt” defined by eligibility determination. The participant must:

- Secure documentation from the SSA verifying a current application or appeal is on file;
- Provide medical verification regarding the nature of the medical incapacity, limitations to participation, the duration of disability or incapacity, as well as a course of treatment recommended or required; and
- Participate in program requirements according to his or her documented medical ability to comply.
- If the WT program participant provides documentation verifying an application or appeal for SSI/SSDI is on file at the SSA office, the participant may be *excused from work requirements*. **The participant is not exempt from WT program requirements. The participant must comply with an ARP that is consistent with the individual's limitations.**<sup>4</sup>

Participants who have provided verification of a SSI/SSDI application or appeal must provide documentation of his/her limitations regarding program participation from a physician licensed under Chapter 458 or 459, F.S.. The participant's ARP should be developed based on the limitations outlined in the medical documentation.

---

<sup>4</sup> Florida Administrative Code 65A-4.206 (4)-(6)



- Section 414.105 (11), F.S., states persons who have applied for SSI/SSDI but have not received a final determination must continue to meet all program requirements assigned to the participant based on medical ability to comply.
- Section 414.065 (1) (b), F.S., states participants receiving TCA who are exempted from noncompliance penalties fails to comply with the alternative plan requirements will be subject to the same penalties as those who are subject to work requirements as outlined in 414.065 (a).

**C. Noncompliance Related to Outpatient Mental Health or Substance Abuse Treatment:** If a participant informs the RWB provider that (s)he is in need of substance abuse or mental health services, the participant should be referred to a Substance Abuse and/or Mental Health (SAMH) service provider. The RWB provider should be responsive to the individual and the need for an Alternative Requirement Plan. If the participant reports to the RWB provider (s)he is already involved in a treatment or mental health program, the provider should assist the participant in updating the IRP to include the alternative requirements, participation in the treatment program and documentation of the treatment.

**Counting the Hours** Florida Statutes, section 414.065 (e), allows participants to be *excused* from work activity requirements for up to **5 hours per week** to participate in a substance abuse or mental health treatment program. The participant may be excused from the work activity **for up to five hours per week** after a mental health or substance abuse professional certifies the treatment protocol and provides verification of attendance at the counseling or treatment sessions each week. If the participant requires more than five hours a week for SAMH treatment or (s)he is involved in an inpatient treatment program, it must be verified by a physician licensed under Chapter 458 or 459, F.S. An ARP must be developed that includes the:

- Assigned program requirements to remain in compliance with the WT program;
- Program and activity requirements that take into consideration the participant's medical limitations; and
- Course of treatment necessary for the individual to resume participation based on the medical documentation.

The Substance Abuse and Mental Health Treatment Verification form, CF-ES 2299, must be used to certify the participant's engagement in the treatment program. Once the participant has started the SAMH program, the SAMH counselor should complete section B of the CF-ES 2299 to verify the WT participant has started the treatment process. The RWB will communicate with the SAMH counselor and monitor participation at least monthly. The RWB provider is responsible for obtaining verification of attendance at the counseling and treatment sessions for each week. Obtaining verification may be included in the participant's IRP/ARP. The RWB should establish a LOP describing the process to document hours in treatment, how often the CF-ES 2299 should be updated and returned to the RWB

provider, as well as, a document or process to verify participation in treatment/counseling activities on a weekly basis.

Once treatment is completed, the SAMH counselor will complete section C of the SAMH Treatment Verification Form, CF-ES 2299, indicating the months that the participant fully complied with the SAMH treatment requirements and successfully completed the program. This information will then be forwarded to the RWB provider.

## **II. Forms**

[Medical Verification Form](#), AWI-WTP 2288(a)

[Statement of Need for Care Form](#), AWI-WTP 2288(b)

[Substance Abuse and Mental Health Treatment Form](#), CF-ES 2299

Date of Issue: May 7, 2012
Office of Issue: DEO FG-071
Reference: WFI Policy

## **FINAL GUIDANCE**

### **FOOD AND BEVERAGE FOR WIA YOUTH**

---

#### **OF INTEREST TO**

Regional Workforce Boards (RWB).

#### **SUBJECT**

Workforce Florida, Inc. (WFI) Policy regarding food and beverage for WIA Youth.

#### **PURPOSE**

The purpose of this issuance is to provide guidance to RWBs One-Stop Career Center employees, and other workforce system partners on WFI's policy regarding food and beverage for WIA Youth.

#### **POLICY**

State and federal funds may be used to provide food, beverage or dining activities for youth enrolled and participating in workforce youth programs provided that participants are not reimbursed in excess of the state per diem amounts for the specific meal or, if contracted for by the regional workforce board, that such expenditures for all food and beverage per person per meal (including any associated costs such as, but not limited to, sales tax and service) shall not exceed those amounts stated in Florida Statutes 112.061(6)(b).

The amounts referred to in FS 112.061(6)(b) are currently:

✓ Breakfast	\$6
✓ Lunch	\$11
✓ Dinner	\$19

As a general guideline, meals (i.e., food, beverages, snacks, etc.) provided before 11 am should not exceed the breakfast rate; between 11 am and 4 pm should not exceed the lunch rate; and after 4 pm should not exceed the dinner rate. However, if the circumstances warrant, the meal designation may be changed as long as the rationale for the change is properly documented.

Local boards that provide food or beverages to youth participants must establish policies and procedures to ensure that these expenses do not exceed the amounts listed above.

#### **AUTHORITY**

Workforce Florida, Inc.



**POLICY  
NUMBER  
120**

## **Administrative Policy**

<b>Title:</b>	Youth Service Provider Selection
<b>Program:</b>	Workforce Innovation and Opportunity Act
<b>Effective:</b>	February 28, 2022

### **I. PURPOSE AND SCOPE**

The purpose of this policy is to provide Local Workforce Development Boards (LWDBs) with the criteria for awarding grants and contracts for youth workforce services under the Workforce Innovation and Opportunity Act (WIOA). Additionally, this policy outlines procurement requirements that govern the youth service provider selection process.

### **II. BACKGROUND**

One of the responsibilities of LWDBs is to select providers of youth workforce services through competitive grants or contracts. LWDBs have the option of directly providing some or all youth workforce services rather than awarding grants or contracts for these services. LWDBs are encouraged to award grants or contracts to youth service providers when local areas have access to experienced and effective youth service providers.

### **III. AUTHORITY**

Workforce Innovation and Opportunity Act of 2014, [Public Law 113-128](#), Section 123

2 Code of Federal Regulations (CFR) Parts [200](#) and [2900](#)

[20 CFR 681.400](#)

[48 CFR 2.1](#)

[Training and Employment Guidance Letter \(TEGL\) No. 21-16](#), Third WIOA Title I Youth Formula Program Guidance

[Chapter 287](#), Florida Statutes

Sections [445.003](#) and [445.007\(9\)](#), Florida Statutes

[Chapter 60A-1](#), Florida Administrative Code

[2020-2024 Florida Workforce Innovation and Opportunity Act Unified Plan](#)

#### **IV. POLICIES AND PROCEDURES**

##### **A. Determination to Directly Provide Youth Services or Procure a Youth Service Provider**

LWDBs that choose to award grants or contracts for youth workforce services must do so through a competitive procurement process as required by WIOA Section 123 and the criteria established in this policy. Competition is expected to improve the delivery of efficient and effective youth workforce services. Though LWDBs have flexibility in determining which WIOA youth services to procure, LWDBs are expected to contract with youth service providers for the program elements youth service providers are best positioned to offer. The intent of this flexibility is to allow LWDBs to directly provide WIOA youth program elements they can most efficiently and cost-effectively provide, such as labor market and employment information, and framework services including assessment, intake, supportive services, and follow-up services.

If LWDBs choose to directly provide youth workforce services, situations may arise where a single entity serves multiple roles, such as fiscal agent, service provider, and/or one-stop operator. Please refer to [Administrative Policy 110 – Local Workforce Development Area and Board Governance](#) for guidance on LWDBs serving multiple functions.

##### **B. Criteria for Youth Service Provider Selection**

When LWDBs award grants or contracts to youth service providers, they must do so in accordance with the following criteria that demonstrate the ability of the provider(s) to:

- (1) Effectively provide the youth services sought by the LWDB; specifically, the execution of the 14 youth program elements.
- (2) Coordinate services with other community organizations, vendors, or the LWDB.
- (3) Provide services at a reasonable cost<sup>1</sup> and provide an accurate project budget.

---

<sup>1</sup> Costs that LWDBs may want to consider in the proposed budget narrative include: program staff wages and fringe benefits, travel, supplies, materials, training costs, work experience wages, stipends, and incentives. Leveraged costs and indirect costs should be requested.

- (4) Demonstrate an understanding of the WIOA program statutory and regulatory requirements, and any other federal, state, and local policies impacting youth program operations.
- (5) Identify partners the provider will work with to help youth achieve successful outcomes.<sup>2</sup>
- (6) Offer or provide access to a continuum of services that allow participants to obtain a General Education Development or high school diploma, enroll into post-secondary education, and obtain employment within their chosen career paths, as applicable.
- (7) Utilize career pathways and sector strategy models with a structured sequence of activities, as well as multiple entry and exit points that provide adequate supportive services, as applicable.
- (8) Meet or exceed performance indicators that will be used to measure the success of the youth served by the program, and the minimum standards and targets set by the LWDB to ensure the LWDB's indicators of performance negotiated with the state for the youth program are met.
- (9) Meet established reporting requirements.
- (10) Demonstrate past performance providing youth services, if applicable.
- (11) Demonstrate strong community and business linkages to ensure the ability to develop work-based learning opportunities and meet the skill and training needs for the state's talent pipeline.

Further, LWDBs must ensure the provider has been in business for at least six months prior to submitting a bid or response to provide services and has a current business license or proof of active compliance with the Secretary of State Corporations Division. LWDBs must also ensure the provider has not been found at fault in criminal, civil, or administrative proceedings related to its performance as a training provider or educational institution, and they must disclose any pending criminal, civil, or administrative proceeding as either a defendant or a respondent.

Further, LWDBs may establish additional criteria to ensure they use providers best positioned to deliver required program elements resulting in strong outcomes for youth participants. If an LWDB establishes additional criteria, it must describe such criteria in its WIOA four-year local plan.

### **C. Phases of the Competitive Procurement Process**

Formal competitive processes may include several phases and steps, which may take place concurrently with other activities. The following phases and steps are designed

---

<sup>2</sup> LWDBs are not required to procure all 14 program elements through a competitive process; therefore, the Request for Proposals might allow vendors to propose to collaborate with other organizations to leverage available resources in the community.

to ensure the competitive procurement process is open and transparent: (1) planning, (2) release and evaluation, (3) negotiation and selection, (4) implementation, and (5) closeout.

## **D. Procurement Standards and Requirements**

LWDBs must award youth service provider grants and contracts in accordance with the procurement standards found in the Uniform Guidance at 2 CFR parts 200 and 2900, in addition to applicable state and local procurement requirements. For the acquisition of property or services required under a federal award or subaward, LWDBs must use documented procurement procedures, consistent with state and local laws and regulations and the standards outlined in 2 CFR 200.318 and further prescribed below.

General procurement requirements under WIOA must also be followed as part of the competitive process. The requirements must be consistent with Uniform Guidance and include the following.

### **1. Written Policies and Procedures**

LWDBs must establish written policies and procedures that describe the competitive process for selecting youth service providers and the manner in which the LWDB will address the settlement of all contractual and administrative issues, such as protests, appeals, and disputes. LWDBs' documented procurement procedures must conform to the procurement standards identified in 20 CFR 200.317 through 200.327. Written policies and procedures must allow for sufficient time for all phases of the procurement process to be carried out in a manner that does not unduly restrict competition. The policies and procedures must also outline a timetable to ensure the selection of youth service providers through a competitive process is conducted at a specified frequency.

### **2. Appropriate Methods of Competitive Procurement**

LWDBs are required to use one of the following methods of procurement:

- (1) Sealed Bids, such as an invitation for bids (IFB), pursuant to the requirements outlined in 2 CFR 200.320(b)(1).
- (2) Proposals, such as a request for proposals (RFP), pursuant to the requirements outlined in 2 CFR 200.320(b)(2).

### **3. Full and Open Competition**

LWDBs must conduct full and open competitions for all procurement transactions.

Pre-qualified lists of potential bidders or offerors must be current, include enough qualified sources to ensure open and free competition, and must not preclude bidders and offerors from qualifying during the solicitation period.

Restricting competition is not allowed. Activities that may be considered to be restrictive of full and open competition include, but are not limited to:

- (1) Placing unreasonable requirements on firms for them to qualify to do business.
- (2) Requiring unnecessary experience and excessive bonding.
- (3) Non-competitive pricing practices between firms or between affiliated companies.
- (4) Non-competitive contracts to consultants that are on retainer contracts.
- (5) Organizational conflicts of interest.
- (6) Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement.
- (7) Any arbitrary action in the procurement process.

#### **4. Simplified Acquisition Threshold**

Procurements that exceed the simplified acquisition threshold (currently set at up to \$250,000 by 48 CFR 2.1) cannot use the small purchase procedures. LWDBs are responsible for determining an appropriate simplified acquisition threshold based on internal controls, an evaluation of risk, and its documented procurement procedures. Such procurements must not exceed \$250,000.<sup>3</sup> If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources, as determined appropriate by the LWDB.<sup>4</sup>

#### **5. Cost and Price Analysis**

When performing a competitive procurement, LWDBs must ensure the proposed costs of the youth service provider are allowable, meaning they are reasonable, necessary, and allocable. Before awarding funds to a subrecipient or vendor, LWDBs must perform a cost or price analysis to determine the reasonableness of individual cost elements and/or the overall price. Price analysis should be used to verify that the overall price offered is fair and reasonable.<sup>5</sup>

---

<sup>3</sup> 2 CFR 200.320(b)

<sup>4</sup> 2 CFR 200.320(a)(2)

<sup>5</sup> 2 CFR 200.324



LWDBs must negotiate profit as a separate element of the price for each contract in which there is no price competition and, in all cases, where cost analysis is performed. To establish a fair and reasonable profit, consideration must be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

Costs or prices based on estimated costs for contracts under the federal award are allowable only to the extent that costs incurred or cost estimates included in negotiated prices would be allowable for the LWDB in accordance with cost principles defined in 2 CFR subpart E. LWDBs may also reference their own cost principles that comply with the federal cost principles.

Additionally, cost realism analyses must be performed on cost-reimbursement contracts to determine the probable cost of performance for each bidder or offeror.

## **6. Standards of Conduct**

LWDBs must have written standards of conduct that require fairness, objectivity, ethical standards, and other related standards of conduct during all phases of the procurement process. Written standards of conduct must address:

- (1) Mitigating apparent or real conflicts of interest. Conflicts of interest arise when the employee, officer or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated has a financial or other interest or a tangible personal benefit from a firm considered for a contract.
- (2) Disclosure of any real or apparent conflict of interest, whether individual, or organizational. Written standards of conduct must identify the process for recusal of individuals or organizations that are members of the LWDB who disclose a real or apparent conflict of interest.
- (3) A description of the firewalls and internal controls to mitigate conflict of interest in circumstances including, but not limited to, situations where an entity acts in more than one role in the one-stop delivery system or performs more than one function in the procurement process, as well as situations where the LWDB uses a sole source selection.
- (4) Confidentiality of information contained in the proposals submitted for consideration.
- (5) Not allowing any entity that develops or drafts specifications, requirements, statements of work, IFBs or RFPs, or evaluates proposals, to compete under the procurement.

## **7. Transparency and Responsibility**

The procurement process must be conducted with transparency and responsibility from the planning phase to the closeout phase. Information about the selection and certification of youth service providers must be made available to the public on a regular basis through electronic means and open meetings, as specified in rule and statute. This provides an avenue for public comment and participation in the process. Information must also be made available to state auditors and federal reviewers.

When selecting an entity as a youth service provider, LWDBs must consider the entity's integrity, compliance with public policy, record of past performance, and other factors that demonstrate transparency and responsibility. LWDBs must also ensure that a potential provider is not debarred, suspended, or otherwise excluded from or ineligible to participate in federal assistance programs or activities.

### **E. Non-Competitive Procurement of Youth Service Providers (Sole Source)**

Where the LWDB determines there are an insufficient number of eligible youth providers in the local area, such as a rural area, the LWDB may award grants or contracts on a sole source basis. LWDBs must follow the criteria outlined in 20 CFR 681.400(b)(4) and 2 CFR 200.320(c) to award sole source grants or contracts for youth services when one of the following occurs:

- (1) Services are available only from a single source.
- (2) The public exigency or emergency for the service will not permit a delay resulting from publicizing a competitive solicitation.
- (3) The United States Department of Labor or DEO expressly authorizes a non-competitive procurement in response to a written request from the LWDB.
- (4) After solicitation of a number of sources, competition is determined to be inadequate, whether for reasons of number or quality of proposals/bids.

LWDBs that use the sole source selection must prepare and maintain written documentation describing the entire process of making the selection.

### **F. Contracting with Small and Minority Businesses, Women's Business Enterprises, and Labor Surplus Firms**

LWDBs must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible, as further prescribed in 2 CFR 200.321(a).

## **G. Youth Service Provider Selection**

Any response received to publicized requests for proposals from bidders or offerors must be considered to the maximum extent practical. LWDBs must have a written method for conducting technical evaluations of the proposals received and making selections. Contracts must be awarded to the responsible bidder or offeror whose proposal is most advantageous to the LWDB, with price and other factors considered.

If the LWDB has an established standing youth committee, it may assign the committee the function of selecting youth service providers. LWDBs, or their standing youth committee, must select youth service providers best positioned to provide the required youth program elements.

## **H. Legally Binding Agreement**

Once the LWDB has competitively selected a youth service provider, the LWDB and the youth service provider must execute a legally binding agreement. At a minimum, the agreement must include the following elements:

- (1) *Statement of Work (SOW)*. The SOW specifies:
  - (a) the period of performance or the start and end date of the contract.
  - (b) the services to be performed, including measurable performance goals to be delivered under the agreement.
- (2) *Authorized Officials and Purpose*. Authorized officials are persons authorized to enter into legally binding agreements and must be on record as the signatory official. Signatures of the authorized persons must be a part of the written agreement.
- (3) *Additional Terms and Conditions*. Funding agreements must include standard terms and conditions that are required by either the federal agency, state law, or local policies. The agreement must identify that youth service providers are sub-recipients of federal funds.

## **I. Recordkeeping**

LWDBs must maintain sufficient records to detail the history of procurement in accordance with 2 CFR 200.318(i) and 2 CFR 200.333. These records must include, but are not limited to, the following:

1. All proposals/bids received.
2. Ratings of all proposals/bids received.
3. Rationale for the method of procurement.
4. Selection of agreement or contract type.

5. Selection or rejection of proposals/bids.
6. Appeals and disputes.
7. Basis for the agreement price.

LWDBs that make the selection for sole source must prepare and maintain written documentation of the entire sole source selection process. The documentation should provide evidence the review was performed by an impartial entity or organization and verify that firewalls were in place during the review of the proposals.

#### **J. Conflict of Interest**

Recognizing that membership of LWDBs is comprised of key providers and leaders from the business, workforce and education communities, and other community-based organizations, WIOA allows LWDBs to contract with members of the LWDB and standing committees for the provision of WIOA-funded services if there are processes in place to prevent or cure a conflict of interest.

When an actual or potential conflict of interest exists between the LWDB and any local board member, employee of the local board, a relative of a local board member, or employee of the local board, or an organization or individual represented by or employing a local board member, the criteria and procedures set forth in the Grantee-Subgrantee Agreement executed between DEO and all LWDBs, and any related administrative policies upon issuance, must be followed.

#### **K. Local Operating Procedures**

Local operating procedures (LOPs) guide how LWDBs operationalize policies related to the selection of youth providers. Each LWDB must develop LOPs, consistent with this policy as well as federal and state requirements that:

1. Establish the competitive procurement process that will be used to select youth service providers when the LWDB will not provide all or some youth activities.
2. Define what would constitute an insufficient number of eligible youth providers for a sole source procurement.

#### **L. State and Local Monitoring**

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

1. Roles of the youth service provider and LWDB staff; and
2. Local monitoring procedures for implementation of this policy.

When the LWDB is the youth service provider, there is an inherent conflict of interest due to the LWDB being unable to effectively monitor itself. In this circumstance, an outside organization or entity must conduct the monitoring and report the results to the Chief Local Elected Official.

## V. DEFINITIONS

**Competitive Procurement** – Also referred to as “competitive solicitation” means the process of requesting and receiving two or more sealed bids, proposals, or replies submitted by responsive vendors (bidders or offerors) in accordance with the terms of a competitive process, regardless of the method of procurement.

**Cost Analysis** – The review and evaluation of any separate cost elements and profit or fee in an offeror’s or contractor’s proposal, as needed to determine a fair and reasonable price or to determine cost realism, and the application of judgment to determine how well the proposed costs represent what the cost of the contract should be, assuming reasonable economy and efficiency.

**Cost Realism Analysis** – The process of independently reviewing and evaluating specific elements of each offeror’s proposed cost estimate to determine whether the estimated proposed cost elements are realistic for the work to be performed, reflect a clear understanding of the requirements, and are consistent with the unique methods of performance and materials described in the offeror’s technical proposal.

**Firewall** – In this context, a firewall consists of documented procedures and security measures, physical and electronic, designed to maintain a competitive environment that prevents conflicts of interest and ensures that internal processes are transparent, fair, and unbiased.

**Proposals** – A procurement method in which either a fixed price or cost reimbursement type of contract is awarded. Proposals are generally used when conditions are not appropriate for the use of sealed bids.

**Sealed Bid** – A procurement method in which bids are publicly solicited and a firm fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all material terms and conditions of the invitation for bids, is the lowest in price.

**Simplified Acquisition Threshold** – The dollar amount below which a non-federal entity may purchase property or services using small purchase methods/procedures.

**Sole Source** – Also referred to as “exceptional purchase.” Any purchase of commodities or contractual services excepted by law or rule from the requirements for competitive solicitation, including, but not limited to, purchases from a single source; purchases upon receipt of less than two responsive bids, proposals, or replies; purchases made by an agency after receiving approval from the department, from a contract procured, pursuant to s. 287.057(1), or by another agency; and purchases made without advertisement in the manner required under s. 287.042(3)(b).

## **VI. ATTACHMENTS**

[WorkforceGPS: Building Quality Request for Proposals \(RFPs\) for WIOA Youth Program Services Brief](#)

[WorkforceGPS: Contracting Strategies that Facilitate Serving Youth in Need](#)



## Administrative Policy

**POLICY  
NUMBER  
102**

<b>Title:</b>	Veteran Intake at Career Centers
<b>Program:</b>	Wagner-Peyser, Jobs for Veterans' State Grant
<b>Effective:</b>	June 9, 2021

### **I. PURPOSE AND SCOPE**

The purpose of this policy is to provide Local Workforce Development Boards (LWDBs) the minimum requirements for establishing an initial intake process for transitioning service members, veterans, and eligible spouses at career centers throughout the CareerSource Florida Network.

### **II. BACKGROUND**

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

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

### **III. AUTHORITY**

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

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

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

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

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

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

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

### **IV. POLICIES AND PROCEDURES**

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

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

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

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

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



## **B. Intake Screening for Enhanced Services**

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

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

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

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

### **1. Eligible Veteran and Spouse**

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

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

- i. Served on active duty for a period of more than 180 days and was discharged or released with a character of service other than dishonorable;
- ii. Was discharged or released from active duty because of a service-connected disability;
- iii. Was discharged or released from active duty by reason of a sole survivorship discharge; or
- iv. As a member of a reserve component under an order to active duty, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with a character of service other than dishonorable.

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

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

**2. Significant Barriers to Employment and Special Populations**

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

**a) Disabled Veteran**

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

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

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

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

**b) Homeless**

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

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

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

**c) Recently Separated, Long-Term Unemployed**

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

**d) Offender**

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

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

**e) Lacks High School Diploma or Equivalent**

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

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

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

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

**f) Low Income**

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

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

**g) Special Population: Veterans Ages 18 to 24**

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

**h) Special Population: Vietnam Era Veterans**

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

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

**i) Special Population: Transitioning Service Members, Capstone**

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

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

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

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

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

**k) Special Population: Transitioning Service Members Reduction in Force**

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

**l) Special Population: Military Treatment Facility and Warrior Transition Unit**

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

**C. Employ Florida Recording**

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

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

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

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

#### **D. Exceptions**

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

##### **1. Outreach**

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

##### **2. Employ Florida**

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

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

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

### **3. Veteran Readiness and Employment Program, Chapter 31**

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

### **4. Homeless Veteran Reintegration Program**

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

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

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

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

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



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

#### **E. State and Local Monitoring**

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

### **V. DEFINITIONS**

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

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

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

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

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

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

**Individualized Career Services** - Services required to retain or obtain employment, consistent with [20 CFR 678.430](#). Generally, these services involve significant staff time and customization to the veteran's needs. Individualized career services include services such as: specialized assessments, developing an individual employment plan, counseling, work experiences (including transitional jobs), etc.

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

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

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

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

## VI. REVISION HISTORY

Date	Description
06/09/2021	Approved by CareerSource Florida Board of Directors.
06/10/2021	Issued by Florida Department of Economic Opportunity.

## VII. RESOURCES

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

[Jobs for Veterans' State Grant Primer](#)

[Military Spouse Desk Reference](#)

[Veteran Intake at Career Centers Flow Chart](#)



**POLICY  
NUMBER 103**

## **Administrative Policy**

<b>Title:</b>	Local Veteran Employment Representative and Disabled Veteran Outreach Program Specialist Outreach Process at American Job Centers		
<b>Program:</b>	Wagner-Peyser / Jobs for Veterans State Grant Program		
<b>Effective:</b>	October 2, 2019	<b>Adopted:</b>	October 2, 2019

### **I. PURPOSE AND SCOPE**

The purpose of this policy is to provide guidance to the Local Workforce Development Boards (LWDBs) on the Disabled Veteran Outreach Program (DVOP) Specialist and Local Veteran Employment Representative (LVER) outreach process.

### **II. BACKGROUND**

In an effort to provide support and assistance with the Jobs for Veterans State Grant (JVSG) refocusing effort referenced in Veterans Program Letter (VPL) No. 03-14 and Training and Employment Guidance Letter (TEGL) No. 19-13, the Florida Department of Economic Opportunity (DEO), with input from U.S. Department of Labor Veterans Employment and Training Service (DOL VETS), has facilitated this process to provide consistency in the outreach of LVERs and DVOP Specialists for LWDB and Career Center staff.

### **III. AUTHORITY**

[Title 38, United States Code \(38 USC\)](#), Chapters 31 and 41

Veterans Program Letter [No. 03-14](#): Expansion and Clarification of Definition of Significant Barriers to Employment for Determining Eligibility for the Disabled Veterans' Outreach Program (DVOP)

Training and Employment Guidance Letter [No. 19-13](#): Jobs for Veterans' State Grants (JVSG) Program Reforms and Roles and Responsibilities of American Job Center (AJC) Staff Serving Veterans

#### IV. LOCAL OPERATING PROCEDURES

Local Operating Procedures (LOPs) help local areas further define and clarify how programs will be operated locally and are unique to each LWDB. Each LWDB must develop LOPs to address and implement a veterans outreach process that complies with [Title 38](#), [VPL 03-14](#), and [TEGL 19-13](#). LOPs must be made available for review to ensure compliance.

DEO will monitor the requirements outlined in this policy and local operating procedures. At a minimum, LWDBs must establish LOPs for DVOP and LVER outreach that include:

##### 1. LVER Outreach

In accordance with VPL 03-14, LVERs must only be assigned duties that promote to employers, employer associations, and business groups the advantages of hiring veterans. LVER staff advocate on behalf of veterans for employment and training opportunities with business, industry, and community-based organizations. Employer outreach is an integral component of the LVER role because it builds relationships with employers within the community and opens doors to new job postings, job development opportunities, and presents the opportunity to educate employers on the positive aspects of hiring veterans. When employer outreach is primarily accomplished by a “business services team” or like entity, LVERs must be included as an active member of that team.

DEO considers inclusion of LVERs in the Business Services Team (BST) to include but not limited to:

- Attending meetings held or facilitated by the BST; or
- Receiving the same type and quality of outreach related training provided to the BST;
- Accompanying BST members on employer visits to facilitate employment, training, and placement services furnished to veterans;
- Not spending a majority of their time providing job order follow-up for employers they do not have a relationship with;
- Accurately entering all services into Employ Florida provided to employers, to include those instances when the services were provided in conjunction with a BST member;
- Not being solely assigned federal contractors/employers;
- Developing and cultivating their own employer relationships and should not be required to provide BST members their “contacts” to assist the BST member with meeting performance benchmarks;
- Serving as an advocate for employment and training opportunities with businesses, industries and community-based organizations.

LVERs should advocate for all veterans served by the AJC with business, industry, and other community-based organizations by participating in appropriate activities such as:

- Planning and participating in job and career fairs;
- Conducting employer outreach;
- In conjunction with employers, conducting job searches and workshops, and establishing job search groups;

- Coordinating with unions, apprenticeships programs and businesses or business organizations to promote and secure employment and training programs for veterans;
- Informing federal contractors of the process to recruit qualified veterans;
- Promoting credentialing and licensing opportunities for veterans; and
- Coordinating and participating with other business outreach efforts.

## 2. DVOP Outreach

In accordance with VPL 03-14, in the event a DVOP specialist does not have a full case-load of eligible veterans and eligible spouses, DVOPs should conduct relationship building, outreach and recruitment activities with other service providers in the local area, to enroll significant barriers to employment (SBE) and priority category veterans in an American Job Center.

DVOP outreach should include but is not limited to locations such as:

- Veteran Centers, Veterans Affairs Medical Centers and outpatient clinics
- Homeless Shelters
- Community based and civic organizations
- Veterans' Service Organizations
- Vocational Rehabilitation Offices
- Workforce Partners and Service Providers
- Veterans' Affairs Coordinators at Colleges/Community Colleges to promote services to veterans and solicit VA Work-Study Assistants
- Faith-Based Organizations
- Military Base Family Service/Support Centers
- Other legitimate venues and locations where veterans with SBEs congregate

DVOPs should receive training from the LWDBs to ensure they conduct outreach and represent the LWDB in accordance with locally established outreach guidelines.

DVOPs must fully and accurately code and case note all services provided during outreach activities.

## V. STATE AND LOCAL MONITORING

Direct services and activities provided by the Jobs for Veterans State Grant (JVSG) staff must be monitored annually for compliance with JVSG requirements by DEO. At a minimum, LWDBs must establish local monitoring policies and procedures that include the requirements outlined in this policy.

## VI. RESOURCES

[Employ Florida Service Code Guide](#)  
[Veterans' Program Letter No. 03-14](#)  
[Veterans' Program Letter No. 03-14, Change 1](#)  
[Veterans' Program Letter No. 03-14, Change 2](#)  
[Training and Employment Guidance Letter No. 19-13](#)

[Training and Employment Guidance Letter No. 19-13, Change 1](#)

[Training and Employment Guidance Letter No. 19-13, Change 2](#)



## Administrative Policy

**POLICY  
NUMBER 112**

<b>Title:</b>	Staffing Requirements
<b>Program:</b>	Jobs for Veterans' State Grant
<b>Effective:</b>	June 9, 2021

### **I. PURPOSE AND SCOPE**

The purpose of this policy is to provide Local Workforce Development Boards (LWDBs) the minimum staffing requirements for staff supported by the Jobs for Veterans' State Grant (JVSG).

### **II. BACKGROUND**

The JVSG is a federally-funded, formula-based staffing grant that supports the hiring of staff to provide individualized career and training-related services to veterans and eligible persons with Significant Barriers to Employment (SBE) and to assist employers in filling their workforce needs with job-seeking veterans and eligible spouses. Florida is currently the third largest recipient of JVSG funding in the nation.

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

### **III. AUTHORITY**

[Title 20, Part 678](#)

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

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

[VPL 03-14](#)

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

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

#### IV. POLICIES AND PROCEDURES

Florida has established a fully integrated workforce services delivery system with DEO as the designated entity responsible for the administration of all workforce services programs, including the JVSG. The Department provides workforce services through Florida's 24 chartered LWDBs and their network of local CareerSource Career Centers.

JVSG-funded staff are fully integrated into the career center to form a comprehensive team that provides services to veterans that address their employment and training needs. LWDBs have assigned JVSG-funded staff allocated according to veteran population and the needs of the community. JVSG-funded staff are state merit staff, jointly managed by the LWDBs in accordance with current grantee-subgrantee agreements.

##### A. JVSG-Funded Staff

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

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

1. **Disabled Veteran Outreach Program (DVOP) Specialist:** DVOP specialists are jointly managed staff assigned to the LWDB to provide individualized career services to SBE veterans and other eligible individuals through the case management process in accordance with Title 38, U.S. Code and current Veteran Program Letters (VPLs). The LWDB must fill DVOP positions with eligible veterans and give preference to those with disabilities as defined in [Title 38, U.S.C. 4103A](#) with priority given to special disabled veterans and then disabled veterans.
2. **Local Veteran Employment Representative (LVER):** LVER staff are jointly managed staff assigned to the LWDB who actively advocate for employment and training opportunities with business, industry, and community-based organizations on behalf of veterans, consistent with Title 38, U.S. Code and current VPLs. LVER



positions are filled in accordance with [Title 38 U.S.C. 4104](#); with priority given to disabled veterans and then eligible veterans.

3. **Consolidated Position (DVOP/LVER):** A JVSG-funded staff person who performs both the duties of the DVOP Specialist and LVER. Consolidated DVOP/LVER positions must promote a more efficient administration of JVSG program services to employers and veterans, with an emphasis on veterans with disabilities.

## **B. Local Staffing Level Designations**

The JVSG program consists of, at minimum, both a LVER and DVOP specialist, or, a Consolidated Position (DVOP/LVER). The deliberate assignment of JVSG staffing levels to LWDBs is paramount to the success of the JVSG program. The proportion of DVOP and LVER staff, as well as the total number of JVSG-funded, full-time positions assigned to each LWDB, is determined by DEO through an analysis of veteran population using data compiled from the Department of Veterans Affairs National Center for Veteran Analysis and Statistics. The statewide, total number of JVSG-funded, full-time positions, by classification, is tracked and maintained by the State Veterans' Program Coordinator (SVPC) and submitted annually to USDOL VETS.

LWDBs may request a modification to the proportion of DVOP and LVER staff or the number of JVSG-funded positions in their local area by submitting a written justification for the requested changes to the SVPC at [VETS@deo.myflorida.com](mailto:VETS@deo.myflorida.com). LWDBs are not authorized to eliminate or modify JVSG-funded positions without approval from DEO.

## **C. JVSG-Funded Position Vacancies**

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

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

JVSG funds may be used to support the advertising of JVSG vacancies through private job boards (i.e. Indeed, Monster) in addition to Employ Florida; however, applicants

must be redirected to apply through the People First Job Center. Cross-advertising may increase the pool of qualified veteran candidates and allow greater flexibility with regards to the nomenclature of the position title.

LWDBs must ensure JVSG-funded positions are filled with a qualified veteran by submitting a completed hiring package to DEO within 50 days of the position becoming vacant. LWDBs who are unable to meet this timeline must provide notification to the SVPC with written justification for any foreseen delay in filling the vacancy within 25 days of the position becoming vacant. Notifications may be sent to the SVPC via email at [VETS@deo.myflorida.com](mailto:VETS@deo.myflorida.com). The SVPC may provide written approval for any delay in filling vacancies for extenuating circumstances, if deemed appropriate by DEO.

#### **D. Pass-Through Funding**

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

Pass-through funding is issued to LWDBs in a manner which ensures DEO remains in alignment with JVSG requirements. If a LWDB is not receiving sufficient pass-through funding to support the fair share cost of JVSG staff, they may submit a written request for additional funding to [VETS@deo.myflorida.com](mailto:VETS@deo.myflorida.com). Upon review and approval by the SVPC and [DEO's Bureau of Financial Management](#), additional funds may be issued.

Pass-through funding provided by JVSG to LWDBs must be expended in accordance with federal cost principles outlined in [2 CFR 200, Subpart E](#). LWDBs who have specific questions regarding allowability of specific costs should contact DEO's Bureau of Financial Management for assistance.

#### **E. National Veterans' Training Institute Mandatory Training**

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

**Note:** Training opportunities through NVTI are available for LWDB Executive Directors, career center managers, and other relevant non-JVSG staff, as approved by the DOL VETS State Director and the requestor's management. If approved, all costs for training, to include travel and lodging, are provided for by the JVSG. A full list of available trainings is located at <https://www.nvti.org/Training/Class-Descriptions>. To

request training for non-JVSG staff, LWDBs must submit a NVTI Training Application Form (Attachment A) to the SVPC by email at [VETS@deo.myflorida.com](mailto:VETS@deo.myflorida.com).

## **F. Monitoring**

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

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

## **V. DEFINITIONS**

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

**Eligible Spouse** - Spouse of any of the following:

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

**Eligible Veteran** - A person who:

- a) Served on active duty for a period of more than 180 days and was discharged or released therefrom with other than a dishonorable discharge;
- b) Was discharged or released from active duty because of a service-connected disability;
- c) As a member of a reserve component under an order to active duty pursuant to section 12301(a), (d), or (g), 12302, or 12304 of title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge; or

- d) Was discharged or released from active duty by reason of a sole survivorship discharge (as that term is defined in [Title 10, 1174\(i\)](#)).

**Significant Barrier to Employment** - A barrier that impedes the veteran from employment as designated by DOL, outlined in [Administrative Policy 102: Veteran Intake at Career Centers](#).

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

## VI. ATTACHMENTS

A. [NVTI Training Application Form](#)

## VII. REVISION HISTORY

Date	Description
06/09/21	Approved by CareerSource Florida Board of Directors.
06/10/21	Issued by Florida Department of Economic Opportunity.



## Administrative Policy

**POLICY  
NUMBER  
117**

<b>Title:</b>	Employment and Advocacy Services		
<b>Program:</b>	Jobs for Veterans State Grant		
<b>Effective:</b>	August 20, 2021	<b>Revised:</b>	September 27, 2021

### I. PURPOSE AND SCOPE

The purpose of this policy is to provide Local Workforce Development Boards (LWDBs) the minimum requirements for providing employment and advocacy services to participants of the Jobs for Veterans' State Grant (JVSG) program.

### II. BACKGROUND

With funding from the U.S. Department of Labor Veterans Employment and Training Service (DOL VETS), the Florida Department of Economic Opportunity (DEO) assigns JVSG-funded Disabled Veterans Outreach Program (DVOP) specialists, Local Veterans' Employment Representatives (LVERs), and Consolidated Positions (CP)<sup>1</sup> to LWDBs.

Florida's JVSG program prepares veterans, transitioning service members, and eligible spouses for meaningful careers. DVOP specialists provide individualized career services to eligible veterans and persons experiencing significant barriers to employment, with an emphasis on assisting veterans who are economically or educationally disadvantaged. LVER staff conduct outreach to employers and business associations to engage in advocacy efforts with hiring executives to develop employment opportunities for veterans and encourage the hiring of veterans. CP staff serve in a dual role as both DVOP specialist and LVER.

### III. AUTHORITY

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

---

<sup>1</sup> All requirements established in this policy for DVOP specialists and LVER staff are applicable to CP staff and must be adhered to when performing the respective role of the DVOP specialist or LVER.

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

[Veterans Program Letter \(VPL\) 07-09 \(Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in Whole or in Part by the U.S. Department of Labor\)](#)

[VPL 07-10 \(Refocused Roles and Responsibilities of Jobs for Veterans State Grant Funded Staff\)](#)

[VPL 03-14 \(Jobs for Veterans' State Grants \(JVSG\) Program Reforms and Roles and Responsibilities of American Job Center \(AJC\) Staff Serving Veterans\)](#)

[VPL 03-14, Change 1 \(Expansion and Clarification of Definition of Significant Barriers to Employment for Determining Eligibility for the Disabled Veterans' Outreach Program \(DVOP\)\)](#)

[VPL 03-14, Change 2 \(Expansion and Clarification of Homeless Definition as a Significant Barrier to Employment \(SBE\)\)](#)

[VPL 07-14 \(American Job Center \(AJC\) participation in Capstone Activities and other Outreach to Transition Service Members\)](#)

[VPL 03-19 \(Designation of Additional Population of Veterans Eligible for Services from the Disabled Veterans' Outreach Program Specialist - Veterans Ages 18 to 24\)](#)

#### **IV. POLICIES AND PROCEDURES**

Upon determination of a jobseeker's eligibility as prescribed in [Administrative Policy 102: Veteran Intake at Career Centers](#); DVOP specialists and LVER staff must facilitate employment services to eligible persons as described in this policy.

##### **A. Disabled Veterans Outreach Program Specialists**

In accordance with [Title 38, U.S.C. 4103A](#), DVOP specialists facilitate individualized career services to eligible persons through the case management framework<sup>2</sup>. The purpose of individualized career services is to provide eligible veterans and spouses the necessary information and customized support for obtaining sustained employment. Case management assists participants by evaluating the individual's service level needs, establishing an employment plan, delivering services, and providing consistent contact through a proactive and structured framework. DVOP specialists must emphasize a customer-focused approach, which recognizes that the eligible persons

---

<sup>2</sup> The minimum service requirements of the case management framework are the provision of an objective assessment, the joint development of a written IEP, and consistent contact.

they serve are individuals who may require services that are tailored to their specific needs, situations, and goals.

## **B. Career Services and Employ Florida Reporting**

Services provided to eligible individuals must be recorded in the State's online labor exchange and case management system, Employ Florida. DVOP specialists must facilitate the creation, or update, of the eligible person's individual registration and Wagner-Peyser Program Application in accordance with Section 3: Manage Individuals and Section 4: Programs - Wagner-Peyser of the [Virtual OneStop® User Guide for Staff](#).

**Note:** Veterans who are participating in the U.S. Department of Veterans Affairs' Veteran Readiness and Employment (VR&E) Chapter 31 Program and/or the U.S. Department of Labor's Homeless Veteran Reintegration Program (HVRP) must be recorded as such in the Veteran page of the Wagner-Peyser Program Application by clicking the respective radio button, and for HVRP participants, by selecting the appropriate HVRP Program Grantee.

DVOP specialists must enroll eligible persons into the JVSG sub-program by entering a JVSG eligibility date on the Intro page of the Wagner-Peyser Program Application. Once the eligible person's individual registration and Wagner-Peyser Program Application has been created, DVOP specialists must document employment services in the participant's Employ Florida Wagner-Peyser program application by recording the service code which corresponds to the service provided, as follows:

Service Code	Service Code Description	Individualized Career Service
V01	JVSG - Objective Assessment <sup>3</sup>	Yes
V02	JVSG - Specialized Assessments	Yes
V03	JVSG - Individual Career Counseling	Yes
V04	JVSG - Individual Employment Plan Update	Yes
V05	JVSG - Short-term Prevocational Services	Yes
V06	JVSG - Coordination of Wraparound Services	No
V07	JVSG - Work Experience	Yes
V08	JVSG - Workforce Preparation Activities	Yes
V09	JVSG - Consistent Contact	No
V10	JVSG - DVOP Outreach Engagement	No
V11	JVSG - Work Readiness Case Conference	No
205	Individual Employment Plan	Yes
500	Referred to Job Over 150 Days	No
114	Staff-Assisted Job Search	No

---

<sup>3</sup> The Objective Assessment must be the initial service provided to the eligible person to initiate JVSG participation.

**Note:** There may be other services that are provided, but the services indicated in the table above are the primary services to be administered by DVOP specialists to assist eligible persons. All services recorded, including those not listed in the chart above, must be recorded under the JVSG customer group in the veteran or eligible person's Wagner-Peyser Service Plan.

## 1. Objective Assessment

DVOP specialists must conduct an objective assessment for eligible persons to determine the appropriate service level and path to obtain employment. The objective assessment is performed using in-depth interviewing and evaluation to identify barriers and appropriate employment goals. The objective assessment must be the first service provided to the veteran by the DVOP specialist. Additional DVOP specialist service codes are contingent on the objective assessment being present in the participant's program application; meaning, no other services may be recorded until the objective assessment has been recorded successfully.

The objective assessment will serve as the foundation and justification for all services and should guide the development of the participant's Individual Employment Plan (IEP). The assessment must include a detailed examination of the participant's qualifications, skills, and capabilities and explore any relevant barriers that may hinder the participant's ability to secure sustainable employment. This examination may include, but is not limited to, a review of the JVSG participant's:

- a. Attitude towards work
- b. Current labor market opportunities
- c. Educational background
- d. Emotional and physical health (including disabilities)<sup>4</sup>
- e. Employment history
- f. Financial situation
- g. Justice involvement
- h. Transportation
- i. Motivation
- j. Wrap-around service needs

All elements of the objective assessment must be completed using the Employ Florida Objective Assessment Summary. Staff must also include an overall note (located on the Objective Assessment Summary General tab) that includes the following:

---

<sup>4</sup> Specific details about participant physical and emotional health must not be documented in Employ Florida, nor stored in the participant's electronic or hard-copy case file.



- i. The Significant Barrier to Employment (SBE) or Special Population Group which affirms the participants eligibility for DVOP specialist services; and
- ii. A summary of the assessment's findings, to include the participant's barriers to employment, occupational skills, and education.

Instructions on how to administer an objective assessment through the Objective Assessment Summary are available in the [Virtual OneStop® User Guide for Staff, Section 4: Individuals - Case Management](#). The objective assessment must be recorded in Employ Florida using service code V01 (JVSG - Objective Assessment) and include the required documentation that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

**Note:** If an objective assessment has already been completed by another DVOP specialist or partner program staff, the DVOP specialist may reaffirm the results from that assessment. If any elements of the Employ Florida Objective Assessment Summary are missing, the DVOP specialist must administer the missing elements. If the objective assessment completed by partner program staff was not completed using the Employ Florida Objective Assessment Summary, the DVOP specialist must create a new objective assessment using the Employ Florida Objective Assessment Summary.

## 2. Specialized Assessments

Specialized assessments help establish a participant's skill level and service needs. The DVOP specialist may use a multi-faceted approach to the specialized assessment process by referring the participant to, and receiving the results of, an assessment which examines one or more of the following categories:

- a. Basic literacy in math, reading, or writing
- b. English language proficiency
- c. Interests and aptitude
- d. Occupational skill levels
- e. Transferable skills

The results of the assessment must be used to inform the participant of career and/or training opportunities. Without assessment results, a mere referral does not constitute a specialized assessment. Specialized assessments may also be provided through the Workforce Innovation and Opportunity Act (WIOA) program, which will require the DVOP specialist to assist the participant with scheduling the assessment(s). When referring participants to WIOA for specialized assessments, this service must be recorded using service code 211 (Referral to WIOA). The case note should indicate how the DVOP specialist helped facilitate the referral along with the results from the specific assessment referred to.

DVOP specialists may assist participants who qualify for, or are already receiving, Department of Veteran Affairs (VA) education benefits, with completing the CareerScope® specialized assessment at: <https://va.careerscope.net/gibill>. CareerScope® is a no-cost, online assessment tool that measures the participant's interests and skill levels and helps determine suitable career paths. The tool also recommends courses or training programs that can help the participant become more marketable in the selected occupations.

**Note:** DVOP specialists may administer additional specialized assessments beyond CareerScope® in accordance with LWDB policy and procedures.

The results of the specialized assessment must be recorded in Employ Florida using service code V02 (JVSG - Specialized Assessment) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

### **3. Individual Career Counseling**

Individual career counseling may be provided by the DVOP specialist following the objective assessment to assist the participant in making informed educational, training, and occupational choices and may include the following:

- a. Assisting in developing a participant's knowledge of educational and occupational opportunities, and/or the steps involved in career planning;
- b. Assisting in developing career goals by using sound information including appropriate assessments and career explorations that focus on the talents, knowledge, transferable skills, interests, values, and aptitudes of the participant;
- c. Interpreting the local job market(s) and providing the steps necessary for the participant to obtain and retain employment in an occupation of the participant's interest;
- d. Providing specific information about job duties, working conditions, and hiring requirements of occupational areas of interest; and
- e. Helping a participant explore and select occupational skills for training opportunities.

Individual career counseling must be recorded in Employ Florida using service code V03 (JVSG - Individual Career Counseling) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

### **4. Individual Employment Plan**

The IEP is a negotiated agreement between the participant and the program detailing what the participant will do to obtain/return to employment and what the program will do to support the participant's efforts. The IEP must include a clear employment goal and outline the steps necessary (objectives) to achieve the goal.

The IEP must address any barriers that may prohibit the participant from achieving the goal.

**a. Developing the Individual Employment Plan**

The IEP must be created using the Employ Florida IEP/Service Strategy wizard<sup>5</sup>. Instructions on how to create an IEP using the Employ Florida IEP/Service Strategy wizard are available in the [Virtual OneStop® User Guide for Staff, Section 4: Individuals - Case Management](#). The Employ Florida system will automatically generate a service code 205 (Individual Employment Plan) upon initial creation. The IEP should be signed by the participant and must be retained in the participant's file. No case note is required if the plan is developed in accordance with this policy.

Employ Florida only allows for one IEP per participant. If the participant has an existing IEP in Employ Florida, the DVOP specialist must determine if the IEP is still active and work with the program partner who created the existing IEP to determine if the plan should be closed or will require joint coordination. An IEP that is coordinated across multiple programs requires constant communication between the DVOP specialist and partner program staff to maximize the effectiveness of the plan and prevent the duplication of services.

**b. Establishing an Employment Goal and Objectives**

The IEP must have one employment goal that drives the plan. The employment goal must contain three (3) dates: date established, review date<sup>6</sup>, and anticipated completion date. Once established, IEP goal and objective dates must not be altered in Employ Florida. The description of the employment goal should be written in a manner that is succinct and pertinent. Additional details regarding the employment goal must be included in the Goal Details text box. The term of a goal can be identified as long-term (12+ months), intermediate (3-12 months), or short-term (0-3 months).

The objectives of the IEP break down the larger goal into comprehensive steps that assist the participant in reaching the employment goal. Effective objectives identify individual tasks to be completed and must include the date the objective was established and review dates for completion.

DVOP specialists must adjust their Employ Florida IEP alert subscription to notify when a goal or objective is nearing the review date by following the

---

<sup>5</sup> HVRP participants that have an existing employment plan developed by the HVRP grantee that meets the criteria set forth in this policy are not required to create a duplicate plan with the DVOP specialist. The DVOP specialist must coordinate with the HVRP case manager to maximize the effectiveness of the plan and prevent the duplication of services.

<sup>6</sup> At minimum, review dates should be established within 15-days from the anticipated completion date.

instructions in the [Virtual OneStop® User Guide for Staff, Section 31: Manage Communications](#).

An effective IEP should use the S.M.A.R.T. principle to create specific, measurable, attainable, relevant, and time-bound goals and objectives, as described below:

- i. **Specific** goals are easy to comprehend and clearly indicate what the participant intends to do. Specific objectives are the action steps outlining exactly what the participant should do in order to achieve the goal.
- ii. **Measurable** goals have benchmarks allowing participants to see progress towards successfully achieving the goal. Goals are measurable by establishing objectives to show progress.
- iii. **Attainable** goals and objectives can be realistically expected to be completed within the timeframe given.
- iv. **Relevant** goals and objectives must be relevant to what the participant is trying to achieve. A relevant goal is based on the participant's work history, education, training, special skills, interests, and aptitudes.
- v. **Time-bound** goals and objectives should be limited to a defined period and include a specific timeline for each step of the process.

#### c. **Reviewing and Updating the Individual Employment Plan**

The IEP must be treated as a living document and reviewed with the participant by the DVOP specialist on a regular basis. At a minimum, the IEP must be reviewed with the participant every 30 days to ensure the participant's progress in completing objectives. The IEP must be amended, as appropriate, when additional needs are identified, or objectives are achieved.

Once created, the goal and objective(s) must not be altered. Objectives that no longer align with the participant's employment goal, or have exceeded the anticipated completion dates, must be closed to reflect unsuccessful completion and include an accompanying case note in the summary section of the respective objective indicating the reason for change or unsuccessful completion (e.g., unexpected emergency, relocation, change in career path, etc.). Once the objective has been closed, a new objective may be created to replace the unsuccessful objective with consent and collaboration from the participant. When new objectives are added, the IEP should be reviewed and signed by the participant and the DVOP specialist.

Updates to the IEP must be recorded by service code V04 (JVSG - Individual Employment Plan Update) and include a case note that describes the update

made to the employment plan (e.g., objective added/completed, additions to goal/objective description, etc.).

**Note:** In the event that a DVOP specialist vacates their position or is dismissed, LWDBs must establish a local policy outlining the procedure to transfer the departing DVOP specialist's JVSG participants to another DVOP specialist or career center staff member that ensures the continued uninterrupted provision of services.

## **5. Short-Term Prevocational Services**

DVOP specialists may provide short-term prevocational services to help participants attain and maintain sustained employment. Short-term prevocational skills include communication and interviewing skills, punctuality, study skills, professional conduct, and basic computer literacy and competencies. Short-term prevocational services also include providing counseling on workplace expectations, professional conduct, and personal maintenance, when appropriate.

The provision of short-term prevocational services must be recorded in Employ Florida using service code V05 (JVSG - Short-term Prevocational Services) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

## **6. Coordination of Wraparound Services**

In order to effectively provide a wholistic level of service, the DVOP specialist must develop a comprehensive network of partner/community resources to provide participants the necessary wraparound services required for overcoming barriers. The resource network may include, but not be limited to:

- a. [American Legion](#)
- b. Community leaders
- c. [Department of Veterans Affairs](#)
- d. [Disabled American Veterans](#)
- e. Faith-based organizations
- f. [Food banks](#)
- g. [Goodwill](#)
- h. Homeless Shelters
- i. [Homeless Veterans Reintegration Program](#)
- j. [Housing Urban Development - Veterans Affairs Supportive Housing](#)
- k. [Iraq and Afghanistan Veterans of America](#)
- l. [Legal Assistance](#)
- m. [Marine Corps League](#)
- n. [Salvation Army](#)
- o. [Supportive Services for Veteran Families](#)

- p. [Veteran Readiness and Employment Program \(Chapter 31\)](#)
- q. [Veteran Service Officers](#)
- r. [Veterans of Foreign Wars](#)
- s. [Vocational Rehabilitation](#)

Once the resource network has been established, the DVOP specialist must do more than refer the participant to local resources or community partners; they must take an active role in assisting the participant access the resources requested (e.g., providing a direct referral, scheduling an appointment, assisting to prepare necessary documentation, and conducting consistent contact to determine the outcome of the referral). The DVOP specialist must coordinate wraparound services to assist the participant in overcoming any barriers specified in the objective assessment; as doing so will demonstrate the program's value and its commitment to the participant's success.

The coordination of wraparound services must be recorded by service code V06 (JVSG - Coordination of Wraparound Services) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

**Note:** It is encouraged that local management have DVOP specialists maintain referral outcome records to establish best practices and overall resources gained from the referral activities. These records should be reviewed on a quarterly basis to ensure referral activities are productive.

## 7. Work Experience

DVOP specialists may place JVSG participants in work experience opportunities through the Workforce Innovation and Opportunity Act (WIOA) or other programs to provide work-based opportunities to practice and enhance the skills and knowledge gained from their military service, program of study, or industry training program.

Work experience is a structured learning experience that takes place in a workplace for a limited period and may be paid or unpaid. Work experience must include academic and occupational education concurrently or sequentially. Work experience opportunities include, but are not limited to:

- a. Apprenticeships;
- b. Department of Defense SkillBridge Program;
- c. Internships;
- d. Job shadowing;
- e. Pre-apprenticeship programs;
- f. Transitional jobs; and
- g. Veterans Affairs Work Study Program.

A work experience should be related to the participant's employment goal. The assessment process and development of the IEP will help to identify appropriate worksites for each participant. The objective assessment process may identify concerns or issues that should be addressed prior to or concurrently with a work experience.

Work experience opportunities may be provided through the WIOA program, which will require the DVOP specialist to assist the participant with preparing documentation for program eligibility and scheduling necessary orientations and appointments. When referring participants to WIOA for work experience opportunities, service code 211 (Referral to WIOA) must be recorded. The case note should indicate how the DVOP specialist helped facilitate enrollment in the work experience opportunity.

LWDBs must establish local policies and procedures which streamline and encourage the referral of JVSG participants to WIOA work experience opportunities and other relevant services. LWDBs are encouraged to build policies and procedures which emphasize the referral of VR&E (Chapter 31) veterans to work experience opportunities.

**Note:** Veterans referred to WIOA-funded workforce experience opportunities and other relevant services, who are determined eligible, receive priority of service in accordance with [Administrative Policy 111: Priority of Service for Veterans and Eligible Spouses](#) and [Administrative Policy 105: Priority of Service \(WIOA\)](#).

The enrollment of a JVSG participant in a work experience opportunity with the assistance of a DVOP specialist must be recorded using service code V07 (JVSG - Work Experience) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

## **8. Workforce Preparation Activities**

DVOP specialists may provide participants workforce preparation activities to increase a participant's employability and help prepare them for the workforce. Workforce preparation activities refer to skills and competencies that are not only useful in the workplace but are fundamental life skills. These preparations may be in the form of activities, programs, and/or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills including competencies in:

- a. Adjusting to civilian work environment;
- b. Critical thinking;
- c. Digital skills;
- d. Skills necessary for successful transition into and completion of post-secondary education, training, or civilian employment;



- e. Utilizing resources; and
- f. Working with others.

The provision of workforce preparation activities must be recorded by service code V08 (JVSG - Workforce Preparation Activities) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

## **9. Consistent Contact**

Regular, consistent contact between the DVOP specialist and the participant, including meetings and updates, both pre-and post-employment, is the foundation of quality case management. Consistent contact is based on the participant's individual needs and situation per the written plan and case notes. Consistent contact may be conducted remotely or in-person; however, no pre-employment contacts should be made without reference to the IEP's goal and objectives. The purpose of pre-employment consistent contact is to ensure all parties are accountable for achieving the objectives and goal of the jointly developed IEP.

When the participant successfully obtains employment, the DVOP specialist must provide post-employment consistent contact for 90 days to ensure sustained employment. Post-employment consistent contact must be performed on a biweekly basis the first month following employment and on a monthly basis thereafter.

Successful consistent contact must involve direct contact with the participant; contact attempts which are not successful do not constitute a successful consistent contact service activity. Direct contact is considered to have occurred when the DVOP specialist and the participant have exchanged information, or the participant has agreed to the service being provided. Contact attempts should be made through various means (i.e., phone, email), and conducted at different times of the day. DVOP specialists who are unable to contact a participant after 90 days must close and exit the case in accordance with [Administrative Policy 115: Common Exit](#).

Successful consistent contact must be recorded by service code V09 (JVSG – Consistent Contact)<sup>7</sup> and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

Unsuccessful consistent contact attempts must be recorded by service code V09 (JVSG – Consistent Contact) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide. Unsuccessful contact attempts must be recorded using Employ Florida Completion Code: Unsuccessful Completion – Failed to Report.

---

<sup>7</sup> Service code V09 (JVSG – Consistent Contact) is contingent on an IEP being present in the current program application and does not extend nor trigger participation.



## 10. Disabled Veterans Outreach Program Specialist Outreach Engagement

As part of their primary duties, DVOP specialists conduct outreach activities in the local area to build capacity with community resources, engage with current participants, and actively recruit eligible veterans to increase their case load. When conducting outreach activities, DVOP specialists may provide immediate services to individuals determined eligible in accordance with [Administrative Policy 102: Veteran Intake at Career Centers](#). Additionally, DVOP specialists may need to conduct outreach<sup>8</sup> to actively case manage participants and provide necessary in-person services.

When a DVOP specialist provides a service to a JVSG participant during outreach, or an individual presents at the career center and is enrolled in JVSG as a result of outreach activities, the DVOP specialist must document this by recording service code V10 (JVSG - DVOP Outreach Engagement) and including a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide. This service code must only be used for the following scenarios:

- a. When a DVOP specialist provides a service to a current participant during outreach.
- b. When a DVOP specialist provides a service to a new participant during outreach.
- c. When a new participant is enrolled in the JVSG program as a result of a DVOP specialist's outreach efforts.<sup>9</sup>

**Note:** The service code V10 (JVSG - DVOP Outreach Engagement) is to be utilized in conjunction with service code E49 (Organizational Visit VET/MSFW). The E49 (Organizational Visit VET/MSFW) code captures the outreach location visit and the V10 (JVSG - DVOP Outreach Engagement) code captures the individual who was served during, or as a result of, the outreach activities. LWDBs are encouraged to monitor and analyze the relationship between the V10 (JVSG - DVOP Outreach Engagement) and the E49 (Organizational Visit VET/MSFW) codes to determine the effectiveness of DVOP specialist outreach activities.

## 11. Work Readiness Case Conference

In a team approach, a DVOP specialist will provide the individualized career services needed to prepare the participant to be deemed work ready to be referred to a LVER for job development and advocacy services. These activities conducted

---

<sup>8</sup> DVOP specialists must not conduct outreach to a participant's private residence. Outreach for the purpose of providing services to a participant who is already enrolled in JVSG should occur in a safe and public setting (e.g., college campus, homeless shelter, community partner's facility).

<sup>9</sup> Service code V10 must only be entered once for individuals presenting at the career center and enrolling in JVSG as a result of a DVOP specialist's outreach efforts. Subsequent V10 service codes for that individual must only be entered for services provided during outreach.

by the LVER provide individualized advocacy and additional opportunities to veterans and eligible persons that effectively facilitate the participant's employment.

The LVER must meet directly with the veteran or eligible person, in person or remotely, to verify work ready status and determine an effective outreach strategy to market the participant to appropriate employment opportunities. This meeting is facilitated by the DVOP specialist through an organized and scheduled case conference. It is recommended the DVOP specialist advise the participant of the role of the LVER as early in the case management process as possible. The effective explanation of the LVER's role demonstrates the program's value to the participant and should further encourage the participant to remain engaged throughout the case management process.

Prior to scheduling the work readiness case conference, the DVOP specialist must ensure the participant's work ready status by ensuring, at minimum, the participant has:

- a. An occupational goal with a favorable market outlook as determined using Employ Florida Labor Market Information (LMI);
- b. The knowledge, skills, aptitudes, and abilities required for the occupational goal;
- c. No barriers that prevent obtaining and retaining employment<sup>10</sup>;
- d. An appropriate, targeted, and current resumé;
- e. Suitable interview attire;
- f. Reliable transportation<sup>11</sup>; and
- g. Demonstrated proper interviewing skills.

Additionally, prior to the referral, the DVOP specialist must provide the LVER information regarding the participant's:

- i. Justice-involvement issues (if applicable);
- ii. Occupational interests;
- iii. Physical limitations; and
- iv. Salary expectations.

The coordination of a work readiness case conference must be recorded by service code V11 (JVSG – Work Readiness Case Conference) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

---

<sup>10</sup> The veteran may be deemed work ready regardless of unresolved barriers to employment, so long as the remaining barriers will not hinder or prevent the obtaining or retaining of employment.

<sup>11</sup> Veterans who do not have access to reliable, private transportation may be referred to the LVER; however, the LVER must tailor the outreach strategy to those employers accessible through public transportation and within walking/biking distance of the participant's residence.

## 12. Job Referrals

DVOP specialists may provide work-ready participants referrals to employment openings in accordance with [Administrative Policy 96: Job Seeker Registration, Application and Services](#). Job referrals must be recorded in Employ Florida by following the instructions available in the [Virtual OneStop® User Guide for Staff, Section 19: Manage Labor Exchange](#). Referrals recorded in Employ Florida in accordance with this policy will automatically generate the relevant service code and the DVOP specialist must include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide. DVOP specialists should inform LVER staff of referrals made to allow for veteran advocacy efforts.

## 13. Staff-Assisted Job Search Activities

DVOP specialists may provide staff-assisted job search activities for work ready participants. Staff assisted job search activities must include significant staff involvement designed to help the participant plan and carry out a successful job-search strategy. These activities include resume preparation assistance, job search workshops, job finding clubs, development of a job-search strategy, and conducting a job search on behalf of the participant. Conducting a job search through Employ Florida on behalf of the participant without the participant's knowledge, does not constitute a staff-assisted job search activity.

The provision of staff-assisted job search activities must be recorded by service code 114 (Staff-Assisted Job Search) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

## C. Local Veterans' Employment Representative

LVER staff conduct employer outreach activities as part of the LWDB's business services unit that support veteran individual job developments and the referral of veterans to appropriate job openings. To serve veterans and eligible persons effectively and efficiently, LVER staff must focus on their primary role, which is employer outreach on behalf of veterans. In executing this role, LVER staff must concentrate efforts on advocacy services for veterans jointly determined to be work ready after receipt of individualized career services from a DVOP specialist. These activities must include efforts to increase job opportunities for veterans and eligible persons through direct employer contact<sup>12</sup>.

---

<sup>12</sup> Direct employer contact may be conducted in-person, over the phone, or through other remote means. Direct contact requires an acknowledgement from the employer regarding the specific service provided.

## **D. Advocacy, Job Development Activities, and Employ Florida Reporting**

LVER staff must document advocacy efforts in the employer's service record and/or the participant's Employ Florida Wagner-Peyser program application, in accordance with this policy, by recording the service code which corresponds to the service provided, as follows:

<b>Service Code</b>	<b>Service Code Description</b>	<b>Employer or Participant Code</b>
123	Job Development Contact	Participant
E33	Job Development	Employer
500	Referred to Job Over 150 Days	Participant
V12	JVSG - Veteran Advocacy Contact	Participant
E53	Veteran Advocacy	Employer

### **1. Job Developments**

[20 Code of Federal Regulations \(CFR\) § 651.10](#) defines a job development as the process of securing a job interview with a public or private employer for a specific participant for whom the career center has no suitable opening on file. Prior to conducting job development activities on behalf of a participant, LVER staff must conduct a full review of Employ Florida to ensure there is no suitable employment opening on file<sup>13</sup>.

The process of securing a job interview on behalf of a veteran or eligible person must occur through direct contact with the employer. Job developments must center on each veteran's needs, skills, abilities, goals, physical abilities, and limitations determined through the work readiness case conference, as described in [Section IV.B.11](#) of this policy.

LVER staff must document job developments made on behalf of work ready JVSG participants by:

- a. Recording service code 123 (Job Development Contact) in the participant's Employ Florida Wagner-Peyser Program Application and attaching a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide; and
- b. Recording employer service code E33 (Job Development) in the employer's service plan. A case note is not required if the case note was entered appropriately on the corresponding 123 (Job Development Contact) service code.

---

<sup>13</sup> If a suitable employment opening is available in Employ Florida, the LVER should coordinate with Wagner-Peyser staff or the DVOP specialist to facilitate a direct referral. LVER staff may contact the employer to advocate on behalf of the veteran in accordance with this policy.

**Note:** The 123 (Job Development Contact) and E33 (Job Development) are complementary service codes that are required for documenting job development contact attempts in most cases. There must be a corresponding number between both services for LVER staff when a business is registered in Employ Florida.

**i. Job Development Job Orders**

Successful job development activities which result in a job order must be recorded in Employ Florida in accordance with [Administrative Policy 99: Job Orders and Placements](#) and relevant local policies and procedures.

**ii. Referral to Job Development Job Orders**

LVER staff may make direct referrals of veterans and eligible persons to job development job orders in accordance with [Administrative Policy 96: Job Seeker Registration, Application and Services](#). Job referrals must be recorded in Employ Florida by following the instructions available in the [Virtual OneStop® User Guide for Staff, Section 19: Manage Labor Exchange](#). Referrals recorded in Employ Florida in accordance with this policy will automatically generate the respective service code. LVER staff must not make referrals to job orders that were not created through their job development activities.

**2. Veteran Advocacy Contact**

LVER staff must advocate on behalf of all veterans, with an emphasis on individualized advocacy on behalf of veterans and eligible persons who have been deemed work ready after receipt of individualized career services from a DVOP specialist. LVER staff conduct veteran advocacy contacts by making direct contact with employers and attempting to secure an interview for a specific veteran for an employment opening that is on file in the Employ Florida online labor exchange system.

LVER staff must document veteran advocacy contact attempts made on behalf of work ready veterans and eligible persons by:

- a. Recording service code V12 (Veteran Advocacy Contact) in the participant's Employ Florida program application and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.
- b. Recording employer service code E53 (Veteran Advocacy) in the employer's service plan. A case note is not required if the case note was entered appropriately on the corresponding V12 (Veteran Advocacy Contact) service code.

**Note:** The V12 (Veteran Advocacy Contact) and E53 (Veteran Advocacy) are complementary service codes that are required for documenting individual advocacy attempts. There should be a corresponding number between both services for LVER staff.

### **3. Career Center Staff**

Career center staff must be prepared to serve veterans and eligible persons when a DVOP specialist is unavailable. At minimum, the LWDB must ensure that the veteran or eligible person is provided with the services requested by the appropriate staff member. Additionally, career center staff must refer the eligible person to the DVOP specialist within two (2) business days so that they may provide a follow-up contact to determine if any additional services are desired. The DVOP specialist whom receives the referral must attempt to contact the eligible veteran or person within two (2) business days of receipt of the referral. Career center staff are not required to case manage veterans and eligible persons, unless mandated by local policy or program-specific requirements.

Referral by a career center staff member to a DVOP specialist for follow-up must be recorded using service code 168 (Referral for DVOP Follow-Up) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

## **V. STATE AND LOCAL MONITORING**

Services and activities provided under JVSG must be monitored annually for compliance with JVSG requirements by DEO. DEO will monitor the requirements outlined in this policy inclusive of required local operating procedures. Additionally, LWDBs must establish local monitoring policies and procedures that include, at minimum:

1. Roles of the JVSG participant and LWDB staff;
2. Coordination of DVOP specialist and LVER staff; and
3. Local monitoring procedures for implementation of this policy.

## **VI. DEFINITIONS**

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

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

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

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

**Consolidated Position (CP)** - Staff who performs the functions and duties of both a LVER and DVOP specialist in select LWDBs as assigned by the State Veterans' Program Office.

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

**Eligible Person** - A veteran, spouse, or caregiver who is eligible to receive services from a DVOP specialist as described in Administrative Policy 102: Veteran Intake at Career Centers.

**Individualized Career Services** - Services required to retain or obtain employment, consistent with [20 CFR 678.430](#). Generally, these services involve significant staff time and customization to the veteran's needs. Individualized career services include services such as: specialized assessments, developing an individual employment plan, counseling, work experiences (including transitional jobs), etc.

**Job Finding Clubs** - An organized activity that provides instructions on resume writing, application preparation, interviewing skills, and/or job lead development and includes a period of structured application where participants attempt to obtain jobs.

**Job Referral** - A staff-assisted job referral is the act of LWDB staff facilitating the match between qualified jobseekers and employers with job openings; and the recording of such referral in Employ Florida.

**Job Search Planning** - Development of a plan (not necessarily a written plan) that includes the necessary steps and timetables to achieve employment in specific occupational, industry, and/or geographic area.

**Job Search Workshop** - An organized activity that provides instructions on resume writing, application preparation, interviewing skills, and/or job lead development.



**Justice Involved** - Having had interactions with the criminal justice system as a defendant.

**Local Veterans' Employment Representative (LVER)** - A representative funded by the JVSG who:

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

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

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

**Resume Assistance** - The act of providing a participant instruction on resume content, format, and cover letters along with providing assistance in the development and creation of the same.

**Suitable Employment** - Employment that offers wages comparable to the participant's recent employment and duties that correspond to his/her education level and previous work experience. Further, suitable employment should be within a reasonable commuting distance from the participant's place of residence, based upon the participant's commuting capabilities (i.e., personal vehicle, bus, walking).

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



**VII. REVISION HISTORY**

Date	Description
9/27/2021	Revised and issued by the Florida Department of Economic Opportunity to incorporate additional elements to improve operational and monitoring capabilities.

This policy rescinds DEO Memorandum Disabled Veterans Outreach Program (DVOP) Specialist and Individualized Career Services (ICS) Codes, issued April 1, 2019.

**VIII. RESOURCES**

[Employ Florida Service Code Guide](#)

[Employ Florida VETS](#)

[Jobs for Veterans State Grants \(JVSG\) Primer](#)

[Veterans' Program Letters Directory](#)



## Administrative Policy

**POLICY  
NUMBER  
119**

<b>Title:</b>	Consolidated Position Operational Requirements
<b>Program:</b>	Jobs for Veterans' State Grant
<b>Effective:</b>	November 10, 2021

### I. PURPOSE AND SCOPE

The purpose of this policy is to provide Local Workforce Development Boards (LWDBs) guidance for Consolidated Position (CP) staff supported by the Jobs for Veterans' State Grant (JVSG).

### II. BACKGROUND

The JVSG is a federally-funded, formula-based staffing grant that supports the hiring of Disabled Veteran Outreach Program (DVOP) specialists and Local Veteran Employment Representatives (LVERs) to provide individualized career and training-related services to veterans and eligible persons with Significant Barriers to Employment (SBE) and to assist employers in filling their workforce needs with job-seeking veterans and eligible spouses, respectively. The principle duties of the LVER are outlined in Title 38, United States Code (U.S.C.) Section 4104 and the principle duties of the DVOP specialist are outlined in Title 38, U.S.C., Section 4102A. Section 241(c) of the VOW (Veterans Opportunity to Work) to Hire Heroes Act of 2011 allows for states to assign CP staff to carry out the principle duties of both the LVER and DVOP, as approved by the U.S. Department of Labor Veterans Employment and Training Services (USDOL VETS).

### III. AUTHORITY

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

[VOW to Hire Heroes Act of 2011](#)

[Veterans Program Letter \(VPL\) 01-20](#)

[VPL 03-14](#)

#### **IV. POLICIES AND PROCEDURES**

JVSG-funded staff are fully integrated into the career center to form a comprehensive team that provides services to veterans that address their employment and training needs. LWDBs are assigned JVSG-funded staff by the Department of Economic Opportunity (DEO) according to veteran population and the needs of the community. JVSG-funded staff are state merit staff, jointly managed by DEO and the LWDBs in accordance with current grantee-subgrantee agreements. As such, LWDBs are responsible for ensuring CPs assigned to their area operate in accordance with this policy. acronyms

##### **A. Consolidated Position Assignment**

The State Veterans Program Coordinator designates CP staff to select areas of the state in accordance with [Administrative Policy 112 Jobs for Veterans' State Grant Staffing Requirements](#). The assignment of CPs is determined through consultation with the respective LWDB and the USDOL VETS State Director of Veterans Employment and Training. DEO will assign CPs to LWDBs when it is established that the assignment of a CP will:

- a) Promote a more efficient administration of services to veterans, with an emphasis on services to disabled veterans;
- b) Ensure no hinderance to the provision of services to veterans and employers; and
- c) Maximize the effectiveness of the JVSG program within the career center and local area.

##### **B. Principle Duties**

Staff designated as CPs must consistently perform the duties of both the DVOP specialist and LVER. LWDBs must ensure that CPs primarily perform the duties, tasks, and functions of the LVER and DVOP as established in Title 38, U.S.C., and outlined in federal and state guidance. LWDBs must ensure that, at a minimum, the CP is:

- a) Performing the role of a DVOP specialist on a bi-weekly (every two weeks) basis, as evidenced by:
  - i. The provision of individualized career services to veterans and eligible persons;
  - ii. Outreach to community partners and organizations to establish and/or maintain a network of veteran resources; and/or
  - iii. Outreach to locations where veterans congregate in order to promote the career center and build his/her caseload.

- b) Performing the role of a LVER on a bi-weekly basis (every two weeks), as evidenced by:
  - i. Outreach to employers to promote the hiring of veterans, to include the provision of job development contacts for veterans who are deemed work ready after receipt of services from a DVOP specialist.
  - ii. The provision of training for career center staff on subjects pertaining to veterans (e.g., priority of service for veterans, career center veteran intake, and the JVSG program).
  - iii. Capacity building within the career center to apprise staff of veteran services and program initiatives.

### **C. Recording Services and Activities**

To validate that CP staff are consistently performing the duties of both a DVOP specialist and LVER, LWDBs must ensure CP staff are recording services and activities from these respective roles in the state's online labor exchange and case management system, Employ Florida. LWDBs must ensure CP staff record services and activities in accordance with all active Administrative Policies and the Employ Florida Service Code Guide.

To ensure services are reported accurately, CP staff must be assigned a distinct user-role for Employ Florida that will allow for privileges to serve both employers and veterans/eligible persons. LWDBs must ensure Employ Florida user accounts created on behalf of CP staff are in alignment with this policy. LWDBs may direct questions regarding the assignment of Employ Florida user roles to the DEO Performance Reporting Unit at [PRA@deo.myflorida.com](mailto:PRA@deo.myflorida.com).

### **D. National Veterans' Training Institute Mandatory Training**

CP staff must attend both the LVER and DVOP mandated trainings offered by the National Veterans' Training Institute (NVTI) located in Dallas, Texas and administered by Management Concepts, Inc. These trainings must be completed within 18 months of the position start date. All costs for training, to include travel and lodging, are provided for by the JVSG. The SVPC will coordinate with individual LWDBs and JVSG staff to schedule NVTI training.

### **E. Monitoring**

LWDBs must review and modify local operating procedures, as necessary, to ensure they are operating in accordance with this guidance. Local JVSG programs must be monitored annually for compliance with state and federal requirements by DEO. DEO will monitor the requirements outlined in this policy and local operating procedures.

## V. DEFINITIONS

**Consolidated Position** - Staff who performs the functions and duties of both a LVER and DVOP specialist in select LWDBs as assigned by the State Veterans' Program Office.

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

**Disabled Veteran Outreach Program Specialist** - Specialists who provide individualized career services and facilitate placements to meet the employment needs of veterans and eligible persons who have significant barriers to employment or have otherwise been designated by USDOL VETS.

**Individualized Career Services** - Services required to retain or obtain employment, consistent with [20 CFR 678.430](#). Generally, these services involve significant staff time and customization to the veteran's needs. Individualized career services include services such as: specialized assessments, developing an individual employment plan, counseling, work experiences (including transitional jobs), etc.

**Local Veterans' Employment Representative** - A representative funded by the JVSG who:

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

**Eligible Spouse** - Spouse of any of the following:

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

- d) Any veteran who died while a total, service-connected disability was in existence.

**Eligible Veteran** - A person who:

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



2023.10.12.A.1

## Strategic Policy

<b>Title:</b>	<b>Statewide Standardization of Tools and Services</b>
<b>Adopted:</b>	10/12/2023
<b>Effective:</b>	10/12/2023

### I. PURPOSE AND SCOPE

The Governor, the CareerSource Florida Board of Directors and the Florida Department of Commerce (FloridaCommerce) are committed to the appropriate and necessary use of federal and state workforce development funds. As described in Chapter 445.003, Florida Statutes, the state's approach to implementing the Workforce Innovation and Opportunity Act (WIOA) has six elements:

- Streamlining Florida's employment and training programs;
- Empowering individuals to make informed decisions in choosing the qualified training program(s) that best meets their needs;
- Providing universal access through a one-stop delivery system for employment services;
- Increasing performance accountability;
- Improving local workforce development board and private sector leadership focused on strategic planning, policy development, and oversight of the local workforce development system; and
- Ensuring localities have exceptional flexibility and integration to build on existing reforms and transformational changes that enhance the Florida workforce system, eliminate barriers to employment and improve opportunities for Florida businesses and job seekers.

Local workforce development boards and local workforce development areas are expected to work with state and local partners to develop plans, strategies and policies implementing these six elements into their operations.

In 2013, the state board adopted a unified brand identity for the state workforce system. Standardization of tools and resources across the CareerSource Florida network ensures the unified brand identity includes a cohesive and consistent customer and staff experience throughout the state.

The benefits of creating a uniform experience for job seekers and businesses include but are not limited to:

- Ease of expansion of partnership relationships with partner agencies, community-based organizations, businesses and other partners that work across multiple local workforce development areas.
- Structured and predictable delivery models that allow targeted performance analysis, troubleshooting and diagnosis, and implementation of continuous improvement models.
- Improved consistency in performance and compliance monitoring.

This policy applies to CareerSource Florida, FloridaCommerce, and all local workforce development boards, local workforce development areas, and regional planning areas.

## **II. BACKGROUND**

Public Law 113-128, the Workforce Innovation and Opportunity Act (WIOA), is designed to help job seekers access employment, education, training and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy.

In 2021, the Florida Legislature passed, and the Governor signed into law, the Reimagining Education and Career Help (REACH) Act. In 2023, as part of its action on [Reimagining Florida's Workforce System: A Three Pillar Plan for Transformation](#), the CareerSource Florida Board of Directors directed CareerSource Florida and FloridaCommerce, in collaboration with the Governor's REACH Office and local workforce development boards, to develop a plan for specific-system-wide improvements for consistency, improved customer experience and efficiencies to include, but not be limited to, technology, administration, fiscal considerations, procurement/contracts and programmatic policies.

The REACH Act directs the state board to minimize duplication and maximize efficient use of resources directed to training and business services. Revisions to the REACH Act included in Senate Bill 240 (2023) require the state board to implement consistent procurement policies and procedures and leverage buying power to achieve cost savings.

The Policies and Procedures of this strategic policy align with the goals of WIOA, Code of Federal Regulations, Chapter 445, Florida Statutes, and the REACH Act to ensure efforts by the state workforce board to achieve efficiencies and consistencies throughout the state are effective.



### III. POLICY AND PROCEDURES

As described in Chapter 445.007(9), Florida Statutes, for purposes of procurement, local workforce development boards and their administrative entities shall apply the procurement and expenditure procedures required by federal law, the policies of FloridaCommerce and the state workforce development board for the expenditure of federal, state, and non-pass-through funds.

Procurement of all technology, tools and services for local, regional and network-wide use shall at a minimum ensure:

- Standardization of service delivery to create a uniform customer experience.
- Realize efficiencies through maximizing the expenditure of funds, use of human and other resources and time directed to training and business services.
- Improve performance, accountability and transparency throughout the workforce development system.

**To support partnership, encourage predictability, and ensure attainment of shared performance goals, state procured technology, tools and services shall be used by all local workforce development boards and local workforce development areas as well as regional planning areas.**

Local workforce development boards, local workforce development areas and regional planning areas are prohibited from using state-appropriated or allocated funds for purchasing tools, services, or resources that are duplicative to state procured items without making a specific request to the CareerSource Florida Board of Directors. If recommended by FloridaCommerce and granted by the state board, the requestor may acquire the specified tools, products or services as approved.

When procuring tools and resources for state use, CareerSource Florida and FloridaCommerce may consider:

- System-wide standardization and need;
- Modernization of delivery;
- Cost, value and return on investment;
- Available data;
- Industry testimonials supporting acquisition;
- Negotiation of contracts;
- Individual local area needs; and
- Input from local workforce development boards, local workforce development regions and stakeholders where appropriate.

Tools and services not made available at the state level that are acquired by local workforce development boards, local workforce development areas and regional planning areas may be subject to a review by the state board or FloridaCommerce.

Local policies and procedures identifying how this statewide strategy is implemented shall be described in each local workforce development board's four-year and two-year

workforce development plans and reflected in the local workforce development board operating policies.

#### **IV. AUTHORITY**

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

[Chapter 2021 – 161, Laws of Florida, the Reimagining Education and Career Help Act](#)

[Chapter 445, Florida Statutes](#)

#### **V. HISTORY**

<b>Date</b>	<b>Description</b>
TBD	Policy approved by CareerSource Florida Board of Directors
02/23/2023	CareerSource Florida Board of Directors approves Florida Workforce System Transformation Plan.



2023.06.07.A.5

## Strategic Policy

<b>Title:</b>	<b>Career Ladder Identifier and Financial Forecaster (CLIFF) Strategy</b>
<b>Adopted:</b>	06/07/2023
<b>Effective:</b>	06/07/2023

### I. PURPOSE AND SCOPE

The CareerSource Florida Board of Directors designs, implements and invests in strategies that foster collaboration and cooperation among workforce, education and industry partners to help Floridians succeed in the workforce. Moreover, a knowledgeable and skilled workforce is essential for attracting economic development opportunities that align with Florida growth strategies. The board's efforts to enhance employment, education and training that advances economic growth, upward mobility and diversification of Florida's economy. These strategies help Floridians and businesses to strengthen and develop the state's overall business climate.

Under the Workforce Innovation and Opportunity Act (WIOA), partner programs and entities responsible for workforce and economic development, educational and other human resource programs collaborate to establish a career center network that integrates service delivery across all programs. This integrated system enhances job seekers' access to quality skills and employment and creates a pipeline of talent for employers to find and hire qualified candidates.

For Floridians receiving public assistance, taking a job with higher wages may result in reduced benefits for their family. As CareerSource Florida's mission includes helping Floridians achieve self-sufficiency through education, training and the provision of wraparound services, it is imperative that career counselors guide job seekers by supporting and sustaining their efforts to understand and address the short-term hurdles caused by changes to benefits through a structured, systematic action plan that will promote steady client engagement and growth toward longer-term economic prosperity.

Local WIOA plans, aligned with Florida's WIOA state plan, clarify how local workforce development boards implement strategies that help Floridians secure good jobs, while

providing employers with the skilled workers they need to compete in the global economy. Local workforce development boards shall align local strategies and policies to help customers achieve self-sufficiency under WIOA, Florida law and the state's workforce development plan.

## **II. BACKGROUND**

Public Law 113 – 128, the Workforce Innovation and Opportunity Act, requires each state workforce development board to assist the Governor in developing, implementing and modifying a state workforce development plan. Florida's WIOA state plan describes Florida's strategy for supporting the publicly funded workforce system. The strategic policy of Florida's state workforce development board provides direction to ensure that publicly funded workforce development programs are administered consistent with the state plan and compliant with WIOA.

In accordance with this federal requirement, Florida's WIOA state plan outlines strategic guidance on delivering services under WIOA and the Wagner-Peyser Act as described in Training and Employment Guidance Letter No. 19-16. The guidance includes developing strategies to create a seamless, customer-focused career center network that integrates service delivery across all programs to make it easier for workers, including those with barriers to employment, to access the services they need to obtain skills and employment.

Pursuant to CareerSource Florida Policy 2021.12.09.A.1 – Comprehensive Employment, Education and Training Strategy, local workforce development boards shall leverage all allowable tools and resources in their authority to assist Floridians in securing employment that leads to economic self-sufficiency and reduces the need for public assistance. That policy also aligns with the Reimagining Education and Career Help (REACH) Act, which establishes a blueprint for Florida's talent ecosystem to ensure the state has the talent it needs to remain competitive in the global economy. This includes developing strategies to help career center customers and job seekers understand their potential earnings from paid employment while mapping the timing and size of reductions in public assistance as they progress toward self-sufficiency.

Consistent with the objectives and guidance above, CareerSource Florida and the Federal Reserve Bank of Atlanta developed the Florida Career Ladder Identifier and Financial Forecaster (CLIFF) Dashboard. This information tool allows one-stop center staff to assist Floridians in visualizing how returning to work or upskilling to a higher-paying occupation could impact their future earnings and public benefits as their household progresses along the path to self-sufficiency.

## **III. POLICIES AND PROCEDURES**

### **POLICY**

Workforce-related programs must be responsive to business and industry needs by providing recruitment, hiring and training to satisfy Florida employers' current and future talent needs. Strategies should align with state board strategic and administrative guidance, local labor

market data and industry sector and local business needs. A collaborative approach including industry, education and workforce partners should ensure the efficient use of resources.

Consistent with WIOA and Florida's WIOA state plan, it is the policy of the CareerSource Florida Board of Directors that the Florida CLIFF Dashboard and associated suite of CLIFF tools shall be leveraged by local workforce development board leadership, career center staff and made available to extended partners and stakeholders to prioritize employment, emphasize education and training, reduce welfare dependency, increase economic self-sufficiency, and meet employer needs.

## **IMPLEMENTATION**

### **Case Management**

The Florida CLIFF Tool Suite offers a graduated series of informational resources for use with customers in a case management setting based on where they are currently along a notional 'crisis-stability continuum':

- CLIFF Snapshot is for those needing immediate assistance in stabilizing their financial situation.
- CLIFF Dashboard focuses on mitigating benefits cliffs for individuals on public assistance as they earn more money and proceed along their path to self-sufficiency.
- CLIFF Financial Planner allows for a more detailed examination of the mechanics of a household's finances.

### **Career Planning**

The Florida CLIFF Dashboard can help clients who have achieved basic financial stability better understand and visualize the timing, magnitude, and general effects of increased earnings from employment on their public assistance as they progress along in-demand career pathways toward self-sufficiency. Of particular value here are the area-specific wage data that allow customers to make informed decisions about which careers to consider and what the impacts of that decision might be.

### **Coordinated and Targeted Services**

Consistent with the REACH Act and [CareerSource Florida's Reimagining Florida's Workforce System: A Three Pillar Plan for Transformation](#), the Florida CLIFF Tool Suite offers practical, actionable information to assist families in identifying and overcoming benefit cliffs on the road to self-sufficiency. The CLIFF Tool Suite further identifies opportunities for strengthening collaboration and alignment among community partners to increase economic mobility, reduce public assistance dependency, and enhance access to education, training and employment.

Efforts should result in greater degrees of coordination, cross-partner efficiencies, inter-partner gap identification and removal, and stronger overall outcomes for the partners' shared customers through more intentional and collaborative case management.

Local workforce development boards shall identify appropriate points within programmatic processes to implement use of the Florida CLIFF Tool Suite to:

- Better understand specific gaps and barriers faced by each client.

- Identify specific wraparound support services needed and assist clients in obtaining needed services through partner referrals or leveraging existing resources at local workforce development boards.
- Heighten awareness among all stakeholders of information useful for shaping each partner's role in the strategic and tactical approach to a given client's situation.
- Prompt exploration—by both individual stakeholders and groups of partners—into opportunities to organize, sequence, and assess the overall set of activities performed by one or more partners in support of their shared customers, particularly around inter-partner resource planning and collaborative service provision.

Local workforce development boards shall develop strategies and policies that provide simplified and expanded access to employment, education and training services. Allowable tools and resources include but are not limited to those described in Training and Employment Guidance Letter Number 19-16, CareerSource Florida Policy 2021.12.09.A.1 — Comprehensive Employment Education and Training Strategy, and the CLIFF Tool Suite. Local strategies for programmatic implementation and usage tracking of the CLIFF Tool Suite shall be written and placed in each local workforce development board's four-year plan, reflected in the local workforce development board's operating policies and implementation shall be monitored by the Department of Economic Opportunity.

#### **IV. AUTHORITIES**

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

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

[Chapter 2021-164, Laws of Florida](#)

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

[CareerSource Florida Policy 2021.12.09.A.1 – Comprehensive Employment Education and Training Strategy](#)

#### **V. ATTACHMENTS**

[State of Florida Workforce Innovation and Opportunity Act Unified Plan](#)

[CareerSource Florida's Reimagining Florida's Workforce System:  
A Three-Pillar Plan for Transformation](#)

[Florida CLIFF Dashboard](#)

Approved \_\_\_\_\_  
Disapproved \_\_\_\_\_

# Action Item 1

## REVISIONS TO CAREERSOURCE FLORIDA WORKFORCE POLICY 092 STAFF TRAINING AND CREDENTIALING

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. 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 effectiveness and efficiency. CareerSource Florida and FloridaCommerce reviewed CareerSource Florida Workforce Policy 092 – One-Stop Staff Credentialing and Skill Standards.

Consistent with [445.007, Florida Statutes](#) and [20 CFR 679.370](#), Local Workforce Development Boards (LWDBs) are charged with the oversight of local area workforce investment activities and workforce program development. Workforce Policy 092 – One-Stop Staff Credentialing is revised as Workforce Policy 092 – Staff Training and Credentialing to ensure that all staff providing direct customer service meet minimum credentialing and training standards as established by the CareerSource Florida Board of Directors and FloridaCommerce. This revised policy provides guidance to all LWDBs to ensure staff are knowledgeable, well-trained, and capable of delivering high-quality customer service to jobseekers and employers. The policy provides a framework to ensure continuous improvement by requiring career center staff to obtain continuing education units (CEU) and for LWDBs to develop local operating procedures related to training.


CareerSource Florida and FloridaCommerce worked closely with LWDBs to refine policy goals, establish measurable outcomes, and build systems to implement and monitor progress. This policy was sent to all 21 LWDBs for consultation from October 9-October 17, 2025. CareerSource Florida received 70 comments from 11 LWDBs. A thorough review of the comments was conducted by CareerSource Florida and FloridaCommerce. 68.60% of the feedback was incorporated into the policy.

This policy applies to CareerSource Florida, FloridaCommerce, all 21 LWDBs and all regional workforce development areas.

## **FOR CONSIDERATION**

- **Approve revisions to CareerSource Florida Workforce Policy 092 – Staff Training and Credentialing and move this policy forward for consideration by the full CareerSource Florida Board of Directors.**



 <h2 style="text-align: center;">Workforce Policy</h2>		<p style="text-align: center;"><b>POLICY NUMBER</b></p> <p style="text-align: center;"><b>O92</b></p>
<b>Title:</b>	Staff Training and Credentialing	
<b>Policy Type:</b>	Operational	
<b>Program:</b>	Workforce Innovation and Opportunity Act	
<b>Effective:</b>		<b>Revised:</b> 

## I. PURPOSE AND SCOPE

State and federal law,<sup>1</sup> directs Local Workforce Development Boards (LWDBs) to oversee local workforce investment activities and workforce program development. LWDBs must ensure that staff meet credentialing and training standards as established by the CareerSource Florida Board of Directors and Florida Department of Commerce (FloridaCommerce). The goal is to ensure staff are knowledgeable, well-trained, and capable of delivering high-quality customer service to jobseekers and employers.

This policy applies to all LWDBs and their affiliated career and one-stop centers. LWDB LOPs must outline [Tier I](#) (core for all staff providing direct customer service), [Tier II](#), and specialized training. LWDBs should also include opportunities for continuing education, traditional and narrated trainings, and other workforce training provided by FloridaCommerce, Workforce Innovation and Opportunity Act (WIOA) partners, and Florida Workforce Integrated Networking Systems (FL WINS). This training should cover program-specific areas to ensure awareness of workforce system strategies and operations, improve efficiency and effectiveness, and enhance customer service and support.

## II. KEY OBJECTIVES

1. Require all frontline and local area staff providing direct customer service to complete FL WINS Cross Training and earn the Florida Workforce Professional Tier I Certificate within 60 days of hire.
2. Maintain ongoing professional development through annual completion of no less than 15 hours of continuing education units (CEU), approved as part of the WIOA local plan.<sup>2</sup>
3. Standardize credentialing and training requirements across all LWDBs, including LWDB-operated One-Stop Career Centers.

<sup>1</sup> § [445.007, Fla. Stat.](#); [20 CFR 679.370](#)

<sup>2</sup> Instructions for WIOA Local and Regional Workforce Plan Guidelines

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29

4. Promote competency in customer service, communication, technology, and program-specific knowledge.
5. Document and verify staff training and certification through consistent recordkeeping and reporting protocols.

### III. **POLICIES AND PROCEDURES**

LWDBs must establish clear local operating procedures (LOPs) LOPs must ensure all frontline and local area staff providing direct customer service, including staff engaging with jobseekers, training, and business customers, meet the following minimum credentialing standards:

#### **A. Minimum Credentialing Standards**

All hired frontline and local area staff providing direct customer service must successfully complete training and obtain the Tier I Certificate and complete FL WINS Cross Training within 60 days of their hire date and in alignment with technical assistance issued by FloridaCommerce. Supervisors may identify staff who have previously obtained Tier I certification but later demonstrate difficulty making timely eligibility determinations, who have poor performance outcomes for jobseekers or businesses, or who have exhibited difficulties in providing quality customer services as candidates who need to be retrained.

##### **1. Tier I Certificate Program**

The Tier I Certification program is mandatory for all frontline and local area staff providing direct customer service. It covers basic workforce concepts, customer service, and workforce system information. Staff who pass the Tier I exam earn the Florida Certified Workforce Professional (FCWP) designation.

##### **2. Alternative Training**

LWDBs may propose training alternatives to Tier I training, but training must be equivalent to Tier I training and approved by CareerSource Florida and FloridaCommerce. . Minimum skill requirements for Tier I Certification or an equivalent and approved alternative to Tier I training include:

- a. Deliver effective customer service,<sup>3</sup> including in-person, written, and verbal methods, and provide core employment services such as job search assistance, resume preparation, interview preparation, career counseling, referral to training and education programs, and job readiness workshops.
- b. Provide labor exchange services including job matching, placement, recruitment support, job fairs, hiring events, and access to online employment tools. Program specific service requirements focus on determining eligibility and reducing service time.
- c. Understand and apply the Eligible Training Provider List and promote Florida-specific work-based learning opportunities, including pre-apprenticeships,

---

<sup>3</sup> Examples include the basic and individualized career services described in [20 CFR 678.430](#) and the Core Business Services cited in [20 CFR 678.435](#).

- 77 apprenticeships, internships, work experience, and on-the-job training.
- 78 d. Understand and advise business and training providers on the Master
- 79 Credentials List.
- 80 e. Apply knowledge of WIOA, including Florida's approved WIOA state plan, and
- 81 the LWDB's WIOA local plan.
- 82 f. Delivery of efficient, effective, and aligned outreach and services to local
- 83 businesses and business organizations, including economic development
- 84 organizations.
- 85 g. Implement priority of service for veterans as required by [38 U.S.C. 4215](#) and [20](#)
- 86 [CFR 1010](#).
- 87 h. Effective use of labor market data from FloridaCommerce.
- 88 i. Implement state workforce policies and technical assistance, guidance and use
- 89 other resources from FloridaCommerce and CareerSource Florida.
- 90 j. Use of career center technology, case management systems, and online
- 91 resources.
- 92 k. Track and contribute to performance indicators to support continuous
- 93 improvement.
- 94 l. Ensure accessibility and apply basic assistive technology to support individuals
- 95 with disabilities, consistent with WIOA Sec. 188, and the Americans with
- 96 Disabilities Act Section 504.
- 97 m. Follow safety and security protocols including continuity of operations plans
- 98 (COOP), disaster response, and cyberattacks.
- 99 n. Uphold ethics and conflict of interest in contracting.

### 100

### 101 **3. WIOA Partner Cross Training**

### 102

103 The FL WINS learning management system is used to help teach, guide, and

104 provide feedback to assist agency staff.

105

106 In addition to completing Tier I training or its approved equivalent, all frontline and

107 local area staff providing direct customer service must complete assigned modules

108 within the FL WINS learning management system, to include the Intro to FL WINS

109 and FloridaCommerce and CSF/LWDB Essentials, within 60 days of hire date.

110

### 111 **4. Continuing Education Unit (CEU)**

### 112

113 After completing the minimum credentialing requirement (including Tier I or Tier I

114 approved equivalent training and FL WINS cross training), frontline and local area

115 staff providing direct customer service are required to complete a minimum of 15

116 continuing education units (CEUs) annually to maintain ongoing professional

117 development as a FCWP.

118

119 To be eligible to achieve recognition for advanced training levels in a board

120 designated specialization (i.e., business services, veteran services, serving those

121 on public benefits, frontline services), staff members may complete the following:

122

- 123 a. 30 CEUs for Bronze status.
- 124 b. 60 CEUs Silver status.
- 125 c. 75 CEUs Gold status; and
- 126 d. 100 CEUs Platinum status.

LWDBs must include a description of advanced training recognition requirements and how CEUs will be identified, reviewed, and assigned in their LOPs.

If a staff member is rehired and previously attained from the Tier I Certification, they must document the certification and complete 15 hours of continuing education units (CEU) within the calendar year of their new hire date.

LWDBs must ensure documentation demonstrating staff completion of required training is tracked and stored, and CEUs must be performed, tracked, and stored consistently and in alignment with the LWDB approved LOPs, technical assistance, and guidance issued by FloridaCommerce.

## **5. Tier II Program for Frontline and Local Area Staff**

The Tier II training program offers optional, on-demand, self-enrollment opportunities for staff to learn detailed information about the various workforce services programs. Staff can select topics that relate specifically to their role. Tier II does not have a comprehensive exam required for passing.

Completion of the modules within the Tier II program qualify for CEUs, in addition to courses, conferences, workshops and training sessions offered by workforce organizations, professionals and service providers. If not electing to utilize Tier II training offered by FloridaCommerce, a description of a local board's Tier II training program must be included as part of the LWDB LOPs.

## **6. Specialized Training**

Employees eligible for advancement within specialized workforce development roles must complete specialized training as a prerequisite for promotion. This ensures alignment and reinforces commitment to high-quality service delivery across specialized areas. Specialized training can include programs like Welfare Transition, JVSG, WIOA and Special Grants and details about specialized training must be included as part of a LWDBs LOPs.

### **a. Business Services Employees Training**

In addition to completing Tier I training and FL WINS cross training modules, new and incumbent business services employees must undergo a specialized training program to ensure they are knowledgeable of the core business services required under WIOA Section 134(d)(1)(A) and [20 CFR 678.435](#), including, but not limited to:

- i. Effective employer engagement and workforce planning
- ii. Effective Communication and outreach coordination and planning, including partnerships with local chambers and economic development organizations.
- iii. Labor market and workforce information including statewide and local demand.
- iv. Business intelligence technology
- v. Talent development pipeline and effective job candidate identification.

- 177 screening, and referral
- 178 vi. Support for workforce training including on-the-job training services,
- 179 incumbent worker training grants, quick response training grants and
- 180 services, customized training, registered apprenticeship and pre-
- 181 apprenticeship, and work-based learning.
- 182 vii. Layoff aversion and rapid response strategies
- 183 viii. Access to federal, state, and local incentives or resources, including tax
- 184 credits and bonding programs, to include those incentives focused on the
- 185 hiring of veterans.

186

187 Business services representatives should also be trained to perform outreach

188 and work directly with local industries and the business to assist them in effective

189 and efficient partnerships with their LWDBs. Business services career center

190 staff should also receive training and experience related to customized services

191 described in [20 CFR 678.435\(b\)](#), including human resources consultation,

192 compliance assistance, employee retention strategies, and other customized

193 labor market analysis.

#### 194

#### 195 **IV. IMPLEMENTATION**

#### 196

197 LWDB LOPs must include timelines for completing initial and continuing education

198 requirements, approved training types in alignment with FloridaCommerce-issued technical

199 assistance and guidance, and documentation methods. LOPs should assign roles for tracking

200 compliance and maintaining records and all training documentation. This includes training

201 documentation associated with approved alternative training consistent with directions

202 provided in Alternative Training Approval Notices provided by FloridaCommerce and

203 CareerSource Florida to ensure that all front-line and local area staff are trained, certified,

204 and prepared to serve jobseekers and employers effectively.

205

206 All workforce training provided by LWDBs to staff must align with state workforce policies and

207 technical assistance issued by CareerSource Florida and FloridaCommerce. LWDBs must

208 adhere to Workforce Policy O124 Statewide Standardization of Tools and Services in the

209 provision of training to staff to ensure alignment and consistency throughout Florida's

210 workforce system.

211

212 FloridaCommerce, in consultation with CareerSource Florida, will monitor LWDBs for both

213 programmatic and fiscal compliance. FloridaCommerce and CareerSource Florida will review

214 LOPs, verify staff credentialing and continuing education records, and assess training-related

215 expenditures. LWDBs must also evaluate and update their procedures annually based on

216 staff feedback, performance data, and changing workforce needs. These steps support

217 continuous improvement and help maintain high-quality services across Florida's LWDBs and

218 One-Stop Career Centers.

#### 219

#### 220 **V. ATTACHMENTS AND RESOURCES**

#### 221

222 [FloridaCommerce Training Materials](#)

223 [Alternate Training Approval Request Form Template](#)

224 [Training and Employment Guidance Letter \(TEGL\) No 4-15](#)

## Request for Approval of Alternative Tier I Training Program

---

### Section 1: LWDB Contact Information

- **LWDB Name:** [Text Field]
  - **Title:** [Text Field]
  - **Phone:** [Text Field]
  - **Contact Person:** [Text Field]
  - **Email:** [Text Field]
  - **Date of Submission:** [Date Picker]
- 

### Section 2: Training Program Overview

- **Title of Proposed Training:** [Text Field]
  - **Training Provider:** [Text Field]
  - **Delivery Method:**
    - ☐ In-person ☐ Virtual ☐ Hybrid
  - **Total Training Hours:** [Numeric Field]
- 

### Section 3: Alignment with Tier I Requirements:

- 1. Ensure Excellent Customer Service:** Serve jobseekers and businesses with clear, respectful, and timely support—whether in person, by phone, or in writing.
- 2. Build Business Relationships:** Engage local employers, understand their needs, and coordinate outreach and support services.
- 3. Support Hiring and Job Matching:** Assist with job matching, placement, recruitment, job fairs, hiring events, and online tools.
- 4. Understand Training Options:** Explain Florida-approved training programs, including apprenticeships, internships, and work-based learning.
- 5. Apply Workforce Policies:** Understand WIOA, Florida's workforce plans, and the roles of CareerSource Florida and the State Workforce Development Board.
- 6. Prioritize Veterans and Key Populations:** Ensure priority service for veterans and other groups as required by law.
- 7. Use Labor Market Data:** Apply FloridaCommerce data to guide jobseekers and support employer decisions.
- 8. Use Technology Effectively:** Operate career center systems, case management tools, and online platforms accurately and efficiently.
- 9. Understand Performance Measures:** Know how staff actions impact state and federal performance goals.
- 10. Support Accessibility:** Ensure services are inclusive and assistive technology is used appropriately.
- 11. Follow Safety Protocols:** Apply procedures for emergencies, COOP, disaster response, and cybersecurity.
- 12. Maintain Ethical Standards:** Follow conflict-of-interest rules and act with integrity in all service areas.

- **Does the proposed alternate training program include all of the required components of the Tier 1 training program? [Yes or No]**
- 

#### **Section 4: Assessment and Certification**

- **Assessment Method:** [Multiline Text Field]
  - **Credential Awarded:** [Text Field]
- 

#### **Section 5: Attachments Checklist**

Include the following with your submission:

- ☐ Curriculum/Syllabus
  - ☐ Test Specifications
  - ☐ Evidence of Outcomes of Training (if available)
  - ☐ Other (Please describe)
- 

#### **Section 6: Certification**

I certify that the proposed training program meets or exceeds the standards of the Tier I Certification and request approval for its use as an alternative training option.

- **Authorized Representative Name:** [Text Field]
  - **Title:** [Text Field]
  - **Signature:** [Digital Signature Field or Placeholder]
  - **Date:** [Date Picker]
  
  - **CLEO Signature:** [Digital Signature Field or Placeholder]
  - **Date:** [Date Picker]
-

# CAREERSOURCE FLORIDA STAFF TRAINING AND CREDENTIALING WORKFORCE POLICY DEVELOPMENT TRACKER

## A. GENERAL INFORMATION

**Policy Name:** Workforce Policy 092 – Staff Training and Credentialing  
**Policy Type:** Operational  
**Related Policies:** [092 – One-Stop Staff Credentialing and Skills Standards](#)  
**Date to Publish:** November 14, 2025

## B. PROJECT SUMMARY

The CareerSource Florida Board of Directors sets the vision for the state workforce system under [Chapter 445.004\(2\), Florida Statutes](#), and reviews policies with FloridaCommerce for effectiveness. Local Workforce Development Boards (LWDBs) must follow [Chapter 445.007, Florida Statutes](#), and [20 CFR 679.370](#) to oversee local workforce programs and ensure staff meet credentialing standards. [Workforce Policy 092 – One-Stop Staff Credentialing and Skills Standards](#) is revised as Workforce Policy 092 – Staff Training and Credentialing to ensure all staff providing direct customer service meet minimum credentialing and training standards as established by the CareerSource Florida Board of Directors and FloridaCommerce. This revised policy provides guidance to all LWDBs to ensure staff are knowledgeable, well-trained, and capable of delivering high-quality customer service to jobseekers and employers. The policy provides a framework to ensure continuous improvement by requiring career center staff to obtain continuing education units (CEU) and for LWDBs to develop local operating procedures related to training.

CareerSource Florida and FloridaCommerce worked closely with LWDBs to refine policy goals, establish measurable outcomes, and build systems to implement and monitor progress. This policy was sent to all 21 LWDBs for consultation from October 9-October 17, 2025. CareerSource Florida received 70 comments from 11 LWDBs. A thorough review of the comments was conducted by CareerSource Florida and FloridaCommerce. 68.60% of the feedback was incorporated into the policy.

This policy applies to CareerSource Florida, FloridaCommerce, all 21 LWDBs and all regional workforce development areas.

Feedback Response Key	
Incorporated	48 (68.60%)
Future Action	12 (17.10%)
No Change	10 (14.30%)
Total	70 (100%)



## C. OVERVIEW OF CHANGES

Substantive Change	Location	Reason
LWDBs must ensure staff are trained and certified to meet standards set by CareerSource Florida and FloridaCommerce. This policy applies to all LWDBs and career centers, requiring Tier I, Tier II, and specialized training for staff. Training must include continuing education and cover key workforce topics to improve service quality and system knowledge.	Section I. Purpose and Scope (Page1)	LWDBs must train and certify staff to meet standards in Chapter 445, Florida Statutes, and 20 CFR 679.370; Training includes Tier I, Tier II, specialized programs, and continuing education to ensure quality service and system knowledge; This helps deliver consistent and effective workforce services across Florida.
<ol style="list-style-type: none"> <li>1. Require all frontline and local area staff providing direct customer service to complete FL WINS Cross Training and earn the Florida Workforce Professional Tier I certificate within 60 days of hire.</li> <li>2. Maintain ongoing professional development through annual completion of no less than 15 hours of continuing education units (CEU), approved as part of the WIOA local plan.</li> <li>3. Standardize credentialing and training requirements across all LWDBs, including LWDB-operated One-Stop Career Centers.</li> <li>4. Promote competency in customer service, communication, technology, and program-specific knowledge.</li> <li>5. Document and verify staff training and certification through consistent recordkeeping and reporting protocols.</li> </ol>	Section II., Key Objectives (Pages 1-2)	Staff must complete FL WINS Cross Training and earn the Tier I Certificate within 60 days of hire to ensure they are ready to serve customers effectively; Ongoing training through 15 CEUs each year keeps staff up to date and supports continuous improvement; Standardizing training and documenting credentials across all LWDBs ensure consistency, accountability, and high-quality service statewide.
All frontline staff must complete FL WINS Cross Training and earn the Tier I Certificate within 60 days of hire. Supervisors may require retraining if certified staff show poor performance or service issues.	Section III(a)(1) Policies and Procedures, Minimum Credentialing Standards Tier I Certificate Program, (Page 2)	Staff must complete Tier I training and FL WINS Cross Training to ensure they are ready to serve jobseekers and employers effectively; This builds a strong foundation in workforce knowledge and customer service; Retraining

Tier I training is required and leads to the Florida Certified Workforce Professional (FCWP) designation.		helps maintain service quality when performance issues arise.
LWDBs may use alternative training but it must be equal in quality and approved by CareerSource Florida and FloridaCommerce. Staff must show skills in customer service, employment services, labor exchange, workforce tools, and business engagement. They must also follow laws and policies, use assistive technology, track performance, and meet safety and ethics standards.	Section III(a)(2). Policies and Procedures, Minimum Credentialing Standards, Alternative Training (Pages 2-3)	<a href="#">20 CFR 678.430</a> ; <a href="#">20 CFR 678.435</a> ; <a href="#">20 CFR 1010</a> ; <a href="#">38 U.S.C. 4215</a>
All frontline staff must complete FL WINS training modules within 60 days of hire. This includes the Intro to FL WINS and FloridaCommerce and CSF/LWDB Essentials. These modules support staff learning and performance	Section III(a)(3), Policies and Procedures, Minimum Credentialing Standards, WIOA Partner Cross Training (Page 3)	FL WINS training helps new staff quickly learn key systems and policies so they can serve customers well; Completing these modules within 60 days ensures consistent onboarding and supports statewide workforce goals
All frontline staff must complete 15 CEUs each year to keep their Florida Certified Workforce Professional (FCWP) status; Staff can earn recognition by completing more CEUs; LWDBs must track and store CEU records and include rules for advanced training in their local procedures.	Section III(a)(4), Policies and Procedures, Minimum Credentialing Standards, Continuing Education Unit (CEU) (Pages 3-4)	Ongoing CEU requirements and advanced training recognition help workforce staff stay current, improve skills, and support consistent, high-quality service across all LWDBs.
Tier II training lets staff choose and complete training that fits their role. It is optional, self-paced, and does not require an exam. Staff earn CEUs for completing modules; LWDBs must describe their own Tier II program in local procedures if they do not use the FloridaCommerce version	Section III(a)(5), Policies and Procedures, Minimum Credentialing Standards, Tier II Program for Frontline and Local Area Staff (Page 4)	Tier II training helps staff build deeper knowledge in areas that match their job, supports ongoing learning, and earns CEUs to maintain professional development.
Staff must complete specialized training before advancing into certain workforce roles, and LWDBs must include training details in their local procedures; Business services employees must complete extra training beyond Tier I and FL WINS to meet requirements.	Section III(a)(6)(a), Policies and Procedures, Minimum Credentialing Standards, Specialized Training, Business Services Employees Training (Page 4)	Specialized training ensures business services staff meet the service standards required under WIOA Section 134(d)(1)(A) and <a href="#">20 CFR 678.435</a> including employer engagement, labor market analysis, and customized business support; This helps LWDBs deliver consistent, high-quality services to

This includes skills in employer engagement, labor market data, outreach, and customized services for businesses.		employers and strengthens local workforce partnerships.
LWDBs must include timelines, approved training types, and documentation methods in their LOPs to ensure staff are trained and certified; Training must follow FloridaCommerce and CareerSource Florida guidance to keep services consistent statewide; FloridaCommerce will monitor compliance, and LWDBs must update procedures yearly to support continuous improvement.	Section IV. Implementation	
	Section V. Attachments and Resources	<a href="#">FloridaCommerce Training Materials</a> ; Alternate Training Approval Request Form Template (Attached); <a href="#">TEGL No. 4-15</a> ; Revised Workforce Policy O124 – Statewide Standardization of Tools and Services (November 13, 2025)

[illegible]

[illegible]

Feedback Response Key			
Incorporated (1)	Future Action (2)	No Change (3)	TOTAL
48	12	10	70
68.60%	17.10%	14.30%	100%

Approved \_\_\_\_\_  
Disapproved \_\_\_\_\_

## Action Item 2

### REVISIONS TO WORKFORCE POLICY 0124 STATEWIDE STANDARDIZATION OF TOOLS AND SERVICES

Public Law 113-128, the Workforce Innovation and Opportunity Act (WIOA), is designed to help job seekers access employment, education, training and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy. The Governor, the CareerSource Florida Board of Directors and the Florida Department of Commerce (FloridaCommerce) are committed to the appropriate and necessary use of federal and state workforce development funds. This commitment includes employing innovative strategies to streamline Florida's employment and training programs and provide universal access through a one-stop delivery system for employment services.

In 2021, Florida enacted the REACH Act to improve workforce development. In 2023, CareerSource Florida and FloridaCommerce worked with partners to create system-wide improvements for consistency and efficiency in areas like technology, administration, and procurement. The REACH Act requires the state board to reduce duplication and use resources efficiently. Senate Bill 240 added rules for consistent procurement and cost savings. The state board adopted **CareerSource Florida Workforce Policy 0124 - Statewide Standardization of Tools and Services** to provide guidance to local workforce development boards (LWDBs) on the requirement for the statewide use of state-procured tools and services and the framework for decision-making. Standardizing tools and resources ensure that a consistent experience for customers and staff statewide. The benefits of creating a uniform experience for job seekers and businesses include but are not limited to:

- Ease of expansion of relations with partner agencies, community-based organizations, businesses and other partners that work across multiple local workforce development areas.
- Structured and predictable delivery models that allow targeted performance analysis, troubleshooting and diagnosis, and implementation of continuous improvement models.

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. 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 effectiveness and efficiency. Consistent with [20 CFR 683.215\(d\)](#) and goals established in [Section 14.36, Florida Statutes](#), Workforce Policy O124 – Statewide Standardization of Tools and Services is revised to establish a unified framework for statewide standardization of tools and services and provide guidance for the use of state-procured resources. This policy combines two policies developed during workforce system transformation and reduces duplication, promotes consistent use of state procured tools or services, and provides LWDBs an option to submit a waiver for consideration if a separate tool or service has been determined to better meet local needs.


CareerSource Florida and FloridaCommerce worked closely with LWDBs to refine policy goals, establish measurable outcomes, and incorporate systems to implement and monitor progress. The policy was sent to all 21 LWDBs from September 22 to October 2, 2025, for consultation. CareerSource Florida received 12 comments from two LWDBs. A thorough review of the comments was conducted by CareerSource Florida and FloridaCommerce. 73% of the feedback was incorporated into the policy.

This policy applies to CareerSource Florida, FloridaCommerce, all 21 LWDBs and all regional workforce development areas. LWDBs shall address local strategies and their policies on procurement of tools and services in their local operating procedures.

### **FOR CONSIDERATION**

- **Approve revisions To CareerSource Florida Workforce Policy O124 - Statewide Standardization of Tools and Services and move the policy forward to the CareerSource Florida Board of Directors for full board approval.**



 <h1 style="text-align: center;">Workforce Policy</h1>		<b>POLICY NUMBER 0124</b>	
<b>Title:</b>	Statewide Standardization of Tools and Services		
<b>Program:</b>	One-Stop		
<b>Type:</b>	Operational		
<b>Effective:</b>	December 22, 2023	<b>Revised</b>	

## I. PURPOSE AND SCOPE

This policy establishes a unified framework for statewide standardization of tools and services and provides guidance for the use of state-procured resources consistent with goals established in Section 14.36, Florida Statutes, the Reimagining Education and Career Help or REACH Act, to increase alignment and efficiency of the state's workforce development system and federal law specifying that the State, Local Workforce Development Boards (LWDBs), Regions, and direct grant recipients must make efforts to reduce administrative costs by minimizing duplication by effectively using information technology to improve services.<sup>1</sup>

## II. MEASURABLE PERFORMANCE OUTCOMES

1. Statewide adoption rate of standardized tools and services
2. Reduction in duplicative technology and service expenditures
3. Increase in system-wide consistency, performance, and efficiency.

Additional measures of performance for this policy include aligned, clearly written, and publicly posted LWDB policies and procedures outlining processes for procurement of tools and services.

## III. POLICIES AND PROCEDURES

### A. The Use of State Procured or Developed Tools

Tools and services negotiated and acquired at the state level must be used by all LWDBs that have an identified need for the specific purpose the tools and services are acquired to fulfill. LWDBs are prohibited from using funds subgranted by FloridaCommerce for the purchase of tools and services that are duplicative of state-procured resources without an approved waiver request.

When a state procured tool or service is not available, LWDBs must attempt to first

<sup>1</sup> [20 CFR 683.215\(d\)](#)

utilize common tools or services procured by a regional planning area. Regional planning areas can assist by negotiating improved rates for the LWDBs in their planning area. Prior to procuring separate solutions, LWDBs must be able to show evidence of work with the local regional planning area to provide a common tool or service at a reduced rate. A list of State procured workforce specific tools or services will be posted by CareerSource Florida, in collaboration with the Florida Department of Commerce (FloridaCommerce) to assist LWDBs.

## **B. Waiver Request Review Process**

Where tools and services are procured, acquired, or developed for implementation statewide by FloridaCommerce or CareerSource Florida, LWDBs seeking to opt out of statewide implementation or utilize a tool or service in place of the procured or acquired tool may request a waiver from FloridaCommerce and CareerSource Florida for two years or until the contract expires, whichever occurs first.

LWDBs that seek a waiver must submit a request to CareerSource Florida and FloridaCommerce using the [Standardization of Tools and Services Waiver Request Form](#). Waiver requests must include:

1. Description of existing tools/services, their functions, and business/customer groups served by them.
2. Impact on performance and measurement and management.
3. Assumptions and constraints of state-provided tools.
4. Fiscal and functional efficiencies.
5. Anticipated benefits, cost savings, economies of scale, return on investment for the local area and the state that will result if the waiver is granted.

FloridaCommerce, in consultation with CareerSource Florida, will review waiver requests and determine whether to approve the LWDB's request. FloridaCommerce will notify the LWDB of the outcome of the waiver review process on or before 15 days from the date the waiver request was received.

## **IV. IMPLEMENTATION**

Each LWDB must develop local policies and procedures in alignment with this policy and include implementation details in their four-year and two-year workforce development plans.

FloridaCommerce will monitor programmatic and fiscal compliance associated with this policy, review waiver requests and procurement plans in consultation with CareerSource Florida, and ensure alignment with WIOA, the REACH Act, and CareerSource Florida policies.

Tools and services will be reviewed six months before contract expiration to assess continued relevance.

## **V. ATTACHMENTS AND RESOURCES**

[Standardization of Tools and Services Waiver Request Form](#)

[Florida CLIFF Dashboard.](#)

# WORKFORCE POLICY DEVELOPMENT TRACKER

## STATEWIDE STANDARDIZATION OF TOOLS AND SERVICES

### TRACKING DOCUMENT

#### A. GENERAL INFORMATION

**Policy Name:** O124 Statewide Standardization of Tools and Services  
**Policy Type:** Operational

**Related Policies:** [CareerSource Florida Strategic Policy O14 / 2023.10.12.A.1 – Statewide Standardization of Tools and Services](#) (Sunset)  
[CareerSource Workforce Policy O124 – Statewide Standardization of Tools and Services](#) (Revised)

**Date to Publish:** November 14, 2025

#### B. PROJECT SUMMARY

CareerSource Florida and FloridaCommerce recommend consolidating two workforce policies—Strategic Policy 2023.10.12.A.1 – Statewide Standardization of Tools and Services and Workforce Policy O124 – Statewide Standardization of Tools and Services. These policies were developed during Workforce System Transformation. Combining them into a single, streamlined policy eliminates redundancy and simplifies guidance for local workforce development boards (LWDBs). The unified policy (O124) provides reduces duplication, promotes consistent use of state-procured tools or services, as well as providing LWDB’s an option to submit a waiver for consideration if a separate tool or service has been determined to better meet local needs.

CareerSource Florida and FloridaCommerce worked with executive directors and staff of LWDBs to align the updated policy with the law, and existing policies. Policies were sent to all 21 LWDBs for consultation feedback.

Feedback Response Key	
<b>Incorporated</b>	7 (63.6%)
<b>Future Action</b>	1 (9.1%)
<b>No Change</b>	3 (27.3%)
<b>Total</b>	11

#### C. OVERVIEW OF CHANGES

Substantive Change	Location	Reason
Revised Purpose and Scope.	Section I. Purpose and Scope (Page 1)	Establishes a unified framework to improve efficiency, reduce duplication, and align with state and federal workforce goals.

Added Measurable Performance Outcomes	Section II. Measurable Performance Outcomes (Page 1)	Requires LWDBs to justify tool choices to promote cost savings, consistency, and accountability.
Revised section on the use of state procured or developed tools.	Section III. Policies and Procedures, A. The Use of State Procured or Developed Tools (Page 1-2)	Using tools procured by the state helps LWDBs stay consistent and avoid spending funds on duplicate systems. When statewide tools aren't available, boards should work together to identify shared, lower-cost options. This leads to efficient spending and better services across Florida's workforce system.
When a state procured tool or service is not available, LWDBs must attempt to first utilize common tools or services procured by a regional planning area. Regional planning areas can assist by negotiating improved rates for the LWDBs in their planning area. Prior to procuring separate solutions, LWDBs should be able to show evidence of work with the local regional planning area to provide a common tool or service at a reduced rate.	Section III. Policies and Procedures, A. The Use of State Procured or Developed Tools (Page 1-2)	This approach promotes cost-efficiency, collaboration, and consistency across Florida's workforce system. It reduces duplication, supports smarter spending, and aligns with WIOA by encouraging shared use of resources and regional coordination.
A list of State procured workforce specific tools or services will be posted by CareerSource Florida, in collaboration with FloridaCommerce.	Section III. Policies and Procedures, A. The Use of State Procured or Developed Tools (Page 2)	This gives all LWDBs a clear and shared list of approved tools and services, supports consistency, transparency, and reduces waste by guiding boards toward tools already paid for by the state.
Waiver process for LWDBs to opt out of statewide implementation or utilize a tool or service in place of the procured or acquired tool.	Section III. Policies and Procedures, B. Waiver Request Review Process (Page 2)	LWDBs can request a waiver to use different tools than the ones chosen by the state for up to two years or until the contract ends, whichever comes first. This allows flexibility while ensuring boards follow statewide rules for the use of public funds.
Identify responsible entity and create a process for LWDB consultation prior to procurement	Section III. Policies and Procedures	This will be addressed by FloridaCommerce in technical assistance.
Revised implementation section requires LOPs in alignment with the policy. Tools and services will be reviewed six months before contract expiration to assess continued relevance.	Section IV. Implementation (Page 2)	Requires local alignment with state policy and regular review of tools for continued relevance. This ensures statewide consistency, accountability, and timely updates to tools and services, helping the system stay efficient and aligned with state and federal goals.

Policy/Template	Line	Type of Comment	Submission Date	Name	Title	Email	Local Workforce Development Board	Comment Entry	Recommended Resolution	Action Taken
Q228 Statewide Standardization of Tools and Services	Lines 34-38	Substantive	01-03-2025 10:02:06	Christine Whitney	Senior Director of Economic Development	cwhit@commerceusa.com	CenterSource Southeast	Select Policy Q228 Standardization of Tools and Services, Policy Line Number Q224, Type of Comment (see direction) Substantive, Comment (Comment with citation) Line 36-38: No comment is regarding the "encouragement" for regional procurement. The policy states that they are encouraged but that they go on to state the requirement to show evidence of regional procurement. Such language is regional may be an off-invoice procurement cycle and agreement cycle for the tools and services. Examples may include virtual reality headsets, Single Audit procurement, GDS, provider services, etc. All boards are not covered in their agreement and procurement cycle for tools and services and may have different levels of needs.	Comment (Proposed Resolution) (R6): If the Board are "encouraged" to procure regionally there should not be a requirement to show documentation of regional work before independent procurement.	This feedback was reviewed and incorporated in part into the draft policy. Language was inserted into this policy to clarify that LMOs must first attempt to procure through regional planning areas before procuring a separate solution for future overhead and increase standardization and ensure procurement for the state for these activities.
Q228 Statewide Standardization of Tools and Services	Line 123	Substantive	01-02-2025 10:02:06	Christine Whitney	Senior Director of Economic Development	cwhit@commerceusa.com	CenterSource Southeast	Select Policy Q228 Standardization of Tools and Services, Policy Line Number 123, Type of Comment (see direction) Substantive, Comment (Comment with citation) I would recommend the definition of tools and services being expanded based on this policy, this can be interpreted broadly. Give the examples accounting systems, IT systems, phone services, etc.?	Comment (Proposed Resolution) (R6): Provide a clear definition on what tools and services are included in this policy.	This feedback was reviewed and incorporated in part into the draft policy. Language was inserted into this policy to clarify that LMOs must first attempt to procure through regional planning areas before procuring a separate solution for future overhead and increase standardization and ensure procurement for the state for these activities.
Q228 Statewide Standardization of Tools and Services	Lines 42-44	Substantive	01-03-2025 10:02:06	Christine Whitney	Senior Director of Economic Development	cwhit@commerceusa.com	CenterSource Southeast	Select Policy Q228 Standardization of Tools and Services, Policy Line Number 123, Type of Comment (see direction) Substantive, Comment (Comment with citation) Line 42-44: Waiver Request Process? The Statement, "these tools and services are provided, acquired or developed for implementation Q2 protocols, LMOs seeking to opt out of statewide implementation or utilize a tool or service in place of the procurement tool... must request a waiver from FloridaCommerce and CenterSource Florida." needs that it is a requirement for Boards to use a tool or service provided by the state and this must opt out. "Having to complete a Waiver request to not use a service, creates additional administration such as the Board. An example of this would be the Choice, labor market software procurement, based on this language in the policy if Board opted not to use the service, they would have to complete a waiver request to not use it.	Comment (Proposed Resolution) (R6): Recommended removing this language and/or include the waiver request when a Board opts to use an alternative tool or service.	The feedback was reviewed and incorporated in part into the draft policy. Language was inserted into this policy to clarify that LMOs must first attempt to procure through regional planning areas before procuring a separate solution for future overhead and increase standardization and ensure procurement for the state for these activities.
Q228 Statewide Standardization of Tools and Services		Substantive	01-04-2025 10:02:06	Christine Whitney	Senior Director of Economic Development	cwhit@commerceusa.com	CenterSource Southeast	Select Policy Q228 Standardization of Tools and Services, Policy Line Number Q224, Type of Comment (see direction) Substantive, Comment (Comment with citation) implementation.	Comment (Proposed Resolution) (R6): There needs to be something in the policy that allows Boards to continue with their current agreements and not have to move to the state that procurement.	This feedback was reviewed and incorporated into this policy language was added to allow LMOs to continue with current agreements and they opt.
Q228 Statewide Standardization of Tools and Services		Substantive	01-05-2025 10:02:06	Christine Whitney	Senior Director of Economic Development	cwhit@commerceusa.com	CenterSource Southeast	Select Policy Q228 Standardization of Tools and Services, Policy Line Number Q224, Type of Comment (see direction) Substantive, Comment (Comment with citation) In the procurement requirement only for vendors that require ability settings with format/ERP and competitive bids?	Comment (Proposed Resolution) (R6): Provide clarification on the procurement tool for regional procurement.	This feedback was reviewed and incorporated in part into the draft policy. Language was inserted into this policy to clarify that LMOs must first attempt to procure through regional planning areas before procuring a separate solution for future overhead and increase standardization and ensure procurement for the state for these activities.
Q228 Statewide Standardization of Tools and Services	Line 123	Substantive	01-06-2025 10:02:06	Christine Whitney	Senior Director of Economic Development	cwhit@commerceusa.com	CenterSource Southeast	Select Policy Q228 Standardization of Tools and Services, Policy Line Number 123, Type of Comment (see direction) Substantive, Comment (Comment with citation) Will there be a database or portal where LMOs can access state provided tools and services?	Comment (Proposed Resolution) (R6): Recommended providing accessible portal to review all services and tools available from the state procurement.	This feedback was reviewed and incorporated in part into the draft policy. Language was inserted into this policy to clarify that LMOs must first attempt to procure through regional planning areas before procuring a separate solution for future overhead and increase standardization and ensure procurement for the state for these activities.
Q228 Statewide Standardization of Tools and Services	Line 38	Critical	01/2/2025 10:37	Gina Romberg	VP Workforce Operations	gromberg@commerceusa.com	CenterSource Central Florida	Select Policy Q228 Standardization of Tools and Services, Policy Line Number 38, Type of Comment (see direction) Critical, Comment (Comment with citation) Line 38 - Clarification of Procurement Authority. The policy does not specify which entity (CenterSource Florida or Florida Commerce) is responsible for procuring state board tools. Without clarity, LMOs tend to shirk or provide input on local needs.	Comment (Proposed Resolution) (R6): Explicitly identify the responsible entity and create a process for LMO consultation before procurement.	This feedback was reviewed and will be addressed by the Department of the state and subsequent review of all state-provided tools for CenterSource Florida and Florida Commerce in technical assistance.
Q228 Statewide Standardization of Tools and Services	Line 38	Critical	01/2/2025 10:37	Gina Romberg	VP Workforce Operations	gromberg@commerceusa.com	CenterSource Central Florida	Select Policy Q228 Standardization of Tools and Services, Policy Line Number 38, Type of Comment (see direction) Critical, Comment (Comment with citation) Line 38 - Transparency of State Procurement Tools. LMOs currently have to systematically go to know which tools are state-provided. This creates risk of non-compliance and duplication.	Comment (Proposed Resolution) (R6): Establish a publicly available website that lists all state-provided tools and services, with functionality for updates and help.	This feedback was reviewed and will be addressed by the Department of the state and subsequent review of all state-provided tools for CenterSource Florida and Florida Commerce in technical assistance.
Q228 Statewide Standardization of Tools and Services	Lines 30-32	Critical	01/6/2025 10:37	Gina Romberg	VP Workforce Operations	gromberg@commerceusa.com	CenterSource Central Florida	Select Policy Q228 Standardization of Tools and Services, Policy Line Number 30, Type of Comment (see direction) Critical, Comment (Comment with citation) Line 30-32 - Restrictions on Local Procurement. The stated prohibition on LMOs using bank for tools deemed "digital" is overly rigid. For example, CAC uses Lightcast labor market analytics, which provides local, real-time data not matched by any other tool. This policy could require LMOs of region-specific solutions available for local employer requirements.	Comment (Proposed Resolution) (R6): Require state tools as a baseline, but allow LMOs to procure supplemental, non-duplicative tools without a waiver. Waivers should apply only in cases of true duplication.	This directly affected the policy (non-duplicative tools) and was addressed.
Q228 Statewide Standardization of Tools and Services	Line 61	Critical	01/6/2025 10:37	Gina Romberg	VP Workforce Operations	gromberg@commerceusa.com	CenterSource Central Florida	Select Policy Q228 Standardization of Tools and Services, Policy Line Number 61, Type of Comment (see direction) Critical, Comment (Comment with citation) Line 61 - Waiver Request Timeline. A 30-day waiver request period is impractical for workforce operations where responsiveness is key. Local providers often need solutions faster than a month.	Comment (Proposed Resolution) (R6): Recommendation: Shorten the waiver request period to 15 days, especially when the LMO is demonstrating cost savings or similar requirements.	Review review timeline related (and confirmed) to be within 30 days.
Q228 Statewide Standardization of Tools and Services	Line 28-29	Substantive	01/6/2025 10:37	Gina Romberg	VP Workforce Operations	gromberg@commerceusa.com	CenterSource Central Florida	Select Policy Q228 Standardization of Tools and Services, Policy Line Number 28, Type of Comment (see direction) Substantive, Comment (Comment with citation) Emergency Purchases (Line 28,29 context). The policy does not address documented emergency purchases when state tools are not yet available, with post-hoc notification to CAC.	Comment (Proposed Resolution) (R6): Recommendation: Allow LMOs to make documented emergency purchases when state tools are not yet available, with post-hoc notification to CAC.	This policy only applies if there is a state tool available. No change is needed.

Feedback Response Key			
Incorporated	Future Action	No change	TOTAL
8	1	2	11
72.70%	9.10%	18.20%	100%

Approved \_\_\_\_\_  
Disapproved \_\_\_\_\_

## Action Item 3

### REVISIONS TO CAREERSOURCE FLORIDA WORKFORCE POLICY P95 – WIOA YOUTH PROGRAM ELIGIBILITY AND SERVICE PROVIDER SELECTION

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. 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 effectiveness and efficiency.

Addressing the needs of youth with barriers to employment is a critical component of the state's workforce strategy. Proactive and responsive partnerships are essential in the coordination of training and support towards high-quality employment outcomes that improve self-sufficiency and align with the workforce needs of Florida's business community. CareerSource Florida and FloridaCommerce reviewed **Workforce Policy P95 – Youth Eligibility and Workforce Policy P120 – Youth Service Provider Selection** and recommend combining these policies into a single workforce policy. Consistent with [Chapter 445, Florida Statutes](#) and [20 CFR 681](#), the revised Workforce Policy P95 – Workforce Innovation and Opportunity Act (WIOA) Youth Program Eligibility and Service Provider Selection include guidance on eligibility, enrollment, use of federal funds to provide food, beverage or dining activities for youth, and how service providers are selected. This workforce policy removes outdated information and simplifies processes.

CareerSource Florida and FloridaCommerce worked closely with Local Workforce Development Boards (LWDBs) to refine policy goals, establish measurable outcomes, and build systems to implement and monitor progress. The policy went out to all 21 LWDBs for consultation from September 22 to October 2, 2025. CareerSource Florida received 14 comments from eight LWDBs. A thorough review of the comments was conducted by CareerSource Florida and FloridaCommerce. 42.90% of the feedback was incorporated into the policy.

This policy applies to CareerSource Florida, FloridaCommerce, all 21 LWDBs and all regional workforce development areas. LWDBs must implement local policies, procedures, and monitoring that define the roles of staff, youth providers, employers and participants.

## **FOR CONSIDERATION**

- **Approve revisions to CareerSource Florida Workforce Policy P95 – WIOA Youth Program Eligibility and Service Provider Selection and move this policy forward to the CareerSource Florida Board of Directors for consideration by the full board.**





**POLICY  
NUMBER**

**P95**

## **Workforce Policy**

<b>Title:</b>	WIOA Youth Program Eligibility and Service Provider Selection		
<b>Type:</b>	Programmatic		
<b>Program:</b>	Workforce Innovation and Opportunity Act - Youth		
<b>Effective:</b>	04/25/2017	<b>Revised:</b>	01/06/2022

### **I. PURPOSE AND SCOPE**

Addressing the needs of youth with barriers to employment is a critical component of the state's workforce system. Proactive and responsive partnerships are essential in the coordination of training and support towards high-quality employment outcomes that improve self-sufficiency and align with the workforce needs of Florida's business community. This policy is designed to provide guidance to Local Workforce Development Boards (LWDBs) on the development of aligned and effective youth programs that ensure high quality outcomes in alignment with state<sup>1</sup> and federal law.<sup>2</sup>

### **II. KEY OBJECTIVES AND MEASURABLE PERFORMANCE OUTCOMES**

#### **A. Key Objectives**

1. Improve in-demand employment and training outcomes by ensuring high quality and cost-effective youth service providers aligned with the needs of Florida businesses.
2. Promote skill development through training that leads to recognized credentials and prepares youth for work within in-demand industries.
3. Expand timely access to youth services for both out-of-school and in-school youth, including those with disabilities.
4. Strengthen partnerships by working with required and additional partners, including local businesses and community partners.
5. Ensure compliance with federal and state procurement requirements for WIOA youth service providers.
6. Ensure compliance and accountability by tracking performance.

#### **B. Measurable Performance Outcomes**

<sup>1</sup>[Chapter 445, F.S.](#)

<sup>2</sup>[20 CFR 681](#)

Performance for this policy will be measured by, at minimum, the following:

1. The six primary WIOA performance indicators for the Youth program as defined in Section 116(b)(2)(A)(ii) and [34 CFR 463.155\(c\)](#) and [20 CFR 677.155](#), and
2. Performance outcome metrics outlined in Workforce Policy 9, Availability of Services to Floridians, for the applicable population.
3. Number of program youth placed in apprenticeship or pre-apprenticeship programs.

### III. POLICIES AND PROCEDURES

#### A. WIOA Youth Eligibility Criteria

LWDBs must actively pursue outreach to potentially eligible youth and ensure that youth enrolled in the WIOA Youth Program meet eligibility criteria as defined in WIOA Sections 129(a)(1) and, [20 CFR 681.200 - 681.220](#). Additionally, LWDB procedures and local policies for youth outreach, eligibility determinations, enrollment, and procurement must be in alignment with technical assistance and guidance issued by FloridaCommerce. Consistent with the relevant Technical Assistance Letter issued by FloridaCommerce, eligibility determinations are based, in part, on the following factors:

- Eligibility criteria as an out-of-school youth (OSY) or in-school youth (ISY)
- School status determination
- Identified barrier(s)<sup>3</sup>

LWDBs must ensure, in alignment with [Workforce Policy 100: Work-Based Training and Work Based Learning Opportunities](#), that education and local youth-focused workforce development systems are coordinated and designed to increase and expand pathways into work-based learning activities, especially registered apprenticeships and preapprenticeship programs, that meet current industry needs. Programs should be designed to efficiently assist youth into, and persist in, high-wage, high-demand, and high-skilled occupations and provide access to an aligned and expanding array of apprenticeship and preapprenticeship options. Programs for youth should be focused on demonstrated industry need, career-relevant training, and increasing in-demand employment outcomes. Youth program participant data on pre-apprenticeship and apprenticeship enrollment, outreach, and completion should be regularly measured, tracked, and shared.

#### B. Enrollment and Assessment

Youth can self-register in Employ Florida, however they cannot self-enroll in a WIOA Youth program. LWDB staff must ensure that youth are registered in Employ Florida and determine eligibility as quickly as possible and before enrollment. The enrollment process includes eligibility determination, objective assessment, development of an Individual Service Strategy (ISS), and participation in any of the 14 WIOA Youth program elements outlined in 20 CFR 681.460. Once an individual is determined to be eligible for the WIOA Youth program, staff are required to

---

<sup>3</sup> WIOA Section 129(a)(1)(B)(iii) for OSY or Section 129(a)(1)(C)(iv) for ISY

complete a WIOA Youth program application in Employ Florida.

Objective assessments evaluate academic and skill levels, career readiness, and service needs. Assessments may include formal tests, interviews, observations, or file reviews, and must accommodate youth with disabilities. Assessments from other programs completed within the past six months may be used. Youth are considered participants only after receiving one of the 14 program elements listed in [20 CFR 681.460](#).

The ISS must be tailored to the youth's needs and include assessment results and education and employment goals aligned with career pathways that are designed to lead to employment within in-demand industry sectors. It must align with at least one WIOA performance indicator and include at least one of the 14 program elements. Existing ISS documents from other programs may be used if completed within the past six months and sufficient to meet WIOA requirements.

Staff must complete the objective assessment and ISS using the state-identified tool listed in the applicable Technical Assistance Letter issued by FloridaCommerce.

Co-enrollment in WIOA programs is highly encouraged and depends on each program's eligibility, individual service needs, and career readiness, determined through assessments of skills, work experience, literacy, and support needs. Youth aged 18 to 24 may be co-enrolled in the WIOA Youth and Adult programs if they meet eligibility for both. Youth may qualify for WIOA adult services if they meet WIOA Adult eligibility requirements and need intensive youth services as well as adult training related to their career pathway. For co-enrolled participants, staff must determine the appropriate services from each program, identify the funding stream for each service in Employ Florida, and ensure services are not duplicated consistent with applicable state and federal law. LWDBs must ensure that services for non-eligible youth are funded through partner programs.

LWDBs should work closely with local businesses, as well as community and WIOA partners, to serve youth.

**C. Use of Federal Funds to Provide Food, Beverage, or Dining Activities**

LWDBs may use state and WIOA funds to provide food and beverages for youth enrolled and participating in youth workforce programs provided that such expenditures adhere to technical assistance and guidance issued by FloridaCommerce.

**D. WIOA Youth Service Provider Selection and Procurement**

LWDBs may deliver youth services directly or award grants and contracts through a competitive procurement process, as required by WIOA Section 123. Direct provision must be cost-effective and comply with governance standards in [Workforce Policy G110 – Local Workforce Development Area Board Governance](#).

Selection through procurement and the execution of contractual arrangements must include specific and measurable deliverables designed to drive the effective, efficient, and aligned delivery of services, include outreach and partnership objectives, and be consistent with issued technical assistance and guidance from FloridaCommerce.

Selected providers must, at minimum:

- demonstrate the ability to offer all 14 required program elements,
- coordinate with community partners,
- offer services at a reasonable cost with a clear budget,
- show knowledge of WIOA requirements,
- have strong community and business linkages.
- meet or exceed LWDB performance indicators,
- comply with reporting requirements,
- be legally established for at least six months,
- hold a current business license,
- disclose any pending legal actions, and
- must not have been found at fault in criminal, civil, or administrative proceedings.

LWDBs may establish additional criteria in their local plans.

#### IV. IMPLEMENTATION

LWDBs must implement local policies, procedures, and monitoring that define the roles of staff, youth providers, employers, and participants. LOPs must ensure proper oversight of eligibility determinations, enrollment, and service delivery and be designed to meet or exceed state and federal performance metrics. LOPs must address the use of funds for food and drink costs for youth and ensure costs do not exceed allowed limits. Youth providers are required to cooperate fully with monitoring activities and follow all applicable regulations. Monitoring must verify compliance with WIOA, 2 CFR Part 200, issued agency guidance and technical assistance, and state policy. If an LWDB also serves as a youth provider, monitoring must be conducted by an external entity. Results must be reported to the Chief Local Elected Official (CLEO).

LWDBs must include in their local policies and procedures, in compliance with § 681.420, ensure appropriate links to entities that will foster the participation of eligible local youth. Such links may include connections to:

- 1) Local area justice and law enforcement officials;
- 2) Local public housing authorities;
- 3) Local education agencies;
- 4) Local human services agencies;
- 5) WIOA title II adult education providers;
  - a. Local disability-serving agencies and providers and health and mental health providers;
- 6) Job Corps representatives; and
  - a. Representatives of other area youth initiatives and including those that serve homeless youth and other public and private youth initiatives.

In accordance with 63T-1.005, Florida Administrative Code (F.A.C.), LWDBs shall include in their local policies and procedures defined staff who will participate in the Community Reentry Team (CRT) to review DJJ youth returning from residential commitment, ensuring they receive appropriate workforce transition services to facilitate their reentry into the community.

FloridaCommerce conducts regular monitoring of each LWDB. This includes reviewing eligibility documentation, evaluating Individual Service Strategies (ISS), assessing procurement practices, and measuring service outcomes.

## **V. ATTACHMENTS AND RESOURCES**

[WIOA Youth Fact Sheet](#)

# WORKFORCE POLICY DEVELOPMENT TRACKER

## WIOA YOUTH PROGRAM ELIGIBILITY AND SERVICE PROVIDER SELECTION

### A. GENERAL INFORMATION

<b>Policy Name:</b>	P95 – WIOA Youth Program Eligibility and Service Provider Selection
<b>Policy Type:</b>	Programmatic
<b>Related Policies:</b>	<a href="#">Workforce Policy P95 – Youth Eligibility</a> <a href="#">Workforce Policy P120 – Youth Service Provider Selection (Sunset)</a> <a href="#">Workforce Policy P71 – Final Guidance Food and Beverage for WIA Youth (Sunset)</a>
<b>Date to Publish:</b>	November 14, 2025

### B. PROJECT SUMMARY

CareerSource Florida and FloridaCommerce merged two workforce policies—P95 - Youth Eligibility and P120 - Youth Service Provider Selection—into one streamlined policy: Revised Workforce Policy P95 – WIOA youth Program Eligibility and Service Provider Selection. This new policy removes outdated references and combines eligibility, enrollment, and procurement guidance into a single, clearer framework.

The updated policy focuses on helping youth with barriers to employment. It sets clear rules for selecting service providers and ensures programs meet legal standards. It also promotes strong partnerships and better outcomes for youth through aligned, accountable services. This workforce policy promotes proactive partnerships and coordinates support to help these youth achieve high-quality employment outcomes that foster self-sufficiency and meet the needs of Florida’s business community. The policy provides guidance to LWDBs on creating effective, aligned youth programs that comply with state and federal laws.

CareerSource Florida and FloridaCommerce worked with executive directors and staff of LWDBs to align the updated policy with the law, and existing policies. Policies were sent to all 21 LWDBs for consultation feedback.

Feedback Response Key	
<b>Incorporated</b>	6 (42.9%)
<b>Future Action</b>	3 (21.4%)
<b>No Change</b>	5 (35.7%)
<b>Total</b>	14

## C. OVERVIEW OF CHANGES

Substantive Change	Location	Reason
Updated Purpose and Scope to align WIOA youth Program Eligibility requirements and Service Provider Selection Requirements.	Section I. Purpose and Scope (Page 1)	Clarifies program goals and legal alignment. Prioritizes youth with barriers and promotes partnerships to improve employment outcomes and meet WIOA and state performance goals.
Key Objectives added.	Section II. Key Objectives and Measurable Performance Outcomes, A. Key Objectives (Page 1)	Adds six objectives to improve youth outcomes, ensure provider quality, expand access, and strengthen accountability. Aligns with labor market needs and WIOA compliance.
Measurable performance outcomes added.	Section II. Key Objectives and Measurable Performance Outcomes, B. Measurable Performance Outcomes (Page 2)	Adds WIOA indicators, Policy 9 metrics, and apprenticeship placements to track performance. Ensures accountability and alignment with workforce needs.
Policies and Procedures combined WIOA Youth Eligibility Criteria, Enrollment and Assessment, WIOA Youth Service Provider Selection and Procurement.	Section III. Policies and Procedures (Pages 2-4)	Simplifies and clarifies policy elements. Eliminates the need for multiple strategic and operational board-approved policies.
Youth eligibility criteria.	Section III. Policies and Procedures, Section A. WIOA Youth Eligibility Criteria (Page 2)	LWDBs must ensure youth meet eligibility under WIOA Section 129(a)(1) and <a href="#">20 CFR 681.200–681.220</a> , using outreach and local procedures aligned with FloridaCommerce guidance. Eligibility is based on school status, barriers to employment, and classification as in-school or out-of-school youth.
Enrollment and Assessment Section clarify regulations on Youth enrollment.	Section III. Policies and Procedures, Section B. Enrollment and Assessment (Page 2-3)	Youth can self-register in Employ Florida, but they cannot enroll themselves in a WIOA Youth program. Only LWDB staff can determine if a youth is eligible and complete the enrollment process. It is important that LWDB staff register youth in Employ Florida quickly and verify eligibility before enrollment. This ensures programs follow federal rules under WIOA Section 129(a)(1) and <a href="#">20 CFR 681.200–681.220</a> and helps youth get timely access to services that support employment and self-sufficiency.



WIOA Youth Application	Section III. Policies and Procedures, Section B. Enrollment and Assessment (Page 3)	To enroll youth in the WIOA program, staff will continue to use the WIOA application in Employ Florida. This policy does not change the mechanism for enrolling/determining eligibility for youth services. This will be reviewed in technical assistance provided by FloridaCommerce.
Clarification for how to key the ISS into Employ Florida for Youth.	Section III. Policies and Procedures, Section B. Enrollment and Assessment (Page 3)	This issue is being reviewed for resolution. Additional technical assistance will be provided by Florida Commerce.
Staff must complete the objective assessment and ISS using the state-identified tool listed in the applicable Technical Assistance Letter issued by FloridaCommerce	Section III. Policies and Procedures, Section B. Enrollment and Assessment (Page 3)	The objective assessment and ISS will continue to be completed using the Objective Assessment Summary Wizard and the Individual Service Strategy Wizard within Employ Florida. This will be reviewed in Technical Assistance.
The ISS must be tailored to the youth's needs and include assessment results and education and employment goals aligned with career pathways that are designed to lead to employment within in-demand industry sectors. It must align with at least one WIOA performance indicator and include at least one of the 14 program elements.	Section III. Policies and Procedures, Section B. Enrollment and Assessment (Page 3)	The ISS is required to include at least one of the 14 WIOA youth program elements and align with at least one WIOA performance indicator. This ensures youth receive services that match their needs and lead to jobs in high-demand industries, supporting both individual success and workforce system goals under <a href="#">20 CFR 681.460</a> and WIOA Section 129(a)(1).
Guidance on use of federal funds to provide food, beverage or dining activities to youth originally described in Final Guidance, Food and Beverage for WIA Youth (DEO Final Guidance-071 dated May 7, 2012) added.	Section III. Policies and Procedures, Section C, Use of Federal Funds to Provide Food, Beverage, or Dining Activities.	This guidance helps workforce programs stay within legal spending limits described in Ch. 112.061(6)(b), F.S. when using public funds for youth meals, ensures food costs follow Florida's per diem rates, and requires boards to document any exceptions. Local procedures must be in place to control costs and support compliance.
This section adds information and guidance from Workforce Policy P120 – Youth Service Provider Selection into this single, leaner policy on WIOA Youth Program Eligibility and Service Provider Selection.	Section III. Policies and Procedures, Section D. WIOA Youth Service Provider Selection and Procurement (Page 4)	LWDBs must either deliver youth services directly or select providers through a competitive process under WIOA Section 123, ensuring cost-effectiveness and alignment with Workforce Policy 110. Additional information will be provided through technical assistance issued by FloridaCommerce.
Selected providers must, at minimum, demonstrate the	Section III. Policies and Procedures, Section D. WIOA	In accordance with <a href="#">20 CFR 681.460</a> , LWDBs must offer all 14 program elements. Additional



ability to offer all 14 required program elements.	Youth Provider Selection and Procurement (Page 4)	information will be provided through technical assistance issued by FloridaCommerce.
LWDBs must implement local policies, procedures, and monitoring processes that define the roles of staff, youth providers, employers, participants, and procedures for the use of federal funds to provide food, beverage, or dining activities.	Section IV. Implementation (Page 4-5)	Requires LOPs and monitoring to ensure compliance with WIOA and 2 CFR. Defines roles, supports oversight, and mandates external review when LWDBs serve as providers
LWDBs are required to establish policies that connect eligible youth to a broad network of community partners—including justice officials, education and housing agencies, health providers, and youth-serving organizations. These policies must designate staff to participate in Community Reentry Teams (CRTs) to support youth returning from residential commitment through coordinated workforce transition services.	Section IV. Implementation (Page 4-5)	These requirements ensure youth—especially those facing barriers such as homelessness, justice involvement, or disabilities—receive comprehensive support that integrates education, employment, and social services. By fostering collaboration across systems, LWDBs help create pathways to meaningful careers and reduce recidivism, aligning with the goals of WIOA to improve long-term employment outcomes for vulnerable youth populations.
WIOA Youth Fact Sheet provided as guidance.	Section V. Attachments and Resources (Page 5)	

[illegible]

Future Worksheet			
Incorporated	Future Action	No change	TOTAL
6	3	5	14
42.86%	21.43%	35.71%	100%

Approved \_\_\_\_\_  
Disapproved \_\_\_\_\_

## Action Item 4

### REVISIONS TO CAREERSOURCE FLORIDA WORKFORCE POLICY P111 – SERVICES FOR VETERANS, MEMBERS OF THE MILITARY, AND SPOUSES

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. 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 effectiveness and efficiency.

CareerSource Florida and FloridaCommerce reviewed the six (6) workforce policies below related to workforce programs that serve veterans, military, and spouses.

1. [Workforce Policy P102](#) - Veteran Intake at Career Centers
2. [Workforce Policy P103](#) - Local Veteran Employment Representative & Disabled Veteran Outreach Program
3. [Workforce Policy P111](#) - Priority of Service for Veterans and Eligible Spouses
4. [Workforce Policy P112](#) - Staffing Requirements (VETS)
5. [Workforce Policy P117](#) - Employment and Advocacy (VETS)
6. [Workforce Policy P119](#) - Consolidated Position Operational Requirements (VETS)

CareerSource Florida and FloridaCommerce recommend eliminating five of these policies and consolidating them into the revised **Workforce Policy P111 – Services for Veterans, Members of the Military, and Spouses**. This single policy reaffirms Florida's commitment to being the nation's most military friendly state through the provision of high quality and responsive workforce programs, resources, and opportunities that strengthen the state's workforce and economy. Its purpose is to ensure that veterans, military service members, and their families receive prioritized access to high quality workforce services and responsive, tailored support that not only maximizes their unique talents and skills but promotes skill development and employment.

This policy establishes the minimum requirements for Local Workforce Development Boards (LWDBs) to implement effective procedures and ensure priority, high quality workforce service and support for transitioning service members and veterans, as well as their spouses and dependents. The Policy applies to all U.S. Department of Labor


(DOL) funded programs including Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser, including the Military Family Employment Advocacy program, Jobs for Veterans State Grant (JVSG), Trade Adjustment Assistance (TAA), and Migrant and Seasonal Farm Worker (MSFW).

CareerSource Florida and FloridaCommerce worked with subject-matter experts from LWDBs to consolidate these policies into the single Workforce Policy P111 – Services for Veterans, Members of the Military, and Spouses. The policy was sent to all 21 LWDBs for consultation from September 22 to October 2, 2025. CareerSource Florida received 14 comments from eight LWDBs. A thorough review of the comments was conducted by CareerSource Florida and FloridaCommerce. 42.90% of feedback was incorporated into the policy. To ensure a high level of service and promote better case management and support, technical assistance will be developed by FloridaCommerce in consultation with CareerSource Florida and will be issued to LWDBs.

This policy applies to CareerSource Florida, FloridaCommerce, all 21 LWDBs and all regional workforce development areas. LWDBs shall develop local strategies and policies on services for veterans, members of the military, and spouses.

### **FOR CONSIDERATION**

- **Approve revisions to CareerSource Florida Workforce Policy P111 – Services for Veterans, Members of the Military, and Spouses and move this policy forward to the CareerSource Florida Board of Directors for consideration by the full board.**

 <h2 style="text-align: center;">Workforce Policy</h2>		<b>POLICY NUMBER</b>  <b>P111</b>
<b>Title:</b>	Services For Veterans, Members of the Military, and Spouses	
<b>Program:</b>	Workforce Innovation and Opportunity Act, Wagner-Peyser, Trade Adjustment Assistance, Migrant and Seasonal Farmworker Program, Jobs for Veterans State Grant, National Dislocated Worker Grants	
<b>Type:</b>	Programmatic	
<b>Effective:</b>		<b>Revised</b> 

## I. PURPOSE AND SCOPE

This policy reaffirms Florida's commitment to being the nation's most military friendly state through the provision of high quality and responsive workforce programs, resources, and opportunities that strengthen the state's workforce and economy. Its purpose is to ensure that veterans, military service members, and their families receive prioritized access to high quality workforce services and responsive, tailored support that not only maximizes their unique talents and skills but promotes skill development and employment.

This policy establishes the minimum requirements for Local Workforce Development Boards (LWDBs) to implement effective procedures and ensure priority, high quality workforce service and support for transitioning service members and veterans, as well as their spouses and dependents. The Policy applies to all U.S. Department of Labor (DOL) funded programs including Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser, including the Military Family Employment Advocacy program, Jobs for Veterans State Grant (JVSG), Trade Adjustment Assistance (TAA), and Migrant and Seasonal Farm Worker (MSFW).

## II. MEASURABLE PERFORMANCE OUTCOMES

1. Number and percentage of eligible persons served.
2. Time to service and evidence of provision of information on priority of service for veterans; and
3. Federal indicator data and state letter grade metrics specific to the applicable population.

Additional measures of performance for this policy include aligned, clearly written, and publicly posted Local Operating Procedures (LOPs) outlining processes to implement this policy.

### III. POLICIES AND PROCEDURES

#### A. Priority of Service<sup>1</sup>

Veterans and eligible spouses (“covered persons”) must receive priority of service for all USDOL-funded job training programs, which include WIOA programs.<sup>2</sup>

Service must be provided by appropriately qualified staff, consistent with issued federal guidance<sup>3</sup> and Florida Department of Commerce (FloridaCommerce) technical assistance, as soon as possible and in alignment with [Workforce Policy 9, Availability of Services to Floridians](#).

##### 1. Intake Procedures

LWDBs must implement standardized intake processes to identify and provide priority service to veterans and eligible spouses.

###### a. Identification at Entry:

- Staff must ask if individuals or their spouses have served in the U.S. military.
- Electronic kiosks must allow self-identification.
- Prominent signage must encourage self-identification.
- Employ Florida must be used to verify veteran status (flag icon).

###### b. Screening for Enhanced Services:

- Intake must be conducted by non-JVSG staff trained in career center services.
- Eligibility must be determined consistent with requirements in Training and Employment Guidance Letter (TEGL) 03-24 and FloridaCommerce Technical Assistance Letter 25-01<sup>4</sup>.
- Eligible individuals must be referred immediately to DVOP specialists. If the individual declines DVOP services, a proper case note must be recorded in Employ Florida indicating that the eligible person is declining DVOP services.
- If the DVOP specialist is unavailable, services must be provided by the next qualified staff member without delay. Additionally, a DVOP referral must be made and the DVOP Specialist has up to two business days to connect with the eligible person.

##### 2. Eligibility for Priority of Service

Covered persons must first meet the program’s eligibility and any statutory priority criteria to receive priority for participation in the program and receipt of services (i.e., WIOA Adult). Consideration of eligibility for WIOA must be documented.

---

<sup>1</sup> [20 CFR 680.650](#).

<sup>2</sup> Priority for veterans and eligible spouses follows other statutory priorities, such as those applied to participants funded through local WIOA Adult funds. See [Workforce Policy 105](#).

<sup>3</sup> [TEGL 10-09](#)

<sup>4</sup> Screening questions are included in Employ Florida and may be reviewed in the DVOP Eligibility Screening Tool developed by the National Veterans Training Institute (NVTI).

Covered persons, for purpose of the provision of priority of services, are defined as follows:

- a. **Veteran:** A person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C 101(2). Active service includes full-time Federal service in the National Guard or a Reserve component. It does not include full-time duty performed strictly for training purposes, nor does it include full-time active duty performed by National Guard personnel who are mobilized by state rather than federal authorities.
- b. **Eligible Spouse:** The spouse of:
  - i. A veteran who died of a service-connected disability.<sup>5</sup>
  - ii. A member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
    - (1) Missing in action.
    - (2) Captured in the line of duty by a hostile force.
    - (3) Forcibly detained or interned in the line of duty by a foreign government or power.
    - (4) A veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
    - (5) A veteran who died while a total, service- connected disability was in existence.

## **B. Jobs for Veterans State Grant Program**

The JVSG program<sup>6</sup> provides staffing to LWDBs to provide enhanced services that prepare veterans, eligible spouses, and other eligible persons for meaningful careers through Disabled Veterans Outreach Program (DVOP) specialists and conducts focused outreach and advocacy for veterans and eligible spouses with local employers through Local Veterans' Employment Representatives (LVERs). Each LWDB must integrate JVSG-funded staff into its one-stop system as part of a comprehensive team that provides services to veterans and eligible persons to address their employment and training needs.

LWDBs must follow technical guidance issued by FloridaCommerce regarding eligibility for enhanced services provided by DVOP specialists and operational guidance for DVOP specialists and LVERs.

## **C. Staffing**

Staffing for positions performing required duties as outlined in this policy is funded through multiple means, including, but not limited to the following:

- JVSG
- Military Family Employment Advocate Program<sup>7</sup>

---

<sup>5</sup> A service-connected death means that the death resulted from a disability incurred or aggravated in the line of duty in active military service.

<sup>6</sup> See [38 USC Chapters 41 and 42](#), and [20 CFR 1001](#).

<sup>7</sup> [Chapter 445 Section 055 - 2024 Florida Statutes - The Florida Senate](#)



- Other Workforce Development Programs, including:
  - WIOA
  - TAA
  - MSFW
  - Wagner-Peyser

LWDBs must follow issued agency technical assistance and guidance specific to these qualifications, required training, specific duties, etc. that are required for those serving in these positions. Services and support to veterans and eligible spouses should not be delayed by the availability of a specific class, title, position, or staff member and should be provided by any available staff as soon as possible.

#### **D. Enrollment, Shared Services, and Partnerships**

The State has a commitment to the families of members of the military<sup>8</sup> in recognition of the sacrifices they make due to frequent moves and separations which can result in barriers to employment. LWDBs shall provide timely and focused services to these family members, i.e., spouses and dependents.

**Co-enrollment<sup>9</sup> of qualifying veterans and military family members is encouraged and, in some instances, required to maximize employment and training outcomes.** LWDBs are highly encouraged to effectively partner with local government, community partners, and businesses to maximize support for the goals of this program and to reduce the number of veterans requiring public assistance and increase the number of veterans and eligible spouses achieving self-sustaining employment through the training and supports provided.

#### **IV. IMPLEMENTATION**

Each LWDB must develop LOPs to implement this policy. Staff must upload all documentation, including that associated with eligibility, to the state-identified case management system. All required activities, including, but not limited to, outreach, co-enrollment, and remote contact, must be documented with appropriate case notes and service codes, consistent with guidance and technical assistance issued by FloridaCommerce.

Additionally, LWDBs must provide annual training to career center staff regarding priority of service and service to veterans and covered persons.

FloridaCommerce monitors compliance associated with this policy to ensure that LWDBs:

- Ensure covered persons are informed of their rights, are identified at point of entry, and receive priority of service.
- Have LVERs provide annual priority of service and veteran/military family member services training.
- Maintain local monitoring procedures.

#### **V. ATTACHMENTS AND RESOURCES**

<sup>8</sup> Section [445.055](#), F.S. describes members of the military.

<sup>9</sup> [Workforce Policy P111, WIOA Adult and Dislocated Worker Program Framework and Design.](#)

179	<a href="#"><u>DVOP Eligibility Screening Tool (Veteran Intake Form)</u></a>
180	
181	<a href="#"><u>Military Spouse Desk Reference</u></a>

# WORKFORCE POLICY DEVELOPMENT TRACKER

## SERVICES FOR VETERANS, MEMBERS OF THE MILITARY, AND SPOUSES

### A. GENERAL INFORMATION

<b>Policy Name:</b>	P111 Services for Veterans, Members of the Military and Spouses
<b>Policy Type:</b>	Programmatic
<b>Related Policies:</b>	<a href="#"><u>Workforce Policy P111 - Priority of Service for Veterans and Eligible Spouses</u></a> <a href="#"><u>Workforce Policy 102 – Veteran Intake at Career Centers (Sunset)</u></a> <a href="#"><u>Workforce Policy 103 – Local Veteran Employment Representative and Disabled Veteran Outreach Program Specialist Outreach Process at American Job Centers (Sunset)</u></a> <a href="#"><u>Workforce Policy 112 – Staffing Requirements (Sunset)</u></a> <a href="#"><u>Policy 117 – JVSG Employment and Advocacy Requirements (Sunset)</u></a> <a href="#"><u>Workforce Policy 119 – JVSG Consolidated Position Operational Requirements (Sunset)</u></a>
<b>Date to Publish:</b>	November 14, 2025

### B. PROJECT SUMMARY

CareerSource Florida and the Florida Department of Commerce (FloridaCommerce) collaborated to consolidate existing policies that provide the minimum requirements for implementing priority of service for veterans and eligible spouses for all U.S. Department of Labor (DOL) funded programs and services including the Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser, Trade Adjustment Assistance, Migrant and Seasonal Farmworker Program, Jobs for Veterans' State Grant Program (JVSG), and National Dislocated Worker Grants. Revised Workforce Policy P111 – Priority of Services for Veterans and Eligible Spouses ensures veterans, military members, and their families receive priority access to high-quality employment services. This supports faster job placement, reduces barriers, and strengthens the state's economy.

The policy is updated to align with federal and state laws and reaffirm Florida's commitment to being the most military-friendly state. The revised version is shorter, clearer, and focused on effective procedures that support veterans, transitioning service members and their dependents.

CareerSource Florida and FloridaCommerce worked with executive directors and staff of LWDBs to align the updated policy with the law, and existing policies. Policies were sent to all 21 LWDBs for consultation feedback. Upon approval, five of the additional policies cited above will be sunset and re-developed as technical assistance.

Feedback Response Key	
<b>Incorporated</b>	8 (53.3%)
<b>Future Action</b>	5 (33.3%)
<b>No Change</b>	2 (13.3%)
<b>Total</b>	15

## C. OVERVIEW OF CHANGES

Substantive Change	Location	Reason
Purpose and Scope expanded.	Section I. Purpose and Scope (Page 1)	Reaffirms Florida's commitment to being the nation's most military friendly state through the provision of high quality and responsive workforce programs, resources, and opportunities that strengthen the state's workforce and economy,
Measurable Performance Outcomes added including the requirement for "aligned, clearly written, and publicly posted Local Operating Procedures (LOPs) outlining processes to implement this policy."	Section II. Measurable Performance Outcomes (Page 2)	Adds public-facing procedures to improve accountability and ensure timely, effective services for veterans and spouses.
Policies and Procedures, Priority of Service modified to include intake procedures and eligibility for priority of service,	Section III. Policies and Procedures, A. Priority of Service (Pages 2-3)	Standardizes intake and eligibility to ensure veterans and spouses are identified early and served promptly, in line with federal and state rules. Standardized intake and clear eligibility definitions help LWDBs meet federal requirements ( <a href="#">20 CFR 680.650</a> ) and FloridaCommerce guidance, improving service consistency and accountability.
Where electronic kiosks are in use, they must allow self-identification. Electronic kiosks are not mandatory.	Section III. Policies and Procedures, A. Priority of Service, 1. Intake Procedures, a. Identification at Entry (Page 2)	Veterans may be identified in multiple ways so priority of service can be determined and provided. Additional information and support will be provided by FloridaCommerce via technical assistance.
LWDBs must implement standardized intake processes to identify and provide priority of service to veterans and eligible spouses. Employ Florida must be used to verify veteran status.	Section III. Policies and Procedures, A. Priority of Service, 1. Intake Procedures, b. Screening for Enhanced Services( Page 2)	Additional information will be provided by FloridaCommerce via technical assistance.

Policy revised to read “Eligible individuals must be referred immediately to DVOP specialists. If the individual declines DVOP services, a proper case note must be recorded in Employ Florida indicating that the eligible person is declining DVOP services”	Section III. Policies and Procedures, A. Priority of Service, 1. Intake Procedures (Page 2)	This change ensures that veterans and eligible spouses are immediately connected to DVOP specialists, who are trained to provide intensive employment services. Prompt referral helps reduce delays in accessing support, while documenting refusals in Employ Florida ensures accountability and compliance with federal requirements under <a href="#">20 CFR 680.650</a> . This strengthens service delivery, improves tracking, and supports better employment outcomes for those who served.
Policy revised to read: “If the DVOP specialist is unavailable, service must be provided by the next qualified staff member immediately. Additionally, a DVOP referral must be made and the DVOP Specialist has up to two business days to connect with the eligible person.”	Section III. Policies and Procedures, A. Priority of Service, 1. Intake Procedures (Page 2)	This practice helps ensure uninterrupted access to employment services for veterans and eligible spouses, even when DVOP specialists are temporarily unavailable. By requiring immediate service from the next qualified staff member and mandating a DVOP referral within two business days, the policy ensures timely engagement, minimizes service delays, and maintains compliance with federal standards <a href="#">under 20 CFR 680.650</a> .
Footnotes added.	Section III. Policies and Procedures, A. Priority of Service and B. Jobs for Veterans State Grant Program	Footnotes link to federal and state rules that guide how services must be delivered. Footnotes and references help clarify which groups get priority when multiple statutory priorities apply, ensuring veterans and eligible spouses are served correctly. This supports consistent and lawful implementation across LWDBs. Technical assistance will be provided by FloridaCommerce to support LWDBs.
Revised Policies and Procedures	Section III. Policies and Procedures, B. Jobs for Veterans State Grant Program (Page 3)	Aligns with federal and state guidance to ensure veterans receive targeted services through integrated staffing.
LWDBs must follow technical guidance issued by FloridaCommerce regarding eligibility for enhanced services provided by DVOP specialists and operational guidance for DVOP specialists and LVERs	Section III. Policies and Procedures, B. Jobs for Veterans State Grant Program (Page 3)	This requirement ensures LWDBs follow consistent rules when identifying who qualifies for enhanced services from DVOP specialists and how those services should be delivered. Guidance from FloridaCommerce helps LWDBs meet federal standards like <a href="#">20 CFR 680.650</a> and WIOA requirements, improves service quality, and ensures veterans and eligible

		spouses get the right support at the right time.
Revised Policies and Procedures relating to staffing requirements.	Section III. Policies and Procedures, C. Staffing (Pages 3-4)	Allows cross-trained staff to deliver services regardless of funding source, ensuring timely support and compliance.
Co-enrollment of qualifying veterans and military family members is encouraged and, in some instances, required to maximize employment and training outcomes.	Section III. Policies and Procedures, D. Enrollment, Shared Services and Partnerships (Page 4)	Co-enrollment helps veterans and military families get more complete support by combining services from different programs. It improves job and training outcomes by using all available resources. It also reduces the need for public assistance by helping people find stable jobs faster. Additional information and support will be provided via technical assistance by FloridaCommerce.
Revised Policies and Procedures related to Enrollment, Shared Services and Partnerships	Section III. Policies and Procedures, D. Enrollment, Shared Services and Partnerships (Page 4)	Supports military families through timely services, co-enrollment, and local partnerships that expand access and reduce employment barriers.
Each LWDB must develop local operating procedures to implement this policy. All documentation, including that associated with eligibility, must be uploaded to the state identified case management system.	Section IV. Implementation, (Page 4)	LWDBs to document procedures, upload eligibility records, and provide annual training to ensure consistent implementation and compliance.
Links are added to a WIOA Veterans Fact Sheet and a Military Spouse Desk Reference.	Section V. Attachments and Resources (Page 4)	Adds quick access to supporting materials for staff and stakeholders.

Policy/Template	Line	Type of Comment	Submission Date	Name	Local Workforce Development Board	Comment Entry	Recommended Resolution	Action Taken
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 64	Substantive	09-30-2025 14:47:57	Michelle Schultz	CareerSource Tampa Bay	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 64, Type of Comment (see directions): Substantive, Comment (Concern with citation): See below for customers who decline.	Comment (Proposed Resolution/E&B): Update to: Eligible individuals are offered DVOP services and if declined, paper case notes are indicated in IT that "At this time the Veteran customer is not interested in DVOP services."	This feedback was reviewed and the policy was revised to read: "Eligible individuals must be referred immediately to DVOP specialists. If the individual declines DVOP services, a proper case note must be recorded in Employment Florida indicating that the eligible person is declining DVOP services."
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 65	Substantive	09-30-2025 14:47:57	Michelle Schultz	CareerSource Tampa Bay	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 65, Type of Comment (see directions): Substantive, Comment (Concern with citation): Definition of "without delay." Recommended resolution below.	Comment (Proposed Resolution/E&B): If the customer is interested in still meeting with a DVOP a referral is made and the DVOP has up to 2 business days to connect with the Veteran customer.	This feedback was reviewed and the policy was revised to read: "If the DVOP specialist is unavailable, services must be provided by the next qualified staff member immediately. Additionally, a DVOP referral must be made and the DVOP Specialist has up to two business days to connect with the eligible person."
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 126	Substantive	09-30-2025 14:47:57	Michelle Schultz	CareerSource Tampa Bay	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 126, Type of Comment (see directions): Substantive, Comment (Concern with citation): Additional program: Transferring Service Members.	Comment (Proposed Resolution/E&B): Add Transferring Service Members (TSM) to the list.	No change needed. There is not a separate TSM program. They are served through Wagner-Peyser and, in some cases by DVOP Specialists as described in the. Recommend no change.
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 161	Administrative	09-30-2025 14:47:57	Michelle Schultz	CareerSource Tampa Bay	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 161, Type of Comment (see directions): Administrative, Comment (Concern with citation): Add clarifying text below.	Comment (Proposed Resolution/E&B): Add "and determined to receive priority of service."	This feedback was reviewed and "military service members" was deleted.
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 55	Substantive	09-30-2025 12:36:43	Danna Runge	CareerSource Broward Flagler Volusia	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 55, Type of Comment (see directions): Substantive, Comment (Concern with citation): The requirement that "Electronic kiosks must allow self-identification" is unclear. It does not define what qualifies as a kiosk or what specific form of self-identification is required. For example, at our center, the kiosk is used by individuals who have already been identified by staff, including veterans, so self-identification at the kiosk is redundant. Additionally, if the expectation is that kiosks must include a new interface or functionality, this may impose a burden depending on existing system capabilities.	Comment (Proposed Resolution/E&B): Define what is meant by "kiosk" (e.g., tablet/station electronic device, resource room computer, etc.) Consider allowing centers that perform identification through staff prior to kiosk use to be in compliance without additional kiosk functionality.	No change to policy needed. The policy as it reads allows for veterans to be identified in multiple ways so that priority of service can be determined and provided. Additional information and support will be provided via technical assistance.
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 63	Substantive	09-30-2025 12:24:02	Danna Runge	CareerSource Broward Flagler Volusia	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 63, Type of Comment (see directions): Substantive, Comment (Concern with citation): The policy states that the Standardized Veteran Intake Form or an approved local equivalent must be used to determine eligibility. However, we currently use the D General Information section for this purpose, which is not a formal local equivalent. The requirement as written may not reflect the procedures currently used by all LWDBs and may cause confusion or unintended non-compliance.	Comment (Proposed Resolution/E&B): Clarify in the policy that the D General Information section may be considered an acceptable alternative to the Standardized Veteran Intake Form if it captures all required data elements for eligibility determination. Alternatively, provide guidance on how to seek approval for local equivalents.	Policy added to simplify and not require an additional form.
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 130	Substantive	10/3/2025 1:00	Will Miles	CareerSource Okaloosa Walton	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 130, Type of Comment (see directions): Substantive, Comment (Concern with citation): LWDBs must follow issued agency technical assistance and guidance specific to these to qualifications...	Comment (Proposed Resolution/E&B): "military service members" could be misleading to include all military service members. Do you mean TSMs?	This feedback was reviewed and "military service members" deleted.
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 128	Administrative	10/3/2025 0:53	Will Miles	CareerSource Okaloosa Walton	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 128, Type of Comment (see directions): Administrative, Comment (Concern with citation): LWDBs must follow issued agency technical assistance and guidance specific to these to qualifications...	Comment (Proposed Resolution/E&B): Need to correct the wording: "guidance specific to these to qualifications."	This feedback was reviewed and this language was revised.
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 108	Administrative	10/3/2025 0:30	Will Miles	CareerSource Okaloosa Walton	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 108, Type of Comment (see directions): Administrative, Comment (Concern with citation): The rules for Veterans Start Grant (VSG) program provides staffing to LWDBs to 102 provide enhanced services that prepare eligible veterans, spouses... Should say veterans, eligible spouses.	Comment (Proposed Resolution/E&B): Should say veterans, eligible spouses.	This feedback was reviewed and this language was revised.
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 40	Critical	10/7/2025 15:37	Gina Romo-Larajo	CareerSource Central Florida	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 40, Type of Comment (see directions): Critical, Comment (Concern with citation): Issue: Policy references multiple overlapping statutory priorities (WIOA, Wagner-Peyser, JVSJ). Without clear hierarchy, staff may struggle to apply consistent rules.	Comment (Proposed Resolution/E&B): Recommendation: Provide explicit priority sequencing guidance when multiple statutory priorities apply, supported by examples.	No changes to policy needed. Additional information is provided via a footnote in the current policy and technical assistance will also be provided to support understanding of LWDBs for this.
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 47	Substantive	10/8/2025 15:37	Gina Romo-Larajo	CareerSource Central Florida	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 47, Type of Comment (see directions): Substantive, Comment (Concern with citation): Lines 47-57 - Intake Procedures Issue: Mandating kiosks, signage, and specific intake processes could be burdensome for smaller centers and may not fit all local layouts.	Comment (Proposed Resolution/E&B): Recommendation: Allow LWDBs flexibility in how they implement veteran identification procedures, provided outcomes (timely identification) are met.	No change to policy needed. The policy as it reads allows for veterans to be identified in multiple ways so that priority of service can be determined and provided. Additional information and support will be provided via technical assistance.
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 102	Substantive	10/9/2025 15:37	Gina Romo-Larajo	CareerSource Central Florida	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 102, Type of Comment (see directions): Substantive, Comment (Concern with citation): Lines 102-109 - Integration of JVSJ Staff Issue: The requirement to fully integrate DVOP and UVER staff could create confusion over supervision and reporting lines.	Comment (Proposed Resolution/E&B): Recommendation: Clarify expectations for integration while maintaining compliance with JVSJ federal role definitions.	No changes to policy needed. The language in the policy does not override JVSJ role requirements.
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 135-147	Critical	10/10/2025 15:37	Gina Romo-Larajo	CareerSource Central Florida	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 135, Type of Comment (see directions): Critical, Comment (Concern with citation): Lines 135-147 - Co-enrollment Issue: Policy "encourage and in some cases require" co-enrollment, but does not specify which cases are mandatory. This creates compliance risks.	Comment (Proposed Resolution/E&B): Recommendation: Provide a clear matrix of when co-enrollment is required vs. encouraged.	No change to policy needed. Additional information and support will be provided via technical assistance.
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 31	Substantive	10/2/2025 15:18	Christina White	CareerSource Suncoast	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 31, Type of Comment (see directions): Substantive, Comment (Concern with citation): Under Section B: Measurable Performance Outcomes. The Policy states, "Additional measures of performance for this policy include signed, clearly written, and publicly posted local Operating Procedures (OPs) outlining processes for procurement of tools and services." Was the "procurement of tools and services" an error? This does not seem relevant to the Veterans topic of the policy and is the same verbiage used in Policy 0126: Statewide Standardization of Tools.	Comment (Proposed Resolution/E&B): Recommend reviewing the language to determine if this should be referencing the JVSJ program requirements instead of purchasing and procurement.	This feedback was reviewed and revisions were made to this policy based on this suggestion.
<b>P111 Services for Veterans and Members of the Military and Spouses</b>	line 126	Administrative	10/3/2025 15:18	Christina White	CareerSource Suncoast	Select Policy: P111 Services for Veterans and Members of the Military and Spouses, Policy line Number: 126, Type of Comment (see directions): Administrative, Comment (Concern with citation): "LWDBs must follow issued agency technical assistance and guidance specific to these to qualifications, required training, specific duties, etc."	Comment (Proposed Resolution/E&B): Check the working on this sentence, it is not flowing correctly. "Specific to these to qualifications..."	This feedback was reviewed and revisions were made to this policy based on this suggestion.

Feedback Response Key			
Incorporated	Future Action	No change	TOTAL
9	4	2	15
60.00%	26.70%	13.30%	100%



# Information Items



## Speaker Bios

### 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.

### Kristy Farina

---



Kristy Farina serves as the administrator of economic research and program performance in FloridaCommerce's Bureau of Workforce Statistics and Economic Research. Farina's team analyzes labor market and workforce data to support economic decision-making and policy planning across Florida.

Before her role with FloridaCommerce, Farina served as faculty at Florida State University, supporting K-12 education research through data analysis and measure design.