

Board of Directors Meeting Agenda

**JANUARY 28, 2026 • 9:00 A.M. – 12:00 P.M., ET
TALLAHASSEE STATE COLLEGE – WORKFORCE DEVELOPMENT (WD) BUILDING**

Chair's Welcome and Remarks

Stephanie Smith

Consent Agenda

1. November 2025 Board of Directors Meeting Minutes
2. January 2026 Executive Committee Meeting Minutes
3. Financial Statement
4. 2025-2026 Master Credentials List
5. Recommendation to Sunset 3 CareerSource Florida Policies
 - P83 – Direct Provider of Workforce Services
 - P91 – Local Workforce Development Board Composition and Certification
 - P93 – One-Stop Delivery System and One-Stop Center Certification Requirements

President's Report

Adrienne Johnston

SPPC Meeting Report

Sophia Eccleston

LWDB Business Services Panel

Nilda Blanco

Rick Beasley

Executive Director, CareerSource South Florida

Joshua Matlock

President and CEO, CareerSource Suncoast

Cheryl Taylor

President, CareerSource Northeast Florida

April Torregiante

Vice President, Programs, CareerSource Tampa Bay

WIOA State Plan Two-year Modification

Victoria Gaitanis

Action Items

1. Recommendation to Seek Federal Waivers to Increase Flexibility in Service Provision and to Remove Barriers
2. Workforce Policy G104 – Sanctions and Other Required Corrective Actions for Local Workforce Development Boards Who Fail to Meet Federal and State Standards

3. Workforce Policy G105 – Composition and Certification of Local Workforce Development Boards; Certification of One-Stop Systems and Boards, and Direct Service Provider Designation
4. Workforce Policy O125 – Business Partnerships, Employer Engagement and Economic Development Support
5. Workforce Policy P74 – Individual Training Account Expenditure Requirements and Waiver Process

Opportunity Zones 2.0

Jason Mahon

Deputy Secretary of Economic Development & Chief Manufacturing Officer, FloridaCommerce

Marketing Campaign Updates

Keri Nucatola

FloridaCommerce Report

J. Alex Kelly

Secretary, FloridaCommerce

Local Partners Report

Joshua Matlock

*President and CEO, CareerSource Suncoast
President, Florida Workforce Development Association*

Open Discussion/Public Comment

Closing Remarks

Stephanie Smith

UPCOMING MEETINGS

- **Finance Council Meeting**, June 2, 10:00 – 11:00 a.m., Miami
- **Strategic Policy and Performance Council Meeting**, June 2, 1:00 – 2:00 p.m., Miami
- **Board of Directors Meeting**, June 3, 9:00 a.m. – 12:00 p.m., Miami



CareerSource Florida
Board of Directors Meeting
January 28, 2026
Consent Item 1
Approved _____
Disapproved _____

Consent Item 1

November 13, 2025, BOARD OF DIRECTORS 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 November 13, 2025, Board of Directors Meeting Minutes, to include any modifications or changes noted by the board.**

**CareerSource Florida
Board of Directors Meeting Minutes
November 13, 2025**

I. Call to Order

Chair Stephanie Smith called the Board of Directors meeting to order at 9:00 a.m. on November 13, 2025.

II. Roll Call

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

Stephanie Smith
John Adams
Sophia Eccleston
Jennifer O'Flannery Anderson
Bayne Beecher
Robert Doyle
Sophia Eccleston
Ryan Goertzen
Eric Hall
Bridget Royster
Tim Hinson
Austin Hosford
Alex Kelly
Joe Marino
D.C. Reeves
Kelly Rogers
Laurie Sallarulo
Robert Salonen
Les Sims
Scott Singer
Meridith Stanfield
Dana Trabulsky

III. Chair's Opening Remarks

Chair Smith highlighted the meeting agenda and went over housekeeping items before moving into the Consent Agenda.

IV. Consent Agenda

Chair Smith presented the consent agenda.

- 1. August 2025 Board of Directors Meeting Minutes**
- 2. October 2025 Executive Committee Meeting Minutes**
- 3. 2025-2026 Master Credentials List**
- 4. Senior Chancellor Kevin O'Farrell Designee for Commissioner Kamoutsas**
- 5. CareerSource Central Florida's Request to Serve as One Stop Operator**
- 6. CareerSource North Central Florida's Request for New Area Designation**

7. **CareerSource South Florida's Request for Local Workforce Development Board Certification**
8. **CareerSource Gulf Coast's Request to Serve as One-Stop Operator**
9. **CareerSource Escarosa's Request for Local Workforce Development Board Certification**
10. **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**

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

Motion: Jennifer O'Flannery Anderson
Second: John Adams

The consent agenda passed. There were no public comments.

V. President's Report

CareerSource Florida President and CEO Adrienne Johnston provided a brief labor market overview, describing current conditions as a “no hire, no fire” environment, with employers retaining workers but hiring more cautiously. While job growth continues, it is slowing, and there are early signs of increased challenges for new job seekers and underemployed individuals.

She also shared high-level updates on key priorities, including the release of program year 2024–25 letter grades, ongoing improvements to the Master Credential List, and implementation of a \$5 million legislative investment to support rural workforce initiatives. Additional focus areas included strengthening business services and alignment with economic development, enhancing data analytics to improve system performance, continued support for veterans through Paychecks for Patriots events, and ongoing engagement with partners and policymakers.

VI. Finance Council Meeting Report

Finance Council Vice Chair Robert Salonen provided a brief overview of the Finance Council meeting from the day prior.

VII. Strategic Policy and Performance Council Meeting Report

Strategic Policy and Performance Council Chair Sophia Eccleston provided highlights from the Strategic Policy and Performance Council meeting the day prior.

VIII. Action Items

CareerSource Florida Chief Financial Officer Dana Davis presented the first action item.

1. Acceptance of CareerSource Florida 2024-2025 Annual Audit

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

Motion: John Adams

Second: Alex Kelly

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

Vice President of Workforce Program Development Victoria Gaitanis presented the following four action items.

2. Workforce Policy O92 – Staff Training and Credentialing

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

Motion: Ryan Goertzen

Second: Robert Salonen

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

3. Workforce Policy O124 – Statewide Standardization of Tools and Services

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

Motion: John Adams

Second: Ryan Goertzen

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

4. Workforce Policy P95 – WIOA Youth Program Eligibility and Service Provider Selection

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

Motion: Robert Doyle

Second: John Adams

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

5. Workforce Policy P111 – Services for Veterans, Members of the Military and Spouses

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

Motion: Joe Marino
Second: Jennifer O'Flannery Anderson

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

IX. Ethics and Open Government

CareerSource Florida General Counsel Brent McNeal provided a high-level overview of Florida's ethics and open government requirements applicable to board members. He reviewed key provisions of the Code of Ethics, including standards of conduct, gift and compensation restrictions, use of nonpublic information, conflict-of-interest disclosures, and annual financial reporting obligations.

He also summarized Sunshine Law and public records requirements, emphasizing that board business must be conducted openly with proper notice, public access, recorded minutes, and compliance with records requests, noting that violations carry significant civil and criminal penalties.

X. Purple Star Workforce Board Designations

CareerSource Florida President and CEO Adrienne Johnsoton announced the launch of a new Purple Star Workforce Board designation, created at the direction of the board to recognize local workforce development boards that demonstrate excellence in serving veterans and military families. She thanked board member Joe Marino for bringing the concept forward and noted that the designation was developed in partnership with Florida Commerce and Veterans Florida, with clear criteria focused on demonstrated veteran engagement, strong partnerships, strategic planning, outreach, and measurable outcomes.

She explained that eligibility requires participation in the state's veterans performance incentive program, evidence of local military and veteran partnerships, a clear and operationalized strategy for veteran services, and strong performance results, including an "A" or higher letter grade for veteran outcomes.

Adrienne concluded by announcing CareerSource Okaloosa Walton as the inaugural Purple Star Workforce Board for 2025, recognizing its outstanding service to veterans and military families.

XI. EDC of Florida's Space Coast

Marci Murphy, President and CEO of Executive Director of CareerSource Brevard Flagler Volusia shared that Brevard County, through the Economic Development Commission of Florida's Space Coast, conducted an employer-informed study to better understand immediate and near-term certification needs in aerospace, space, aviation, and defense. She emphasized that local partners – including the school system, state college, CareerSource, and economic development – are already collaborating closely, and that a key takeaway is the scale of demand: the space industry's credential and talent needs far exceed what any single county or institution can supply, requiring a coordinated regional and statewide approach.

Dr. Mildred Coyne, CEO of Coyne Workforce Solutions, summarized the study's approach and findings, explaining that the work was designed to be practical and actionable – built on one-on-one interviews with major employers rather than a

traditional survey – to capture real projected needs over the next 18-24 months. She highlighted major workforce gaps (including challenges tied to security clearance requirements and limited talent supply), identified foundational and priority technical skills, and translated those needs into nationally recognized certifications. Coyne outlined how the resulting “blueprint” focuses on measurable tactics – boosting existing programs, integrating certifications into current training, and creating new offerings where gaps exist – supported by clear implementation goals and ongoing partner accountability to expand the talent pipeline for Florida’s Space Coast.

XII. FloridaCommerce Report

FloridaCommerce Secretary Alex Kelly shared updates on Florida Commerce’s major economic development priorities, emphasizing the underway, statutorily required three-year update to Florida’s target industry sectors, which will guide eligibility and prioritization for key programs and incentives. He noted a focus on more clearly defining what is included within each sector, highlighting additions and clarifications around aerospace subsectors and emerging areas like agriculture technology, so partners and applicants better understand how proposals align.

He also underscored Florida’s rapid economic growth and diversification, which is driving intensified competition for talent across industries, and outlined related efforts including a multi-agency rural tour to expand small business support, preparations for Opportunity Zones 2.0 with a stronger rural emphasis, and targeted initiatives tied to clearance-related workforce pathways, advanced air mobility and drones, and maritime/port competitiveness that will shape future workforce demand.

XIII. Local Partners Report

Florida Workforce Development Association (FWDA) President and CareerSource Suncoast President and CEO Josh Matlock provided an update on local board activities, highlighting the September Workforce Professional Development Summit as a key example of innovation and continuous improvement across local workforce boards. He noted strong participation with over 500 attendees and 84 workshops covering topics such as artificial intelligence, apprenticeship, youth services, business services, and data-driven performance improvement.

Josh also recognized the celebration of Workforce Champions from across the state, thanked CareerSource Florida leadership and partners for their support, and concluded by sharing an impact highlight from a Paychecks for Patriots event that demonstrated meaningful engagement with job seekers and veterans.

XIV. Open Discussion/Public Comment

Chair Smith opened up the floor for discussion amongst board members before asking if there were any comments from the public.

There were no public comments.

XV. Chair’s Closing Remarks

Chair Smith thanked the board for their attention and contributions during the meeting.

She noted upcoming meetings before adjourning the meeting.

The meeting was adjourned at 11:25 a.m.

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

Approved _____
Disapproved _____

Consent Item 2

JANUARY 2026 EXECUTIVE COMMITTEE 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 January 15, 2026, Meeting Minutes, to include any modifications or changes noted by the board.**

**CareerSource Florida
Executive Committee Meeting Minutes
January 15, 2026**

I. CALL TO ORDER

Chair Stephanie Smith called the meeting to order at 3:00 p.m. ET.

II. ROLL CALL

The following members were present:

Stephanie Smith
Alex Kelly
Kevin McDonald
Robert Salonen
Meredith Stanfield

III. ACTION ITEM

CareerSource Florida Vice President of Workforce Program Development Victoria Gaitanis introduced the action item.

1. Determination on Appeal of Credentials Review Committee Actions

Chair Smith called for a vote to approve the Action Item.

Motion: Alex Kelly

Second: Kevin McDonald

There were no members of the public wishing to comment on the Action Item.

The action item passed unanimously.

IV. OPEN DISCUSSION/PUBLIC COMMENT

There were no public comments.

V. CHAIR'S CLOSING REMARKS

Chair Smith closed by thanking Committee members for their time and reminded them of upcoming CareerSource Florida meetings and events.

The meeting adjourned at 3:15 p.m. ET.

VI. BOARD SECRETARY CERTIFICATION

In accordance with Article VII, Section 7.3, I hereby certify these minutes reflect the proceedings by the Board of Directors of CareerSource Florida, have been reviewed by the Board, and approved or approved with modifications which have been incorporated herein.

Adrienne Johnston
Board Secretary

Date

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

CareerSource Florida
Board of Directors Meeting
January 28, 2026
Consent Item 3

Approved _____
Disapproved _____

Consent Item 3

ACCEPTANCE OF CAREERSOURCE FLORIDA 2024-2025 ANNUAL AUDIT

CareerSource Florida's independent audit firm, Cherry Bekaert, LLC., has completed the annual financial audit of the accounting records and systems of CareerSource Florida for the fiscal year ending June 30, 2025. Enclosed in the agenda packet is the final audit report.

In accordance with Policy Number 121 issued by the Florida Department of Commerce on Resolution of Recipient and Subrecipient Monitoring and Audit Findings, auditors will appear before the Board, or an appropriate committee of the Board, to explain the opinions expressed by the auditor and to discuss the significance of any audit findings, including any findings contained in the management letter.

Copies of the audit, management letter, and any corrective action plan must be submitted to the Florida Department of Commerce Inspector General, the State Auditor General's Office, the Department of Financial Services, and the Federal Audit Clearinghouse, as well as to the Governor, House, and Senate as part of the CareerSource Florida annual report required to be submitted by December 1 of each year.

Auditors appeared before the Finance Council in November 2025 to present draft statements. Final statements included for Consent Item 2 have no substantive changes from draft statements.

FOR CONSIDERATION

- **Acceptance of the annual financial statement audit for the fiscal year ending June 30, 2025, conducted and prepared by Cherry Bekaert, LLC.**

CAREERSOURCE FLORIDA, INC.

FINANCIAL STATEMENTS AND SUPPLEMENTARY INFORMATION

As of and for the Year Ended June 30, 2025

And Report of Independent Auditor

CAREER SOURCE FLORIDA, INC.

TABLE OF CONTENTS

REPORT OF INDEPENDENT AUDITOR..........1-3

MANAGEMENT'S DISCUSSION AND ANALYSIS..........4-9

FINANCIAL STATEMENTS

Statements of Net Position	10
Statements of Activities	11-12
Balance Sheets – Governmental Fund Type – General Fund	13
Reconciliation of the Balance Sheets of the Governmental Fund to the Statements of Net Position.....	14
Statements of Revenues, Expenditures, and Changes in Fund Balance – Governmental Fund Type – General Fund	15
Reconciliation of the Statements of Revenues, Expenditures, and Changes in Fund Balance of the Governmental Fund to the Statements of Activities.....	16
Notes to the Financial Statements.....	17-26

OTHER REPORTS

Report of Independent Auditor on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with <i>Government Auditing Standards</i>	27-28
Report of Independent Auditor on Compliance for Each Major Federal Awards Program and State Project and on the Internal Control Over Compliance Required by the Uniform Guidance and Chapter 10.650, Rules of the Auditor General.....	29-31

SUPPLEMENTARY INFORMATION

Schedule of Expenditures of Federal Awards	32
Notes to the Schedule of Expenditures of Federal Awards and State Financial Assistance	33
Schedule of Findings and Questioned Costs	34-35

Report of Independent Auditor

To the Board of Directors
CareerSource Florida, Inc.
Tallahassee, Florida

Report on the Audit of the Financial Statements

Opinions

We have audited the accompanying financial statements of the governmental activities and the major fund of CareerSource Florida, Inc. (the "Organization"), as of and for the year ended June 30, 2025, and the related notes to the financial statements, which collectively comprise the Organization's basic financial statements as listed in the table of contents.

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the governmental activities and the major fund of Organization as of June 30, 2025, and the respective changes in financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinions

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are required to be independent of the Organization and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Prior Year Financial Statements

The financial statements of the Organization as of June 30, 2024 were audited by other auditors whose report dated October 21, 2024 expressed an unmodified opinion on those statements.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Organization's ability to continue as a going concern for twelve months beyond the financial statement, including any currently known information that may raise substantial doubt shortly thereafter.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and, therefore, is not a guarantee that an audit conducted in accordance with generally accepted auditing standards and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards and *Government Auditing Standards*, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Organization's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Organization's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control related matters that we identified during the audit.

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis, as listed in the table of contents, be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Supplementary Information

Our audits were conducted for the purpose of forming opinions on the financial statements that collectively comprise the Organization's basic financial statements. The accompanying schedule of expenditures of federal awards and state financial assistance, as required by Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award*, and Chapter 10.650, Rules of the Auditor General, is presented for purposes of additional analysis and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audits of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards and state financial assistance is fairly stated, in all material respects, in relation to the financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated December 30, 2025, on our consideration of the Organization's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Organization's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Organization's internal control over financial reporting and compliance.

Cherry Bekaert LLP

Orlando, Florida

December 30, 2025

CAREER SOURCE FLORIDA, INC.

MANAGEMENT'S DISCUSSION AND ANALYSIS

JUNE 30, 2025 AND 2024

This discussion and analysis of CareerSource Florida, Inc.'s financial performance provides an overview of its financial activities for the fiscal year ended June 30, 2025. This analysis should be read in conjunction with the report of independent auditor (pages 1 through 3) and the basic financial statements, which begin on page 10.

Financial Highlights

Assets of CareerSource Florida, Inc. exceeded its liabilities at the close of the most recent fiscal year by \$826,541 (net position of \$823,695, is unrestricted). Assets exceeded liabilities at the close of the prior fiscal year by \$880,006 (net position of \$860,736 is unrestricted).

Government assistance, including pass-through grants, accounted for \$19,692,140 and \$20,438,514 in revenue for the years ended June 30, 2025 and 2024, respectively.

For the years ended June 30, 2025 and 2024, CareerSource Florida, Inc. spent \$1,155,574 and \$1,399,637, respectively, for Incumbent Worker Training programs, \$6,629,870 and \$5,112,245 respectively, for Quick Response Training, and \$12,091,182 and \$14,015,063, respectively, in other program costs, which include general, administrative, and contractual expenses. For the year ended June 30, 2025, CareerSource Florida, Inc. incurred \$19,876,626 in total expenses for a total decrease of \$650,319 or 3.17% compared to prior year. For the year ended June 30, 2024, CareerSource Florida, Inc. incurred \$20,526,945 in total expenses for a total increase of \$3,959,019 or 23.91% from the prior year.

Overview of Financial Statements

This discussion and analysis is intended to serve as an introduction to CareerSource Florida, Inc.'s basic financial statements. The basic financial statements are comprised of three components: 1) government-wide financial statements, 2) fund financial statements, and 3) notes to the financial statements.

Government-Wide Financial Statements

The government-wide financial statements are designed to provide readers with a broad overview of CareerSource Florida, Inc.'s finances, in a manner similar to a private-sector business. CareerSource Florida, Inc.'s government-wide financial statements include the statement of net position and the statement of activities.

The statement of net position presents financial and capital resources of CareerSource Florida, Inc. Assets are reported when CareerSource Florida, Inc. acquires ownership over assets and liabilities are reported when they are incurred, regardless of the timing of the related cash flows. The difference between CareerSource Florida, Inc.'s total assets and total liabilities is net position. Over time, increases or decreases in net position may serve as a useful indicator of whether the financial position is improving or deteriorating.

The statement of activities presents revenue and expenses and shows how CareerSource Florida, Inc.'s net position changed during the most recent fiscal year. All changes in net position are reported in a manner similar to the approach used by a private-sector business in that revenues are recognized when earned or established criteria are satisfied and expenses are reported when incurred. Accordingly, revenues are reported even when they may not be collected for several months after the end of the accounting period and expenses are recorded even though they may not have used cash during the period.

CAREER SOURCE FLORIDA, INC.

MANAGEMENT'S DISCUSSION AND ANALYSIS

JUNE 30, 2025 AND 2024

Fund Financial Statements

Fund financial statements consist of a balance sheet and a statement of revenues, expenditures, and changes in fund balances. These statements are prepared on an accounting basis that is significantly different from that used to prepare the government-wide financial statements.

In general, these financial statements have a short-term emphasis and, for the most part, measure and account for the cash and other assets that can easily be converted to cash. For example, amounts reported on the balance sheet include items such as cash and receivables collectible within a short period of time, but do not include capital assets such as land and buildings. Fund liabilities include amounts that are to be paid within a short period after the end of the fiscal year. The difference between a fund's total assets and total liabilities is labeled as fund balance, and generally indicate the amount that can be used to finance the next fiscal year's activities.

Notes to the Financial Statements

The notes provide additional information that is essential to a full understanding of the data provided in the government-wide and fund financial statements. They can be found on pages 17 through 26 of this report.

In addition to the basic financial statements and accompanying notes, this report also presents a Schedule of Expenditures of Federal Awards and State Financial Assistance, which can be found on page 32. This schedule lists all federal and state grants awarded to CareerSource Florida, Inc. and the related expenditures for the fiscal year ended June 30, 2025.

Government-Wide Financial Analysis

One of the most important questions asked about CareerSource Florida, Inc.'s finances is, "Is CareerSource Florida, Inc., as a whole, better off or worse off as a result of the year's activities"? The statement of net position and the statement of activities report information about CareerSource Florida, Inc.'s activities in a way that will help answer this question. These two statements report the net position of CareerSource Florida, Inc. and changes in them during the last reporting period. You may think of CareerSource Florida, Inc.'s net position – the difference between assets and liabilities – as one way to measure financial health or financial position. Over time, increases or decreases in CareerSource Florida, Inc.'s net position are one indicator of whether its financial health is improving or deteriorating. However, you will need to consider other non-financial factors such as changes in interest rates, economic conditions, regulations, and new or changed governmental legislation.

CAREER SOURCE FLORIDA, INC.
MANAGEMENT'S DISCUSSION AND ANALYSIS

JUNE 30, 2025 AND 2024

The following schedule is a summary of the fiscal year 2025 Statement of Net Position, which can be found on page 10 of this report with comparative information for the fiscal years 2024 and 2023.

Condensed Financial Statements
Statement of Net Position

	2025	2024	2023
ASSETS			
Current and other assets	\$ 9,760,118	\$ 6,565,930	\$ 8,187,932
Capital and long-term assets	460,295	663,636	862,214
Total Assets	\$ 10,220,413	\$ 7,229,566	\$ 9,050,146
LIABILITIES			
Current Liabilities	8,599,438	5,377,783	6,961,767
Long-term liabilities	794,434	971,777	1,187,460
Total Liabilities	\$ 9,393,872	\$ 6,349,560	\$ 8,149,227
NET POSITION			
Net investment in capital assets	2,846	19,270	59,029
Net position, beginning of year	823,695	860,736	841,890
Total Net Position	\$ 826,541	\$ 880,006	\$ 900,919

As noted earlier, changes in net position may serve over time as a useful indicator of an organization's financial position. For the year ended June 30, 2025, CareerSource Florida, Inc.'s net position is \$826,541, which is a decrease of \$53,465 in net position for the year. This decrease in net position represented a decrease of approximately 6.08% from the \$880,006 net position at June 30, 2024, and is the result of a decrease in capital assets due to depreciation and amortization in 2025, net of the decrease in unrestricted funds. For the year ended June 30, 2024, CareerSource Florida, Inc.'s net position is \$880,006, which is a decrease of \$20,913 in net position for the year. This decrease in net position represented a decrease of approximately 2.32% from the \$900,919 net position at June 30, 2023, and is the result of a decrease in capital assets due to depreciation and amortization in 2024, net of the decrease in unrestricted funds. The majority of CareerSource Florida, Inc.'s net position is unrestricted and can be used for operations and program related expenses.

CAREERSOURCE FLORIDA, INC.
MANAGEMENT'S DISCUSSION AND ANALYSIS

JUNE 30, 2025 AND 2024

The following chart is a summary of the information presented in the 2025 Statement of Activities found on page 11 of this report, with comparative information in 2024 and 2023.

Condensed Financial Statements
Statement of Activities

	2025	2024	2023
Revenue:			
Operating grants and contributions	\$ 19,692,140	\$ 20,438,514	\$ 16,453,370
Other income	131,021	67,518	1,522
Total Revenue	19,823,161	20,506,032	16,454,892
Expenses:			
Program Services:			
Incumbent worker training	1,155,574	1,399,637	985,047
Quick response training	6,629,870	5,112,245	5,066,916
Other program costs	12,091,182	14,015,063	10,515,963
Total Expenses	19,876,626	20,526,945	16,567,926
Change in net position	(53,465)	(20,913)	(113,034)
Net position, beginning of year	1,205,252	1,226,165	1,226,165
Net position, end of year	\$ 1,151,787	\$ 1,205,252	\$ 1,113,131

Governmental activities decreased CareerSource Florida, Inc.'s net position by \$53,465, or by 6.08%, for the year ended June 30, 2025, and decreased CareerSource Florida, Inc.'s net position by \$20,913, or by 2.32%, for the year ended June 30, 2024. The following information related key points regarding the financial activities that significantly impacted the change in net assets:

- Operating grants and contributions revenue decreased by \$746,374, or 3.65, in 2025. This resulted from a decrease in the amount of requested reimbursements in the Incumbent Worker Training grant program in the year and reduced contract expenses related to the special projects, partially offset by an increase in the amount of requested reimbursements in the Quick Response Training grant program. Operating grants and contributions revenue increased by \$3,985,144, or 24.22%, in 2024. This resulted from an increase in the amount of requested reimbursements in the Incumbent Worker Training grant program in the year and additional contract expenses related to the REACH Act.
- Incumbent Worker Training ("IWT") grant reimbursements decreased by \$244,063, or 17.44%, in 2025, and increased by \$414,590, or 42.09%, in 2024. IWT expenses are incurred on a reimbursement-request basis and are subject to timing variances; thus, these changes are a result of timing variances pertaining to award issuance and subsequent reimbursement requested. For the year ended June 30, 2025, CareerSource Florida, Inc. received and processed fewer requested reimbursements than the previous year, and for the year ended June 30, 2024, CareerSource Florida, Inc. received and processed more requested reimbursements than the previous year.

CAREER SOURCE FLORIDA, INC.

MANAGEMENT'S DISCUSSION AND ANALYSIS

JUNE 30, 2025 AND 2024

- Quick Response Training (“QRT”) grant assistance increased by \$1,517,625, or 29.69%, in 2025, and increased by \$45,329, or 0.89%, in 2024. QRT expenses are incurred on a reimbursement-request basis and are subject to timing variances; thus, these changes are a result of timing variances pertaining to award issuance and subsequent reimbursement requested. For the years ended June 30, 2025 and 2024, CareerSource Florida, Inc. received and processed more requested reimbursements than each of the previous years.
- Other Program Costs decreased by \$1,923,881, or 13.73%, in 2025. This decrease is mostly in program costs due to reduced special project contracts. Other Program Costs increased by \$3,499,100, or 33.27%, in 2024. This increase is mostly in program costs due to additional contract expenses related to the REACH Act.

Fund Financial Analysis

As noted earlier, CareerSource Florida, Inc. also presents fund financial statements to provide information on near-term inflows, outflows, and balances of spendable resources. CareerSource Florida, Inc. has one governmental fund (the “General Fund”). The financial operations of the General Fund are included in the Statement of Revenues, Expenditures, and Changes in Fund Balance on page 15 of this report.

The following are significant highlights of the general fund financial statements:

- At June 30, 2025, total assets were \$9,760,118, of which cash accounted for 77.90% of the total balance. At June 30, 2024, total assets were \$6,565,930, of which cash accounted for 45.68% of the total balance.
- Cash increased a total of \$4,604,027 in 2025 for a balance of \$7,603,116 at June 30, 2025. This was the result of QRT program funds received during the year exceeding disbursements, and an increase in grant payables at year-end. Cash decreased a total of \$2,025,378 in 2024 for a balance of \$2,999,089 at June 30, 2024. This was the result QRT program funds disbursed during the year exceeding receipts, and an advance of QRT program funds requested in June 2024 not being received until after year-end.
- Total general fund liabilities at June 30, 2025 were \$8,599,438, of which unearned revenues accounted for approximately 61.16% of the total. The increase in the unearned revenue balance resulted from QRT program receipts during the year exceeding disbursements. Total general fund liabilities at June 30, 2024 were \$5,377,783, of which unearned revenues accounted for approximately 58.56% of the total. The decrease in the unearned revenue balance resulted from QRT program funds disbursed during the year exceeding receipts, and an advance of QRT program funds requested in June 2024 not being received until after year-end.
- Total General Fund revenues were \$19,731,401 for the year ended June 30, 2025, a decrease of \$774,631 or 3.78%. This decrease was driven by a decrease in the amount of requested reimbursements in Incumbent Worker Training grant program in the year and reduced contract expenses related to the special projects, partially offset by an increase in the amount of requested reimbursements in the Quick Response Training grant program. Total General Fund revenues were \$20,506,032 for the year ended June 30, 2024, an increase of \$4,051,140 or 24.62%. This increase was driven by more dollars being requested for reimbursement by IWT grantees and reimbursements for additional contract expenses related to the REACH Act.
- Total expenditures decreased by \$693,422 in 2025, or 3.38%. This was primarily the result of increased spending in QRT program. Total expenditures increased by \$4,061,592 in 2024, or 24.64%. This was primarily the result of increased spending of the IWT program and additional contract expenses related to the REACH Act.

CAREER SOURCE FLORIDA, INC.

MANAGEMENT'S DISCUSSION AND ANALYSIS

JUNE 30, 2025 AND 2024

Capital Asset Administration

CareerSource Florida, Inc.'s investment in capital assets amounts to \$2,845 for the year ended June 30, 2025 and \$19,270 for the year ended June 30, 2024 (net of accumulated depreciation and amortization), which includes the lease right-to-use assets and related lease liability. Additional information on CareerSource Florida, Inc.'s capital and lease right-to-use assets can be found in Notes 3 and 4 on pages 22 through 24 of this report.

Economic Factors

In accordance with the Workforce Innovation and Opportunity Act of 2014, CareerSource Florida, Inc. operates throughout the state as the primary workforce policy organization on behalf of the State of Florida. CareerSource Florida, Inc. accomplishes this by linking workforce and economic development strategies through business-driven initiatives and programs to ensure that Florida's Workforce has the skills that will meet current and future business needs. Florida businesses continue to cite workforce issues as their most important concern, according to surveys undertaken by various business associations. This concern is consistent with national studies highlighting the difficulties of finding and keeping qualified workers. Additionally, the growing prominence of the technology and biotechnology sectors increases the need to produce skilled workers.

Since Florida's economy is linked to both national and global economic markets which are impacted and driven by major changes and advancements in technology, the challenges facing CareerSource Florida, Inc. will never be completely accomplished and must be continuously adapted to meet these challenges from year to year. CareerSource Florida, Inc. also promotes an environment where Floridians have the opportunity to upgrade their education and skills to obtain jobs that lead to economic self-sufficiency.

Funding for CareerSource Florida, Inc., its initiatives and operations, is derived from legislative appropriations from revenues collected by the state of Florida and federal workforce training funds. In addition to funds for general operational costs of the Board and direct staff, CareerSource Florida, Inc. receives funding for two customized training programs the Quick Response Training and Incumbent Worker Training programs.

Request for Information

This financial report is designed to provide a general overview of CareerSource Florida, Inc.'s finances. Questions concerning any of the information provided in this report or requests for additional information should be addressed to CareerSource Florida, Inc., P.O. Box 13179, Tallahassee, Florida 32317.

CAREER SOURCE FLORIDA, INC.
STATEMENT OF NET POSITION

JUNE 30, 2025 AND 2024

	2025	2024
ASSETS		
Current Assets:		
Cash	\$ 7,603,116	\$ 2,999,089
Grants and contracts receivable	2,048,382	3,469,638
Prepaid expenses	108,120	96,703
Total Current Assets	<u>9,759,618</u>	<u>6,565,430</u>
Noncurrent Assets:		
Capital assets, net	2,846	19,720
Lease right-to-use asset, net	457,449	643,916
Prepaid expenses	500	500
Total Noncurrent Assets	<u>460,795</u>	<u>664,136</u>
Total Assets	<u><u>\$ 10,220,413</u></u>	<u><u>\$ 7,229,566</u></u>
LIABILITIES AND NET POSITION		
Current Liabilities:		
Accounts payable and accrued liabilities	\$ 3,339,898	\$ 2,228,553
Unearned revenue	<u>5,259,540</u>	<u>3,149,230</u>
Total Current Liabilities	<u>8,599,438</u>	<u>5,377,783</u>
Long-Term Liabilities:		
Due Within One Year:		
Compensated absences	172,945	143,376
Lease liability	228,453	212,969
Due in More Than One Year:		
Compensated absences	35,423	29,366
Lease liability	<u>357,613</u>	<u>586,066</u>
Total Long-Term Liabilities	<u>794,434</u>	<u>971,777</u>
Total Liabilities	<u>9,393,872</u>	<u>6,349,560</u>
Net Position:		
Net investment in capital assets	2,846	19,270
Unrestricted	<u>823,695</u>	<u>860,736</u>
Total Net Position	<u>826,541</u>	<u>880,006</u>
Total Liabilities and Net Position	<u><u>\$ 10,220,413</u></u>	<u><u>\$ 7,229,566</u></u>

The accompanying notes to the financial statements are an integral part of these statements.

CAREER SOURCE FLORIDA, INC.
STATEMENT OF ACTIVITIES

YEAR ENDED JUNE 30, 2025

Functions/Programs	Expenses	Program Revenues			Net (Expense) Revenue and Changes in Net Position
		Charges for Services	Operating Grants and Contributions	Capital Grants and Contributions	
				Governmental Activities	
Governmental Activities:					
Economic environment					
Incumbent worker training	\$ 1,155,574	\$ -	\$ 1,155,574	\$ -	\$ -
Quick response training	6,629,870	-	6,629,870	-	-
Other program costs	12,091,182	-	11,906,696	-	(184,486)
Total Governmental Activities	<u>\$ 19,876,626</u>	<u>\$ -</u>	<u>\$ 19,692,140</u>	<u>\$ -</u>	<u>(184,486)</u>
General Revenue:					
Miscellaneous					<u>131,021</u>
Total General Revenue					<u>131,021</u>
Change in net position					(53,465)
Net position, beginning of year					<u>880,006</u>
Net position, end of year					<u>\$ 826,541</u>

The accompanying notes to the financial statements are an integral part of these statements.

CAREER SOURCE FLORIDA, INC.
STATEMENT OF ACTIVITIES

YEAR ENDED JUNE 30, 2024

Functions/Programs	Expenses	Program Revenues			Net (Expense) Revenue and Changes in Net Position
		Charges for Services	Operating Grants and Contributions	Capital Grants and Contributions	
				Governmental Activities	
Governmental Activities:					
Economic environment					
Incumbent worker training	\$ 1,399,637	\$ -	\$ 1,399,637	\$ -	\$ -
Quick response training	5,112,245	-	5,112,245	-	-
Other program costs	14,015,063	-	13,926,632	-	(88,431)
Total Governmental Activities	<u>\$ 20,526,945</u>	<u>\$ -</u>	<u>\$ 20,438,514</u>	<u>\$ -</u>	<u>(88,431)</u>
General Revenue:					
Miscellaneous					<u>67,518</u>
Total General Revenue					<u>67,518</u>
Change in net position					(20,913)
Net position, beginning of year					<u>900,919</u>
Net position, end of year					<u>\$ 880,006</u>

The accompanying notes to the financial statements are an integral part of these statements.

CAREER SOURCE FLORIDA, INC.
BALANCE SHEETS
GOVERNMENTAL FUND TYPES – GENERAL FUND

JUNE 30, 2025 AND 2024

	2025	2024
ASSETS		
Current Assets:		
Cash	\$ 7,603,116	\$ 2,999,089
Grants and contracts receivable	2,048,382	3,469,638
Prepaid expenses	108,620	97,203
Total Current Assets	\$ 9,760,118	\$ 6,565,930
LIABILITIES, DEFERRED INFLOWS, AND FUND BALANCE		
Current Liabilities:		
Accounts payable and accrued liabilities	\$ 3,339,898	\$ 2,228,553
Unearned revenue	5,259,540	3,149,230
Total Current Liabilities	8,599,438	5,377,783
Deferred Inflows of Resources:		
Unavailable revenue	91,760	-
Fund Balance:		
Non-spendable - prepaid expenses	108,620	97,203
Unassigned	960,300	1,090,944
Fund Balance	1,068,920	1,188,147
Total Liabilities, Deferred Inflows, and Fund Balance	\$ 9,760,118	\$ 6,565,930

The accompanying notes to the financial statements are an integral part of these statements.

CAREER SOURCE FLORIDA, INC.**RECONCILIATION OF THE BALANCE SHEETS OF THE GOVERNMENTAL FUND TO THE STATEMENTS OF NET POSITION****JUNE 30, 2025 AND 2024**

	2025	2024
Total fund balance of governmental fund	\$ 1,068,920	\$ 1,188,147
 Amounts reported for governmental activities in the statements of net position are different because:		
Long-term liabilities are not due and payable in the current period and, therefore, are not reported in the funds. These liabilities consist of:		
Compensated absences	(208,368)	(172,742)
Lease liability	(586,066)	(799,035)
Amounts to be collected under receivables that are not available to pay for the current period's expenditures and are reported as a deferred inflow of resources in the fund.	91,760	-
Capital assets used in governmental activities are not financial resources and, therefore, are not reported in the fund.	2,846	19,720
Lease right-to-use assets used in governmental activities are not financial resources and, therefore, are not reported in the fund.	<hr/> 457,449	<hr/> 643,916
Net Position of Governmental Activities	<hr/> \$ 826,541	<hr/> \$ 880,006

The accompanying notes to the financial statements are an integral part of these statements.

CAREERSOURCE FLORIDA, INC.**STATEMENTS OF REVENUES, EXPENDITURES, AND CHANGES IN FUND BALANCE**
GOVERNMENTAL FUND TYPE - GENERAL FUND**YEARS ENDED JUNE 30, 2025 AND 2024**

	2025	2024
Revenue:		
Intergovernmental revenue	\$ 19,600,380	\$ 20,438,514
Miscellaneous	131,021	67,518
Total Revenue	<u>19,731,401</u>	<u>20,506,032</u>
Expenditures:		
Other program costs	7,563,829	9,975,617
Grants and aids	7,785,444	6,511,882
Salaries and benefits	3,246,854	2,961,123
Administration contracts	444,863	399,423
Occupancy	234,263	232,066
Board meetings and travel	100,295	164,240
Dues and subscriptions	82,020	85,899
Office expenses	70,775	67,868
Travel	65,030	66,727
Professional fees and consultants	79,986	50,274
Insurance	19,590	15,436
Telephone and communications	14,277	13,495
Training and registrations	<u>143,402</u>	-
Total Expenditures	<u>19,850,628</u>	<u>20,544,050</u>
Net change in fund balance	(119,227)	(38,018)
Fund balance at beginning of year	<u>1,188,147</u>	<u>1,226,165</u>
Fund balance at end of year	<u>\$ 1,068,920</u>	<u>\$ 1,188,147</u>

The accompanying notes to the financial statements are an integral part of these statements.

CAREER SOURCE FLORIDA, INC.**RECONCILIATION OF THE STATEMENTS OF REVENUES, EXPENDITURES, AND
CHANGES IN FUND BALANCE OF THE GOVERNMENTAL FUND TO THE
STATEMENTS OF ACTIVITIES****YEARS ENDED JUNE 30, 2025 AND 2024**

	2025	2024
Net change in fund balance - total governmental fund	\$ (119,227)	\$ (38,018)
Amounts reported for governmental activities in the statements of net position are different because: Some expenses reported in the statements of activities do not require the use of current financial resources and, therefore, are not reported as expenditures in the governmental fund:		
Unused compensated absences	(35,626)	43,815
Lease liability	212,969	195,507
Receivables uncollected within 60 days of year-end are unavailable to pay for current period expenditures and are reported as a deferred inflow of resources in the fund.	91,760	-
Governmental funds report capital outlays as expenditures. However, in the statements of activities, the cost of those assets is allocated over their estimated useful lives as depreciation and amortization expense:		
Depreciation and amortization expense on capital assets	(16,874)	(39,309)
Amortization expense on lease right-to-use assets	<u>(186,467)</u>	<u>(182,908)</u>
Change in Net Position of Governmental Activities	<u><u>\$ (53,465)</u></u>	<u><u>\$ (20,913)</u></u>

CAREER SOURCE FLORIDA, INC.

NOTES TO THE FINANCIAL STATEMENTS

JUNE 30, 2025 AND 2024

Note 1—Summary of significant accounting policies

Reporting Entity – CareerSource Florida, Inc. (“CareerSource Florida” or “the Organization”) is a not-for-profit corporation created by Chapter 445 of the Florida Statutes. Chapter 2000-165, Laws of Florida, known as the Workforce Innovation Act of 2000, superseded by the Workforce Innovation and Opportunity Act of 2014, created the corporation, which became effective July 1, 2000. This corporation is required to be registered, incorporated, organized, and operated in compliance with Chapter 617, Florida Statutes, as a nonentity of State government.

CareerSource Florida is the principal workforce policy organization for the state of Florida and the local workforce boards. The Florida Workforce System connects employers with qualified, skilled talent and Floridians with employment and career development opportunities to achieve economic prosperity. The Organization is administratively housed within the Department of Commerce (“FloridaCommerce”), and contracts with FloridaCommerce to implement its strategic policies and administer the workforce system.

CareerSource Florida is governed by a Board of Directors (the “Board”), whose membership and appointment is determined by the Governor of the State of Florida and must be consistent with Public Law No. 113-128, Title I, Section 101(b) since it serves as the State’s Workforce Investment Board pursuant to law.

Though the state of Florida appoints the Board, it has no further accountability. Therefore, for financial reporting purposes, CareerSource Florida is a related organization of the state. There are no component units included in the accompanying financial statements.

The accounting policies of the Organization conform to generally accepted accounting principles (“U.S. GAAP”) as applied to governmental units. The more significant accounting policies used by the Organization are described below. The Organization’s reporting entity applies all relevant Governmental Accounting Standards Board (“GASB”) pronouncements.

Government-Wide Financial Statements – The government-wide financial statements (i.e., the statements of net position and the statements of activities) report information on all of the nonfiduciary activities of CareerSource Florida. The focus of the government-wide statements is on the sustainability of CareerSource Florida as an entity and the change in aggregate financial position resulting from the activities of the fiscal period.

The statements of activities demonstrate the degree to which the direct expenses of a given function are offset by program revenues. Direct expenses are those that are clearly identifiable with a specific function. Program revenues include operating grants and contributions used to recover expense of a given function or program. Other items not properly included among program revenues are reported instead as general revenues.

While separate government-wide and fund financial statements are presented, they are interrelated. The governmental activities column incorporates data from the governmental fund.

Fund Financial Statements – The fund financial statements provide information about CareerSource Florida’s governmental fund. Separate statements for the governmental fund are presented. CareerSource Florida reports one governmental fund, the General Fund, which is used to account for all financial resources of the Organization. The general fund is reported as a major fund.

Measurement Focus, Basis of Accounting, and Financial Statement Presentation – The accounting and financial reporting treatment is determined by the applicable measurement focus and basis of accounting. Measurement focus indicates the type of resources being measured such as current financial resources or economic resources. The basis of accounting indicates the timing of transactions or events for recognition in the financial statements.

CAREERSOURCE FLORIDA, INC.
NOTES TO THE FINANCIAL STATEMENTS

JUNE 30, 2025 AND 2024

Note 1—Summary of significant accounting policies (continued)

The government-wide financial statements are reported using the economic resources measurement focus and the accrual basis of accounting. Revenues are recorded when earned and expenses are recorded when a liability is incurred, regardless of the timing of related cash flows. Grants and similar items are recognized as revenue as soon as all eligibility and timing requirements imposed by the provider have been met.

The governmental fund financial statements are reported using the current financial resources measurement focus and the modified accrual basis of accounting. Revenues are recognized as soon as they are both measurable and available. Revenues are considered to be available when they are collectible within the current period or soon enough thereafter to pay liabilities of the current period. For this purpose, the government considers revenues to be available if they are collected within 60 days of the end of the current fiscal period. Expenditures are generally recorded when a liability is incurred, as under accrual accounting. However, expenditures related to compensated absences and lease payables are recorded only when payment is due. General capital asset acquisitions are reported as expenditures in governmental funds.

Expenditure-driven grants are recognized as revenue when the qualifying expenditures have been incurred and all other eligibility requirements have been met, and the amount is received during the period or within the availability period for this revenue source (within 60 days of year-end). All other revenue items are considered to be measurable and available only when cash is received by the Organization.

Budgetary Information – GASB requires budgetary comparisons to be presented for the general fund that has a legally adopted budget. Management has determined that CareerSource Florida is not legally required to adopt an operating budget by the FloridaCommerce, Florida Statutes, or any federal regulation. Therefore, no budgetary comparison schedules have been presented.

Use of Estimates – The preparation of U.S. GAAP financial statements requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and changes therein, and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the reporting period. Actual results could differ from those estimates.

Cash – CareerSource Florida's cash are considered to be cash on hand and demand deposit checking accounts.

Grants and Contracts Receivable – Grants and contracts receivable consist primarily of amounts due from FloridaCommerce. Management determines the allowance for doubtful accounts based on specific identification and a general reserve based on management's experience with prior collections and the current economic environment. Management's estimate of potential uncollectible amounts associated with grants and contracts receivable is immaterial; accordingly, no allowance for doubtful accounts has been recorded.

Capital Assets – Capital assets, which include property and equipment, are reported in the government-wide financial statements. Capital assets are defined by CareerSource Florida as assets with an initial, individual cost of more than \$5,000 and an estimated useful life in excess of one year. As the Organization acquires additional capital assets each period they are capitalized and reported at historical cost. The reported value excludes normal maintenance and repairs which are essentially amounts spent in relation to capital assets that do not increase the capacity or efficiency of the item or increase its estimated useful life. Donated capital assets are recorded at their estimated acquisition value at the date of donation.

Property and equipment are depreciated using the straight-line method over the following estimated useful lives:

Leasehold improvements	5 Years
Office furniture	7 Years
Office equipment and computers	5 Years

CAREERSOURCE FLORIDA, INC.
NOTES TO THE FINANCIAL STATEMENTS

JUNE 30, 2025 AND 2024

Note 1—Summary of significant accounting policies (continued)

Capital assets acquired by CareerSource Florida are considered to be owned by the Organization. However, funding sources may maintain an equitable interest in the property purchased with grant monies as well as the right to determine the use of any proceeds from the sale of these assets. The federal government has a reversionary interest in those assets purchased with its funds which have a cost of \$5,000 or more and an estimated useful life of at least one year.

Leases – Lease contracts that provide the Organization with control of a non-financial asset, such as land, buildings, or equipment, for a period of time in excess of 12 months are reported as a leased asset with a related lease liability. The lease liability is recorded at the present value of future lease payments, including fixed payments, variable payments based on an index or fixed rate and reasonably certain residual guarantees. The intangible leased asset is recorded for the same amount as the related lease liability plus any prepayments and initial direct costs to place the asset in service. Leased assets are amortized over the shorter of the useful life of the asset or the lease term. The lease liability is reduced for lease payments made, less the interest portion of the lease payment.

Compensated Absences – Permanent full-time employees are granted vacation benefits in varying amounts to specified maximums depending on tenure with the Organization. CareerSource Florida employees' annual leave balances in excess of 360 hours will be transferred to sick leave on an hour-for-hour basis. Sick leave is accrued but generally only paid out at 25% of the accrued balance after 10 years of service up to a stated maximum. However, the employment contract with the President stipulates that sick leave is paid in accordance with the employment contract. CareerSource Florida evaluated compensated absences to recognize balances that are more likely than not to be paid as the respective liability.

Revenue Recognition – Revenues are recognized when earned. CareerSource Florida received advanced funds from the state of Florida to administer the Quick Response Training program. Under this program, the Organization awards funds to businesses that provide training to the businesses' employees via local community colleges and/or state universities. CareerSource Florida defers the revenue relating to these programs until the earnings process is substantially complete, which the Organization has determined occurs when the training has taken place and the college or business has submitted requests for reimbursement.

Deferred Inflows of Resources – Deferred Inflows of Resources, represents an acquisition of net assets that applies to a future period and so will not be recognized as revenue until then. CareerSource Florida has unavailable revenue related to grants that meets the criteria.

Transferred Investment Income – As a condition of its grants and in compliance with 2 CFR 200.305 of the Uniform Guidance as adopted by CareerSource Florida, all interest above \$500 earned on funds advanced from the state of Florida is due and payable to the state of Florida. At June 30, 2025 and 2024, the applicable liability due to the state of Florida is included in accrued liabilities in the statements of net position.

Categories and Classification of Net Position and Fund Balance – Net Position Flow Assumption – Sometimes CareerSource Florida will fund outlays for a particular purpose from both restricted (e.g., restricted grant proceeds) and unrestricted resources. In order to calculate the amounts to report as restricted – net position and unrestricted – net position in the government-wide financial statements, a flow assumption must be made about the order in which the resources are considered to be applied. It is CareerSource Florida's policy to consider restricted – net position to have been depleted before unrestricted – net position is applied.

CAREER SOURCE FLORIDA, INC.
NOTES TO THE FINANCIAL STATEMENTS

JUNE 30, 2025 AND 2024

Note 1—Summary of significant accounting policies (continued)

Fund Balance Flow Assumptions – Sometimes CareerSource Florida will fund outlays for a particular purpose from both restricted and unrestricted resources (the total of committed, assigned, and unassigned fund balance). In order to calculate the amounts to report as restricted, committed, assigned, and unassigned fund balance in the governmental fund financial statements a flow assumption must be made about the order in which the resources are considered to be applied. It is CareerSource Florida's policy to consider restricted fund balance to have been depleted before using any of the components of unrestricted fund balance. Further, when the components of unrestricted fund balance can be used for the same purpose, committed fund balance is depleted first, followed by assigned fund balance. Unassigned fund balance is applied last.

Fund Balance Policies – Fund balance of governmental funds is reported in various categories based on the nature of any limitations requiring the use of resources for specific purposes. The Organization itself can establish limitations on the use of resources through either a commitment (committed fund balance) or an assignment (assigned fund balance).

The provisions of GASB Statement No. 54, *Fund Balance Reporting and Governmental Fund Type Definitions*, specifies the following classifications:

- **Nonspendable Fund Balance** – Nonspendable fund balances are amounts that cannot be spent because they are either (a) not in spendable form or (b) legally or contractually required to be maintained intact.
- **Restricted Fund Balance** – Restricted fund balances are restricted when constraints placed on the use of resources are either: (a) externally imposed by creditors, grantors, contributors, or laws or regulations of other governments; or (b) imposed by law through constitutional provisions or enabling legislation. As of June 30, 2025 and 2024 there are no amounts that are classified as restricted fund balance.
- **Committed Fund Balance** – The committed fund balance classification includes amounts that can be used only for the specific purposes determined by a formal action of the Organization's highest level of decision-making authority. The Board of Directors is the highest level of decision-making authority for the Organization that can, by adoption of a board resolution prior to the end of the fiscal year, commit fund balance. Once adopted, the limitation imposed by the board resolution remains in place until a similar action is taken (the adoption of another board resolution) to remove or revise the limitation. As of June 30, 2025 and 2024 there are no amounts that are classified as committed fund balance.
- **Assigned Fund Balance** – The assigned fund balance consists of amounts that are constrained by a less-than-formal action of the Organization's governing authority, or by an individual or body to whom the governing authority has delegated this responsibility. In addition, residual balances in capital projects and debt service funds are considered assigned for the general purpose of the respective fund. Unlike commitments, assignments generally only exist temporarily. In other words, an additional action does not normally have to be taken for the removal of an assignment. Conversely, as discussed above, an additional action is essential to either remove or revise a commitment. As of June 30, 2025 and 2024, there are no amounts that are classified as assigned fund balance.
- **Unassigned Fund Balance** – Unassigned fund balance is the residual classification for the General Fund.

Income Taxes – CareerSource Florida is generally exempt from income taxes under Section 501(c)(3) of the Internal Revenue Code. The Organization is exempt from state income taxes on related income pursuant to Chapter 220.13 of the Florida Statutes. As a charitable organization, only unrelated business income, as defined by Section 509(a)(1) of the Internal Revenue Code, is subject to federal income tax. CareerSource Florida currently has no unrelated business income. Therefore, no provision for income taxes has been made in the accompanying financial statements.

CAREER SOURCE FLORIDA, INC.
NOTES TO THE FINANCIAL STATEMENTS

JUNE 30, 2025 AND 2024

Note 1—Summary of significant accounting policies (continued)

CareerSource Florida has reviewed and evaluated the relevant technical merits of each of its tax positions in accordance with U.S. GAAP for accounting for uncertainty in income taxes, and determined there are no uncertain tax positions that would have a material impact on the financial statements of the Organization.

Functional Allocation of Expenses – Expenses are charged directly to programs that benefit from the expense where possible, or to the indirect cost pool. Indirect expenses are allocated to programs based on the percentage of total funds from each program utilized across the entire Organization from the prior quarter.

Subsequent Events – Management has evaluated subsequent events through the date that the financial statements were available to be issued, December 30, 2025, and determined there are no events that require disclosure. No subsequent events occurring after this date have been evaluated for inclusion in these financial statements.

Recent Accounting Guidance:

GASB Statement No. 101 – In June 2022, GASB issued GASB Statement No. 101, *Compensated Absences*. The objective of this Statement is to better meet the information needs of financial statement users by updating the recognition and measurement guidance for compensated absences. That objective is achieved by aligning the recognition and measurement guidance under a unified model and by amending certain previously required disclosures. The requirements of this Statement are effective for fiscal years beginning after December 15, 2023, and all reporting periods thereafter. There have been no significant changes in accounting policies or practices related to the implementation of GASB Statement No. 101 during the reporting period.

GASB Statement No. 102 – In December 2023, GASB issued GASB Statement No. 102, *Certain Risk Disclosures*. This Statement requires a government to assess whether a concentration or constraint makes the primary government reporting unit or other reporting units that report a liability for revenue debt vulnerable to the risk of a substantial impact. Additionally, this Statement requires a government to assess whether an event or events associated with a concentration or constraint that could cause the substantial impact to have occurred, have begun to occur, or are more likely than not to begin to occur within 12 months of the date the financial statements are issued. If a government determines those criteria for disclosure have been met for a concentration or constraint, it should disclose information in notes to financial statements in sufficient detail to enable users of financial statements to understand the nature of the circumstances disclosed and the government's vulnerability to the risk of a substantial impact. The requirements of this Statement are effective for fiscal years beginning after June 15, 2024, and all reporting periods thereafter. There have been no significant changes in accounting policies, practices, or disclosures related to the implementation of GASB Statement No. 102 during the reporting period.

GASB Statement No. 103 – In April 2024, GASB issued GASB Statement No. 103, *Financial Reporting Model Improvements*. The objective of this Statement is to improve key components of the financial reporting model to enhance its effectiveness in providing information that is essential for decision making and assessing a government's accountability. This Statement also addresses certain application issues. Areas affected include management's discussion and analysis, unusual or infrequent items, presentation of the proprietary fund statement of revenues, expenses, and changes in fund net position, major component unit information, and budgetary comparison information. The requirements of this Statement are effective for fiscal years beginning after June 15, 2025, and all reporting periods thereafter. The Organization is currently evaluating the impact of this guidance on its financial statements.

CAREERSOURCE FLORIDA, INC.
NOTES TO THE FINANCIAL STATEMENTS

JUNE 30, 2025 AND 2024

Note 2—Cash

Florida Statutes provide for risk sharing collateral pools by banks and savings and loan associations. These pools collateralize local government deposits and certificates of deposit with participating depositories. CareerSource Florida's demand deposits are placed in such authorized depositories.

Custodial credit risk for deposits is the risk that in the event of a bank failure, the Organization's deposits may not be returned or the Organization will not be able to recover collateral securities in the possession of an outside party. At June 30, 2025 and 2024, the carrying amount of CareerSource Florida, Inc.'s deposits was \$7,603,116 and \$2,999,089, respectively, and the bank balance of CareerSource Florida, Inc.'s deposits was \$7,826,421 and \$3,350,912, respectively. The bank balance is insured up to Federal Deposit Insurance Corporation ("FDIC") limits or by collateral held by CareerSource Florida's custodial bank which is pledged to a state trust fund that provides security for amounts held in excess of FDIC coverage in accordance with the Florida Security for Deposits Act, Chapter 280, Florida Statutes. The Florida Security for Public Deposits Act established guidelines for qualification and participation by banks and savings associations, procedures for the administration of the collateral requirements, and characteristics of eligible collateral.

Note 3—Capital assets, net

The following is a summary of changes in capital assets during the years ended June 30:

	<u>July 1, 2024</u>	<u>Increases</u>	<u>Decreases</u>	<u>June 30, 2025</u>
Capital assets:				
Leasehold improvements	\$ 17,505	\$ -	\$ -	\$ 17,505
Office furniture	219,652	-	-	219,652
Office equipment and computers	309,118	-	-	309,118
Total capital assets	546,275	-	-	546,275
Less accumulated depreciation and amortization:				
Leasehold improvements	(17,505)	-	-	(17,505)
Office furniture	(208,863)	(10,789)	-	(219,652)
Office equipment and computers	(300,187)	(6,085)	-	(306,272)
Total accumulated depreciation and amortization	(526,555)	(16,874)	-	(543,429)
Lease right-to-use assets	\$ 19,720	\$ (16,874)	\$ -	\$ 2,846

CAREER SOURCE FLORIDA, INC.
NOTES TO THE FINANCIAL STATEMENTS

JUNE 30, 2025 AND 2024

Note 3—Capital assets, net (continued)

	<u>July 1, 2023</u>	<u>Increases</u>	<u>Decreases</u>	<u>June 30, 2024</u>
Capital assets:				
Leasehold improvements	\$ 17,505	\$ -	\$ -	\$ 17,505
Office furniture	219,652	-	-	219,652
Office equipment and computers	309,118	-	-	309,118
Total capital assets	<u>546,275</u>	<u>-</u>	<u>-</u>	<u>546,275</u>
Less accumulated depreciation and amortization:				
Leasehold improvements	(17,505)	-	-	(17,505)
Office furniture	(177,485)	(31,378)	-	(208,863)
Office equipment and computers	(292,256)	(7,931)	-	(300,187)
Total accumulated depreciation and amortization	<u>(487,246)</u>	<u>(39,309)</u>	<u>-</u>	<u>(526,555)</u>
Lease right-to-use assets	<u>\$ 59,029</u>	<u>\$ (39,309)</u>	<u>\$ -</u>	<u>\$ 19,720</u>

Depreciation and amortization expense related to capital assets was \$16,874 and \$39,309 for the years ended June 30, 2025 and 2024, respectively, which was charged to other program costs in the statements of activities.

Note 4—Leases

The Organization leases office facilities under an agreement that expires in November 2027. The discount rate used as the interest rate was 4.25%, which is the Organization's incremental borrowing rate as of the commencement date of the lease.

The Organization also leases office equipment under an agreement that expires in March 2029. The discount rate used as the interest rate was 8.50%, which is the Organization's incremental borrowing rate as of the commencement date of the lease.

The following is a summary of changes in the lease right-to-use asset during the years ended June 30:

	<u>July 1, 2024</u>	<u>Increases</u>	<u>Decreases</u>	<u>June 30, 2025</u>
Lease right-to-use assets:				
Facilities	\$ 1,862,823	\$ -	\$ -	\$ 1,862,823
Office equipment	23,639	-	-	23,639
Total lease right-to-use assets	<u>1,886,462</u>	<u>-</u>	<u>-</u>	<u>1,886,462</u>
Less accumulated amortization:				
Facilities	(1,241,377)	(181,739)	-	(1,423,116)
Office equipment	(1,169)	(4,728)	-	(5,897)
Total accumulated depreciation and amortization	<u>(1,242,546)</u>	<u>(186,467)</u>	<u>-</u>	<u>(1,429,013)</u>
Lease right-to-use assets, net	<u>\$ 643,916</u>	<u>\$ (186,467)</u>	<u>\$ -</u>	<u>\$ 457,449</u>

CAREER SOURCE FLORIDA, INC.
NOTES TO THE FINANCIAL STATEMENTS

JUNE 30, 2025 AND 2024

Note 4—Leases (continued)

	<u>July 1, 2023</u>	<u>Increases</u>	<u>Decreases</u>	<u>June 30, 2024</u>
Lease right-to-use assets:				
Facilities	\$ 1,862,823	\$ -	\$ -	\$ 1,862,823
Office equipment	-	23,639	-	23,639
Total lease right-to-use assets	1,862,823	23,639	-	1,886,462
Less accumulated amortization:				
Facilities	(1,059,638)	(181,739)	-	(1,241,377)
Office equipment	-	(1,169)	-	(1,169)
Total accumulated depreciation and amortization	(1,059,638)	(182,908)	-	(1,242,546)
Lease right-to-use assets, net	\$ 803,185	\$ (159,269)	\$ -	\$ 643,916

Amortization expense related to the lease right-to-use assets was \$186,467 and \$182,908 for the years ended June 30, 2025 and 2024, respectively, which was charged to other program costs in the statements of activities.

The following is a summary of changes in the lease liability during the years ended June 30:

	<u>July 1, 2024</u>			Due Within	
		<u>Increases</u>	<u>Decreases</u>	<u>June 30, 2025</u>	<u>One Year</u>
Lease liability	\$ 799,035	\$ -	\$ (212,969)	\$ 586,066	\$ 228,453
					Due Within
	<u>July 1, 2023</u>	<u>Increases</u>	<u>Decreases</u>	<u>June 30, 2024</u>	<u>One Year</u>
Lease liability	\$ 970,903	\$ 23,639	\$ (195,507)	\$ 799,035	\$ 212,969
<u>Years Ending June 30,</u>	<u>Principal</u>	<u>Interest</u>	<u>Total</u>		
2026	\$ 228,452	\$ 21,218	\$ 249,670		
2027	244,732	10,999	255,731		
2028	108,668	1,704	110,372		
2029	4,214	151	4,365		
	<u>\$ 586,066</u>	<u>\$ 34,072</u>	<u>\$ 620,138</u>		

Future debt service requirements on the lease payable at June 30, 2025 are as follows:

Interest expense related to the lease liability was \$30,747 and \$38,015 for the years ended June 30, 2025 and 2024, respectively, which was charged to other program costs in the statements of activities.

CAREERSOURCE FLORIDA, INC.
NOTES TO THE FINANCIAL STATEMENTS

JUNE 30, 2025 AND 2024

Note 5—Compensated absences

The following is a summary of changes in compensated absences during the years ended June 30:

	July 1, 2024	Net Change	June 30, 2025	Due Within One Year
Compensated absences	\$ 172,742	\$ 35,626	\$ 208,368	\$ 172,945
	July 1, 2023	Net Change	June 30, 2024	Due Within One Year
Compensated absences	\$ 216,557	\$ (43,815)	\$ 172,742	\$ 143,376

Note 6—Retirement plan

CareerSource Florida participates in a safe harbor 401(k) Plan (the Plan). The Plan covers all eligible employees of CareerSource Florida. Employer contributions are determined at the discretion of a fiduciary committee of CareerSource Florida and in accordance with the Internal Revenue Code. The Organization contributed a total of \$327,524 and \$284,141 to the Plan during the years ended June 30, 2025 and 2024, respectively. Employees are permitted to make contributions up to applicable Internal Revenue Code limits. Employees contributed \$159,026 and \$152,816 to the Plan during the years ended June 30, 2025 and 2024, respectively. Employees are immediately vested in their own contributions and earnings on those contributions. Employees become 100% vested in employer defined contributions after completing three years of service. For each of the years ended June 30, 2025 and 2024, plan forfeitures included in contribution expense totaled \$17,087 and \$20,003, respectively. Employer and employee contributions owed to the Plan as of June 30, 2025, and 2024 totaled \$-0- for both years. There were no expenses for the Plan paid for by CareerSource Florida during the years ended June 30, 2025 and 2024.

Note 7—Commitments, concentrations, and contingencies

See Note 4 for information on lease commitments.

Significant Funding Source – CareerSource Florida receives a substantial amount of its funding from the United States Department of Labor, the United States Department of Health and Human Services, and the United States Department of Education passed through the state of Florida, Department of Commerce, and funding from the state of Florida Department of Commerce directly. A significant reduction in the level of this funding, if this were to occur, could have an adverse effect on CareerSource Florida, Inc.'s programs and activities.

Risk Management – CareerSource Florida is exposed to various risks of loss related to torts; theft of, damage to and destruction of assets; errors and omissions; injuries to employees; and natural disasters. CareerSource Florida, Inc. has obtained insurance from commercial underwriters for the aforementioned risks, including workers' compensation for the years ended June 30, 2025 and 2024.

CareerSource Florida has not paid any settlements in excess of insurance coverage for each of the past three years. Furthermore, CareerSource Florida had no significant reduction in insurance coverage from the prior year.

Grants – The grant revenue amounts received are subject to audit and adjustment by grantor agencies. If any expenses are disallowed by the grantor agencies as a result of such an audit, any claim for reimbursement to the grantor agencies would become a liability of CareerSource Florida. In the opinion of management, all grant expenses are in compliance with terms of the grant agreements and applicable Federal and State laws and regulations.

CAREER SOURCE FLORIDA, INC.
NOTES TO THE FINANCIAL STATEMENTS

JUNE 30, 2025 AND 2024

Note 8—Related party transactions

Receivables of \$2,037,210 and \$3,466,641 were due from the state of Florida, Department of Commerce and Department of Corrections, at June 30, 2025 and 2024, respectively, and are included in grants and contracts receivable in the statements of net position and in the balance sheets of the governmental fund type – general fund. Federal and state program revenue received through the state of Florida, Department of Commerce and Department of Corrections, for the years ended June 30, 2025 and 2024 was \$19,692,140 and \$20,438,514 respectively.

OTHER REPORTS

**Report of Independent Auditor on Internal Control over Financial Reporting and on
Compliance and Other Matters Based on an Audit of Financial Statements
Performed in Accordance with *Government Auditing Standards***

To the Board of Directors
CareerSource Florida, Inc.
Tallahassee, Florida

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the governmental activities and the major fund of CareerSource Florida, Inc. (the “Organization”), as of and for the year ended June 30, 2025, and the related notes to the financial statements, which collectively comprise the Organization’s basic financials statements, and have issued our report thereon dated December 30, 2025.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Organization’s internal control over financial reporting (“internal control”) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Organization’s internal control. Accordingly, we do not express an opinion on the effectiveness of the Organization’s internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity’s financial statements will not be prevented or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses or significant deficiencies may exist that have not been identified.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Organization’s financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Organization's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Organization's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Cherry Bekaert LLP

Orlando, Florida
December 30, 2025

Report of Independent Auditor on Compliance for Each Major Federal Awards Program and State Project and on Internal Control over Compliance Required by the Uniform Guidance, Chapter 10.650, Rules of the Auditor General and the Special Audit Guidance Provided by the Florida Department of Commerce

To the Board of Directors
CareerSource Florida, Inc.
Tallahassee, Florida

Report on Compliance for Each Major Federal Program and State Project

Opinion on Each Major Federal Program and State Project

We have audited CareerSource Florida, Inc.'s (the "Organization") compliance with the types of compliance requirements identified as subject to audit in the U.S. Office of Management and Budget (OMB) *Compliance Supplement* and the requirements described in the State of Florida Department of Financial Services' State Projects Compliance Supplement, that could have a direct and material effect on each of the Organization's major federal programs and state projects for the year ended June 30, 2025. The Organization's major federal programs and state projects are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

In our opinion, the Organization complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs and state projects for the year ended June 30, 2025.

Basis for Opinion on Each Major Federal Program and State Project

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* ("Uniform Guidance"); Chapter 10.650, Rules of the Auditor General ("Chapter 10.650"); and the special audit guidance provided by the Florida Department of Commerce ("special FloridaCommerce guidance"). Our responsibilities under those standards and Uniform Guidance, Chapter 10.650, and special FloridaCommerce guidance, are further described in the *Auditor's Responsibilities for the Audit of Compliance* section of our report.

We are required to be independent of the Organization and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for each major federal program and state project. Our audit does not provide a legal determination of the Organization's compliance with the compliance requirements referred to above.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or grant agreements applicable to the Organization's federal programs and state projects.

Auditor's Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the Organization's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and, therefore, is not a guarantee that an audit conducted in accordance with generally accepted auditing standards, *Government Auditing Standards*, the Uniform Guidance, Chapter 10.650, and the special FloridaCommerce guidance, will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about the Organization's compliance with the requirements of each of its major federal programs and state projects as a whole.

In performing an audit in accordance with generally accepted auditing standards, *Government Auditing Standards*, the Uniform Guidance, Chapter 10.650, and the special FloridaCommerce guidance, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the Organization's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of the Organization's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, Chapter 10.650, and the special FloridaCommerce guidance, but not for the purpose of expressing an opinion on the effectiveness of the Organization's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Report on Internal Control Over Compliance

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program or state project on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program or state project will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program or state project that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the *Auditor's Responsibilities for the Audit of Compliance* section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given this limitation, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weaknesses or significant deficiencies in internal control over compliance may exist that were not identified.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance, Chapter 10.650, and the special FloridaCommerce guidance. Accordingly, this report is not suitable for any other purpose.

Cherry Bekaert LLP

Orlando, Florida
December 30, 2025

SUPPLEMENTARY INFORMATION

CAREER SOURCE FLORIDA, INC.**SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS AND STATE FINANCIAL ASSISTANCE****YEAR ENDED JUNE 30, 2025**

Grantor/Pass-Through Grantor/Program Title/Grant Number	Assistance Listing Number	Passed Through to Subrecipients	Federal Expenditures
FEDERAL			
United States Department of Labor:			
Passed through FloridaCommerce:			
Employment Services Cluster:			
Wagner-Peyser Funded Activities	17.207	\$ -	\$ 1,956,370
Workforce Investment and Opportunity Act (WIOA) Cluster:			
WIA/WIOA Adult Program	17.258	-	1,751,292
WIA/WIOA Youth Activities	17.259	-	1,702,388
WIA/WIOA Dislocated Worker Formula Grants	17.278	-	3,343,223
Total Workforce Investment and Opportunity Act (WIOA) Cluster		-	6,796,903
Total United States Department of Labor		-	8,753,273
U.S. Department of Commerce			
Passed through Florida Dept of Economic Opportunity			
Broadband Opportunity Program	21.027	-	125,000
Broadband BEAD	21.027	-	249,949
Total United States Department of Treasury		-	374,949
United States Department of Health and Human Services:			
Passed through FloridaCommerce:			
Temporary Assistance for Needy Families (TANF)	93.558	-	753,256
Total United States Department of Health and Human Services		-	753,256
Total Expenditures of Federal Awards		\$ -	\$ 9,881,478
STATE			
Florida Department of Economic Opportunity			
Quick Response Training	40.026	\$ -	\$ 6,701,480
CareerSource Florida Operations	40.036	-	484,182
TANF Transitional Benefits Feasibility Study	40.036	-	-
Total Florida Department of Economic Opportunity		-	7,185,662
Total Expenditures of State Financial Assistance		-	7,185,662
Total Expenditures of Federal Awards and State Financial Assistance		\$ -	\$ 17,067,140

CAREERSOURCE FLORIDA, INC.
NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
AND STATE FINANCIAL ASSISTANCE

YEAR ENDED JUNE 30, 2025

Note 1—Basis of presentation

The accompanying Schedule of Expenditures of Federal Awards and State Financial Assistance (the “Schedule”) includes the federal and state award activity of CareerSource Florida, Inc. (“CareerSource Florida” or “the Organization”). The information in this Schedule is presented in accordance with Title 2 U.S. Code of Federal Regulations (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Audits of States, Local Governments, and Non-Profit Organizations*, Chapter 10.650, Rules of the Auditor General, and the special audit guidance provided by the Florida Department of Commerce. Therefore, some amounts presented in this Schedule may differ from amounts presented in, or used in the preparation of the basic financial statements. For purposes of the Schedule, federal awards and state financial assistance include all grants, contracts, and similar agreements entered into directly with the federal or state government and other passthrough entities. The Organization has obtained Assistance Listing Numbers (ALN) and Catalog of State Financial Assistance (CSFA) numbers to ensure all programs have been identified in the Schedule. Clusters are separately identified within this Schedule.

Note 2—Summary of significant accounting policies

The Schedule was prepared on the modified accrual basis of accounting.

Note 3—Contingencies

Grant monies received and disbursed by the Organization are subject to review by the grantor agencies. Such audits may result in requests for reimbursement due to disallowed expenditures. Based upon prior experience, the Organization does not believe such disallowance, if any, would have a material effect on the financial position of the Organization. As of June 30, 2025, there were no material questioned or disallowed costs as a result of grant audits in process or completed.

Note 4—Noncash assistance

The Organization did not receive any federal or state noncash assistance for the year ended June 30, 2025.

Note 5—Indirect cost

The Organization has elected not to use the 10% de minimis indirect cost rate as allowed under the Uniform Guidance.

Note 6—Federally funded insurance

The Organization did not receive federally funded insurance during the fiscal year ended June 30, 2025.

Note 7—Federally funded loans

The Organization has no federally funded loans as of June 30, 2025. No funds were expended in the form of loan or loan guarantees during the fiscal year ended June 30, 2025.

CAREER SOURCE FLORIDA, INC.
SCHEDULE OF FINDINGS AND QUESTIONED COSTS

YEAR ENDED JUNE 30, 2025

Section I. Summary of Auditor's Results

Financial Statement Section

Type of auditor's report issued: Unmodified

Internal control over financial reporting:

- Material weakness identified? yes no
- Significant deficiency identified? yes none reported

Noncompliance material to financial statements noted? yes no

Federal Awards and State Projects Section

Internal control over major programs and projects:

- Material weakness identified? yes no
- Significant deficiency identified? yes none reported

Type of auditor's report issued on compliance for major programs and projects: Unmodified

Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)? yes no

Identification of major programs and projects:

Federal Programs:

<u>Assistance Listing #</u>	<u>Program Name</u>
17.207-CL	Employment Service Cluster
93.558	Temporary Assistance for Needy Families

State Project:

<u>CSFA #</u>	<u>Project Name</u>
40.026	Quick Response Training

Dollar threshold used to determine Type A Programs:

Federal	<u>\$750,000</u>
State	<u>\$750,000</u>

Auditee qualified as low-risk auditee? yes no

Section II. Schedule of Financial Statement Findings

None reported for the year ended June 30, 2025.

Section III. Federal Award and State Projects Findings and Questioned Costs

None reported for the year ended June 30, 2025.

CAREER SOURCE FLORIDA, INC.
SCHEDULE OF FINDINGS AND QUESTIONED COSTS

YEAR ENDED JUNE 30, 2025

Section IV. Prior Year Findings

There were no prior year findings reported.

Section V. Other Matters

- (a). No management letter is required because there were no findings required to be reported in the management letter (see AG Rule Section 10.656(3)(e)).
- (b). CareerSource Florida, Inc. performed a reconciliation of its financial records to the Subrecipient Enterprise Resource Application (SERA) maintained by the Florida Department of Commerce in a satisfactory matter for the year ended June 30, 2025.

Consent Item 4

Determination on Appeal of Credentials Review Committee Actions

Pursuant to section 445.004(4)(h), Florida Statutes, and the Reimagining Education and Career Help (REACH) Act, section 14.36, F.S., the CareerSource Florida Board of Directors appoints the Florida Credentials Review Committee to identify nondegree credentials and degree credentials of value for approval by the state workforce development board and inclusion on the state's Master Credentials List. The Credentials Review Committee acts as an advisory committee or similar group created by CareerSource Florida.

The Credentials Review Committee established a definition for credentials of value and, in alignment with federally funded workforce accountability requirements, created a Framework of Quality that undergoes a biennial review as required by s. 445.004(4)(h)3., F.S. The Credentials Review Committee developed a Master Credentials List and a process for the quarterly review and approval of credential applications. The Master Credentials List serves as the basis for the Florida Department of Education's Postsecondary Career and Professional Education (CAPE) Act Industry Certification Funding List. Applicants seeking eligibility for CAPE Act funding for secondary and postsecondary industry certifications must submit a Master Credentials List application for inclusion on the Master Credentials List. The submission must meet both CAPE eligibility criteria – as set forth in Rule 6A-6.0576, Florida Administrative Code – and standards defined in the Framework of Quality as required by s. 445.004(4) and s. 1008.44, F.S. CAPE approved certifications that are added to the 2025-2026 Master Credentials List are also added to the 2025-2026 CAPE Industry Certification Funding List.

After the November 6, 2025, Credentials Review Committee meeting, where the committee approved the 2025-2026 Master Credentials list, the Credentials Review Committee and CareerSource Florida received twelve (12) valid appeals within the required timeframe. The Interagency Review Team, a multi-agency group composed of representatives from CareerSource Florida, Florida Department of Education, FloridaCommerce, the REACH Office, and Florida Department of Agriculture and Consumer Services (FDACS) (for agriculture-related credentials), evaluated the credential applications. Each credential was evaluated using statutory requirements¹ and the currently adopted Framework of Quality to ensure it met the following criteria:

¹ Section 445.004(4)(h)

- **Alignment with Industry Certification Standards –**
The credential must meet the formal definition of an industry certification, including validation by a recognized certifying body.
- **Direct Linkage to In-Demand and High-Wage Employment –**
The credential must demonstrate a clear and verifiable connection to a Standard Occupation Classification (SOC) code that reflects current labor market demand, meets established wage thresholds, and holds recognized value within the industry.
- **Evidence-Based Review –**
All evaluations must be grounded in publicly accessible and verifiable documentation, ensuring transparency and consistency in the review process.

The evaluation of appeal applications led to the recommendation by the Interagency Review Committee for the addition of 9 new credentials to the 2025-2026 Master Credentials List.

Additionally, the evaluation of appeal applications led to the recommendation by the Interagency Review Committee to deny 3 credentials for inclusion in the 2025-2026 Master Credentials List. These credentials are as follows:

The appeal review was conducted by an interagency team of subject matter experts from the Department of Commerce, Department of Education, and CareerSource Florida. The Executive Committee upheld the recommendations of the Interagency Review Committee to add 9 new credentials and deny 3 credentials for inclusion in the 2025 to 2026 Master Credentials List, consistent with the authority provided under Florida Statute 445.004. With this approval, the 2025-2026 Master Credentials List will include a total of 2,403 credentials consisting of:

- 296 degree credentials
- 884 non-degree credentials
- 592 registered apprenticeships
- 589 industry certifications
- 42 K-8 Cape digital tools

The CareerSource Florida Executive Committee met on January 15, 2026, and approved recommendations for the 2025-2026 Master Credentials List to be sent to the CareerSource Florida Board of Directors for delivery to the State Board of Education. Credentials identified for removal will remain on the list for at least two years after identification for removal. Valid submitters may reconcile eligibility issues and re-submit credentials.

After approval and prior to the State Board of Education meeting, there may arise the need for technical revisions to the list, such as revisions to certification names, availability of the certification, or code numbers that need to be revised.

FOR CONSIDERATION

- **Approve sending the updated 2025-2026 Master Credentials List to the State Board of Education.**

- **Approve technical revisions to the list by the Department of Education, as needed, without adding or removing any credentials not explicitly described in this Consent Item**

ATTACHMENTS

[Framework of Quality](#)

2025-2026 Master Credentials List

Approved _____
Disapproved _____

Consent Item 5

RECOMMENDATION TO SUNSET THREE 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 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 review policies for their effectiveness and efficiency and recommend the rescission of policies, as necessary.

P83 – Direct Provider of Workforce Services – This policy outlines the processes for local workforce development boards (LWDBs) to request designation as a direct provider of workforce services (other than training services), to request an extension of a previous designation as a direct service provider; and, to submit annual performance reports.

P91 – Local Workforce Development Board Composition and Certification – This policy provides LWDBs with the requirements for LWDB membership composition under the Workforce Innovation and Opportunity Act (WIOA) and Chapter 445, Florida Statutes, and the process for certification of LWDBs.

P93 – One-Stop Delivery System and One-Stop Center Certification Requirements – This policy provides LWDBs with the expectations of the one-stop delivery system and one-stop career centers in each local area. This policy includes the minimum standards LWDBs must use to certify each one-stop career center, to ensure consistent quality customer service delivery in all local workforce development areas.

Guidance related to the processes described in these policies is incorporated into revised **Workforce Policy G105 – Composition and Certification of Local Workforce Development Boards; Certification of One-Stop Systems; and Direct Service Provider Designation**. The revised policy is consistent with the goals established in Florida law to increase alignment and efficiency of the state workforce development system, state and federal law, and [CareerSource Florida Workforce Policy O124 –](#)

Statewide Standardization of Tools and Services. This includes the development and implementation of four standardized forms used for identifying and validating direct providers of workforce services, board composition and certification, and certification of one-stop systems. Other guidance and compliance needs may be provided, as necessary by CareerSource Florida and FloridaCommerce through technical assistance.

CareerSource Florida and FloridaCommerce recommend the sunset of these policies and their removal from the CareerSource Florida list of active and current state workforce policies.

FOR CONSIDERATION

- **Approve sunset of CareerSource Florida Workforce Policy P83 – Direct Provider of Workforce Services and remove it from the CareerSource Florida list of active and current state workforce policies.**
- **Approve sunset of CareerSource Florida Workforce Policy P91 – Local Workforce Development Board Composition and Certification and remove it from the CareerSource Florida list of active and current state workforce policies.**
- **Approve Sunset of CareerSource Florida Workforce Policy P93 – One-Stop Delivery System and remove it from the CareerSource Florida list of active and current state workforce policies.**

Approved _____
Disapproved _____

Action Item 1

RECOMMENDATION TO SEEK FEDERAL WAIVERS TO INCREASE FLEXIBILITY IN SERVICE PROVISION AND TO REMOVE BARRIERS

The U.S. Department of Labor (USDOL) Secretary's (Secretary) waiver authority under the Workforce Innovation and Opportunity Act (WIOA) is a tool to promote workforce system innovation and focus on outcomes. USDOL is supportive of waivers that are within the Secretary's waiver authority and where the state can articulate in its waiver requests how the proposed waiver will improve job seeker and employer outcomes or otherwise achieve positive outcomes. WIOA Section 189(i)(3)(A) establishes the limitations of the Secretary's general waiver authority for Title I, subtitles A, B, and E and the Wagner-Peyser Act sections 8-10.

On November 25, 2025, USDOL issued [Training and Employment Guidance Letter \(TEGL\) No. 05-25 – Maximizing Innovation in Workforce Innovation and Opportunity Act Programs](#) to provide state and local workforce development systems waiver opportunities, to promote flexibility within the WIOA Formula funded programs, and to achieve the Administration's vision for America's workforce under [Executive Order 14278 on Preparing Americans for High-Paying Skilled Trade Jobs of the Future](#). This TEGL offers options that the public workforce system can use to innovate and modernize operations and program services by using existing WIOA flexibilities and encourages increased waiver use to scale industry-driven strategies, enhance worker mobility, create opportunities to integrate systems and realign resources, optimize service delivery, improve accountability for participant outcomes, and remove barriers to innovation. This TEGL and these flexibilities align with the strategic vision and goals described in the Florida Workforce Development System's WIOA Combined Plan.

The CareerSource Florida Board of Directors reviews and considers all proposed waiver requests. It is recommended that the CareerSource Florida Board of Directors approve this recommendation to seek all allowable federal waivers to increase flexibility in service provision and to remove barriers. Requested waivers are as follows:

- **Statistical Adjustment Model:** A waiver of WIOA Section 116(b)(3)(A)(v)(II)(bb) and 20 CFR 677.170(c)(2) to remove race, ethnicity, and sex from the statistical adjustment model. This waiver will enhance Florida's focus on serving individuals with barriers to work instead of characteristics tied to Diversity, Equity, and Inclusion (DEI). This waiver request aligns with TEGL 05-25, which encourages

states to identify barriers to modernizing their performance systems and to adopt waivers that improve accountability and outcomes and issued state guidance. It also supports Florida's state strategy by placing emphasis on real progress in employment and skills rather than demographic categories. This waiver aligns with state strategy Pillar IV: Accountability by sharpening attention on measurable results that matter for workers and employers.

- **Supportive Services:** A waiver of WIOA Section 134(d)(2) and 20 CFR 680.910 to offer targeted supportive services within 12 months of exit for employment retention to participants. These services will reduce benefit cliffs and temporarily replace lost benefits so workers can advance into higher paying jobs. Tied to WIOA performance indicators, Florida expects increases in work-based learning, training, and employment in the 4th quarter after exit. This waiver supports TEGL 05-25 and Pillar II: Worker Mobility and Pillar V: Flexibility and Innovation of Florida state strategy by promoting flexible use of services to improve career pathways and assist workers in moving into better jobs with higher earnings.
- **American Jobs Center (AJC):** A waiver of the requirement in WIOA Section 121(e)(1) and 20 CFR 678.300(c) to establish and maintain a comprehensive American Job Center (AJC) in each of the state's local workforce development areas in circumstances where alternative delivery approaches are sufficient. This will allow alternatives to a physical comprehensive AJC in areas where service delivery models can or already meet community needs. This waiver will help rural areas avoid burdens associated with acquiring and maintaining a site, providing greater flexibility to LWDBs, and providing opportunities to invest funds in service delivery for job seekers and businesses instead of maintaining brick and mortar facilities. Florida expects increases in participant numbers as boards increase the provision of AJC services in community spaces. This waiver request aligns with TEGL 05-25 and Pillar III: Integrated Systems and Pillar V: Flexibility and Innovation.
- **Training Contracts:** A waiver of WIOA Section 134(c)(3)(F)(i) and (G) and 20 CFR 680.320(a) and 680.340(a) to allow all training services through training contracts. This expands use of work-based training, pre-apprenticeships, on-the-job training, and fast-track programs already validated by employers. Florida will pair this waiver with its OJT Training Waiver approved by the Secretary. Outcomes will be tracked using apprenticeship data. This aligns with TEGL 05-25 and Pillar I: Industry-Driven Strategies in Florida's state strategy.
- **20% Expenditure Requirement:** A waiver of WIOA Section 129(c)(4) and 20 CFR 681.590(b) to allow local workforce development areas to count both WIOA local youth formula funds and TANF funds toward the minimum 20 percent expenditure requirement for paid or unpaid work experience. This gives local boards greater flexibility to focus Title I Youth funds on other priorities like expanding pre-apprenticeships. This aligns with TEGL 05-25 by enabling flexible approaches that support work-based learning. This waiver will support Pillar II: Worker Mobility and Pillar V: Flexibility and Innovation as described in Florida's state strategy.
- **14 Youth Program Elements:** A waiver of WIOA Section 129(c)(2) requiring LWDBs to provide all 14 youth program elements. This will enable LWDBs to focus funds on work-based learning and work-based training such as work experience, pre-apprenticeships, and registered apprenticeships. Boards can make better

resource allocations to activities proven to lead directly to jobs. Aligned with TEGL 05-25 encouraging targeted innovation and improved outcomes, this waiver supports Pillar I: Industry Driven Strategies and Pillar V: Flexibility and Innovation of Florida's state strategy.

All waiver requests will be submitted to the State Workforce Development Board and waivers approved by the Board of Directors will be included in its WIOA Combined Plan, submitted to USDOL and the U.S. Department of Education in March 2026.

FOR CONSIDERATION

- **Approve recommendation to seek federal waivers to increase flexibility in service provision and to remove barriers.**
- **Upon approval by the State Workforce Development Board, all waivers will be included in Florida's WIOA Combined Plan and posted for public comment at careersourceflorida.com for 30 calendar days before submission to USDOL.**

Approved _____
Disapproved _____

Action Item 2

REVISIONS TO CAREERSOURCE FLORIDA WORKFORCE POLICY G104 – SANCTIONS AND OTHER REQUIRED CORRECTIVE ACTION FOR LOCAL WORKFORCE DEVELOPMENT BOARDS WHO FAIL TO MEET FEDERAL AND STATE STANDARDS

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 G104–Sanctions for Local Workforce Development Boards to Meet Federal and State Standards.

Revised Workforce Policy G104 – Sanctions and Other Required Corrective Action for Local Workforce Development Boards Who Fail to Meet Federal and State Standards explains that under WIOA Section 116, Local Workforce Development Boards (LWDBs) must meet federal and state performance standards or face sanctions. The policy describes possible sanctions for failing to meet performance measures or resolve deficiencies in alignment with federal and state law. LWDBs must train officials and staff on responsibilities and sanctions, manage funds properly, and create strategies to meet or exceed performance standards. Outcomes include verifying staff training, monitoring performance data and fund use, and implementing processes to avoid penalties.

Chief Local Elected Officials (CLEOs) and LWDBs receive quarterly updates and annual notifications on whether they meet federal performance accountability measures or state-issued letter grades. Corrective actions apply when LWDBs fail to meet core requirements, such as executing agreements, achieving certification, meeting performance requirements for two consecutive years, or fixing audit findings. Poor performance for two years or low letter grades (two Ds or one F) triggers a Turnaround Plan. This plan must include leadership changes, training, and monitoring within six months, with two years to improve. Failure can lead to sanctions like withholding funds, reducing allocations, or board decertification under WIOA §107(c)(3). LWDBs must

develop Local Operating Procedures (LOPs) to collect and report data, monitor quality, and resolve findings aligned with TEGL 11-19, Change 2 and 20 CFR 677.220. FloridaCommerce will monitor compliance through audits and reviews.

LWDBs may appeal sanctions or reorganization plans to the Governor or the United States Department of Labor (USDOL) under 20 CFR 683.650 and 20 CFR 677.225 within 30 days of notice.

CareerSource Florida and FloridaCommerce worked 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 November 24 – December 10, 2025. CareerSource Florida received 19 comments from 6 LWDBs. A thorough review of the comments was conducted by CareerSource Florida and FloridaCommerce. About 84.20% of the feedback was incorporated into the policy, and technical assistance is planned to address additional LWDB feedback.

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 G104 – Sanctions and Other Required Corrective Action for Local Workforce Development Boards Who Fail to Meet Federal and State Standards.**



POLICY
NUMBER
G104

Workforce Policy

Title: Sanctions and Other Required Corrective Action for Local Workforce Development Boards Who Fail to Meet Federal and State Standards

Policy Type: Programmatic

Program: Workforce Innovation and Opportunity Act

Adopted: 02/20/2020

Revised:

I. PURPOSE AND SCOPE

The Workforce Innovation and Opportunity Act (WIOA), Section 116, establishes performance accountability requirements for core programs that support employment and training outcomes. Training and Employment Guidance Letter No. 11-19, Change 2,¹ issued by the U.S. Departments of Labor and Education, updates how state performance is evaluated and clarifies that states may lose up to 10% of the Governor's Reserve funds for repeated failure or non-reporting of results. CareerSource Florida requires Local Workforce Development Boards (LWDBs) to promptly address performance, programmatic, or financial deficiencies to protect funding and avoid penalties. LWDBs play a critical role in advancing the strategic and operational goals of the Governor and the State Workforce Development Board (SWDB) for Florida's Workforce Development System. The CareerSource Florida Board of Directors, acting as the SWDB, issues policy and guidance aligned with federal and state laws and its strategic priorities to ensure LWDBs, service providers, and career centers deliver services effectively and efficiently. This policy informs LWDBs utilizing WIOA Title I and other funds authorized by the SWDB about potential consequences, including sanctions and remedies, for failing to meet performance measures or violating applicable laws, regulations, standards, or agreement terms with the Florida Department of Commerce (FloridaCommerce).

II. KEY OBJECTIVES AND MEASURABLE PERFORMANCE OUTCOMES

A. Key Objectives

1. Increase awareness and develop training, as needed for Chief Local Elected Officials (CLEOs), LWDB members, leadership, and staff of LWDBs and career centers about board responsibilities and potential sanctions and remedies for failing to meet performance measures or violating federal and state laws, regulations, standards, or

¹ [Training And Employment Guidance Letter No. 11-19, Change 2](#)

30 the terms of agreements between LWDBs and FloridaCommerce.
31 2. Employ sound management practices and controls for the proper expenditure of
32 funds passed to LWDBs and administered through FloridaCommerce.
33 3. Develop strategies, procedures, and policies to meet or exceed identified state and
34 federal performance standards in alignment with state goals and objectives.
35

36 **B. Measurable Performance Outcomes**

37 1. Verification that CLEOs, Board Chairs, LWDB members, and career center staff are
38 provided with information on CareerSource Florida's policies and strategies, on
39 funding provided to the LWDB, and on requirements and consequences associated
40 with LWDB performance expectations.
41 2. Verification that staff and career centers are provided information and training
42 applicable to their job duties, including federal and state guidance and state workforce
43 policies.
44 3. LWDBs shall implement clear processes to locally monitor and ensure proper use
45 and expenditure of funds in alignment with state guidance.
46 4. LWDB staff shall identify needs, implement training, and attend policy-related training
47 conducted by CareerSource Florida and/or FloridaCommerce as necessary.
48 5. LWDBs shall develop and implement policies, procedures, and strategies to meet
49 performance expectations to avoid potential sanctions.
50

51 **III. POLICY AND PROCEDURES**

52 The CareerSource Florida Board of Directors seeks to ensure all LWDBs maintain credibility
53 and accountability for meeting performance, programmatic, and financial requirements. CLEOs
54 and LWDBs receive quarterly updates and annual notifications on whether they meet federal
55 performance accountability measures and state-issued letter grades. Any LWDB not meeting
56 the regulatory or statutory standards shall be subject to specific conditions and sanctions consistent
57 with applicable federal laws, regulations, and guidance.
58

59 **A. Deficiencies²**

60 In the following circumstances, corrective actions may be imposed on LWDBs:
61

62 1. Failure by the LWDB to execute a Grantee-Subgrantee Agreement between
63 FloridaCommerce and the LWDB within the timeframe prescribed by
64 FloridaCommerce.
65 2. Failure by the LWDB's board members, staff, fiscal agent, or administrative entity
66 to appropriately oversee the delivery of services and ensure the effective and
67 efficient use of funds.
68 3. Failure to:
69
70 a. Carry out the required functions of a LWDB as set forth in WIOA sec. 107(d).
71 b. Achieve certification.
72 c. Sustain program and fiscal integrity.
73 d. Properly use federal or state funds resulting in disallowed costs.
74 e. Act in a manner necessary to prevent waste, fraud, or abuse of federal or state
75 funds.
76 f. Submit timely and accurate required financial and performance reports, including
77 annual Single Audits or financial statement audits.
78 g. Meet the agreed-upon ITA expenditure requirement under section 445.003(3),
79 Florida Statutes.
80

² [20 CFR 677.220](#)

81 h. Take corrective actions to resolve findings of non-compliance identified during
82 programmatic, fiscal, or investigative monitoring or audit reviews conducted by
83 the USDOL, FloridaCommerce, or other legally authorized entity.
84 i. Resolve or address performance improvement plans, notices of deficiencies,
85 or corrective action requirements within the timeframe determined by the
86 authorized monitoring or reviewing authority.
87 j. Resolve or address all independent audit findings or questioned costs.
88 k. Comply with administrative and service contract requirements.
89 l. Retain and produce required service delivery, program participant, and/or
90 financial records.
91 m. Address and resolve reported threats to health and safety of program
92 participants or staff, which may include investigating complaints, taking
93 appropriate corrective actions, or making referrals to the appropriate
94 authorities.
95 n. Meet other identified performance requirements, including:
96 i. Performance data demonstrating a failure to maintain or improve in
97 actual performance outcomes for two or more years among enrolled
98 individuals within subgroup populations, such as veterans and
99 individuals receiving public assistance;³
100 ii. Two or more years of failing to meet adjusted local levels of performance
101 consistent with WIOA sec. 116 and TEGL 11-19, Change 2,⁴ or
102 iii. Two consecutive years with an annual letter grade of F.⁵

103 **B. Actions**
104

105 The CareerSource Florida Board of Directors and FloridaCommerce may impose the
106 following actions in response to deficiencies noted in Section A, above:
107

108 1. **Specific Conditions** – Failure by the LWDB to fully resolve the deficiencies stated
109 in the corrective notice may result in:
110
111 a. Placing the LWDB on cost-reimbursement status.
112 b. Requiring invoices and supporting documentation to be submitted to justify and
113 support expenditures prior to approving future draw requests.
114 c. Establishing additional prior approval as deemed necessary by FloridaCommerce.
115 d. Any additional action that the Governor, CareerSource Florida Board of
116 Directors, or FloridaCommerce may determine as effective or necessary to
117 correct the deficiency.
118 e. Full fiscal review of expenditures related to funds passed to the LWDB
119 through FloridaCommerce.
120 f. Full programmatic review of participant eligibility and compliance with federal
121 and state laws, regulations, and guidance.
122 g. The requirement of an LWDB to perform the required corrective action.
123 h. Recapture and reallocation of funds.
124

125 2. **Turnaround Plan:** CareerSource Florida and FloridaCommerce will examine LWDB
126 performance on each of the criteria developed under s. 14.36(3)(h) for various
127 populations served, including, but not limited to, veterans, individuals on public
128 assistance as defined in s. 414.0252(10), and businesses. LWDBs consistently
129 underperforming on required adjusted local levels of performance and two consecutive
130 state-issued LWDB annual Letter Grades, including data isolated for a single

³ When evaluating subgroup performance, cohort size will be taken into consideration to ensure statistical validity and fairness in the assessment process.

⁴ [Training and Employment Guidance Letter No. 11-19, Change 2](#)

⁵ Letter grade methodology described at <https://analytics.careersourceflorida.com/LetterGrades/Methodology>

131 subgroup, to include veterans and individuals receiving public assistance, will be
132 required to submit an LWDB Turnaround Plan to the SWDB for review and approval.
133 For the purposes of this section, poor letter grade performance is defined as two
134 consecutive letter grades of D or a single year with an F. An LWDB that fails to submit
135 a timely Turnaround Plan or completes a Turnaround Plan cycle and does not improve
136 to a grade of "C" or higher is subject to corrective action, including, but not limited to,
137 removal of board members and executive directors under s. 445.007(2)(b) and
138 possible board decertification under WIOA s. 107(c)(3).

139 a. LWDB Turnaround Requirements: After notification, the LWDB will have 6 months
140 to develop and submit this plan, which must be data-based and designed to create
141 the conditions to improve the LWDB's performance during a two-year
142 implementation period. FloridaCommerce shall apply intensive monitoring until the
143 plan's closure. Requirements for LWDB Turnaround include:
144 i. The removal of the current LWDB Chair.
145 ii. The results of a review of the performance of the executive director
146 and/or the designated person responsible for operational and
147 administrative functions of the board and a plan based on that review
148 for the improvement of leadership performance designed to support
149 LWDB improvement in administrative function of the board.
150 b. The development of a professional development plan that provides ongoing,
151 targeted support to increased performance by staff and leaders.
152 c. The results from a review of practices in hiring, recruitment, retention, and
153 reassignment of staff supporting the identified population and the associated
154 actions identified for improvements in this area.
155 d. A description of local, data-based monitoring efforts, aligned to SWDB standards,
156 that will be enacted to support improvement in the identified area(s).
157 e. A description of the review and update of any applicable local policies or operating
158 procedures and how these will be updated to improve alignment and performance
159 with the identified subgroup, if applicable; and
160 f. A description of how plan implementation will be documented and tracked.
161
162 3. **Notice** – FloridaCommerce will at a minimum provide notice to the CLEO, the
163 executive director, board chair, and/or the designated person responsible for
164 operational and administrative functions of the board of the need for a Turnaround
165 Plan or corrective action to secure prompt compliance. The notice may include
166 additional performance, programmatic, or financial reviews, or additional technical
167 assistance activities. The notice will include a timeline for required implementation and
168 provide the opportunity for the LWDB to resolve any deficiencies.
169
170 4. **Sanctions** – Failure by the LWDB to fully resolve the deficiencies stated in the
171 corrective notice or failure to fulfill the specific conditions placed on the LWDB may
172 result in:
173
174 a. Disallowing all or part of the cost or activity determined to be non-compliant.
175 b. Temporarily withholding reimbursement.
176 c. Reduce infrastructure funding allotment.
177 d. Reduction or otherwise adjustment of the LWDB's funding (by disqualification
178 from distributions of incentive monies, reallocated formula funding, and/or state-
179 level reserve funds).
180 e. Suspension or termination, in whole or in part, of the federal or state award.
181 f. Issuance of a notice of intent to revoke approval of all or part of the local plan
182 affected.
183 g. Imposing a reorganization plan which may include:
184 i. Decertifying the LWDB and requiring that a new board be appointed

185 and certified for the local area.

186 ii. Prohibiting the use of eligible providers and one-stop partners.

187 iii. Selecting an alternative entity as defined in WIOA Section 107 to

188 administer the program for the local area involved.

189 iv. Merging the local area into one or more other local areas, after

190 consultation with CLEO(s) in the local areas; or

191 v. Making such other changes necessary to secure compliance.

192

193 h. Initiation of suspension or debarment proceedings.

194 i. Any other penalty or action deemed appropriate by the Governor, CareerSource

195 Florida Board of Directors, or FloridaCommerce.

196

197 **C. Appeal Processes**

198 A local area that has been found in substantial violation of WIOA and has received

199 notification that either all or part of the local plan will be revoked or that a reorganization

200 will occur may appeal such sanctions to the Secretary of Labor, USDOL under [20 CFR](#)

201 [683.650](#). The appeal must be filed no later than 30 days after receipt of written

202 notification of the revoked plan or imposed reorganization. A copy of the appeal must be

203 simultaneously provided to the CareerSource Florida Board of Directors and the

204 Governor. The sanctions do not become effective until the time for appeal has expired

205 or USDOL has issued a decision. USDOL will notify the Governor and the appellant in

206 writing of the Secretary's decision within 45 days after receipt of the appeal.

207 A local area that has failed to meet local performance indicators for three consecutive

208 program years and has received the Governor's notice of intent to impose a reorganization

209 plan may appeal to the Governor to rescind or revise such plan no later than 30 days after

210 receiving written notice of the reorganization plan. The Governor must make a final

211 decision within 30 days after receiving the appeal. The local area may appeal the final

212 decision of the Governor to USDOL under [20 CFR 677.225](#) no later than 30 days after

213 receiving the Governor's final decision. Any appeal of the Governor's final decision must

214 be appealed jointly by the LWDB and the Chief Elected Official. USDOL will make its

215 final decision within 30 days after receipt of the appeal. The decision by the Governor on

216 the appeal becomes effective at the time it is issued and remains effective unless USDOL

217 rescinds or revises the reorganization plan.

218

219 **IV. IMPLEMENTATION**

220 LWDBs must establish and maintain Local Operating Procedures (LOPs) that ensure all staff

221 understand performance accountability requirements, including those outlined in [TEGL No. 11-](#)

222 [19, Change 2, 20 CFR 677.220](#), and [20 CFR 683.720](#). LOPs should outline the processes the

223 LWDB uses to collect, validate, and report performance data; monitor internal program quality;

224 implement corrective actions at the staff and provider level; and ensure timely resolution of

225 findings identified through local or state monitoring. These procedures should focus on

226 strengthening internal controls, supporting continuous improvement, and promoting program

227 integrity. LOPs should be data-informed, aligned with state and federal standards, and reviewed

228 regularly to ensure responsiveness to evolving compliance and reporting requirements.

229 Implementation of this policy requires LWDBs to integrate local policies and procedures that

230 proactively address potential deficiencies and support timely corrective actions. LWDBs must

231 document and track all efforts to meet performance expectations, including training, monitoring,

232 and leadership development activities.

233 FloridaCommerce, in consultation with CareerSource Florida, will monitor LWDB compliance

234 through intensive reviews, fiscal and programmatic audits, and evaluation of LOPs. This

239
240
241

oversight ensures that LWDBs maintain accountability and transparency while working toward continuous improvement and alignment with state workforce goals.

Comment Entry	Recommended Resolution	Action Taken
The policy provides that the LWDB Turnaround Plan must be data-based. The data is based on federal performance data which becomes available months after services are delivered. Turnaround plans require immediate adjustments, but the lagged data means that a LWDB is reacting to old data and conditions, not the current data. This creates a gap between performance problems and the ability to respond, especially in quarterly or annual planning cycles.	Recommended solution -- a turnaround plan should be based on real-time leading indicators, performance measures, and local administrative data (i.e., community college enrollment/completion records, regional economic development data, local unemployment claims).	Clarification added referencing the federal requirement for this and TA will be provided to assist LWDBs with this.
Each LWDB is required to establish and maintain Local Operating Procedures that reflect the expectations detailed in the policy and local strategies to avoid potential deficiencies, actions, and sanctions. This is vague.	Recommend solution – cross-reference Policy O125 which specifies the requirements of what must be in the Local Operating Procedures.	Language added to clarify LOP requirements
Comment (Concern with citation): Can the state clarify what the performance measures are for identified subgroup populations so that the LWDBs will be clear regarding expectations.	Comment (Proposed Resolution/Edit): Technical Assistance on the above question	Technical assistance and training will be provided.
Comment (Concern with citation): Clarification as to whether poor performance is being among the lowest 5 scoring LWDBs in state issued letter grades or having a grade of D/F? Seems to be conflicting language regarding how letter grades will be considered for corrective actions.	Comment (Proposed Resolution/Edit): Clarification regarding how letter grades are evaluated	Language revised to add clarity on how letter grades are used in this evaluation.
Comment (Concern with citation): There are already letter grade criteria and key performance indicators with a priority to serve these groups. I'm not sure how adding performance goals for subgroups is beneficial and could potentially be discriminatory if there's preferential goals.	Comment (Proposed Resolution/Edit): Tie performance goals to specific programs or grants (TANF, JVS, etc.)	Language revised to clarify this requirement.
Comment (Concern with citation): Given the lag between performance and letter grade designation, boards should be given a full year for the data to catch up with the local changes made in the performance plan. The data lag means for some data sets, you are navigating around ebbeys using a chart generated the summer of the year before.	Comment (Proposed Resolution/Edit): Before implementation, all data being utilized would need to be shared with local boards on a consistent basis.	This data is made available to LWDBs in a variety of ways, and additional methods of sharing this data will be provided along with additional TA.
Comment (Concern with citation): These are RICHARD WILLIAMS comments. The policy reads including two sub-groups, but doesn't exclude other subgroups. What if boards decided to target other subgroups based upon local need or resources put into play by other organizations. This doesn't take into consideration the wide variety of veteran populations in the state. Each board may have very different populations of vets.	Comment (Proposed Resolution/Edit): The policy should indicate steps necessary to add subgroups for measurement.	The policy has been rewritten to clarify subgroups will be considered.
Comment (Concern with citation): The policy states that deficiencies may be triggered when a LWDB fails to meet adjusted levels of performance (line 71) or fails for "two or more years" (line 95). However, the language does not specify that this standard applies to the same primary indicator for the same core program, as required by WIOA §116 and TEGI 11-19, Change 2. This omission may lead to incorrect interpretations, such as treating failures on different indicators across different years as consecutive-year failure.	Comment (Proposed Resolution/Edit): A deficiency is triggered only when the LWDB fails to meet the same primary indicator of performance for the same core program in two consecutive program years, consistent with WIOA §116 and TEGI 11-19, Change 2.	Language revised to clarify this requirement.
Comment (Concern with citation): The policy lists several deficiency triggers but does not indicate whether some deficiencies are considered more serious or require faster escalation. Without prioritization, LWDBs cannot distinguish between technical noncompliance (e.g., minor reporting issues) and issues suggesting systemic risk (e.g., fiscal integrity failures), which may result in inconsistent enforcement across the state.	Comment (Proposed Resolution/Edit): Create a tiered deficiency framework (e.g., Critical, Major, Moderate, Administrative), with examples and corresponding state responses.	Minor reporting issues are not intended to be characterized as deficiencies and is consistent with Federal Law. No change needed.
Comment (Concern with citation): The policy uses the LWDB Letter Grade (specifically bottom-five ranking or D/F grades) as a sanctionable metric, including grounds for termination. The Letter Grade is a consumer transparency tool, not a punitive accountability measure. The grade does not undergo federal adjustment, validation, or statistical controls comparable to WIOA indicators, creating risk of misalignment with federal accountability rules.	Comment (Proposed Resolution/Edit): Remove the Letter Grade as a sanction trigger and rely solely on federally adjusted WIOA performance indicators. This ensures compliance with the legislative intent of the Letter Grade system and prevents local boards from being penalized based on a metric not designed for sanctions.	WIOA does not prohibit states from using additional performance measures. Section 14.35, F.S. does not prohibit the state board from using letter grades to evaluate LWDBs' performance.
Comment (Concern with citation): Section II A allows a Turnaround Plan to be initiated based on subgroup outcomes (e.g., veterans, public assistance recipients), yet Section II A does not list subgroup performance as a deficiency trigger. This creates an internal policy inconsistency, as Turnaround Plans may be imposed based on factors not formally defined as deficiencies.	Comment (Proposed Resolution/Edit): Either: (1) Add subgroup performance explicitly to the Deficiencies section with a clear definition, methodology, and standards; or (2) Remove subgroup outcomes as a standalone trigger for Turnaround Plans to maintain internal policy coherence.	Language revised to clarify this requirement.
Comment (Concern with citation): Using subgroup performance defines, especially for veterans, poses significant methodological issues. Recent state practices (e.g., Purple Star Board award determinations) reveal challenges in interpreting subgroup data without accounting for demographic, barrier, and labor market differences. Wage-based indicators further distort comparisons between transitioning service members and high-barrier veterans, resulting in misleading conclusions.	Comment (Proposed Resolution/Edit): Subgroup declines should not trigger a Turnaround Plan unless the state implements a validated methodology that incorporates: • population characteristics, • barrier levels, • labor market conditions, and • service mix differences. Otherwise, subgroup discussions should occur during required annual performance review meetings, with escalation only if a LWDB fails to take documented steps to address identified issues.	Language revised to clarify this requirement.
Comment (Concern with citation): The policy states that "poor letter grade performance" means two consecutive D grades, but the state issues quarterly Letter Grades. This creates ambiguity: two D grades may occur within a single program year, which would not constitute sustained underperformance.,	Comment (Proposed Resolution/Edit): If Letter Grades are not removed, clarify that "two consecutive letter grades" means two consecutive annual grades, not quarterly grades. This preserves the intent to identify systemic, long-term performance issues.	Language revised to clarify this requirement.
Comment (Concern with citation): The policy simultaneously: • flags LWDBs for Turnaround Plans if they are in the bottom five statewide, regardless of actual grade, and • defines poor performance as two D grades or one F. A board could earn a B but still fall in the bottom five statewide, resulting in sanctions despite meeting expectations.	Comment (Proposed Resolution/Edit): Remove Letter Grades for reasons outlined before. If not, remove bottom-five ranking from trigger.	Language revised to clarify this requirement.
Comment (Concern with citation): This section stipulates 'other identified performance requirements' and notes that corrective actions may be imposed if failing two or more years of local adjusted performance "...AND being among the lowest five scoring LWDBs in the state...". This seems very arbitrary.	Comment (Proposed Resolution/Edit): The policy should state a threshold for corrective action triggers. All of the policies rely on subjective language and no definitive benchmarks or thresholds are given. The policy should also state if this is based on the overall indicators of performance score or as it is now and based on actual categories of performance missed.	Clarification added on federal requirements and TA can be provided to support LWDBs with this.
Comment (Concern with citation): This section does not list the Board Chair as receiving notice of the need of a Turnaround Plan.	Comment (Proposed Resolution/Edit): Include the Board Chair as a contact in addition to the CEO and CLEO.	Policy revised to include Board Chair in notifications.
Comment (Concern with citation): "among the lowest five...".	Comment (Proposed Resolution/Edit): Lines 127-129 define poor letter grade performance as, this only references lowest 5 letter grade scores. Under this if everyone was an "A", the lowest numerical scores would qualify. That is ridiculous!! line 97 needs to track the language in 127.	Policy revised to include Board Chair in notifications.
Comment (Concern with citation): "Turnaround"	Comment (Proposed Resolution/Edit): there needs to be a clear definition that separates reorganization, PIP and turnaround.	Policy re-organized to clarify PIPs are a form of TA, consistent with issued federal guidance, and Turnaround Plans and reorganizations are a form of Sanction.
Comment (Concern with citation): Notice; minimum notice	Comment (Proposed Resolution/Edit): Notice should also be given to the Board Chair. Clarity needs to be provided on the type of notice: call or written, and the time frame of the notice: within _____ days of any action.	Policy revised to include Board Chair in notifications.

Feedback Response Key			
Incorporated	Future Action	No change	TOTAL
16	1	2	19
84.20%	5.30%	10.52%	

Action Item 3

CAREERSOURCE FLORIDA WORKFORCE POLICY G105 – COMPOSITION AND CERTIFICATION OF LOCAL WORKFORCE DEVELOPMENT BOARDS; CERTIFICATION OF ONE-STOP SYSTEMS; AND DIRECT SERVICE PROVIDER DESIGNATION

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 development 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 three workforce policies described below and recommend consolidation of these policies into a single policy with standardized forms to simplify requests for SWDB action.

- Workforce Policy P91 – Local Workforce Development Board Composition and Certification
- Workforce Policy P93 – One-Stop Delivery System and One-Stop Center Certification Requirements
- Workforce Policy P83 – Direct Provider of Workforce Services

This new policy sets standards for the composition and certification of Local Workforce Development Boards (LWDBs), the certification of One-Stop Delivery Systems, and the designation of LWDBs as direct providers of career services under the Workforce Innovation and Opportunity Act (WIOA) and Florida law. Chief Local Elected Officials (CLEOs) must appoint LWDB members according to WIOA Section 107(b) and state criteria, ensuring representation from key industry sectors and counties within the local area. LWDB appointees cannot be current members of the local Education and Industry Consortium. CLEOs hold authority to remove LWDB members, executive directors, or operational leads for cause, including lack of performance, as defined in Section 445.002(2), Florida Statutes.

LWDBs must be certified every two years using standardized forms provided by FloridaCommerce and CareerSource Florida, while One-Stop Delivery Systems require certification every three years per WIOA Section 121(g). Certification depends on

compliance with federal and state laws, including 20 CFR 679.320 and WIOA Section 107(c). Conditional approval may be granted for boards needing extra time to meet non-performance criteria. LWDBs failing to meet performance standards for three consecutive years or engaging in fraud or abuse must face decertification after notice and a 30-day comment period.

CLEOs and LWDBs receive quarterly updates and annual notifications on whether they meet federal performance accountability measures and state-issued letter grades. Persistent deficiencies—such as failure to convene stakeholders, partner with employers, or update policies—can lead to sanctions, including decertification, merging local areas, or appointing an alternative entity. FloridaCommerce provides technical assistance, including Performance Improvement Plans, before imposing corrective actions, emphasizing continuous improvement and compliance with Workforce Policy P88 – Performance Requirements for Local Workforce Development Boards and Workforce Policy G104 – Sanctions and Other Required Corrective Action for Local Workforce Development Boards Who Fail to Meet Federal and State Standards.

LWDBs may request designation as direct providers of career services under WIOA Section 107(g) and 20 CFR 679.410(b). State law prohibits LWDBs from providing training services. Approval for an LWDB to provide direct career services requires a compliance review and submission of an annual performance report detailing cost savings, improved outcomes, and best practices. Designation cannot exceed the duration of the local WIOA plan and may be revoked for noncompliance or poor performance. FloridaCommerce monitors LWDB governance annually to ensure alignment with WIOA Section 108 and 20 CFR 679.560, promoting accountability and quality across Florida's workforce system.

CareerSource Florida and FloridaCommerce worked 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 November 24 – December 10, 2025. CareerSource Florida received 16 comments from 3 LWDBs. A thorough review of the comments was conducted by CareerSource Florida and FloridaCommerce. About 62.50% of the feedback was incorporated into the policy, and technical assistance is planned to address additional LWDB feedback.

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

FOR CONSIDERATION

- **Approve new CareerSource Florida Workforce Policy G105 - Composition and Certification of Local Workforce Development Boards; Certification of One-Stop Systems and Direct Service Provider Designation.**

- **Approve the use of four (4) standardized forms to document and verify board composition and certification, one-stop system delivery requirements, and direct providers of workforce services.**

 <h2 data-bbox="458 566 975 629">Workforce Policy</h2>	POLICY NUMBER G105
Title: Composition and Certification of Local Workforce Development Boards; Certification of One-Stop Systems; and Direct Service Provider Designation	
Policy Type: Governance	
Program: Workforce Innovation and Opportunity Act	
Effective:	Revised:

I. PURPOSE AND SCOPE

Local Workforce Development Boards (LWDBs) are critical in achieving the Governor and State Workforce Development Board's (SWDB) strategic and operational vision and goals for Florida's Workforce Development System. The CareerSource Florida Board of Directors, as the SWDB, sets guidelines—aligned with state and federal laws and its strategic goals—to ensure local workforce boards, service providers, and career centers efficiently deliver essential services. Consistent with state and federal requirements,¹ these guidelines support the review, designation and/or certification of LWDBs, service providers for the one-stop delivery system, and one-stop career centers.

This policy outlines the standards and procedures related to LWDB composition as well as for certifying LWDBs, One-Stop Delivery Systems, and approving LWDBs to directly provide career services.

II. KEY OBJECTIVES AND MEASURABLE PERFORMANCE OUTCOMES

A. Key Objectives

LWDBs must ensure:

- a. LWDB governance meets requirements per state and federal law and is designed to support designated performance outcomes and SWDB-determined strategic objectives.
- b. High-quality, accessible, and integrated one-stop career center services and service providers.

¹ Workforce Innovation and Opportunity Act (WIOA), 20 Code of Federal Regulations (CFR) Parts 676 through 679, and [Chapter 445](#), Florida Statutes.

29

30 **B. Measurable Performance Outcomes**

31

32 1. 100% of qualifying LWDBs are certified every two years and meet required LWDB
33 board composition requirements.

34 2. 100% of qualifying One-Stop Delivery Systems are certified every three years.

35 3. LWDBs serving as direct providers of workforce services meet requirements to be
36 approved and designated as such.

37

38 **III. POLICIES AND PROCEDURES**

39

40 **A. Local Workforce Development Board Composition**

41

42 The Chief Local Elected Official (CLEO) must select members of the LWDB, consistent
43 with the criteria in federal and state law and criteria set by the Governor. The membership
44 of a LWDB must be consistent with WIOA section 107(b). LWDB appointees must not be
45 current members of the local area's Education and Industry Consortium as defined by
46 CareerSource Florida's Workforce Policy. Business representatives appointed to the
47 LWDB shall include the industry sectors of focus identified in the local area WIOA plan.
48 LWDBs should include representation on their boards from businesses in all counties
49 within the local area. LWDBs must make public a current and updated list of their LWDB
50 members on their website and submit a form demonstrating compliance with federal and
51 state requirements² as part of the LWDB Certification process.

52

53 LWDB members who no longer hold the position or status that made them eligible
54 appointees must resign or be removed by the CLEO. LWDB vacancies must be filled
55 within a reasonable amount of time, but no more than 12 months from the vacancy
56 occurrence. This process must be described as part of the local plan.

57

58 CLEOs are responsible for providing leadership to LWDBs and ensuring not only fiscal
59 and programmatic compliance, but also performance. Consistent with this, a CLEO may
60 remove members of a LWDB, its executive director and/or the designated person
61 responsible for operational and administrative functions of the board for cause. As set
62 forth in section [445.002\(2\), F.S.](#), "for cause" includes lack of performance. Lack of
63 performance includes, but is not limited to, the following:

64 1. Nonperformance, as more fully set forth in Section III.B. For purposes of removal
65 under this section, an LWDB is determined to have not met the standard if its
66 performance is below 90 percent of the negotiated standard for each performance
67 indicator.

68 2. Consistent failure to perform on LWDB Letter Grades, the state identified measure
69 of performance, including letter grade performance in identified subgroup
70 populations.

71 a. CareerSource Florida and FloridaCommerce will examine LWDB performance
72 on each of the criteria developed under s. 14.36(3)(h) for various populations
73 served, including, but not limited to, veterans, individuals on public assistance
74 as defined in s. 414.0252(10), and businesses. LWDBs consistently
75 underperforming with a single subgroup, as evidenced by two consecutive letter
76 grades of D or a single year with an F for that subgroup, will be required to

² [20 CFR 679.320; Section 445.007, Florida Statutes.](#)

submit a LWDB Turnaround Plan, consistent with Workforce Policy G104: Sanctions and Other Required Corrective Action for LWDBs Who Fail to Meet Federal and State Standards.

B. Local Workforce Development Board Certification and Decertification

LWDBs must be certified every two years. FloridaCommerce provides guidance to complete this process. LWDBs submit requests for certification using standardized forms provided by FloridaCommerce and CareerSource Florida.

CareerSource Florida and FloridaCommerce review submitted documents for completion and compliance with all state laws and federal regulations, using the approved and posted versions of the LWDB Composition Tool and the Evaluation for LWDB Certification Form to make approval recommendations to the SWDB based on information provided. Conditional approval for certification may be granted for LWDBs seeking certification that require additional time to meet criteria not associated with performance. LWDBs not meeting requirements outlined in the Evaluation for LWDB Certification Form may not be recommended for full approval.

Obtaining LWDB certification indicates that an LWDB meets minimum requirements to perform critical duties that support the workforce system in a designated local area. The SWDB may take action when the performance or activities of an LWDB do not meet requirements outlined in state board policies or state or federal law. This action can include LWDB decertification.

LWDBs who exhibit the following deficiencies cannot be fully certified and may be decertified, after the provision of notice and 30-day comment period, by the SWDB:³

1. Fraud, abuse, or failure to carry out the functions set forth in WIOA Section 107(d) and [20 CFR 679.370](#).⁴
2. Nonperformance: Failure to meet identified state or federal performance accountability measures for two consecutive program years.
 - a. Chief local elected officials (CLEOs) and their LWDBs will receive a notification from FloridaCommerce annually indicating whether the LWDB met or did not meet statistically adjusted federal performance accountability measures or failed to meet requirements associated with consistent poor performance on state issued LWDB Letter Grades as outlined in Section III - A. For LWDBs not successfully meeting state or federal performance accountability measures, the notification will include a reminder that failure to meet performance requirements in the next consecutive year may result in decertification and outline required actions related to increased monitoring and the provision of technical assistance that must occur during the next year.

Additional criteria for LWDB decertification include those listed below:

- b. Consistent failure to convene a system of stakeholders to support local workforce development activities.
- c. Consistent failure to effectively partner and engage local employers resulting in a measurable decline in measures of employer satisfaction for two consecutive

³ WIOA Section 107(c)(3).

⁴ TEGL 11-19 Change 2 | U.S. Department of Labor

124 years.

125 d. Consistent failure to update LOPs and policies consistent with state law or policies

126 measured through monitoring reports noting this deficiency for two consecutive

127 years.

128 e. Other criteria as specified in Workforce Policies G104 - Sanctions and Other

129 Required Corrective Action for Local Workforce Development Boards Who Fail to

130 Meet Federal and State Standards and P88 - Performance Requirements for

131 Local Workforce Development Boards.

132

133 If a LWDB is decertified, a new LWDB for the designated local workforce development

134 area must be appointed by the identified CLEO contingent upon a reorganization plan

135 developed by FloridaCommerce in consultation with the CLEO. Plans governing LWDB

136 reorganization for certification, including those that involve consolidation of LWDBs, must

137 be approved by the SWDB.⁵

138

139 **C. Certification of the Local One-Stop Delivery System**

140

141 Every three years, each local One-Stop Delivery System must be certified.⁶ LWDBs must

142 certify their local One-Stop Delivery Systems unless the LWDB serves or intends to serve

143 as the One-Stop Operator. In such cases, the LWDB must first request approval from the

144 SWDB to operate in that role. Upon submission, CareerSource Florida and

145 FloridaCommerce will review the request for compliance in accordance with all applicable

146 state laws and federal regulations, using the SWDB's standardized **Evaluation for One-**

147 **Stop Certification Form.** This form includes minimum criteria—such as measures of

148 effectiveness, accessibility, and continuous improvement—that LWDBs must apply when

149 selecting and certifying each local One-Stop Delivery System. CareerSource Florida and

150 FloridaCommerce review the request and recommend approval to the SWDB when

151 appropriate.

152

153 The certification approval of a LWDB to serve as its own One-Stop Operator can be

154 revoked by the SWDB if it is determined that the LWDB no longer meets minimum criteria,

155 including those used to assess the one-stop delivery system's effectiveness, accessibility,

156 and commitment to continuous improvement as outlined in the *Evaluation for One-Stop*

157 *Certification Form.*

158

159 **D. Approval of Waiver and Designation of LWDBs as a Direct Provider of Career**

160 **Services**

161

162 LWDBs may request to be a direct provider of career services.⁷ For a LWDB to be a direct

163 provider of career services, approval must be granted by the SWDB. LWDBS are not

164 permitted to be designated as direct providers of training services.⁸

165

166 FloridaCommerce and CareerSource Florida will guide boards through the application

167 process. CareerSource Florida and FloridaCommerce will review the application and

168 documentation for compliance with all state laws and federal regulations, using the

169 standardized **Evaluation for LWDB Direct Service Provider Designation Form.**

⁵ WIOA Section 107(c)(3)(C).

⁶ WIOA Section 121(g).

⁷ 20 CFR 679.410(b) and WIOA Section 107(g).

⁸ [Section 445.007\(6\), Florida Statutes.](#)

CareerSource Florida and FloridaCommerce will make a recommendation, as appropriate to the SWDB for consideration to designate LWDBs to serve as a direct provider of career services.

A LWDB designated as a direct provider of career services must submit a performance report at the end of each program year during which direct workforce services were provided. The report must contain, at a minimum, the following:

1. An analysis of cost savings as a result of the LWDB providing direct workforce services.
2. A description of improvement in performance outcomes.
3. A description of any “best practices” to be shared with other LWDBs.
4. Evidence that the direct service provision was incorporated into the local WIOA plan within 60 days of receipt of approval to serve as a direct provider of workforce services.

LWDBs must submit the annual performance report by September 30 each year (or when requested by FloridaCommerce). LWDBs submit annual performance reports via email to FloridaCommerce at LWDBGovernance@commerce.fl.gov.

The designation as a direct provider of workforce services may not exceed the duration of the local WIOA plan and may be renewed through the submission of a new request, not to exceed the durations of such subsequent plans. The approval to serve as a direct provider of workforce services can be revoked by the SWDB if determined that it is no longer necessary or for persistent failure to meet associated performance measurements.

IV. IMPLEMENTATION

LWDBs are responsible for conducting annual internal reviews of their governance and service delivery systems, incorporating customer feedback, staff training metrics, and accessibility assessments. LWDBs must update certification criteria, in alignment with SWDB identified criteria, every two years and include them in the WIOA local plan as required under WIOA Section 108 and [20 CFR 679.560](#).

FloridaCommerce will monitor LWDBs and their LOPs annually in consultation with CareerSource Florida to ensure compliance with federal and state requirements. FloridaCommerce and CareerSource Florida will address any deficiencies through the state's resolution process and consistent with applicable CareerSource Florida policies. These efforts promote continuous improvement, accountability, and consistent quality across Florida's workforce development system.

Boards that do not meet the requirements outlined in this policy, or that exhibit deficiencies as described in CareerSource Florida Policy G104 – Sanctions and Other Required Corrective Action for Local Workforce Development Boards Who Fail to Meet Federal and State Standards, may be subject to corrective actions. These may include, but are not limited to:

1. Issuance of a Corrective Notice
2. Imposition of Specific Conditions, including a required Turnaround Plan
3. Application of Sanctions, which may include:

220 a. Decertifying the LWDB.
221 b. Selecting an alternative entity as defined in WIOA Section 108 to administer the
222 program for the local area.
223 c. Merging the local area into one or more other local areas, after consultation with the
224 CLEO.
225 d. Making other necessary changes to secure compliance.

226
227 FloridaCommerce provides technical assistance and support to LWDBs before initiating
228 corrective actions or sanctions. This assistance may include guidance on corrective action
229 planning, clarification of certification criteria, technical resources, and identification of best
230 practices. The goal is to promote continuous improvement and ensure boards have a fair
231 opportunity to meet federal and state standards before formal sanctions are considered.

232
233 **V. ATTACHMENTS AND RESOURCES**

234
235 [Evaluation for LWDB Certification Form](#)

236
237 [Evaluation for One-Stop Certification Form](#)

238
239 [Evaluation for LWDB Direct Service Provider Designation Form](#)

240
241 [One-Stop Delivery System Standardized Certification Template](#)

Evaluation For LWDB Certification Form

This form is utilized by CareerSource Florida and FloridaCommerce to review the submission of Local Workforce Development Boards (LWDBs) seeking LWDB certification or re-certification in compliance with all state laws and federal regulations and provide a recommendation to the State Workforce Development Board for consideration and approval, if appropriate. All items below must be identified as 'met' for a LWDB to be certified.

1. **If an existing LWDB, indicate here:** Choose an item.
2. **Indicate counties served by this LWDB:**

Requirement	Citation (State)	Citation (Federal)	Met/Not Met	Notes
1. BOARD COMPOSITION: There is a valid and submitted LWDB Board Composition Tool that indicates board appointments and composition are in accordance with federal and state law,	s. 445.007, F.S.	20 CFR 679.320, 20 CFR 679.340, 20 CFR 679.350	Choose an item.	
2. PERFORMANCE: There is documentation that the board negotiated local performance indicators and ensured compliance that assisted in the meeting or exceeding of all negotiated and adjusted targets identified through federal and state required performance accountability measures. To include the following applicable measures for each program: a) Employment b) Wage c) Training, and d) Employer Satisfaction	s. 445.007, F.S.	20 CFR 679.370	Choose an item.	
3. SERVICE PROVISION: There is documentation that the board appropriately and effectively a. Provided for the designated all local service providers. b. Developed and implemented strategies for meeting the skill needs of employers c. Led efforts to develop and implement career pathways in partnership with business and education partners.	s. 445.007(6). F.S.	20 CFR 679.370		
4. FISCAL INTEGRITY: There is documentation that the board manages funds responsibly and maintains fiscal integrity and transparency. Including: a. The timely submission of budgets for review	s. 445.007 (12),	20 CFR 679.370		

<ul style="list-style-type: none"> b. The publishing of its most recent IRS Form 990 and all required contracts c. The submission of required compensation disclosures d. The submission of required infrastructure funding agreements e. The submission of documentation demonstrating that LWDB workforce investment activities are aligned the needs of local employers and support local economic growth 				
<p>5. MONITORING: There is documentation that the board conducted oversight of local programs and services and required activities. This documentation included:</p> <ul style="list-style-type: none"> a) annual self-assessments to evaluate compliance with certification criteria, including board composition, service delivery, and accessibility, b) internal monitoring results, including any corrective actions taken, c) Local Operating Procedures (LOPs) and Local Policies are in alignment with State Workforce Policies d) Any required or executed Memorandum(s) of Understanding e) Those related to the certification of one-stop centers, 	s. 445.007, F.S.	20 CFR 679.310, 20 CFR 679.370	Choose an item.	
<p>6. PARTNERSHIP: There is documentation that the board actively and effectively partnered and coordinated with</p> <ul style="list-style-type: none"> a. economic development organization, b. public and private educational entities, c. local businesses, d. community organizations, and e. required WIOA partners. 	s. 445.007, F.S.	20 CFR 679.370	Choose an item.	
<p>7. COMPLIANCE: There is documentation that the board ensured compliance with</p> <ul style="list-style-type: none"> a. transparency and public access to meetings and records requirements, b. the conflict-of-interest provisions, c. requirements specific to Education and Industry Consortiums d. the timely submission of a local plan in alignment with the State Plan. 	ss. 445.007(1), (14), and (15), F.S.	20 CFR 679.310, 20 CFR 679.370, 20 CFR 679.390, 20 CFR 679.430	Choose an item.	
<p>Workforce Research and Regional Labor Market Analysis: There is evidence of workforce</p>		20 CFR 679.370	Choose an item.	

research and regional labor market analysis consistent with federal requirements.				
Other Considerations:			Choose an item.	

LWDB Direct Service Provider Waiver Request - Evaluation Form

This form is utilized by CareerSource Florida and FloridaCommerce to review the submission of Local Workforce Development Boards (LWDBs) seeking to serve as a direct service provider in compliance with all state laws and federal regulations and to provide a recommendation to the State Workforce Development Board for consideration and approval, if appropriate. All applicable items below must be identified as 'met' for a LWDB to be presented to the State Board for approval of a waiver and designation as a direct provider of workforce services.

- 1. LWDB:** Choose an item.
- 2. Choose an item.** **Date Assessment Completed:** Click or tap to enter a date.

Requirement	Citation (State)	Citation (Federal)	Met/Not Met	Notes
CLEO Agreement: Documentation that the Chief Local Elected Official (CLEO) has agreed to the LWDB serving as a direct provider of career services.	s. 445.007(6), F.S.	WIOA §107(g)(2); 20 CFR 679.410(b)		Submission of documents by LWDB required.
Firewall Implementation: Description of protective measures to ensure the transparency, integrity, proper oversight and management of internal processes. To establish a firewall separating the LWDBs oversight role from its service provider role.	s. 445.007(6), F.S.	20 CFR 679.430		Submission of documents by LWDB required.
Cost Analysis: Estimated cost of services and documentation of expected cost savings from direct provision.	s. 445.007(6), F.S.			Submission of documents by LWDB required.
Performance Improvement: Description of anticipated improvements to service delivery and performance outcomes.	s. 445.007(6), F.S.			Submission of documents by LWDB required.
Grant Program Identification: Identification of grant programs funding the direct service activities.	s. 445.007(6), F.S.			Submission of documents by LWDB required.
Oversight and Monitoring: Internal controls and procedures (including LOPs) for oversight and evaluation of LWDB performance as a direct provider.	s. 445.007(6), F.S.	20 CFR 679.430		Submission of documents by LWDB required.

Evaluation for One-Stop Certification

This form is utilized by CareerSource Florida and FloridaCommerce to review the submission of Local Workforce Development Boards (LWDBs) seeking to serve as a One-Stop Operator in compliance with all state laws and federal regulations and provide a recommendation to the State Workforce Development Board for consideration and approval, if appropriate. This form also contains minimum criteria, including those assessing the system's effectiveness, accessibility, and commitment to continuous improvement, that LWDBs must use in the selection of each local One-Stop Delivery Operator.

Identifying Information

- 1. Please select how the LWDB was selected as the one-stop operator using the dropdown below.**
Choose an item.
- 2. LWDB:** Choose an item.
- 3. Date Assessment Completed:** Click or tap to enter a date.
- 4. Current Certification Level:** Choose an item.
- 5. Certification Level Requested:** Choose an item.

Section A: Effectiveness Criteria¹

Requirement	Citation (State)	Citation (Federal)	Met/Not Met	Notes
Procurement: Documentation was provided that sole source procurement ² or successful competition ³ was completed in alignment with state and federal law.	ss. 445.007(6) and (9); s. 445.009, F.S.	20 CFR 679.410(a)(1)		Submission of documents required by LWDB.
Approval: Documentation of approval of chief elected officer was provided.	ss. 445.007(6) and 445.009	20 CFR 679.410(a)(2)		Submission of documents required by LWDB.
Performance: Evidence was submitted indicating the LWDB met or exceeded negotiated levels of performance for federal indicators of performance.	ss. 445.007(6) and 445.009	20 CFR 678.800(c)		Assessed via internal review – no LWDB submissions required.
Performance Monitoring: Evidence was submitted indicated there is a regular process for local performance monitoring that includes: <ul style="list-style-type: none">• The identification and provision of aligned and approved technical assistance designed to support performance improvement;• Customer feedback in alignment with Workforce Policy P9, Availability of Services to Floridians, for both jobseekers and businesses; and	ss. 445.007(6) and 445.009	20 CFR 678.800(c)		Submission of documents required by LWDB.

¹ s. 445.007(6), Fla. Stat.

² [20 CFR 679.410\(a\)\(1\)\(i\)](#)

³ [20 CFR 679.410\(a\)\(1\)\(ii\)](#)

<ul style="list-style-type: none"> The implementation of a regular system of professional development and skills training in alignment with Workforce Policy O92, Staff Training and Credentialing Skill Standards. 				
<p>Programmatic Effectiveness: Documentation was provided that demonstrates how well the one-stop system integrates available services for participants and businesses and meets the workforce development needs of participants and the employment needs of local employers, including:</p> <ul style="list-style-type: none"> Local labor force participation rates at or below the state average; Regular collaboration with local economic development organizations and local businesses that includes regular meetings and partnerships (OJT contracts, training initiatives, etc.) that align with identified local sectors of strategic focus, identified emerging trends, or other needs identified through the use of labor market data; How access to partner programs is provided to the maximum extent possible, including the provision of services outside of regular business hours as the need is identified by LWDBs and with the feedback of one-stop customers; and Compliance with relevant state workforce policies, state and federal law, and agency technical assistance is locally monitored. 	ss. 445.007(6) and 445.009	20 CFR 678.800(b)		Submission of documents may be required by LWDB if a review of available information is not sufficient.
<p>Programmatic Compliance: Documentation is provided that programmatic compliance is achieved, including:</p> <ul style="list-style-type: none"> All state and federally required services, including core services, are made available to Floridians consistent with the law, including electronically available services; All required memorandums of understanding with mandatory or optional partners participating in the one-stop delivery system have been executed; Submission of required information for employees of FloridaCommerce who deliver employment services; and Individual Training Accounts have been expended on programs aligned with labor market needs of the local area and the system utilizes locally leveraged resources from other parts of the workforce system. Requirements specific to Education and Industry Consortium, consistent with section 445.007(15), Florida Statutes, have been met. 	ss. 445.007 and 445.009, F.S.	20 CFR 678.800(b)		Submission of documents may be required by LWDB if a review of available information is not sufficient.
<p>Fiscal Effectiveness: Documentation is provided that describes how well the center(s) operated in a cost-efficient manner. This must include:</p>	s. 445.009	20 CFR 678.800(b)		Submission of documents may be

<ul style="list-style-type: none"> • Documentation related to indirect cost agreement(s); and • That at least 90% of Wagner-Peyser funding is going into direct customer service costs; • The implementation of a regular system of fiscal monitoring to identify and improve fiscal compliance and performance. 				required by LWDB if a review of available information is not sufficient.
<p>Accessibility Compliance: Documentation was provided that centers meet accessibility requirements consistent with state and federal law, including the following:</p> <ul style="list-style-type: none"> • Compliance with ADA and disability-related regulations implementing WIOA sec. 188, set forth at 29 CFR Part 38. This includes how the physical accessibility of one stop centers will be ensured. • Provision of reasonable accommodation, auxiliary aids, services, and assistive technology. • Provision of reasonable modifications to policies, practices, or procedures where necessary. • The administering of programs that encourage participation. • Policies and practices are designed to communicate effectively with all potential customers, including those with disabilities. 		20 CFR 678.800(b))		Submission of documents required by LWDB.

Section H: Signatures Documenting Review and Approval by the LWDB or FloridaCommerce

*The application of a LWDB seeking to serve as a one-stop operator must include a signature of the chief elected official in the local area demonstrating approval.

Signature _____

Printed Name _____

Title _____

Date _____

Organization _____

LWDB Composition Requirements - be completed by Florida Commerce or SWDB Staff.	To	SCORE
Business Representative Criteria		
Percentage members from business in the local area		
COUNT of members from small business as defined by the U.S. Small Business Administration.		
Workforce Representative Criteria		
Percentage of the members who are workforce representatives.		
COUNT of representatives of labor organizations		
COUNT of representatives of a joint labor-management, or union affiliated, registered apprenticeship program within the area who must be a training director or a member of a labor organization.		
Additional Requirements		
COUNT of eligible training provider administering adult education and literacy activities under WIOA title II		
COUNT of public education or training provider is represented		
COUNT of private education or training provider is represented		
COUNT of representatives from an institution of higher education providing workforce investment activities, including community colleges		
COUNT of representative from economic and community development entities		
COUNT of representative from the State Employment Service office under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) serving the local area		
COUNT of representatives from programs carried out under title I of the Rehabilitation Act of 1973, other than sec. 112 or part C of that title		
MAY include		
COUNT of representatives of community-based organizations that have demonstrated experience and expertise in addressing the employment, training or education needs of individuals with barriers to employment, including organizations that serve veterans or provide or support competitive integrated employment for individuals with disabilities		
Count of representatives of organizations that have demonstrated experience and expertise in addressing the employment, training, or education needs of eligible youth, including representatives of organizations that serve out-of-school youth		
Count of representatives of entities administering education and training activities who represent local educational agencies or community-based organizations with demonstrated expertise in addressing the education or training needs for individuals with barriers to employment		
Count of governmental and economic and community development entities who represent transportation, housing, and public assistance programs		
Count of representatives from philanthropic organizations serving the local area		
Count of representatives of other appropriate individuals as determined by the chief elected official		

REQUIRED ELEMENT	OPTIONAL ELEMENT
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LWDB Composition Requirements	CFR	FL Statute
Business Representative Criteria		
A majority of the members of the Local WDB must be representatives of business in the local area	20 CFR 679.320(b)	
At a minimum, two members must represent small business as defined by the U.S. Small Business Administration.	20 CFR 679.320(b)	
Workforce Representative Criteria		
At least 20 percent of the members of the Local WDB must be workforce representatives.	20 CFR 679.320(c)	
MUST include two or more representatives of labor organizations, where such organizations exist in the local area.	20 CFR 679.320(c)(1)	
MUST one or more representatives of a joint labor-management, or union affiliated, registered apprenticeship program within the area who must be a training director or a member of a labor organization.	20 CFR 679.320(c)(2)	
Additional Requirements		
MUST include at least one eligible training provider administering adult education and literacy activities under WIOA title II	20 CFR 679.320(d)(1)	
If a public education or training provider is represented on the local board, a representative of a private education provider must also be appointed to the local board. (Unless waived by the SWDB)		s. 445.007 (1), F.S.
MUST include at least one representative from an institution of higher education providing workforce investment activities, including community colleges;	20 CFR 679.320(d)(2)	
If a public education or training provider is represented on the local board, a representative of a private education provider must also be appointed to the local board. (Unless waived by the SWDB)		s. 445.007 (1), F.S.
MUST include at least one representative from economic and community development entities	20 CFR 679.320(d)(3)(i)	
MUST include at least one representative from the State Employment Service office under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) serving the local area	20 CFR 679.320(d)(3)(i)	

MUST include at least one representative from programs carried out under title I of the Rehabilitation Act of 1973, other than sec. 112 or part C of that title	20 CFR 679.320(d)(3)(i) ii)	
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MAY include		
one or more representatives of community-based organizations that have demonstrated experience and expertise in addressing the employment, training or education needs of individuals with barriers to employment, including organizations that serve veterans or provide or support competitive integrated employment for individuals with disabilities	20 CFR 679.320(c)(3)	
one or more representatives of organizations that have demonstrated experience and expertise in addressing the employment, training, or education needs of eligible youth, including representatives of organizations that serve out-of-school youth.	20 CFR 679.320(c)(4)	
Entities administering education and training activities who represent local educational agencies or community-based organizations with demonstrated expertise in addressing the education or training needs for individuals with barriers to employment	20 CFR 679.320(e)(1)	
Governmental and economic and community development entities who represent transportation, housing, and public assistance programs	20 CFR 679.320(e)(2)	
Philanthropic organizations serving the local area	20 CFR 679.320(e)(3)	
Other appropriate individuals as determined by the chief elected official	20 CFR 679.320(e)(4)	

Representation Category	Representation DROPODOWN
BUSINESS	REQUIRED: Small Business
WORKFORCE	REQUIRED: Business
EDUCATION & TRAINING PROVIDER	REQUIRED: Labor Organization
ECONOMIC DEVELOPMENT	REQUIRED: Joint labor-management, or union affiliated, registered apprenticeship program
COMMUNITY PARTNER	REQUIRED: Eligible training provider administering adult education and literacy activities (PUBLIC)
WIOA	REQUIRED: Eligible training provider administering adult education and literacy activities (PRIVATE)
OTHER	REQUIRED: Representative from an institution of higher education providing workforce investment activities (PUBLIC)
	REQUIRED: Representative from an institution of higher education providing workforce investment activities (PRIVATE)
	REQUIRED: A representative from an economic and community development entity
	REQUIRED: A representative from the State Employment Service office under the Wagner-Peyser Act
	REQUIRED: A representative from Vocational Rehabilitation or Blind Services
	OPTIONAL: A representative of a community-based organization with expertise in addressing the employment, training or education needs of individuals with barriers to employment, including organizations that serve veterans or provide or support competitive integrated employment for individuals with disabilities
	OPTIONAL: A representative of an organization addressing the employment, training, or education needs of eligible youth
	OPTIONAL: a representative of a local educational agency (school district) or community-based organization with demonstrated expertise in addressing the education or training needs for individuals with barriers to employment
	OPTIONAL: A representative of a governmental and economic and community development entity who represents transportation, housing, and public assistance programs
	OPTIONAL: A representative of a local philanthropic organizations
	OPTIONAL: OTHER

Policy/Template	Line	Local Workforce Development	Comment Entry	Recommended Resolution	Action Taken	Feedback Response Key			
						Incorporated	Future Action	No change	TOTAL
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 88	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P5 LBS-87: The policy states that LWDBs "submit requests for certification using standardized forms provided by FloridaCommerce and CareerSource Florida"; but it does not specify what documents LWDBs must submit to FloridaCommerce at the start of the certification cycle, or whether LWDBs can access the standardized forms in advance. This may lead to inconsistent preparation timelines across local areas.	Comment (Proposed Resolution)(Edit): Specify whether FloridaCommerce or CSF distributes the LWDB certification submission forms and when they will be made available. Consider stating whether the forms will be published in advance to support consistent statewide implementation.	The draft forms were shared along with this policy for feedback and will be linked with the policy revision when adopted by the SWDB.				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 91	CareerSource Brevard Flagler Volusia	The policy indicates that CSF and FloridaCommerce "use the evaluation for LWDB certification to determine if the LWDB is eligible to receive funding for its One-Stop system." This may lead to inconsistency in whether LWDBs are expected to come to FloridaCommerce and submit this form or whether it is used solely as an internal evaluation tool. The policy also does not specify which documents LWDBs must submit as part of the certification request or the submission timeline.	Comment (Proposed Resolution)(Edit): Clarify whether the Evaluation for LWDB certification Form is completed only by CSF/Commerce or also by LWDBs. Consider adding explicit guidance on the required documents LWDBs must submit and the expected submission timeline.	Language added to forms to clarify. The draft forms were shared along with this policy for feedback and will be linked with the policy revision when adopted by the SWDB. Technical assistance will follow to provide additional support for LWDBs on this process.				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 100	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P4 L159: Section D provides detailed requirements for LWDB Direct Provider designation, while Section E provides requirements for LWDB certification and one-stop system designation. This may lead to inconsistency in the scope of the policy. This may also lead to confusion about whether Direct Provider designation is the primary focus of the policy despite the broader scope stated on Page 1.	Comment (Proposed Resolution)(Edit): Clarify whether Direct Provider designation is intended to have more detailed statewide standards or whether additional detail should be added to the other sections for consistency. Refining the introductory copy language may help align expectations.	The draft forms were shared along with this policy for feedback and will be linked with the policy revision when adopted by the SWDB.				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 141	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P4 L144-145: The policy references WIOA Section 1337, which requires LWDBs to submit an annual report but does not provide specific instructions for certification under WIOA. This may lead to inconsistency in whether the MOU-FA, assessment assessments, or other documentation are part of the certification submission or reviewed separately during monitoring. This may lead to inconsistent interpretations of certification requirements.	Comment (Proposed Resolution)(Edit): Clarify the required components of the one-stop certification submission, including whether the MOU-FA is included in the one-stop certification submission. This will help align monitoring. Consider adding the Evaluation for One-Stop Certification Form and specifying supporting documentation expectations.	Policy revised to add clarity and specification as requested.				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 150	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P4 L150-151: The policy supports the review, designation, and certification of LWDBs, service providers for the one-stop system, and direct providers. While the policy states that only Section D contains detailed procedural requirements (Direct Provider designation), while LWDB certification and one-stop system certification are also included, this may lead to inconsistency. This may also lead to confusion about whether the policy governs all three areas equally.	Comment (Proposed Resolution)(Edit): Clarify whether the policy is intended to provide equivalent procedural guidance for LWDB certification, one-stop delivery system certification, and Direct Provider designation. Consider refining the Purpose and Scope language or adding corresponding detail to ensure consistent interpretation across LWDBs.	Language added to forms to clarify. The draft forms were shared along with this policy for feedback and will be linked with the policy revision when adopted by the SWDB. Technical assistance will follow to provide additional support for LWDBs on this process.				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 159	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P5 L197-201: The policy requires LWDBs to conduct an annual internal review of governance and service delivery. This may lead to inconsistency in whether LWDBs must conduct an internal review or whether they must submit a report or required documentation of these reviews. This may result in inconsistent implementation across local areas and potential monitoring inconsistencies.	Comment (Proposed Resolution)(Edit): Define the minimum required elements of the annual internal review or provide a template/shortcut to the one-stop certification application. Clarify documentation required and whether the review must be submitted, retained, or incorporated into LWDB certification.	Language added to forms to clarify. The draft forms were shared along with this policy for feedback and will be linked with the policy revision when adopted by the SWDB. Technical assistance will follow to provide additional support for LWDBs on this process.				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 1	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): Multiple Sections: Required for LWDBs to undergo an internal evaluation. The policy references several standardized forms (LWDB Certification, One-Stop Certification, Direct Provider Designation) but does not consistently specify which form is used for which purpose. This may lead to internal evaluation tools used by CSF/Commerce. This has the potential to result in incorrect or incomplete submissions.	Comment (Proposed Resolution)(Edit): For each referenced form, explicitly state whether the LWDB completes and submits the form or whether the form is used internally by CSF/Commerce to evaluate submissions. Consider adding a submission checklist to Appendix or Attachments.	Language added to forms to clarify. The draft forms were shared along with this policy for feedback and will be linked with the policy revision when adopted by the SWDB. Technical assistance will follow to provide additional support for LWDBs on this process.				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 130	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P4 L153-157, P5 L153-157: The policy states that LWDBs must obtain SWDB approval to serve as a One-Stop Operator, but does not clarify the sequence of actions (e.g., prior to proposing a One-Stop Operator, does another step like corrective action, reiteration, or reapplication process follow the reevaluation).	Comment (Proposed Resolution)(Edit): Clarify the procedural sequence for requesting and obtaining SWDB approval to serve as a One-Stop Operator but does not clarify the sequence of actions (e.g., prior to proposing a One-Stop Operator, does another step like corrective action, reiteration, or reapplication process follow the reevaluation).	This will be provided via Technical Assistance				
G105 LWDB Composition; Certification of One-Stop Systems and Boards	Line Number: 137, H4 L153-157, P5 L153-155	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P5 L153-157: The policy specifies conditions under which certification or designation may be revisited. This may lead to confusion about the corrective action, reiteration, or reapplication process following reevaluation.	Comment (Proposed Resolution)(Edit): Consider including a description of the corrective action or reiteration process to ensure LWDBs understand the steps required to return to compliant status following reevaluation.	This will be provided via Technical Assistance				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 1	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): The policy contains multiple provisions for LWDBs to receive letter grades and undergo direct provider certification, Direct Provider designation but does not present them in a single narrative format. This may create ambiguity for new boards or staff unfamiliar with the distinctions.	Comment (Proposed Resolution)(Edit): Consider separating the three provisions directly related to LWDBs with clearly labeled requirements, timelines, and form usage. This will improve readability and ensure consistent statewide interpretation.	Policy revised to add clarity and specification as requested.				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 60	CareerSource Palm Beach County	Comment (Concern with citation): The policy incorporates the state issued LWDB Letter Grade as a criterion for determining "fack of performance" for individual removal. This is problematic because the LWDB Letter Grade is a consumer-informed metric, designed to support consumer choice, and is not a valid performance metric as it is not validated, performance-accountability measure for personnel decisions. Unlike the federally governed WIOA Primary Indicators of Performance, the LWDB Letter Grade is not a valid performance metric, validation testing, and no statistical adjustment model to account for varying participant characteristics, economic conditions, or regional labor markets. The LWDB Letter Grade is a compliance communication tool rather than a rigorously adjusted performance metric. Using it as grounds for "for cause" removal misaligns its purpose and creates significant fairness and compliance concerns.	Comment (Proposed Resolution)(Edit): Revise the section to clarify that "for cause" removal applies to individual "lack of performance" if the Letter Grade is not a valid performance metric. The LWDB Letter Grade is not a basic for personnel action. Program-level concerns arising from Letter Grade are best addressed through programmatic improvements, accountability mechanisms in G103 and G104, not through individual removal provisions intended to address misconduct or individual-level deficiencies. The LWDB Letter Grade is a compliance communication tool, not a performance-centered intent of the Letter Grade, and prevents the misuse of an unvalidated metric for personnel decisions.	The Lack of Performance requirements must include federal performance measures and is consistent with WIOA Section 107(c)(3) and with s 445.002(2), F.S.				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 68	CareerSource Palm Beach County	Comment (Concern with citation): The policy includes persistent poor performance as a reason for individual removal as a factor in determining "lack of performance" for the purpose of removing individual LWDB members or the executive director. This is problematic because persistent poor performance is not a valid performance metric. Persistent poor performance will be evaluated, what metrics will be used, or the methodology for determining whether an LWDB is "consistently underperforming." Without a clear evaluation framework, this provision is susceptible to inconsistent application across local areas.	Comment (Proposed Resolution)(Edit): Remove subgroup performance as a sole basis for individual removal. This will ensure LWDBs are not removed for a single poor performance metric.	Subgroup performance is not currently listed as a sole basis for individual removal.				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 79	CareerSource Palm Beach County	Comment (Concern with citation): The policy lists "failure to convene education and industry consortium meetings in accordance with s. 445.007" as an element of "lack of performance" that may justify removal. This is problematic because this provision is not a valid performance metric. Convening consortium meetings is a compliance requirement, not a performance measure. Treating a compliance issue as a performance metric creates a false sense of "lack of performance" beyond the intent of s. 445.002(2), F.S., which addresses individual-level conduct or incompetence, not whether the organization met procedural requirements.	Comment (Proposed Resolution)(Edit): Remove failure to convene consortium meetings as a compliance issue to be addressed through monitoring and corrective action, not as grounds for individual removal. This will ensure LWDBs are not removed for a single poor performance metric.	Policy edited to remove this from this section.				
State Policy: G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Policy Line Number: 122	CareerSource Citrus Levy Marion	Comment (Concern with citation): This section states boards can be decertified for measurable declines in business customer satisfaction. To our knowledge this is not being measured at this time and would need to be done by CSF/Commerce. We measure the satisfaction of job seekers and business clients locally and nationally. The policy does not provide any details on benchmark performance or methods of measurement. When would this begin?	Comment (Proposed Resolution)(Edit): The state should propose a standardized tool and manage the survey process as is used to. Additionally, this is already indirectly measured through letter grade, but not in a way that would show definite increase or decrease of overall satisfaction.	Technical assistance will be provided and this recommendation will be taken into consideration for future action.				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Policy Line Number: 122	CareerSource Citrus Levy Marion	Select Policy: G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation, Comment (Concern with citation): measures of employer satisfaction,	Comment (Proposed Resolution)(Edit): this needs more definition: what are the measures? How is reduced funding being considered?	This particular metric aligns with the updated federal measure on employer satisfaction, finalized in two rules by USDOJ on March 25, 2024, which establish a definition of Effectiveness in Serving Employers. https://www.dol.gov/agencies/etsa/performance/reporting . Additional technical assistance and information will be provided.				

Policy/Template	Line	Local Workforce Development Board	Comment Entry	Recommended Resolution	Action Taken
LWDB Composition Tool	Line Number: 23	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): The current composition tool has the automated calculation at the bottom of the 1st page and this one does not.	Comment (Proposed Resolution/Edit): Keep the automated calculation of the composition compliance summary on the bottom of the 1st page as it currently is without changing it. The current form calculates the % and is very easy to determine if you've completed it correctly because it turns green when you've met the required and red when you haven't and the red has helped me to realize that some of our members represent additional categories.	We will incorporate this recommendation prior to the Tool's release.
LWDB Composition Tool	Line Number: 1	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): The Composition Compliance Summary doesn't automatically count the % of members and turn green when it's met or red when it's not, which can cause errors.	Comment (Proposed Resolution/Edit): Please keep the form as it currently is without using this Composition Compliance Summary on the second tab. This new tab is not as easy to understand if we've met the criteria in each category.	Clarifying language, instructions and technical assistance will be provided for the second tab.

Feedback Response Key			
Incorporated	Future Action	No change	TOTAL
2	0	0	2

Policy/Template	Line	User/Workforce Development Board	Comment Text	Recommended Resolution	Action Taken
Evaluation for One-Stop Certification Form	Line Number: 11	CarverSource Reward Rager Vtata	Comment (Concern with statement): The Evaluation for One-Stop Certification Form appears to continue criteria for UWDBs to serve as the One-Stop Delivery System. There are distinct processes for UWDBs to serve as the One-Stop Delivery System. These are distinct processes and UWDBs are not required to complete, submit, or use internally.	Comment (Proposed Resolution/Edit): Clarify regarding the criteria for UWDB operator approval from the UWDB perspective certification or clarify which portions of the form apply to each process. Clarify which sections UWDBs must complete versus which sections are completed by CfC/Commerce.	Resolved to clarify which sections UWDBs must complete versus which sections are completed by CfC/Commerce. A submission will be provided as part of Section of Assistance.
Evaluation for One-Stop Certification Form	Line Number: 12	CarverSource Reward Rager Vtata	Comment (Concern with statement): Several criteria mentioned in the One-Stop Certification Form are not clearly defined (e.g., P6, OHS or whether these criteria will be monitored or internal review). This may create uncertainty in the application packet.	Comment (Proposed Resolution/Edit): Clarify whether UWDBs must attach evidence of compliance with referenced UWDB-wide policies (e.g., P6, OHS) or clarify which sections UWDBs must attach evidence of compliance for with referenced UWDB-wide policies (e.g., P6, OHS) in the application packet.	Resolved to clarify which sections UWDBs must attach evidence of compliance for with referenced UWDB-wide policies (e.g., P6, OHS) in the application packet.

Feedback Response Key			
Incorporated	Future Action	No change	TOTAL
			2

Policy/Template	Line	Local Workforce Development Board	Comment Entry	Recommended Resolution	Action Taken
Evaluation for LWDB Direct Service Provider Designation	Line Number: 1	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): The "Met/Not Met" criteria lack defined minimum evidence standards, which may lead to inconsistent interpretation by both LWDBs and state reviewers.	Comment (Proposed Resolution/Edit): Define minimum evidence requirements or provide examples of acceptable documentation for each criterion to ensure consistent statewide application.	Additional training and technical assistance will also be forthcoming on this topic.

Feedback Response Key			
Incorporated	Future Action	No change	TOTAL
0	1	0	1

Approved _____
Disapproved _____

Action Item 4

NEW WORKFORCE POLICY O125 - BUSINESS ENGAGEMENT AND ECONOMIC DEVELOPMENT SUPPORT

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 recommend approval of CareerSource Florida Workforce Policy O125 – Business Engagement and Economic Development Support establishing statewide standards for Local Workforce Development Boards (LWDBs) to deliver consistent, high-quality business services that support employer recruitment, training, and retention, driving economic growth across Florida. LWDBs must coordinate with career centers, economic development partners, and educational institutions to align services with regional workforce needs, using strategies such as On-the-Job Training (OJT), Customized Training, Incumbent Worker Training, apprenticeships, and layoff prevention incentives.

This new policy requires LWDBs to implement demand-driven training programs, enhance employer engagement, and integrate workforce strategies into regional economic development plans. Formal partnerships with economic development agencies must be documented through Memorandums of Understanding (MOUs) and include shared metrics including business engagement and satisfaction.

CareerSource Florida and FloridaCommerce worked 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 November 24 – December 10, 2025. CareerSource Florida received 27 comments from 9 LWDBs. A thorough review of the comments was conducted by CareerSource Florida and FloridaCommerce. 77.80% 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 New Workforce Policy O125 – Business Engagement and Economic Development Support**

 <h1 data-bbox="458 566 975 635">Workforce Policy</h1>	POLICY NUMBER O125
Title: Business Engagement and Economic Development Support	
Policy Type: Operational	
Programs: Workforce Innovation and Opportunity Act & Wagner-Peyser	
Effective: 06/11/2019	Revised: 02/20/2025

I. PURPOSE AND SCOPE

Florida's workforce strategy is focused on delivering a high-performing workforce system that is flexible, results-driven, and always improving. Business services are a vital part of that strategy. Florida's vision focuses on strengthening business engagement and delivering real value by identifying employer needs, coordinating services across partners, and building sector-based partnerships that support in-demand industries. Strong, responsive connections with businesses are essential to achieving this vision. Local Workforce Development Boards (LWDBs) and career centers work side-by-side with employers of all sizes to provide consistent, high-quality support that helps them find, train, and retain skilled workers, fueling local economies and driving job growth. FloridaCommerce and CareerSource Florida reinforce these efforts by encouraging alignment, reducing barriers to collaboration, and providing strategic and technical support. This policy establishes clear expectations for how LWDBs should engage employers, coordinate with regional partners, and align workforce services with regional needs to help communities attract, grow, and retain businesses.

II. KEY OBJECTIVES AND MEASURABLE PERFORMANCE OUTCOMES

LWDBs should establish and develop effective relationships and networks with the business community. LWDBs develop and implement promising and proven strategies that provide the skilled workforce needed by local employers to expand employment and career advancement opportunities within in-demand industry sectors or occupations. LWDB services assist in driving regional economic development through strategic partnerships and data-driven decisions.¹

A. Key Objectives

- Enhance Employer Engagement:** Conduct proactive and responsive outreach and communication and develop tailored workforce strategies that align with business needs to build lasting partnerships.

¹ [20 CFR 679.370\(e\)\(4\)](#)

31

32 2. **Expand Demand-Driven Training Programs:** Grow and promote training models

33 like On-the-Job Training (OJT), Customized Training (CT), Incumbent Worker

34 Training (IWT), and apprenticeships, as well as rapid-credential opportunities to

35 support business growth, meet workforce demands in high-growth sectors, and

36 improve employment outcomes through strategic collaboration and ongoing

37 evaluation. Increase awareness and support of state-level training programs like

38 Quick Response Training (QRT) grants.

39

40 3. **Advance Regional Economic Development:** Partner with local and regional

41 economic development organizations (EDOs) to integrate workforce training into

42 economic development activities.

43

44 **B. Measurable Performance Outcomes**

45

46 **1. Employer Engagement & Satisfaction**

47 • Total number of employers served.

48 • Effectiveness in Serving Employers.²

49

50 **2. Business Engagement**

51 • Number of businesses participating in work-based training.

52 • Number of Memorandums of Understanding (MOUs) executed in alignment with

53 technical guidance.

54 • Business engagement metrics.³

55

56 **III. POLICIES AND PROCEDURES**

57

58 Business services help employers grow and connect individuals to jobs by aligning training with

59 industry needs and preparing job seekers for in-demand roles. LWDBs and career centers are

60 required to deliver services that support regional economic growth and advance the WIOA

61 goals of building a demand-driven workforce system. LWDBs must collaborate with economic

62 development partners to address workforce gaps and plan for future needs.⁴ To promote

63 consistency and efficiency across Florida's workforce system, LWDBs must align business

64 services with statewide standards. A consistent statewide approach ensures employers receive

65 high-quality support through sector strategies, career pathways, and proven models such as

66 OJT, as highlighted in TEGL 21-22.⁵ The 2021 REACH Act⁶ further integrates education and

67 workforce systems to meet labor market demands.

68

69 LWDBs should collaborate within all counties in their local workforce development areas and

70 across regional planning areas to establish formal partnerships with regional and local EDOs

71 to deliver seamless, high-quality business services. These partnerships should be documented

72 in MOUs or formal agreements that outline the roles and responsibilities of each entity in

73 supporting business recruitment, expansion, and retention efforts. Coordination efforts should

74 be conducted in alignment with technical assistance and include regular meetings, joint

75 planning sessions and shared business engagement metrics, economic impact metrics,

² WIOA Effectiveness in Serving Employers Performance Indicator: [TEN 24-23](#)

³ [EconoVue Business Engagement Success Metrics](#)

⁴ [20 CFR 679.370](#)

⁵ [Training and Employment Guidance Letter \(TEGL\) No. 21-22](#)

⁶ [Section 14.36, F.S.](#)

76 partnership and coordination metrics, service delivery metrics, and shared goals for strategic
77 alignment to ensure alignment with regional economic growth strategies.
78

79 **A. Strategic Coordination with Economic Development**

80 LWDBs are expected to foster strategic partnerships with regional and local businesses
81 and EDOs by coordinating planning efforts, sharing labor market intelligence, and
82 collaborating on initiatives that drive business growth and job creation. These
83 partnerships ensure workforce strategies align with state workforce and economic
84 goals, regional economic goals, and are supported through ongoing communication and
85 data-informed decision-making.
86

87 LWDBs must coordinate with regional and local economic development agencies to:
88

- 89 1. Identify business recruitment or expansion opportunities.
- 90 2. Align WIOA-funded training programs with targeted business needs.
- 91 3. Offer work-based training options as part of available supports for employers.
- 92 4. Increase awareness and provide timely support for businesses seeking state training
93 program assistance like Quick Response Training (QRT) grants.
94

95 Such coordination must be documented in local MOUs or formal partnership
96 agreements in alignment with technical guidance. CareerSource Florida and
97 FloridaCommerce will provide technical assistance, including a standardized MOU
98 template, information about existing economic development partnerships, and training
99 resources, as part of a statewide toolkit.
100

101 **B. Business-Aligned Toolkit and Training Models**

102 With the support of technical assistance, resources, and a statewide toolkit provided by
103 CareerSource Florida and FloridaCommerce, LWDBs should develop a comprehensive
104 local Business Toolkit that details the services and support available to businesses in
105 alignment with standards set by CareerSource Florida and FloridaCommerce. LWDBs
106 must also establish and communicate clear procedures and products that ensure
107 consistent implementation and compliance with federal and state regulations. These
108 procedures must include:
109

- 110 1. **Application and Approval:** Outline clear procedural steps for requesting and
111 approving training programs.
- 112 2. **Documentation Standards:** Specify required records for training activities and
113 outcomes.
- 114 3. **Monitoring and Reporting:** Detail processes for oversight and compliance with
115 WIOA, 20 CFR, and Chapter 445, Florida Statutes.
116

117 LWDBs should utilize WIOA-funded training strategies, including those listed below, as
118 allowable options for effective implementation:
119

- 120 1. **On-the-Job Training (OJT):** Wage reimbursement for training new hires.
- 121 2. **Paid Work Experience:** Temporary employment opportunities focused on skill
122 development.
- 123 3. **Registered Apprenticeships and Pre-Apprenticeships:** Structured programs for
124 long-term talent development.
- 125 4. **Incumbent Worker Training:** Training designed to help a business retain a skilled

126 workforce or avert layoffs.

127 5. **Customized Training:** Tailored training designed to meet the special requirements
128 of a business or a group of businesses that is conducted with a commitment by the
129 business to employ or continue to employ an individual upon successful completion
130 of the training.

131 6. **Quick Response Training:** Increase awareness and support of state-level training
132 programs like Quick Response Training (QRT) grants.

134 Training strategies must be provided consistently and made available to all businesses.
135 Allowable training providers include state educational institutions, industry, or
136 contracted providers of training, and may include credentials on the Eligible Provider
137 Training List or the Master Credential List. Training providers should be identified with
138 the input of business partners in alignment with issued technical assistance. All
139 activities must comply with applicable federal and state requirements.

141 **IV. IMPLEMENTATION**

143 LWDBs are encouraged to use sector strategies, develop career pathways, and share
144 innovative best practices across local workforce development areas and local workforce
145 development regions.

147 Each LWDB must develop and maintain applicable Local Operating Procedures (LOPs). LOPs
148 must be reviewed each year and updated as needed. A description of LWDB business
149 strategies and local operating procedures must be described in WIOA local plans. LOPs should
150 include employer outreach and candidate screening steps; training coordination; sector
151 strategy actions and employer feedback methods; rules for using WIOA funds to support
152 businesses; and documentation and tracking of employer commitments.

154 Florida Commerce, in consultation with CareerSource Florida, will provide technical guidance,
155 including templates, and conduct annual reviews of LOPs and business service results as
156 necessary.

158 **V. ATTACHMENTS AND RESOURCES**

160 [WorkforceGPS - Business Engagement Collaborative Community Homepage](#)

162 [Toolkit | Business Center | CareerOneStop](#)

164 [WorkforceGPS - What the Evidence Says About Employer Engagement Strategies](#)

166 [WorkforceGPS - Modernizing Business Services for Today's Employer](#)

168 [WorkforceGPS - Employer Engagement Webinar Series: Top 20 "Take Home Now"
169 Strategies for Success](#)

171 [WorkforceGPS - Business Services: Effectively Engaging Employers, Utilizing Data, and
172 Measuring Performance](#)

Policy/Template	Line	Local Workforce Development Board	Comment Entry	Recommended Resolution	Action Taken
Q125 Business Services	Lines 56-62	CareerSource Central Florida	Comments should be provided for each key objective and measurable performance outcomes listed in this policy in the relevant WIOA section. Code of Federal Regulation (24 CFR 57.100) requires WIOA funds to be used for core business services and additional allowable business services listed in this policy. This policy should be revised to reflect this requirement.	Clarification provided within policy.	
Q125 Business Services	Lines 80-115	CareerSource Central Florida	Core business services and additional allowable business services listed in this policy are to be provided by the Local Workforce Development Board. These services are to be provided through their one-stop delivery systems. These services have three primary objectives: to provide job seekers with employment and measurable performance outcomes and confirm what is required by law and regulations.	Recommend solution – add clarifications for each business service listed in this policy and reorganize the services into the appropriate categories.	Clarification provided within policy.
	Lines 183-185	CareerSource Central Florida	By whom the Local Operating Providers need to be prepared:	Recommended solution – add a date for completion and first review by Florida Commerce and DOL.	This will be addressed in technical assistance and training
Q125 Business Services	Line Number 165	CareerSource Tampa Bay	Comment: It is recommended to remove P40, as it is redundant. The program functions more as a recruiting and on-boarding opportunity for the job seeker rather than a tangible benefit to the business, since participants also have the ability to receive training and placement services through the program. "Recruit" can bring a negative air to recruitment.	Remove P40 as an employer incentive. It is suggested to remove the word "Recruit" as it is redundant and may convey a more positive and value-driven message.	Policy was revised to add INT and remove P40.
Q125 Business Services	Line Number 171	CareerSource Capital Region	Comment (Proposed Resolution)(a)(2) Supporting evidence indicates that participating employers must commit to bring participants upon successful completion of training.	Comment (Proposed Resolution)(a)(2) Supporting evidence indicates that participating employers must commit to bring participants upon successful completion of training.	Language in Employee Commitments section of this policy has been revised to reflect requirement to have OE retain the language.
Q125 Business Services	Line Number 17	CareerSource Broward	Comment (Proposed Resolution)(a)(2) The policy states that one of the Measurable Performance Outcomes is "Time to Service Measurement".	Comment (Proposed Resolution)(a)(2) Need definition of what this means and how this is calculated.	This will be addressed in technical assistance and training
Q125 Business Services	Line Number 81	CareerSource Broward	Comment (Concurred with clarifications): Policy indicates that the workforce board should enter into a MOU with the Greater Ft. Lauderdale Alliance. There are also other partners involved in this program.	Comment (Proposed Resolution)(a)(2) Need definition on how/where these will be tracked.	This will be addressed in technical assistance and training
Q125 Business Services	Line Number 52	CareerSource Research Coast	Comment (Concurred with clarifications): Please clarify what metrics and methodology are used to measure success.	Comment (Proposed Resolution)(a)(2) Clarification	This will be addressed in technical assistance and training
Q125 Business Services	Line Number 177	CareerSource Research Coast	Comment (Concurred with clarifications): This also applies to Paid Work Experience as Nothing participants is currently not required?	Comment (Proposed Resolution)(a)(2) Clarification	This proposed change will be explored with case management technical staff.
Q125 Business Services	Line Number 49	CareerSource Research Coast	Comment (Concurred with clarifications): Please clarify which program participants will be assigned to which partners. DOL, INT, and OE participants are already assigned to one of the partners.	Comment (Proposed Resolution)(a)(2) Clarification	Language in Employee Commitments section of this policy has been revised to reflect requirement to have OE retain the language.
Q125 Business Services	Line Number 120	CareerSource Palm Beach County	Comment (Concurred with clarifications): The requirement that WIOA funds provide technical assistance and training to business partners is redundant. This policy should expand the scope of WIOA authority under WIOA. Reducing business failure rates and increasing employment rates are the primary goals of this program.	Comment (Proposed Resolution)(a)(2) Authorize the requirement to have WIOA responsibility to workforce development partners to provide technical assistance and training to business partners. This is consistent with economic development partners focus areas and the intent of WIOA. This is also consistent with the intent of WIOA to expand the scope of WIOA authority under WIOA. Reducing business failure rates and increasing employment rates are the primary goals of this program.	Language revised to read instead of must.
Q125 Business Services	Line Number 122	CareerSource Palm Beach County	Comment (Concurred with clarifications): We are of a position that WIOA programs are "an act of a public authority" and not a private entity. Therefore, WIOA funds may not be used for business induction or economic development partners to provide technical assistance and training to business partners. This is consistent with the intent of WIOA to expand the scope of WIOA authority under WIOA. Reducing business failure rates and increasing employment rates are the primary goals of this program.	Comment (Proposed Resolution)(a)(2) Review the language in Employee Commitments section of this policy to reflect the requirement to have WIOA responsibility to workforce development partners to provide technical assistance and training to business partners. This is consistent with the intent of WIOA to expand the scope of WIOA authority under WIOA. Reducing business failure rates and increasing employment rates are the primary goals of this program.	Change the section name from Available Incentive Training Models to Business Higher Training Models. Assess requirement to policy in alignment with Economic Development partners and speaking the language of business.
Q125 Business Services	Line Number 127	CareerSource Palm Beach County	Comment (Concurred with clarifications): The policy requires WIOA to establish Memoranda of Understanding (MOUs) with regional and local economic development partners to provide technical assistance and training to business partners that are not designated as required one-stop partners under WIOA §132(b) and §132(c). WIOA funds can be used as economic development partners to provide technical assistance and training to business partners in the one-stop delivery system. While WIOA encourages strategic	Comment (Proposed Resolution)(a)(2) Review the requirement to reflect that coordination with WIOA partners is not required for business partners that are not designated as required one-stop partners under WIOA §132(b) and §132(c). WIOA funds can be used as economic development partners to provide technical assistance and training to business partners in the one-stop delivery system.	Related to "should" and expanding options for documentation beyond MOUs.
Q125 Business Services	Line Number 140	CareerSource Palm Beach County	Comment (Concurred with clarifications): The use of the term "incentive" in this section is redundant. The term "incentive" is used in the section "Available Incentive Training Models to Business Higher Training Models". This section is redundant with the section "Available Incentive Training Models to Business Higher Training Models". Assess requirement to policy in alignment with Economic Development partners and speaking the language of business.	Comment (Proposed Resolution)(a)(2) Review the section "Available Incentive Training Models to Business Higher Training Models". Assess requirement to policy in alignment with Economic Development partners and speaking the language of business.	Changed the section name from Available Incentive Training Models to Business Higher Training Models. Assess requirement to policy in alignment with Economic Development partners and speaking the language of business.

0125 Business Services	Line Number: 201	CareerSource Palm Beach County	Comment Concern with changing PWE (Participating Work Experience) (PWE) to the term "Participating Training" and "Participating Experience" (PWE) as an acronym for "Participating Work Experience". PWE is a participant-focused program to provide short-term, structured work exposure and foundational skill-building, including basic skills training, to individuals who are not currently employed. It is classified as a Career Service, not a training service, so it is not intended to meet employer needs. The term "Participating Training" is more descriptive of the interaction in the way GTF, INT, or Customized Training do. Describing PWE as a "Participating Experience" is also more descriptive of the interaction and less vague or vague regarding eligibility, documentation, and employer expectations.	Comment (Proposed Resolution)(40) Remove PWE from this section.	Revised to add INT and remove PWE.
0125 Business Services	Line Number: 203	CareerSource Palm Beach County	Comment Concern (with clarifications): The policy makes no opportunity to highlight TAFT-funded Community Service (non-work experience) as an effective way to engage individuals in the workforce. The policy also does not provide examples of how employers as a "try-before-you-buy" opportunity. This activity allows employers to assess the potential of individuals to work in their organization before committing to a full-time placement. This is an effective way to engage individuals in the workforce while providing meaningful skill development for TAFT participants. The policy also does not provide examples of how individuals who successfully complete TAFT Community Service may become candidates for subsequent WIOA-funded On-the-Job Training (OJT) placements.	Comment (Proposed Resolution)(40) Add language recognizing TAFT-funded Community Service as an effective way to engage individuals in the workforce. This activity allows employers to assess the potential of individuals to work in their organization before committing to a full-time placement. This is an effective way to engage individuals in the workforce while providing meaningful skill development for TAFT participants. The policy also does not provide examples of how individuals who successfully complete TAFT Community Service may become candidates for subsequent WIOA-funded On-the-Job Training (OJT) placements.	This will be addressed in technical assistance and training. Once TAFT & SNAP EBT are in E5, we may want to reconsider tracking these activities as separate.
Select Policy: 0125 Business Services	Policy Line Number: 136-127	CareerSource North Florida	Policy does not provide guidance on how to document the linkage, allowable costs, what documentation is acceptable and does not provide examples of allowable documentation. The policy also does not provide examples of how to document non-disallowable services provided. Concern - will cause documentation costs	Comment (Proposed Resolution)(40) Clearly delineate non-disallowable expenses under WIOA Title 1 such as apprenticeship training, apprenticeship costs, apprenticeship opportunities, providing labor market information, and other training activities. This addition will provide clarity on what documentation is acceptable to enhance employer experience, and reinforce the integrated service delivery approach to be followed whenever a participant receives training services.	This will be addressed in technical assistance and training
Select Policy: 0125 Business Services	Policy Line Number: 48	CareerSource Citrus Levy Marion	Comment (Concern with clarifications): The measurable performance outcomes section includes a formula for how to measure the outcome. The formula for how to measure the outcome does not mention if the funding, economic condition, etc., will be taken into account.	Comment (Proposed Resolution)(40) Policies that define a measurable outcome must include the formula for calculating and at least one condition measured.	Clarion added for federal guidance on this in this policy.
Select Policy: 0125 Business Services	Policy Line Number: 60	CareerSource Citrus Levy Marion	Comment (Concern with clarifications): This section needs to impose performance goals on GTF services or REACT services. It does not state if the goal is to be included in the performance measurement section or the outcome section. This does not seem to be an area where we should be seeking "performance". Additionally, this is completely dependent on the local economy.	Comment (Proposed Resolution)(40) It is apparent that the GTF service activity listed in the Rapid Response funds section of the policy is not included in the performance measurement section. The performance measurement section does not cover all of the expenses of GTF/REACT services activities to legitimate performance measurement. The performance measurement section of GTF/REACT services activities is not included in the outcome section of GTF/REACT services activities. This data is totally unrelated to our mission and objectives.	Removed
0125 Business Services	Line Number: 23	CareerSource Citrus Levy Marion	Comment (Concern with clarifications): Key Objective - metrics	Comment (Proposed Resolution)(40) Throughput the data to be measured and how the data is defining throughput. The data needs to be converted with the detail addressed.	Language clarified in policy
0125 Business Services	Policy Line Number: 47	CareerSource Citrus Levy Marion	Comment (Concern with clarifications): Within 90 days Select Policy	Comment (Proposed Resolution)(40) Within 90 days of what? agent how is the state making IT to develop a plan.	Removed
0125 Business Services	Policy Line Number: 60	CareerSource Citrus Levy Marion	Comment (Concern with clarifications): The two measures cited here out of place. Are these measures for the state or the county? We are not sure if these are economic factors that affect youth, why are we being judged based on them? Median income and median household income are not economic factors.	Comment (Proposed Resolution)(40) The GTF measures section does not include the two measures cited here. These measures are not economic factors. GTF/REACT services activities are not included in the outcome section. This data is totally unrelated to our mission and objectives.	Removed
0125 Business Services	Number: 177	CareerSource Tampa Bay	Comment (Concern with clarifications): Training is a component of training. Define "Training" agree with PWE if it's for OJT, INT & Customized training are already covered. If it's referring to training, the training providers must be approved by the state. The training providers must be approved by the state.	Comment (Proposed Resolution)(40) Example of some Employer Commitments:	Removed
0125 Business Services	Line Number: 150	CareerSource Tampa Bay	Comment (Concern with clarifications): PWE is a participant service and not a training service. PWE is a participant service that provides directly benefit from having a PWE participant. In this way it should be used as an acronym for employer engagement.	Comment (Proposed Resolution)(40) It is apparent that the PWE acronym is being used as an acronym for employer engagement.	Revised to add INT and remove PWE. Language in Employer Commitments section revised to reflect requirement to file OJT retain
0125 Business Services	Line Number: 161	CareerSource Tampa Bay	Comment (Concern with clarifications): There is nothing in the page that requires PWE to be a participant service, just a PWE work. The comment only clarifies about what constitutes training. Only OJT can be listed. 20 CFR § 640.700. (a) Training. Training means instruction that results in the acquisition of knowledge or skills. (b) Work experience. Work experience means experience that is planned, structured, and supervised by an employer or registered apprenticeship program sponsor in the public, private non-profit, or private for-profit sectors, or by a registered apprenticeship program provider for the WIOA participant in exchange for the reimbursement, typically up to 100 percent of the participant's wages, of the cost of the training and the costs of providing the training and supervision related to the training. In limited circumstances, as provided in WIOA sec. 1445(b)(3) and 1452, the employer may be required to pay the participant's wages for the training. (c) On-the-Job Training (OJT). OJT means training that is provided by an employer to enable a participant to gain experience in a particular occupation or industry. OJT contracts under WIOA title 1, must not be entered into with an employer that has exhibited a pattern of failing to provide OJT participants with compensation, benefits, and working conditions that are comparable to those provided to other employees in the same occupation or industry. (d) Customized Training. Customized training means training that is designed to meet the specific needs of an employer or an individual participant. (e) Work-based training. Work-based training means training that is provided by an employer to a participant to become proficient in the occupation for which the training is being provided. (f) Apprenticeship training. Apprenticeship training means training that is provided by an employer to a participant to become proficient in the occupation for which the training is being provided. (g) Sector-based training. Sector-based training means training that is provided by an employer to a participant to become proficient in the occupation for which the training is being provided. (h) Sector skills training. Sector skills training means training that is provided by an employer to a participant to become proficient in the occupation for which the training is being provided. (i) Sector-based training and apprenticeship training. Sector-based training and apprenticeship training means training that is provided by an employer to a participant to become proficient in the occupation for which the training is being provided.	Comment (Proposed Resolution)(40) Determine what work-based training programs can be used as employer locations. I suggest replacing "work-based training" with "sector-based training" to avoid clutter with language in the reg.	Revised to add INT and remove PWE. Language in Employer Commitments section revised to reflect requirement to file OJT retain
0125 Business Services	Line Number: 124	CareerSource Tampa Bay	Comment (Concern with clarifications): The single training programs need to be delivered here. My previous citations and comments provide the information for this line.	Comment (Proposed Resolution)(40) Determine what work-based training programs can be used as employer locations. I suggest replacing "work-based training" with "sector-based training" to avoid clutter with language in the reg.	Language added to include WIOA funded education and training programs

Feedback Response Key			
Incorporated (1)	Future Action (2)	No change (3)	TOTAL
21	6	0	27
77.80%	25.92%	0.00%	

Approved _____
Disapproved _____

Action Item 5

REVISIONS TO CAREERSOURCE FLORIDA WORKFORCE POLICY P74 – INDIVIDUAL TRAINING ACCOUNT EXPENDITURE REQUIREMENTS AND WAIVER PROCESS

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 P74 – Individual Training Account Expenditure Requirements and Waiver Request Process.

WIOA and Florida law emphasize access to training that leads to credentials of value and employment. Boards should plan spending to match local job needs and work with partners to ensure training leads job seekers to good jobs and helps businesses find skilled workers. Revised Workforce Policy P74 – Individual Training Account Expenditure Requirements and Waiver Process describes the required use of WIOA funds for Individual Training Account (ITA) expenditures, sub-cost categories, requirements for allocating and reporting funds, and integrated service delivery and strategic alignment.

LWDBs must budget and spend at least 50% of their WIOA Adult and Dislocated Worker formula funds on allowable state ITAs expenditures unless they have an approved waiver. This revision expands allowable expenditures to include the cost of workforce training expended in other WIOA partner programs, providing the participant is co-enrolled. LWDBs that determine they need a waiver from this requirement must make a formal request with all required information consistent with directions issued in technical assistance on this topic. Both the LWDB and Chief Local Elected Official (CLEO) must approve waiver requests.

This revised policy also provides a Simplified Waiver Option for High-Performing LWDBs that demonstrate all the following:

1. An increase in recorded expenditures and/or individuals served in allowable training cost categories outlined in Section III.B. of the policy except Section III.B.5., Training Program and Case Management; and

2. A minimum of 25% of their WIOA Adult and Dislocated Worker formula funds expended in all allowable training cost categories outlined in Section III.B. of the policy except Section III.B.5., Training Program and Case Management.

LWDBs that meet the criteria above will need to submit a request notifying Florida Commerce and CareerSource Florida that they wish to utilize this option, in alignment with issued technical assistance and guidance. Submission must include an attestation indicating that the LWDB will continue to work to meet the 50% expenditure requirement. FloridaCommerce and CareerSource Florida will review internally available data and confirm eligibility for this option and notify the LWDB whether it is eligible to apply through the Simplified Waiver Option format or if a Standard Waiver Application is required. No additional information will be required for LWDBs qualifying for this waiver type.

CareerSource Florida sent this policy to all 21 LWDBs for consultation from December 19, 2025 – January 6, 2026. CareerSource Florida received 12 comments from 5 LWDBs. CareerSource Florida and FloridaCommerce conducted a thorough review of the comments. 73.30% of feedback was incorporated into the policy, and technical assistance is planned to address additional LWDB feedback.

FOR CONSIDERATION

- **Approve revisions to CareerSource Florida Workforce Policy P74 – Individual Training Account Expenditure Requirements and Waiver Process.**



POLICY
NUMBER
P74

Workforce Policy

Title:	<u>State Individual Training Account Expenditure Requirements and Waiver Process</u>		
Type:	Programmatic		
Program:	Workforce Innovation and Opportunity Act		
Effective:	June 29, 2012	Revised:	TBD

I. PURPOSE AND SCOPE

The Workforce Innovation and Opportunity Act (WIOA)¹ and Florida law² emphasize access to training that leads to credentials of value and employment. The state workforce development board's (SWDB) training strategy includes Individual Training Accounts (ITAs) to help individuals gain skills for in-demand jobs. Local Workforce Development Boards (LWDBs) must use at least 50% of their Title I WIOA Adult and Dislocated Worker funds each year on ITAs, other training services prescribed and authorized by WIOA, and services supporting employment through training unless granted a waiver by the SWDB. These funds must support training that helps jobseekers get jobs and helps businesses find skilled workers. LWDBs must plan how to use these funds in ways that match local job needs and support long-term success. LWDBs are expected to work with local and regional partners, businesses, and organizations that offer support services to ensure training leads to performance outcomes.

II. KEY PROGRAM OBJECTIVES AND MEASURABLE PERFORMANCE OUTCOMES

A. Key Program Objectives

1. Allocate a minimum of 50% of WIOA Adult and Dislocated Worker funds annually to state allowable Individual Training Accounts (ITAs) expenditures.³
2. Coordinate training expenditures with other funding sources and partner programs to expand training access, support co-enrollment, and reduce duplication of services.
3. Prioritize training programs that lead to recognized, stackable credentials aligned with in-demand occupations, career pathways, and regional sector strategies.
4. Monitor expenditures using the Subrecipient Enterprise Resource Application (SERA) and ensure compliance with state-defined sub-cost category reporting requirements.

¹ Workforce Innovation and Opportunity Act of 2014, [Public Law 113-128](#), Section 134(c)(3)

² Section 445.003(3)(a)1., F.S.

³ [20 CFR 680.200](#)

28

29 **B. Measurable Performance Outcomes**

30

31 1. Percentage of WIOA funds allocated to state allowable ITAs activities meets or exceeds
32 the 50% requirement annually.

33 2. Number of participants enrolled in and completing training programs that result in
34 attainment of credentials during a program year.

35 3. Compliance rate of LWDBs submitting training and training-related expenditures in SERA
36 by sub-cost category.

37 4. Percentage of training participants who attain employment in in-demand occupations
38 within two quarters after exit, consistent with meeting or exceeding WIOA Primary
39 Indicators of Performance.

40

41 **III. POLICIES AND PROCEDURES**

42

43 WIOA funds may be used for training only when no other grant assistance is available or when
44 WIOA support is needed in addition to aid like Federal Pell Grants under Title IV of the Higher
45 Education Act of 1965. The cost of participant training must be coordinated with other funding
46 sources as required in [Workforce Policy P122 – Adult and Dislocated Worker Program](#)
47 [Eligibility](#). Veterans Affairs (VA) education and training benefits are not considered “other grant
48 assistance” for WIOA eligibility. Tuition, books, fees, other WIOA-authorized training services,
49 and services supporting employment through training count toward the 50% expenditure
50 requirement.⁴ The Allowable Programmatic Training and ITA Costs Crosswalk, developed by
51 the Florida Department of Commerce (FloridaCommerce), guides LWDBs on qualifying
52 expenses. FloridaCommerce requires LWDBs to report these expenditures in SERA using
53 defined cost categories.

54

55 **A. ITA Expenditures**

56

57 An ITA is a payment agreement established on behalf of a participant with a training service
58 provider from the State Eligible Training Provider List or ETPL.⁵ LWDBs may not provide
59 training services themselves⁶ but may, under limited circumstances, use a contract instead of
60 an ITA to provide training services.

61

62 **B. Sub-Cost Categories**

63

64 Other training services prescribed and authorized by WIOA and services supporting
65 employment through training are identified in cost categories. These categories describe
66 activities that are not paid through ITAs but are “other training services as prescribed by
67 WIOA” for purposes of the state ITA expenditure requirement. The sub-cost categories for
68 this expenditure requirement are outlined below.

69

70 **1. Occupational Skills Training**

71 Occupational skills training is a structured program that equips participants with
72 specific job skills needed for entry, intermediate, or advanced roles in various fields.
73 LWDBs should prioritize programs leading to recognized, high-value credentials,
74 especially those on the Master Credentials List that align with in-demand or emerging
75 local industries.

76

⁴ Section 445.003(3)(a)1., F.S.

⁵ [20 CFR Part 680 Subpart C](#)

⁶ Section 445.007(6), F.S.

77

78 **2. Other Allowable Training Expenditures**

79 Other allowable training services prescribed and authorized by WIOA but not purchased

80 using an ITA can be counted to assist boards in meeting this requirement, including:

81

82 a. On-the-job training.

83 b. Registered apprenticeship programs not on the ETPL.

84 c. Programs that combine workplace training with related instruction and may include

85 cooperative education programs.

86 d. Incumbent worker training.

87 e. Training programs operated by the private sector or provided by contracted providers.

88 f. Skill upgrading and retraining.

89 g. Entrepreneurial training.

90 h. Job readiness training in combination with other training activities.

91 i. Adult education and literacy activities provided concurrently or in combination with

92 services provided in any of the above.

93 j. Customized training.

94 Supportive services required for participation in career or training services must be

95 provided in accordance with [Workforce Policy - P109 Supportive Services and Needs-](#)

96 [Related](#) Payments and recorded in Employ Florida in accordance with the Employ Florida

97 Service Code Guide.

98

99 **3. Other Work-Based Learning Opportunities**

100 Work-based learning provides WIOA-eligible participants with career exploration and skill

101 development. LWDBs may offer programs combining paid or unpaid work experience with

102 academic and occupational education, delivered either together or separately.

103 Requirements are outlined in [Workforce Policy P100- Training and Work-Based Learning](#)

104 [Opportunities](#). Although these costs are not paid through ITA they must be recorded in

105 SERA under Work Experience and Internships and can count towards the state ITA

106 expenditure requirement.

107

108 **4. Co-Enrollment in other training service programs**

109 A maximum of 25% of the required 50% state ITA expenditure requirement can be met

110 through participants enrolled in the WIOA Adult or Dislocated Worker program whose

111 training tuition and required fees are paid for by another federal or state program if the

112 following conditions are met:

113 a. Training aligns with in-demand occupations and has been determined appropriate by

114 the LWDB.

115 b. Documented case management, navigation, and support services are provided; and

116 Credential attainment or documented training completion occurs.

117

118 Calculation is limited to training costs paid through another federal or state program and

119 training case management as outlined below.

120

121 **5. Training Program and Case Management**

122 Costs associated with training program and case management are costs:

123 a. Directly related to staff time used in developing, implementing, or coordinating

124 authorized training programs for participants identified in this policy, including costs

125 directly related to case management and job placement services for clients in

126 training (not clients seeking training).

127 b. Associated with developing, implementing, or coordinating local training for

129 eligible clients participating in training programs leveraged through other grants
130 (e.g., Temporary Assistance for Needy Families, Pell Grants), including
131 expenditures associated with the provision of support services to individuals
132 while they are in training.

133
134 Staff costs are limited to salaries and benefits.
135

136 **C. Requirements and Associated Potential Consequences**

138 LWDBs must allocate at least 50% of expected WIOA Adult and Dislocated Worker
139 formula funds each fiscal year to meet the state ITA expenditure requirement. This
140 percentage is based on carry-forward funds (estimated or actual) plus current year
141 allocations. The required minimum allocation of 50 percent (or waiver percentage) must
142 be shown in the budget submitted to FloridaCommerce.

144 LWDBs must report monthly related expenditures in SERA for each of the specified state
145 ITA sub-cost categories listed in Section III.B. of this policy. The Crosswalk reflects
146 qualifying expenditures. To ensure the most effective use of WIOA funds, LWDBs that are
147 unable to expend the required 50% or that have not secured a state ITA expenditure
148 requirement waiver (see Section III.E., ITA Waiver Requests) risk having funds recaptured
149 and reallocated in accordance with Workforce Policy F7 – Recapture and Reallocation of
150 WIOA Funds, and/or corrective action consistent with Workforce Policy G104: Sanctions
151 and Other Required Corrective Action for LWDBs Who Fail to Meet Federal and State
152 Standards.

154 **D. Integrated Service Delivery and Strategic Alignment**

156 LWDBs should align planning and spending for workforce training with regional workforce
157 priorities. This includes:

- 159 1. Using labor market data and employer input to guide training investments.
- 160 2. Selecting training providers that support regional sector strategies.
- 161 3. Encouraging co-enrollment across WIOA programs to expand services and reduce
162 duplication.
- 163 4. Actively promoting training opportunities to individuals who are unaware of or not engaged
164 with career centers. Key strategies include community outreach and employer partnership
165 in alignment with all applicable issued technical assistance.

167 **E. ITA Waiver Requests**

169 If an LWDB decides it cannot meet the state's 50% Individual Training Account (ITA)
170 expenditure requirement, it may request a waiver to spend less than the required amount. The
171 waiver request must be submitted **before July 1** of the program year (PY) for which the waiver
172 will apply. Both the LWDB and the Chief Local Elected Official(s) (CLEO) must review and
173 approve the waiver request. The LWDB must complete a formal request that includes all
174 required information, following the instructions provided in technical assistance issued for this
175 topic. After local approval, the LWDB sends the request to FloridaCommerce's Bureau of
176 Financial Management, which reviews it and forwards it to CareerSource Florida's Workforce
177 Program Development unit. All waiver requests must follow the specific procedures outlined
178 in this policy. Waivers are valid for one year only. Two options for waiver requests are outlined
179 below.

181
182 **Option 1: The Simplified Waiver Option for High Performing LWDBs:**

183 1. LWDBs eligible for this option must demonstrate all the following:

184 a. An increase in recorded expenditures and/or individuals served in allowable

185 training cost categories outlined in Section III.B. except Section III.B.5., Training

186 Program and Case Management; and

187 b. A minimum of 25% (half) of the required 50% state ITA expenditures in WIOA Adult

188 and Dislocated Worker formula funds expended in all allowable training cost

189 categories outlined in Section III.B. except Section III.B.5., Training Program and

190 Case Management.

191 2. LWDBs that meet the criteria above will need to submit a request notifying Florida

192 Commerce and CareerSource Florida that they wish to utilize this option, in alignment with

193 issued technical assistance and guidance. Submission must include an attestation

194 indicating that the LWDB will continue to work to meet the 50% expenditure requirement.

195 FloridaCommerce and CareerSource Florida will review internally available data and

196 confirm eligibility for this option and notify the LWDB whether it is eligible to apply through

197 the Simplified Waiver Option format or if a Standard Waiver Application is required. No

198 additional information will be required for LWDBs qualifying for this waiver type.

199

200 **Option 2: The Standard Waiver Option:**

201 Waiver requests of the 50% expenditure requirement must not be below 30% and must

202 include both detailed projections for how the requested waiver will meet local training needs

203 and projected expenditure for the following program year in all applicable categories

204 described in Section III.B., should the waiver be approved. Other documentation required will

205 be outlined in technical assistance and guidance.

206 Boards granted this type of waiver must meet at least three times of the course of the fiscal

207 year with FloridaCommerce and CareerSource Florida to review fiscal and programmatic data

208 related to training services, in alignment with the terms of the waiver acceptance

209 communicated to the LWDB within the waiver acceptance notification.

210 1. The ITA Review Committee, which includes staff from CareerSource Florida and Florida

211 Commerce, will determine the sufficiency of the waiver request. If further clarification

212 is required, a meeting will be scheduled between the LWDB and the ITA

213 Review Committee. The ITA Review Committee may:

214 a. Request additional documentation.

215 b. Propose adjustments to the requested waiver, to include alternate negotiated

216 expenditure rate(s) in whole or by expenditure category.

217 2. The LWDB may accept, counter, or reject the proposed rate. Rejection requires attestation

218 that the board understands the full 50% expenditure requirement will apply.

219

220 **IV. IMPLEMENTATION**

221 LWDBs must create clear local strategies for optimizing workforce training that align with state

222 and federal rules. These strategies must include monthly tracking of spending on training

223 programs, including ITA; plans that match local workforce needs; and outreach to underserved

224 groups. Boards must also define staff roles, train staff to promote training services, and

225 document how they provide support services, case management, and co-enrollment across

226 WIOA programs. FloridaCommerce will include this as part of its LWDB monitoring efforts.

227

Policy/Template	Line	Type of Comment	Submission Date	Name	Title	Email	Local Workforce Development Board	Comment Entry	Recommended Resolution	Action Taken
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 35	Substantive	01-06-2026 16:29:41	Michelle Schultz	Senior Director of Development	schultzm@careersourcetb.com	CareerSource Tampa Bay	Comment (Concern with citation): Clarification regarding the timeframe.	Could bullet 2 be amended as follows for clarification? 2. Number of participants enrolled in and completing training programs that result in attainment of credentials as reported through 4th quarter of WIOA Follow Up, consistent with WIOA Primary Indicators of Performance.	Language amended to clarify the data reviewed is program year data.
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 47	Critical	1/4/26 11:36	Gina Ronokarijo	VP Workforce Operations	GRonokarijo@careersourcecf.com	CareerSource Central Florida	The policy reference d is P122	The correct policy number is P127	Link will be updated prior to the posting of this policy.
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 63	Substantive	01-06-2026 16:43:35	James Watson	COO	jwatson@careersourcebfv.com	CareerSource Brevard Flagler Volusia	(Concern with citation): Lines 65-67	Update later references to explicitly state that "this requirement" refers to Florida's 50 percent training expenditure requirement.	Language in policy updated as requested.
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 77	Substantive	1/6/26 10:14	Kimberly Bodine	Executive Director	kbodine@careersourcegc.com	CareerSource Gulf Coast	Under the section Allowable Non-ITA Expenditures, I believe that Internships should be included. Internships are a recognized activity as a work based learning activity in WIOA law and in CareerSource FL policy 101. In our region (and also in region	Include Work Based Learning Activities when unsubsidized permanent employment is the goal. This is how we operate our internships.	Language updated in policy to reflect this. The Crosswalk will be updated and additional technical assistance will be provided.

P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 82	Substantive						<small>Categories for the policy do not align with the crosswalk or SERA reporting categories. On-the-job training is listed under 2. Allowable Non-ITA Expenditures in the policy, however on the "Allowable Programmatic Training and ITA Costs Crosswalk</small>	<small>Align the categories in the policy with the crosswalk and SERA State ITA categories. Include Other WIOA Specified Training as a category in the policy to included OJT expenditures and update the crosswalk category for #3-#11 to Other WIOA Specified Training.</small>	<small>Note has been made to update the crosswalk as soon after the policy is adopted by the SWDB.</small>
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 128	Substantive	1/7/2026 9:49	Rebecca Livingston	Executive Vice-President	rlivingston@careersourcenefl.com	CareerSource Northeast Florida	<small>Comment: Within the policy, it is not clearly stated what may happen if a LWDB does not meet the waiver percentage.</small>	<small>Recommended Solution: Please clarify what Technical Assistance or other actions the state may take if the LWDB does not meet the waiver percentage.</small>	<small>Citation to the LWDB Performance Policy added to clarify</small>
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 146	Critical						<small>Workforce Policy P7 is not the correct policy number – it is 2002.01.09.A.3</small>	<small>Workforce Policy P7 is not the correct policy number – it is 2002.01.09.A.3</small>	<small>Link will be updated prior to the posting of this policy.</small>

P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 162	Critical	1/7/2026 9:49	Rebecca Livingston	Executive Vice-President	rlivingston@careersourcenefl.com	CareerSource Northeast Florida	Comment: The policy requires submission of a waiver prior to July 1 of the PY for which the waiver applies. The waiver request is driven by the approved budget from the State from the program year. In recent years, the LWDBs received	Recommended Solution: To ensure that the LWDB follows all required steps for the waiver submission, we suggest that the waiver request is due by August 1st rather than July 1st.	TA will be provided to assist LWDBs and include how projections can be used for this purpose.
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 177	Critical	1/4/26 11:36	Gina Ronokarijo	VP Workforce Operations	GRonokarijo@careersourcecf.com	CareerSource Central Florida	What is "EZ"?	Define EZ or remove the reference.	Language updated in policy to reflect this.
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 177	Substantive	1/5/26 17:39	Tracey McMorris	VP of Operations	tmcmorris@careersourcer.com	CareerSource Research Coast	Policy conflicts with the crosswalk allowable expenditures. Under Training Program and Case Management, the policy states "Staff costs are limited to salaries and benefits", however, the Allowable Programmatic Training and ITA Costs	Edit the policy wording to include not only staff salary and benefits but the allocated share of costs in support of training program and case management.	Language in policy clarifies this.

P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Lines 179-180	Substantive						<p>Because the waiver is prepared during the current program year and submitted by July 1, it is unclear whether the required comparison should be calculated using the current, soon-to-be-complete d program year (e.g., PY 2025-26)</p>	<p>Clarify which program years are used to calculate the average increase and specify whether the comparison is based on expenditures, individuals served, or both.</p> <p>TA will be provided to LWDBs on how to calculate % if there is carry-over (in collaboration with Finance and Accounting)</p>
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 182	Substantive					<p>The EZ Waiver option is intended to provide a streamlined, objective, and low-burden pathway for Local Workforce Development Boards (LWDBs) that are demonstrably increasing training investments but are unable to meet the statutory req</p>	<p>To maintain accountability while restoring the EZ Waiver's intended simplicity, this section should be removed in its entirety, relying instead on:</p> <p>Demonstrated increase in Occupational Skills Training (ITA) activity, and Verification of minimum expenditure thresholds already required under the EZ Waiver option</p> <p>These criteria alone are sufficient to confirm that an LWDB is:</p> <p>Actively expanding training services</p> <p>Aligning resources toward skill development</p> <p>Operating in good faith toward the 50% statutory goal</p>	<p>WIOA training is already including and is not limited to OST to encourage all applicable WIOA training services.</p>

P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 208	Substantive	1/7/2026 9:49	Rebecca Livingston	Executive Vice-President	rlivingston@careersourcenefl.com	CareerSource Northeast Florida	Comment: The policy states "Florida Commerce and CSFL will review internally available data and confirm eligibility for this option (EZ Waiver) and notify the LWDB prior to presentation to the SWDB for approval."	Recommended Solution: Please clarify the timing for approval of eligibility. If the LWBD is not eligible for the EZ Waiver, will the LWDB have the option to then submit a Standard Waiver?	TA will be provided.
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 217	Critical	1/4/26 11:36	Gina Ronokarijo	VP Workforce Operations	GRonokarijo@careersourcecf.com	CareerSource Central Florida	Below 30% of what?	Specify what this means.	Language added to clarify this in policy.
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 249	Substantive	01-06-2026 16:29:41	Michelle Schultz	Senior Director of Development	schultzm@careersourcetb.com	CareerSource Tampa Bay	Comment (Concern with citation): Frequency of ITA Committee reviews	Would CSF and FIComm give consideration to an amended initial approach to the frequency of ITA Committee reviews to semi-annually versus quarterly for the first two years of new policy issuance due to the associated burden or use of both state and LWDB resources plus how expenditures accrue across the program year.	This will be made available as needed and on a case by case basis and as part of conditional waiver acceptance determination and review and will be clarified through technical assistance.

Feedback Response Key			
Incorporated (1)	Future Action (2)	No change (3)	TOTAL
11	3	1	15
73.30%	20%	7%	

Policy/Template	Line	Type of Comment	Submission Date	First Name	Last Name	Title	Email	Select your Local Workforce Development Board.	Comment Entry	Recommended Resolution	Action Taken
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 128	Substantive	1/7/2026 9:49	Rebecca	Livingston	Executive Vice-President	rlivingston@careersourcenfl.co	CareerSource Northeast Florida	Comment: Within the policy, it is not clearly stated what may happen if a LWDB does not meet the waiver percentage.	Recommended Solution: Please clarify what Technical Assistance or other actions the state may take if the LWDB does not meet the waiver percentage.	
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 162	Critical	1/7/2026 9:49	Rebecca	Livingston	Executive Vice-President	rlivingston@careersourcenfl.co	CareerSource Northeast Florida	Comment: The policy requires submission of a waiver prior to July 1 of the PY for funding to be applied. The waiver request is driven by the application from the state for the program year. In recent years, the LWDBs received the budget late May/June. This requirement creates a hardship to ensure board approval of the budget as well as board and CLEO approval of the Waiver request.	Recommended Solution: To ensure that the LWDB follows all required steps for the waiver submission, we suggest that the waiver request is due by August 1st rather than July 1st.	
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 208	Substantive	1/7/2026 9:49	Rebecca	Livingston	Executive Vice-President	rlivingston@careersourcenfl.co	CareerSource Northeast Florida	Comment: The policy states " Florida Commerce and CSFL will review internally available data and confirm eligibility for this option (EZ Waiver) and notify the LWDB prior to presentation to the SWDB for approval."	Recommended Solution: Please clarify the timing for approval of eligibility. If the LWDB is not eligible for the EZ Waiver, will the LWDB have the option to then submit a Standard Waiver?	
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 63	Substantive							Comment (Concern with citation): Lines 65-67 appropriately explain that certain "other training services" do not meet federal requirements but may be directed toward the state's workforce development, later referring to these services (77-80, 105-107) only refer to "this requirement" without clearly restating that the requirement is the state's 50 percent training expenditure requirement, which could lead to confusion.	Update later references to explicitly state that "this requirement" refers to Florida's 50 percent training expenditure requirement.	
P74 Individual Training Account Expenditure Requirements and Waiver Request	01-06-2026 16:43:35	James	Watson	COO			jwatson@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Because the waiver is prepared for the current program year and submitted to the state, it is not clear if the waiver would be calculated using the current, soon-to-be-completed program year (e.g., PY 2025-26) and the immediately preceding program year (e.g., PY 2024-25). Further clarification is needed to ensure consistent calculation.	Clarify which program years are used to calculate the average increase and specify whether the comparison is based on expenditures, individuals served, or both.	
P74 Individual Training Account Expenditure Requirements and Waiver Request	Lines 179-180	Substantive							The EZ Waiver option is intended to provide a streamlined, objective, and low-cost alternative for Local Workforce Development Boards (LWDBs) that are demonstrating separate training investments but are unable to meet the statutory 50% threshold. The requirement that LWDBs demonstrate an average increase across seven separate training and supportive service categories is duplicative of existing policy controls, misaligned with the stated purpose of an "EZ" waiver, and adds unnecessary complexity without improving accountability or outcomes. The Provision Conflicts with the Purpose of an "EZ" Waiver. By definition, the EZ Waiver should:	To maintain accountability while restoring the EZ Waiver's intended purpose, this section should be removed in its entirety, relying instead on:	
P74 Individual Training Account Expenditure Requirements and Waiver Request	01-06-2026 16:43:35	James	Watson	COO			jwatson@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Reduce administrative burden Rely on readily verifiable data Avoid multi-layered analytical thresholds Incentivize LWDBs to use resources LWDBs to:	Demonstrated increase in Occupational Skills Training (ITA) activity, and Verification of minimum expenditure thresholds already required under the EZ Waiver option These criteria alone are sufficient to confirm that an LWDB is: Aligning resources toward skill development Operating in good faith toward the 50% statutory goal	
P74 Individual Training Account Expenditure Requirements and Waiver Request	01-06-2026 16:43:35	James	Watson	COO			jwatson@careersourcebfv.com	CareerSource Brevard Flagler Volusia	3. Averaging Across Categories Penalizes Strategic, Demand-Driven Investment WIOA emphasizes sector strategies, employer demand, and regional labor market alignment. In practice, LWDBs are expected to:		
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 35	Substantive							Scale specific training models based on local need Reduce or phase others as market demand shifts The "average increase" requirement unintentionally:		
P74 Individual Training Account Expenditure Requirements and Waiver Request	01-06-2026 16:29:41	Michelle	Schultz	Senior Director of Development			schultzm@careersourcetb.com	CareerSource Tampa Bay	Comment (Concern with citation): Clarification regarding the timeframe.	Could buffer it be amended as follows for clarification? 2. Number of participants enrolled in and completing training programs that result in attainment of credentials as reported through 4th quarter of WIOA Follow Up, consistent with WIOA Primary Indicators of Performance.	
P74 Individual Training Account Expenditure Requirements and Waiver Request	01-06-2026 16:29:41	Michelle	Schultz	Senior Director of Development			schultzm@careersourcetb.com	CareerSource Tampa Bay	Comment (Concern with citation): Frequency of ITA Committee reviews	Would CDF and ITComm give consideration to an amended initial approach to the frequency of ITA Committee review to semi-annually versus quarterly for the first two years of new policy issuance due to the associated burden or use of both state and LWDB resources plus how expenditures accrue across the program year.	
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 77	Substantive							Comment (Concern with citation): Under the section Allowable Non-ITA Expenditures, I believe that internships should be included. Internships are recognized activity as a work based learning activity in WIOA law and in CareerSource FL policy 101. In our region (and also in region 12, according to NIDAL) internships have resulted in many permanent job placements. We know it also has in other regions, and it would seem inconsistent not to include an allowable non-ITA expenditure.	Include Work Based Learning Activities when unsubsidized permanent employment is the goal. This is how we operate our internships.	
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	1/6/26 10:14	Kimberly	Bodine	Executive Director			kbodine@careersourcecg.com	CareerSource Gulf Coast	Comment (Concern with citation): Categories for the policy do not align with the crosswalk or SERA reporting categories. On-the-job training is listed under 2. Allowable Non-ITA Expenditures in the policy, however the "Allowable Non-ITA Training and ITA Costs Crosswalk" (07/07/2023) lists it under 1. ITA Training and ITA Costs Crosswalk for the state ITA reporting in SERA.	Align the categories in the policy with the crosswalk and SERA State Framework and Design. The intent is to include ITA categories. Include Other WIOA Specified Training as a category in the policy to include OIT expenditures and update the crosswalk category for #3-11 to other WIOA Specified Training.	
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	1/5/26 17:39	Tracey	McMorris	VP of Operations/COO			tmcmorris@careersourcer.com	CareerSource Research Coast	Comment (Concern with citation): Policy conflicts with the crosswalk allowable expenditures. Under Training Program and Case Management, the policy states "Staff costs are limited to salaries and benefits", however, the Allowable Programmatic Training and ITA Costs Crosswalk includes the "Allocated share of costs in support of training program and case management".	Edit the policy wording to include not only staff salary and benefits but the allocated share of costs in support of training program and case management.	
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	1/5/26 17:39	Tracey	McMorris	VP of Operations/COO			tmcmorris@careersourcer.com	CareerSource Research Coast	The policy reference is P122	The correct policy number is P127	Note: The link at line 47 is for Workforce Policy P122 - Adult and Dislocated Worker Program Eligibility. The link directs to P127 - Adult and Dislocated Worker Program Framework and Design. The intent is for the link to point to P122 - Adult and Dislocated Worker Program Eligibility.
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	1/4/26 11:36	Gina	Ronokarjo	VP Workforce Operations			GRonokarjo@careersourcecf.co	CareerSource Central Florida	Workforce Policy P7 is not the correct policy number – it is 2002.01.09.A.3	Workforce Policy P7 is not the correct policy number – it is 2002.01.09.A.3	Link edits to Workforce Policy P7 - Revision to Recapture and Reallocation of WIOA Funds as intended. The policy will be revised as P7 - Recapture and Reallocation of WIOA Funds.
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	1/4/26 11:36	Gina	Ronokarjo	VP Workforce Operations			GRonokarjo@careersourcecf.co	CareerSource Central Florida	What is "EZ"?	Define EZ or remove the reference.	
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	1/4/26 11:36	Gina	Ronokarjo	VP Workforce Operations			GRonokarjo@careersourcecf.co	CareerSource Central Florida	Below 30% of what?	Specify what this means.	
Other Requirements Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Lines 120-138 –	Critical	12/11/2025 0:39	Gina	Ronokarjo	Vice President of Workforce Operations	GRonokarjo@careersourcecf.co	CareerSource Central Florida	The policy provides that the turnaround plan must be data-based. The data is based on federal performance data which becomes available months after services were delivered. Turnaround plans require immediate adjustments, but lagging data means that a LWDB is reacting to old data and conditions, not the current data. This creates a gap between performance problems and the ability to respond, especially in quarterly or annual planning cycles.	Recommend solution – add a date for completion and first review by Florida Commerce and CSF.	Recommend solution – add a date for completion and first review by Florida Commerce and CSF.
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Lines 215-222	Critical	12/11/2025 0:39	Gina	Ronokarjo	Vice President of Workforce Operations	GRonokarjo@careersourcecf.co	CareerSource Central Florida	Each LWDB is required to establish and maintain Local Operating Procedures that reflect the expectations detailed in the policy and local strategies to avoid potential deficiencies, actions, and sanctions. This is vague.	Recommend solution – cross-reference Policy O125 which specifies the requirements of what must be in the Local Operating Procedures.	
O125 Business Services	Lines 16-62	Critical	12/11/2025 0:39	Gina	Ronokarjo	Vice President of Workforce Operations	GRonokarjo@careersourcecf.co	CareerSource Central Florida	Comments should be provided for each key objective and measurable performance outcomes listed in this policy to the relevant WIOA section, Code of Federal Regulations or Florida Statutes. It is difficult to track the stated key objectives and measurable performance outcomes and confirm what is required by state and federal law.	Link edits to O125 Business Services and add a date for completion and first review by Florida Commerce and CSF.	
O125 Business Services	Lines 89-115	Critical	12/11/2025 0:39	Gina	Ronokarjo	Vice President of Workforce Operations	GRonokarjo@careersourcecf.co	CareerSource Central Florida	Core business services and additional allowable training services listed in the policy are not lining up with state and federal requirements. Under WIOA, Florida has four core service boards. Florida also provides specific core business services through their one-stop delivery systems. These services fall into three categories: required core services, permissible customized services, and additional allowable services. Additionally, Florida has established additional requirements for LWDBs beyond federal minimums. Under a section of the O125 Business Services, LWDBs must provide ongoing oversight related to administrative costs, duplicated services, career counseling, economic development, equal access, compliance and accountability, and performance outcomes.	Recommend solution – add citations for each business service and recategory the services into the appropriate categories.	
O125 Business Services	Lines 183-185	Critical	12/11/2025 0:39	Gina	Ronokarjo	Vice President of Workforce Operations	GRonokarjo@careersourcecf.co	CareerSource Central Florida	By when do the Local Operating Procedures need to be prepared?	Recommended solution – add a date for completion and first review by Florida Commerce and CSF.	
O125 Business Services	Line Number 165	Substantive	12/10/2025 18:50	Michelle	Schultz	Senior Director of Development	schultzm@careersourcetb.com	CareerSource Tampa Bay	Comment: It is recommended to remove PWE as an employer incentive. The program functions more as a mentoring and training opportunity for the job seeker rather than a tangible benefit to the business, since participants often lack the skills and knowledge needed to fully engage in a position. Additionally, the term "incentive" can carry a negative connotation.	Remove PWE as an employer incentive. It is suggested to use "employee benefits" or another term that conveys a more positive and value-driven message.	
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 109	Substantive	12-10-2025 16:31:06	Kimberly	Bodine	Executive Director	kbodine@careersourcecg.com	CareerSource Gulf Coast	Comment (Concern with citation): Please add more language around the development of a modified WIOA local plan. It is unclear how this could be considered technical assistance.	Comment (Proposed Resolution/Edit): see above	
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 127	Critical	12-10-2025 16:31:06	Kimberly	Bodine	Executive Director	kbodine@careersourcecg.com	CareerSource Gulf Coast	Comment (Concern with citation): Concerned that decline in performance may lead enrollment of a job group back as dislocated workers. There is nothing in federal guidance or performance data which indicates that not having enrollments in a singular program is a performance issue. Centerers can only enroll individuals who wish to be enrolled and who meet eligibility requirements. If we have no enrollments in Dislocated Workers it does not affect the state's federal performance outcomes to my knowledge. We cannot control those who do or do not seek our services.	Comment (Proposed Resolution/Edit): define performance, and not as fewer or low enrollments of a certain population, but for the performance of those enrolled who are part the subgroup population	
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 208	Critical	12-12-2025 16:31:06	Kimberly	Bodine	Executive Director	kbodine@careersourcecg.com	CareerSource Gulf Coast	Comment (Concern with citation): The requirement for LWDB accountability listed though 213 is burdensome, and without a state developed dashboard or system where this information can be used to monitor performance, it will be difficult for the state to track. The state has struggled to come up with an easy to use for the workforce system/network, and are we to define how well our services meet the need of the clients with barriers to employment? Measures of effectiveness of engagement with employers, will that have a defined measurement?	Comment (Proposed Resolution/Edit): define the measurements and develop a system where they can be tracked in real time, so that LWDB's can better create strategies in real time	
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 85	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P118-87. The policy states that LWDBs "submit requests for certification using standardized forms provided by Florida Commerce and CareerSource Florida," but it does not specify which entity distributes these forms, whether they are sent at the start of the certification cycle, or whether LWDBs can access the standardized forms in advance. This may lead to inconsistent preparation timelines across local areas.	Comment (Proposed Resolution/Edit): Specify whether FloridaCommerce or CSF distributes the LWDB certification submission forms and when they will be made available. Consider stating whether the forms will be published in advance to support consistent statewide implementation.	
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 91	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P118-87. The policy also states that LWDBs are expected to complete and submit this form or whether it is used solely as an internal evaluation tool. The policy also does not specify which documents LWDBs must submit as part of the certification request or the submission timeline.	Comment (Proposed Resolution/Edit): Clarify whether the Evaluation for LWDB Certification Form is completed only by CSF/Commerce or directly by LWDBs. Consider adding explicit guidance on the required documents LWDBs must submit and the expected submission timeline.	
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 159	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P4.114-143: The policy requires WIOA section 211(d) as the authority for one-stop certification but does not define what constitutes the "certification packet". LWDBs must submit it is unclear whether the MOU-IFA, accessibility assessments, or other documentation are part of the certification submission or reviewed separately. This may lead to inconsistent interpretations of certification requirements.	Comment (Proposed Resolution/Edit): Clarify whether Direct Provider designation is intended to have more detailed statewide standards or whether additional detail should be added to the sections for consistency. Refining the introductory scope language may help align expectations.	
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 141	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P1.14-11 Scope of Policy: The Purpose and Scope section states that the policy "supports the review, designation, and certification of one-stop service delivery for the one-stop system." However, the policy does not define what constitutes a one-stop system or what constitutes detailed procedural requirements (Direct Provider designation), while LWDB certification and one-stop system certification are addressed at a higher level. This inconsistency may create confusion about whether the policy governs all three areas equally.	Comment (Proposed Resolution/Edit): Clarify the required components of the one-stop certification submission and whether the MOU-IFA is included in the certification packet or addressed separately through monitoring. Consider referencing the Evaluation for One-Stop Certification Form and specifying supporting documentation expectations.	
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 10	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P1.10-11 Scope of Policy: The Purpose and Scope section states that the policy "supports the review, designation, and certification of one-stop service delivery for the one-stop system." However, the policy does not define what constitutes a one-stop system or what constitutes detailed procedural requirements (Direct Provider designation), while LWDB certification and one-stop system certification are addressed at a higher level. This inconsistency may create confusion about whether the policy governs all three areas equally.	Comment (Proposed Resolution/Edit): Clarify whether the policy is intended to provide equivalent procedural guidance for LWDB certification, one-stop delivery system certification, and Direct Provider designation. Consider refining the Purpose and Scope language or adding corresponding detail to ensure consistent interpretation across LWDBs.	
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 197	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P5.139-20: The policy requires LWDBs to conduct annual internal reviews of governance and service delivery systems but does not define the minimum components or required documentation of these reviews. This may result in inconsistent implementation across local areas and potential monitoring inconsistencies.	Comment (Proposed Resolution/Edit): Define the minimum required elements of the annual internal review or provide a template/checklist to ensure consistent statewide application. Clarify documentation expectations and whether the review must be submitted, retained, or incorporated into LWDB certification.	

G102 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 1	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): Multiple Sections - Clarification of Required Forms vs. Internal Evaluation: The policy references several standardized forms (LWDB Certification, One-Stop Certification, Direct Provider Designation) but does not consistently specify which forms must be completed by LWDBs and which are internal evaluation tools used by CSF/Commerce. This has the potential to result in incorrect or incomplete submissions.	Comment (Proposed Resolution/Edit): For each referenced form, explicitly state whether the LWDB completes and submits the form or whether the form is used internally by CSF/Commerce to evaluate submissions. Consider adding a submission checklist to Appendix or Attachments.	
G103 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 139	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): Section C: The policy states that LWDBs must obtain SWDB approval to serve as their own One-Stop Operator but does not clarify the sequence of actions (e.g., prior to procurement, prior to certification) or whether reapproval is required during each three-year certification cycle.	Comment (Proposed Resolution/Edit): Clarify the procedural sequence for requesting and obtaining SWDB approval to serve as a One-Stop Operator, including timing, renewal requirements, and required forms. This will help ensure consistent compliance with WIOA 121(d) and 20 CFR 678.620.	
G103 LWDB Composition; Certification of One-Stop Systems and Boards	Line Number: 102-137; P4 L153; 157; PS L189-193	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P2 L102-137; P4 L153-157; PS L189-193: The policy specifies conditions under which certification or designation may be revoked but does not describe the corrective action/reinstatement, requalification process following revocation.	Comment (Proposed Resolution/Edit): Consider including a description of the corrective action or reinstatement process to ensure LWDBs understand the steps required to return to compliant status.	
G103 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 1	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): The policy contains multiple processes with different statutory bases and timelines (LWDB certification, one-stop certification, Direct Provider designation) but presents them in a single narrative format. This may create ambiguity for new boards or staff unfamiliar with the distinctions.	Comment (Proposed Resolution/Edit): Consider separating the three processes into distinct subsections with clearly labeled requirements, timelines, and form usage. This will improve readability and ensure consistent statewide interpretation.	
Evaluation for One-Stop Certification Form	Line Number: 1	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): The Evaluation for One-Stop Certification Form requires to complete certain criteria before LWDBs appear to serve as their own One-Stop Operator. The criteria for the One-Stop Delivery System. These are distinct processes under WIOA 121(d) and 121(g), and G103 does not clarify which sections LWDBs are required to complete, submit, or use internally.	Comment (Proposed Resolution/Edit): Consider separating the criteria for LWDBs from the criteria for system certification or clarify which portions of the form apply to each process. Clarify which sections LWDBs must complete versus which sections are completed by CSF/Commerce.	
Evaluation for One-Stop Certification Form	Line Number: 92	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): Several criteria reference other statewide policies (P9, P92) without clarifying whether documentation must be included in the certification packet. This may create inconsistent submissions.	Comment (Proposed Resolution/Edit): Clarify whether LWDBs must attach evidence of compliance with referenced statewide policies (e.g., P9, P92) or whether these criteria will be validated through monitoring or internal review.	
Evaluation for LWDB Direct Service Provider Designation	Line Number: 1	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): The "Met/Not Met" criteria lack defined minimum evidence standards, which may lead to inconsistent interpretation by both LWDBs and state reviewers.	Comment (Proposed Resolution/Edit): Define minimum evidence requirements or provide examples of acceptable documentation for evaluation to prevent inconsistent statewide application.	
LWDB Composition Tool	Line Number: 23	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): The current composition tool has the automated calculation at the bottom of the 1st page and this one does not.	Comment (Proposed Resolution/Edit): Calculation of the composition compliance summary on the bottom of the 1st page as it is currently is without changing it. The current form calculates the % and is very easy to determine if you've completed it correctly because it turns green when you've met the required and red when you haven't and the red has helped me to realize that some of our members represent additional categories.	
LWDB Composition Tool	Line Number: 1	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): Please keep the form as it currently is without using this Composition Compliance Summary on the second tab. This new tab is not as easy to understand if we've met the criteria in each category.	Comment (Proposed Resolution/Edit): Please keep the form as it currently is without using this Composition Compliance Summary on the second tab. This new tab is not as easy to understand if we've met the criteria in each category.	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 93	Substantive	12-10-2025 15:54:40	Rebecca	Livingston	Executive VP	rlivingston@careersourcenew.com	CareerSource Northeast Florida	Comment (Concern with citation): Can the state clarify what the performance measures are for identified subgroup populations so that the LWDBs will be clear regarding expectations.	Comment (Proposed Resolution/Edit): Technical Assistance on the above question	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 96	Substantive	12-10-2025 15:54:40	Rebecca	Livingston	Executive VP	rlivingston@careersourcenew.com	CareerSource Northeast Florida	Comment (Concern with citation): Clarification as to whether poor performance is being among the lowest 5 scoring LWDBs in state issued letter grades or having a grade of D/F? Seems to be conflicting language regarding how letter grades will be considered for corrective actions.	Comment (Proposed Resolution/Edit): Clarification regarding how letter grades are evaluated	
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 216	Administrative	12-10-2025 15:47:04	Tandria	Edwards	Sr. Director	tandria.edwards@careersourcecapitalregion.com	CareerSource Capital Region	Comment (Concern with citation): The policy indicates the methodology is to be posted annually by October 15th.	Comment (Proposed Resolution/Edit): There is no methodology posted for PY 25-26. Does this paragraph mean PRIOR year methodology will be posted?	
O125 Business Services	Line Number: 177	Substantive	12-10-2025 15:47:04	Tandria	Edwards	Sr. Director	tandria.edwards@careersourcecapitalregion.com	CareerSource Capital Region	Comment (Concern with citation): Section E (Employee Commitments) indicates that participating employers must commit to hiring participants upon successful completion of training.	Comment (Proposed Resolution/Edit): Suggest editing how this is framed, considering the inclusion of OIT as an allowable business incentive, as it requires that individuals be hired prior to starting OIT training.	
O125 Business Services	Line Number: 57	Substantive	12-10-2025 14:03:29	Ron	Moffett	Executive Vice President	rmoffett@careersourcebroward.com	CareerSource Broward	Comment (Concern with citation): The policy states that one of the Measurable Performance Outcomes is "Time to Service Measurements"	Comment (Proposed Resolution/Edit): Need clarification from the state on how this is calculated	
O125 Business Services	Line Number: 81	Substantive	12-10-2025 14:03:29	Ron	Moffett	Executive Vice President	rmoffett@careersourcebroward.com	CareerSource Broward	Comment (Concern with citation): Policy indicates that the workforce board should encourage a minimum of 100% of the Geiger Ft. Lauderdale Alliance. There are several performance metrics related to this.	Comment (Proposed Resolution/Edit): Need clarification on how/where these will be tracked.	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 93	Substantive	12-10-2025 11:54:57	Anthony	Gagliano	VP/COO	agagliano@careersources.com	CareerSource Suncoast	Comment (Concern with citation): There are already letter grade criteria and key performance indicators with a priority to serve these groups. I'm not sure how adding performance goals for subgroups is beneficial and could potentially be discriminatory if there's preferential goals.	Comment (Proposed Resolution/Edit): Tie performance goals to specific programs or grants (TANF, JVSG, etc.)	
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 91	Substantive	12-10-2025 11:36:09	Debby	Wood	Chief Operating Officer	debby.wood@careersourcechipola.com	CareerSource Chipola	Comment (Concern with citation): The policy indicates the methodology for evaluating performance metrics associated with the Letter Grade. The measures are impacted by the economy which is based on where you are. Rural areas face additional issues with the metrics and will certainly have issues meeting subgroup metrics. LWDB3's recovery from COVID-19 and Hurricane Michael is mentioned. The labor force participation rate is used to decide whether to move forward with the LWDBs and the participants in work related training and employment/employment outcomes when the LWDB has less customers to participate and who "want" to participate. The "Reduction in Public Assistance" measure is an issue. With a declining workforce added to the government shutdown and changes in legislation, there are more and more customers applying for benefits. In most cases, when the economy is bad, the LWDBs are not impacted. In the case of LWDB3, it is due to a sanction and NOT increased wages. "Contract Repeat Builders" is another measure with issues. In an LWDB where the population is declining and businesses are closing/reducing hours, etc., it is difficult to measure and compare to the previous three years.	Comment (Proposed Resolution/Edit): If these measures are to be maintained, then consideration of a much lower target percentage is needed for rural areas. One methodology for measuring all 21 LWDBs does not work.	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards, Designation	Line Number: 125	Substantive	12-10-2025 11:26:20	Richard	Williams	Executive Director	richard.williams@careersourcechipola.com	CareerSource Chipola	Comment (Concern with citation): Given the lag between performance and letter grade designation, boards should be given a full year for the data to catch up with the local changes made in the performance plan. The data lag means for some data sets, you are navigating around icebergs using a chart generated the summer of the year before.	Comment (Proposed Resolution/Edit): Before implementation, all data being utilized would need to be shared with local boards on a consistent basis.	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 93	Substantive	12-10-2025 11:22:03	Debby	Wood	Chief Operating Officer	debby.wood@careersourcechipola.com	CareerSource Chipola	Comment (Concern with citation): These are RICHARD WILLIAMS comments. The policy reads including two sub-groups, but doesn't exclude other subgroups. What if boards decided to target other subgroups based upon local need or resources put into play by other organizations. This doesn't take into consideration the wide variety of veteran populations in the state. Each board may have very different populations of vets.	Comment (Proposed Resolution/Edit): The policy should indicate steps necessary to add subgroups for measurement.	
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 27	Substantive	12-10-2025 10:10:43	Cory	Weaver	Director of Operations	cweaver@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): Item II.a. states "Maximize and continue to improve the quality of service, customer satisfaction and effectiveness of services provided" How will Customer Satisfaction be measured?	Comment (Proposed Resolution/Edit): Provide additional detail on how Customer Satisfaction will be measured.	
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 62	Substantive	12-10-2025 10:10:43	Cory	Weaver	Director of Operations	cweaver@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): Beginning in line 62 it states "...the negotiated local level of performance applicable to a program year must be revised to reflect the actual economic conditions experienced and the characteristics of the populations served by the LWDB during such program year using the statistical adjustment model" The regions have not received the adjusted local levels of performance.	Comment (Proposed Resolution/Edit): Include information on when/where adjusted levels will be shared with the local boards.	
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 104	Substantive	12-10-2025 10:10:43	Cory	Weaver	Director of Operations	cweaver@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): Beginning on line 104 it states, "Consistent with federal guidance, if an LWDB fails to meet the adjusted local level of performance for one or more of the core WIOA metrics in any program year, technical assistance must be provided." The adjusted level of performance is referenced; however, boards have never received the adjusted levels.	Comment (Proposed Resolution/Edit): Include detail on how/when adjusted performance data will be shared with the local boards.	
Select Policy: G103 Performance Requirements for Local Workforce Development Boards	Line Number: 185	Substantive	12-10-2025 10:10:43	Cory	Weaver	Director of Operations	cweaver@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): Please clarify what metrics and methodology will be used to measure these performance outcomes.	Comment (Proposed Resolution/Edit): Clarification	
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 60	Substantive	12-10-2025 10:27:36	Christina	Coble	Business Services Manager	ccoble@careersourcer.com	CareerSource Research Coast	Comment (Concern with citation): Current guidance requires LWDBs to provide information regarding RR and Layoff Aversion services to businesses, even if they don't currently need them, but there is no code to document these efforts in EF.	Comment (Proposed Resolution/Edit): Develop an employer code to reflect a provision of information regarding rapid response services to employers similar to other codes developed to reflect provision of information.	
O125 Business Services	Line Number: 177	Substantive	12-09-2025 10:27:36	Christina	Coble	Business Services Manager	ccoble@careersourcer.com	CareerSource Research Coast	Comment (Concern with citation): This is also applicable to Paid Work Experience as hiring participants is currently not required?	Comment (Proposed Resolution/Edit): Clarification	
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 199	Substantive	12-09-2025 10:27:36	Christina	Coble	Business Services Manager	ccoble@careersourcer.com	CareerSource Research Coast	Comment (Concern with citation): How will results be measured and what standard tools will be used?	Comment (Proposed Resolution/Edit): Clarification	
O125 Business Services	Line Number: 71	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepbc.com	CareerSource Palm Beach County	Comment (Concern with citation): Please clarify which program participants will be measured on this outcome: OIT, IWT and RA participants are already employed by nature of the activity.	Comment (Proposed Resolution/Edit): A deficiency is triggered only when the LWDB fails to meet the same primary indicator of performance for the same core program in two consecutive program years, consistent with WIOA §116 and TEGI 11-19, Change 2.	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 59	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepbc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy lets several deficiency triggers but does not indicate whether the deficiencies are considered more serious or require faster escalation. Without prioritization, LWDBs cannot distinguish between technical noncompliance (e.g., minor reporting issues) and systemic issue risk (e.g., fiscal integrity failure), which may result in inconsistent enforcement across the state.	Comment (Proposed Resolution/Edit): Create a tiered deficiency framework (e.g., Critical, Major, Moderate, Administrative), with examples and corresponding state responses.	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 92	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepbc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy uses the LWDB Letter Grade (specifically bottom-five ranking or D/F grades) as a sanctionable metric, including grounds for leadership removal. However, the REACH Act establishes the Letter Grade as a consumer accountability tool, not a punitive accountability measure. The grade does not undergo federal adjustment, validation, or statistical controls comparable to WIOA indicators, creating risk of misalignment with federal accountability rules.	Comment (Proposed Resolution/Edit): Remove the Letter Grade as a sanction trigger and rely solely on federally adjusted WIOA performance indicators. This ensures compliance with the legislative intent of the Letter Grade system and prevents local boards from being penalized based on a metric not designed for sanctions.	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 118	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepbc.com	CareerSource Palm Beach County	Comment (Concern with citation): Using subgroup performance declines, especially for veterans, poses significant methodological issues. Recent state practices (e.g., Purple Book Board Award determinations) reveal challenges with using subgroup data when assessing performance. Demographic, banner, and labor market differences. Wage-based indicators further distort comparisons between transitioning service members and high-barrier veterans, resulting in misleading conclusions.	Comment (Proposed Resolution/Edit): Subgroup declines should not trigger a Turnaround Plan unless the state implements a validated methodology that incorporates: <ul style="list-style-type: none">• state-specific characteristics;• banner levels;• labor market conditions; and• service mix differences. Otherwise, subgroup discussions should occur during required annual performance review meetings, with escalation only if a LWDB fails to take documented steps to address identified issues.	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 128	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepbc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy simultaneously: <ul style="list-style-type: none">• flags LWDBs for Turnaround Plans if they are in the bottom five statewide, regardless of actual grade, and• defines poor performance as two D grades or one F. A board could earn a B but still fall in the bottom five statewide, resulting in sanctions despite meeting expectations.	Comment (Proposed Resolution/Edit): Remove Letter Grades for reasons outlined before. If not, remove bottom-five ranking from trigger.	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 95	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepbc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy states that "poor letter grade performance" means two consecutive D grades, but the state issues quarterly Letter Grades. This creates ambiguity: two D grades may occur within a single program year, which would not constitute sustained poor performance.	Comment (Proposed Resolution/Edit): Remove Letter Grades for reasons outlined before. If not, remove bottom-five ranking from trigger.	

G102 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 62	Critical	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy expands the statutory definition of "for cause" removal by linking it to LWDB performance outcomes such as failing WIOA performance indicators, REACH Act Letter Grades, and subgroup performance measures. This interpretation is inconsistent with Florida Statutes and WIOA. Under s. 445.002(2), F.S., "for cause" refers to the conduct or performance of the individual, including fraud, illegal acts, or neglect of duty. The policy's definition of "for cause" is broader than this. It does not tie "lack of performance" to the LWDB's federal or state performance outcomes. WIOA likewise provides CEOs with appointment authority but does not authorize the removal of board members or CEOs based on program-level performance metrics. Conflicting organizational performance with individual misconduct or incompetence exceeds statutory intent.	Comment (Proposed Resolution/Edit): Revise the section to clarify that "for cause" removal applies to individual performance or conduct, consistent with s. 445.002(2), F.S., and does not include LWDB performance indicators, letter grades, or subgroup outcomes. If the state wishes to address poor LWDB performance, it should rely on the existing mechanisms in G103 and G104, which already outline program-level corrective actions and sanctions, distinct from individual removal authority.
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 65	Critical	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy incorporates the state-issued LWDB Letter Grade as a criterion for determining "lack of performance" and, by extension, grounds for removing individual board members or the executive director. This is problematic because LWDB Letter Grade is a consumer-oriented metric designed to support transparency and user-friendly public reporting—not to serve as a validated, performance accountability measure for personnel decisions. Unlike the federally governed WIOA Primary Indicators of Performance, the Letter Grade undergoes no federal audit check, no validation testing, and no statistical analysis is conducted to account for the impact of participant characteristics, economic conditions, or regional labor market differences. As a result, the Letter Grade reflects a communication tool rather than a reasonably adjusted performance metric. Using it as grounds for "for cause" removal misappropriates its purpose and creates significant fairness and compliance concerns.	Comment (Proposed Resolution/Edit): Remove the Letter Grade from the list of factors used to determine individual "lack of performance." If the Letter Grade is retained for transparency or compliance purposes, it should be removed from use as a public-facing information metric, not as a basis for personnel action. Program-level concerns arising from Letter Grade trends should instead be addressed through existing system accountability mechanisms in G103 and G104, not through individual removal provisions intended to address misconduct or individual-level deficiencies. This approach maintains statutory alignment, preserves the consumer-centered intent of the Letter Grade, and prevents the misuse of an invalidated metric for personnel decisions.
G102 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 68	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy includes persistent underperformance with "identified subgroup populations" as a factor in determining "lack of performance" for the purpose of removing individual LWDB members or the executive director. This is problematic because the policy does not define how subgroup performance will be evaluated, what metrics will be used, or the methodology for determining whether an LWDB is "consistently underperforming." Without a clear evaluation framework, this provision is subjective and susceptible to inconsistent application across local areas.	Comment (Proposed Resolution/Edit): Remove subgroup performance as a basis for individual removal unless the state develops and publishes a clear, evidence-based methodology that includes definitions, evaluation criteria, timeframes, and an adjustment model that accounts for cohort characteristics and local economic conditions. Subgroup analysis, if used, should be addressed through program-level monitoring and technical assistance frameworks, not through individual "for cause" removal provisions. This will ensure fairness, transparency, and consistent statewide application.
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 79	Critical	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy lists "Failure to convene education and industry consortium meetings" in accordance with s. 445.007 as an element of "lack of performance" that may justify removal of individual LWDB members or the executive director. This is a misclassification. Convening consortium meetings is a compliance requirement, not a performance measure. Treating a compliance lapse as a performance deficiency expands the definition of "lack of performance" beyond the intent of s. 445.002(2), F.S., which addresses individual-level conduct or incompetence, not whether the organization met procedural requirements.	Comment (Proposed Resolution/Edit): Rectify failure to convene consortium meetings as a compliance issue to be addressed through monitoring and corrective actions, not as grounds for individual removal under "lack of performance." If the state wishes to emphasize the importance of consortium compliance, it should address it through established compliance mechanisms rather than personnel-related performance provisions. This maintains fidelity to statutory preserves a clear distinction between individual performance and compliance obligations.
O125 Business Services	Line Number: 130	Critical	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy requires LWDBs to provide technical assistance to small and new businesses to reduce the rate of business failure" exceeds the scope of LWDB authority under WIOA. Reducing business failure rates is outside the LWDB's statutory role and risks noncompliance.	Comment (Proposed Resolution/Edit): Revise this requirement to limit technical assistance to small and new businesses to reduce the rate of business failure" to the scope of LWDB authority under WIOA. Reducing business failure rates is outside the LWDB's statutory role and risks noncompliance.
O125 Business Services	Line Number: 133	Critical	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy states that LWDBs must offer WIOA-funded training programs to WIOA participants "as part of a package of incentives for employers." This language is inconsistent with federal regulations governing the use of WIOA Title I funds. Under 20 CFR 683.245 and 683.260, WIOA funds may not be used for business-inducement or economic-development incentives, nor may they be positioned as tools to attract, retain, or financially benefit employers outside the context of training eligible workers. Describing WIOA-funded work-based training as an "incentive" risks misinterpretation and could lead to noncompliance findings during federal or state monitoring.	Comment (Proposed Resolution/Edit): Revise the language to clarify that LWDBs must offer WIOA-funded training programs to WIOA participants "as part of a package of incentives for employers," not as a business incentive. Suggested replacement: "LWDBs may coordinate with economic development partners to ensure that WIOA-funded work-based training options are available as part of the workforce support offered to businesses, consistent with WIOA eligibility, documentation, and training requirements."
O125 Business Services	Line Number: 137	Critical	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy requires LWDBs to establish Memoranda of Understanding (MOUs) with regional and local economic development agencies. WIOA does not authorize states to mandate MOUs with local economic development agencies. Under 20 CFR 683.213(b) and 30 CFR 678.400, Economic development agencies are not statutory one-stop partners in the one-stop delivery system. While WIOA encourages strategic coordination with economic development in planning and sector strategy development, federal law does not permit states to compel LWDBs to enter into binding MOUs with non-required partners. Requiring such agreements exceeds the authority provided under WIOA and creates unnecessary bureaucracy.	Comment (Proposed Resolution/Edit): Revise the requirement to reflect that coordination with economic development partners should be encouraged, but not mandated through MOUs, unless a local area workforce development board is a statutory one-stop partner. Suggested replacement: "LWDBs may coordinate with economic development partners to ensure that employer-facing processes and making work-based training easier to access. Revise the title (e.g., "Employer-Focused Training Sector") and update streamlining documentation, including contracting, plain-English terms, and user-friendly workflows. This approach aligns with WIOA, improves employer participation, and removes terminology that may conflict with federal regulation."
O125 Business Services	Line Number: 140	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): The use of the term "incentive" in this section is inconsistent with the language included in the paragraph (regarding 20 CFR 683.245 and 683.260), WIOA funds cannot be used as an incentive for employers to hire WIOA participants. The purpose of this section appears to be strengthening employer participation in OTT, IWT, Customized Training, and other work-based models. If that is the intent, framing these options as "incentives" is inaccurate and creates compliance risk. The real opportunity is to streamline processes, reduce administrative burden, and improve employer experience; ensuring participation without mischaracterizing training services as inducements.	Comment (Proposed Resolution/Edit): Reframe the section to focus on simplifying employer-facing processes and making work-based training easier to access. Revise the title (e.g., "Employer-Focused Training Sector") and update streamlining documentation, including contracting, plain-English terms, and user-friendly workflows. This approach aligns with WIOA, improves employer participation, and removes terminology that may conflict with federal regulation.
O125 Business Services	Line Number: 165	Critical	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): Including Paid Work Experience (PWE) in this section is inappropriate because PWE is neither a business "incentive" nor an employer-driven training strategy. PWE is a participant-focused activity designed to provide short-term, structured work exposure and skills training to individuals in the WIOA youth population. Under WIOA-Adult, PWE is explicitly classified as a "Career Service" not a training service, and is intended to meet employer skill needs, offset training costs, or function as a talent pipeline mechanism in the way OTT, IWT, or Customized Training do. Describing PWE as a business incentive mischaracterizes its statutory purpose and may cause confusion or misuse regarding eligibility, documentation, and employer expectations.	Comment (Proposed Resolution/Edit): Remove Paid Work Experience from this section.
O125 Business Services	Line Number: 165	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy misses an opportunity to highlight TANF-funded Community Service (non-paid work) experience as an effective employer engagement tool. TANF Community Service can be positioned as an incentive as a "valuable talent pipeline mechanism." This activity allows employers to observe participant performance in a real work setting without wage reimbursement while providing meaningful skill development for TANF participants. It also serves as a valuable talent pipeline mechanism, as individuals who successfully complete TANF Community Service may become candidates for subsequent WIOA-funded On-the-Job Training (OJT) placements.	Comment (Proposed Resolution/Edit): Add language recognizing TANF-funded Community Service as an employer-facing engagement that can engage participants to the workplace, allow employers to observe as a "valuable talent pipeline mechanism." This activity allows employers to observe participant performance in a real work setting without wage reimbursement while providing meaningful skill development for TANF participants. It also serves as a valuable talent pipeline mechanism, as individuals who successfully complete TANF Community Service may become candidates for subsequent WIOA-funded On-the-Job Training (OJT) placements.
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 116	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): The policy outlines factors that may be used to determine whether technical assistance should escalate to a Performance Improvement Plan (PIP), but it does not establish clear, objective, or consistently applied criteria for making that determination. Phrases such as "may be" may be interpreted as "a general possibility." This activity allows employers to observe participant performance in a real work setting without wage reimbursement while providing meaningful skill development for TANF participants. It also serves as a valuable talent pipeline mechanism, as individuals who successfully complete TANF Community Service may become candidates for subsequent WIOA-funded On-the-Job Training (OJT) placements.	Comment (Proposed Resolution/Edit): Strengthen this section by defining clear, mandatory, and measurable escalation thresholds. For example, specify that a PIP will be required when (a) two or more indicators fail in a single program year, or (b) two consecutive years of declining performance are documented. Additionally, include a defined review process and timeline that outlines when and how technical assistance is evaluated before escalation, ensuring consistent and transparent application statewide.
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 104	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): The statement that federal guidance requires technical assistance when an LWDB fails one or more adjusted performance indicators appears to overstate federal requirements. Under WIOA Section 116 and related TEGLs, the mandate for technical assistance applies clearly at the state level when a state fails to meet its negotiated performance levels. Federal guidance does not impose a universal requirement that states must automatically provide technical assistance to local workforce boards upon failure of a single local indicator. Where TA for local areas is required, it is established through state policy rather than federal mandate.	Comment (Proposed Resolution/Edit): Revise the language to clarify that providing technical assistance to LWDBs following performance failure is a state policy requirement, not a federal requirement.
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 124	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & COO	sgustafson@careersourcepc.com	CareerSource Palm Beach County	Comment (Concern with citation): Using subgroup performance declines (e.g., veterans, public assistance recipients) as justification for placing an LWDB on a PIP is problematic. This approach fails to consider why they have struggled to contextualize subgroup data (Purple Star Veterans, understanding Wagner-Peyser declining wages) and declines in subgroup outcomes cannot be meaningfully interpreted without considering cohort characteristics and external factors. Without this context, the policy risks penalizing boards for shifts in the population served rather than program effectiveness.	Comment (Proposed Resolution/Edit): Rather than using subgroup declines as a standalone basis for a PIP, address subgroup concerns through a collaborative approach that involves discussions and negotiations with each LWDB. If, after these discussions, a board fails to take reasonable, documented steps to improve subgroup outcomes, escalation to a PIP may be warranted. This approach ensures decisions are made with appropriate context, protects against misinterpretation of subgroup data, and strengthens accountability through collaboration.
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 126	Critical	12-09-2025 09:05:26	Marsha	Durden	Executive Director	marsha.durden@careersourcenorthflorida.com	CareerSource North Florida	Comment (Concern with citation): Lines 126-129. Lack of standardization of data collection existing for Veterans and public assistance recipients. Also not included in the standards of barriers to employment data collection/reporting use statewide through Employ Florida and CareerSource Florida analytics. Public assistance is undefined. Data systems are not configured. Statistical validity concerns.	Comment (Proposed Resolution/Edit): Lines 126-129 Provide standard reporting templates accessible through CareerSource Florida Analytics. Define individuals receiving public assistance specifically, TANF, SNAP or Medicaid at the time of enrollment. Specifically named data fields in EF for veterans and public assistance recipients. Establish minimum cohort sizes for statistical validity, recommended not less than 30 before triggering PIP requirements.

Select Policy: O125 Business Services	Line Numbers: 124-127	Critical	12-09-2025 09:05:26	Marsha Durden	Executive Director	marshadurden@careersourcefl.com	CareerSource North Florida	Policy does not provide guidance on how to document the linkage, allocate costs, what documentation is acceptable and does not provide examples of allowable versus non-allowable business services activities. Concern - will cause disallowable costs	Comment (Proposed Resolution/Edit): Clarify allowable versus non-allowable expenditures under WIOA title 1 such as allowable employee outreach to market, OJT, IWT, and apprenticeship opportunities, providing labor market information to support employer training decisions, prescreen eligible candidates for positions that include training components. Clarify acceptable documentation methods such as position description clearly stating training focused duties, activity logs showing connection between employer contacts and training programs, allocation formulas for mixed duty positions.	
Select Policy: O125 Business Services	Line Number: 48	Substantive	12-08-2025 08:38:05	Dale French	Executive Vice President	dfrench@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): The measurable performance outcomes section states that an increase in work-based training will be measured. However, there is no formula for how it will be measured and does not mention if level of funding, economic conditions, etc. will be taken into account.	Comment (Proposed Resolution/Edit): Policies that state a performance measure should include the formula for calculating and all local conditions should apply.	
Select Policy: O125 Business Services	Line Number: 60	Substantive	12-08-2025 08:38:05	Dale French	Executive Vice President	dfrench@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): This section seeks to impose performance goals on layoff aversion or REACT services. It does not state the goal is to INCREASE or DECREASE the number of instances in the local economy. This does not seem to be an area where we should seek 'performance'. Additionally, this is completely dependent on the local economy.	Comment (Proposed Resolution/Edit): It is apparent that CSF is seeking activity based on the Rapid Response funds received by boards annually. This is minor funding and does not cover all expenses of layoff aversion activities to begin with. This should be removed based on the number of customers seeking RA assistance in the centers which comprises 80% of our front-line staff's time in which we get no funding for.	
Select Policy: G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 122	Substantive	12-08-2025 08:38:05	Dale French	Executive Vice President	dfrench@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): This section states boards can be decommissioned for measurable decreases in job placement. To our knowledge this is not being measured at this time and would need to be done by the state. We measure satisfaction of job seekers and businesses using locally procured tools. The policy does not provide any details on benchmark performance or methods of measurement. When would this begin?	Comment (Proposed Resolution/Edit): The state should procure a standardized tool and manage the survey process as they used to. Additionally, this is already indirectly measured through letter grade, but not in a way that would show definite increase or decrease of overall satisfaction.	
Select Policy: G103 Performance Requirements for Local Workforce Development Boards,	Line Number: 27	Substantive	12-08-2025 08:38:05	Dale French	Executive Vice President	dfrench@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): This section notes customer satisfaction is measured and reported by the state. Our region is currently measuring customer satisfaction through a locally procured tool. The state USED to perform customer satisfaction surveys but quit many years ago.	Comment (Proposed Resolution/Edit): Thoroughly explain expectations given this is an operating policy.	
Select Policy: G103 Performance Requirements for Local Workforce Development Boards	Line Number: 62	Substantive	12-08-2025 08:38:05	Dale French	Executive Vice President	dfrench@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): This section states that local performance numbers must be revised. However, there is no indicator of when these would be provided to local boards.	Comment (Proposed Resolution/Edit): Provide a deadline for adjusted performance measures to be provided to local boards. This should be done timeliness to allow for boards to adjust business models as needed to maximize funding and resources.	
Select Policy: G103 Performance Requirements for Local Workforce Development Boards	Policy Line Number: 95	Substantive	12-08-2025 08:38:05	Dale French	Executive Vice President	dfrench@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): The annual performance reviews currently do not include an overall performance indicators scoring.	Comment (Proposed Resolution/Edit): Annual reports provided to boards should include the overall indicators of Performance scoring as a percentage. This will be especially helpful when adjusting business models to achieve satisfactory performance in deficient areas.	
Select Policy: G103 Performance Requirements for Local Workforce Development Boards	Line Number: 102	Substantive	12-08-2025 08:38:05	Dale French	Executive Vice President	dfrench@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): This section specifically references ADJUSTED levels of performance after year one. However, it does not detail when this will occur.	Comment (Proposed Resolution/Edit): The policy should state when local boards will be notified of adjusted performance numbers. Boards should also have the opportunity to discuss proposed ADJUSTED numbers to maintain economic or funding conditions before ADJUSTED numbers are finalized.	
Select Policy: G103 Performance Requirements for Local Workforce Development Boards	Line Number: 218	Substantive	12-08-2025 08:38:05	Dale French	Executive Vice President	dfrench@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): This section states that methodology for calculating Letter Grades will be posted publicly by October 15 annually.	Comment (Proposed Resolution/Edit): This methodology should include back-up information to include not only the programs counted, but the actual data extracted to calculate. This will provide full transparency to the public and boards. At this time the data is esthetic.	
Select Policy: G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 95	Substantive	12-08-2025 08:38:05	Dale French	Executive Vice President	dfrench@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): This section stipulates 'other identified performance requirements' and notes that corrective actions may be imposed if failing two or more years of local adjusted performance "...AND being among the lowest five scoring LWDBs in the state...". This seems very arbitrary.	Comment (Proposed Resolution/Edit): The policy should state a threshold for corrective action triggers. All of the policies rely on subjective terminology with no definitive benchmarks or thresholds given. The policy should also state if this is based on the overall indicators of Performance score or as it is now based on actual categories of performance missed.	
Select Policy: G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 157	Substantive	12-08-2025 08:38:05	Dale French	Executive Vice President	dfrench@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): This section does not list the Board Chair as receiving notice of the need of a Turnaround Plan.	Comment (Proposed Resolution/Edit): Include the Board Chair as a contact in addition to the CEO and CLEO.	
O125 Business Services	Line Number: 23	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): Key Objective- metrics	Comment (Proposed Resolution/Edit): Throughout this section various metrics are referenced without clarity on how they will be measured and how the state is defining them in terms of acceptable and non-acceptable. This needs to be corrected with this detail added.	
O125 Business Services	Line Number: 47	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): within 90 days Select Policy	Comment (Proposed Resolution/Edit): within 90 days of what? again how is the state enabling EF to develop uniform reporting?	
O125 Business Services	Line Number: 60	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): the two measures cited here out of plan, minimum notice or off notices or less? we have no control over the economics that affect layout - why are we being judged based on them? Median earnings, ...etc. is this the DW metrics overall?	Comment (Proposed Resolution/Edit): The DW measures should be used and the criteria under (a) eliminated. Footnote 7- this data is totally unrelated to our mission and beyond our scope.	
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 122	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Select Policy: G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation, Comment (Concern with citation): measures of employer satisfaction,	Comment (Proposed Resolution/Edit): this needs more definition: what are the measures? How is reduced funding being considered? etc.	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 97	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): "among the lowest five..."	Comment (Proposed Resolution/Edit): Lines 127-129 define poor letter grade performance as, this only references lowest 5 letter grade scores. Under this if everyone was an "A", the lowest numerical scores would qualify. That is ridiculous!! line 97 needs to track the language in 127	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 130	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): "Turnaround"	Comment (Proposed Resolution/Edit): there needs to be a clear definition that separates reorganization, PIP and turnaround.	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	Line Number: 157	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): Notice; minimum notice	Comment (Proposed Resolution/Edit): Notice should also be given to the Board Chair. Clarity needs to be provided on the type of notice: call or written, and the time frame of the notice: within ____ days of any action.	
Select Policy: G103 Performance Requirements for Local Workforce Development Boards	Line Number: 28	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): this citation speaks of customer service yet there is no statement about which customer- business and/or participant, nor is there how this is being measured.	Comment (Proposed Resolution/Edit): The policy should clearly state which customer group, the measure being used and the level that is acceptable and/or considered as "improved."	
Select Policy: G103 Performance Requirements for Local Workforce Development Boards, Designation:	Line Number: 66	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): "revised to reflect"	Comment (Proposed Resolution/Edit): this is revised based upon data from the current year, or the year in which the data was generated. This has not been done before and SF should orange for demonstrations of the methodology to each local board using their most recent year data.	
Select Policy: G103 Performance Requirements for Local Workforce Development Boards, Designation:	Line Number: 117	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): earlier cohort size and year over year comparison was mentioned and should be included here as well.	Comment (Proposed Resolution/Edit): see above	
Select Policy: G103 Performance Requirements for Local Workforce Development Boards	Line Number: 189	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): "...three consecutive years..."	Comment (Proposed Resolution/Edit): The data for the 3rd year is in the system after the first year. WIOA could not have anticipated the data lag and the state should make adjustments to taken into consideration that data lag and adjust its yearly reference.	
Select Policy: G103 Performance Requirements for Local Workforce Development Boards	Line Number: 207	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): Measure of ROI	Comment (Proposed Resolution/Edit): what metrics will be used to determine ROI? These should be stated in the policy.	
Select Policy: G103 Performance Requirements for Local Workforce Development Boards	Line Number: 234	Substantive	12-05-2025 16:04:23	Rusty Skinner	CEO	rskinner@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): LWDBs are responsible for HR and data management systems...including ROI"	Comment (Proposed Resolution/Edit): first, for standardization, the data should be collected so that everyone is uniformly held accountable. This is an under cost to be placed on a local board. Secondly, you must define the metrics to be used.	
O125 Business Services	Line Number: 177	Administrative	12-02-2025 15:12:30	Michelle Moeller	Director	moellerm@careersourcectb.com	CareerSource Tampa Bay	Comment (Concern with citation): Hiring participants upon successful completion of training - Define "Training" agree with this if it's for OJT, IWT & Customized are already employed. If this referring to GST, the training providers must 1st be accountable to offer quality training that prepares students for employment. ,	Comment (Proposed Resolution/Edit): Example of some Employer Commitments: 1. Hire OJT participants 2. Retain, promote and increase salary of IWT and Customized Training participants 3. Screen and hire qualified candidates who have recently completed training 4. Interview CareerSource referred candidates.	
O125 Business Services	Line Number: 150	Substantive	12-01-2025 17:19:30	Keidian Kunkel	President & CEO	kunkelk@careersourcectb.com	CareerSource Tampa Bay	Comment (Concern with citation): Paid Work Experience is a participant service and should not be sold as an incentive to employers. While employers may indirectly benefit from hosting a PWX participant, in no way should it be used as an incentive for employer engagement.	Remove PWX as a listed employer incentive and replace with IWT which is missing from the incentive list.	
O125 Business Services	Line Number: 161	Substantive	12-01-2025 17:19:30	Keidian Kunkel	President & CEO	kunkelk@careersourcectb.com	CareerSource Tampa Bay	Comment (Concern with citation): There is nothing in the reg that requires PWX host sites to employ participants after the PWX ends. The messaging is not clear about what constitutes training. Only OJT can truly be listed. 20 CFR § 680.707. What are the requirements for on-the-job training?	Comment (Proposed Resolution/Edit): Delineate that this requirement is only applied to OJT employer partners.	
O125 Business Services	Line Number: 124	Substantive	12-01-2025 17:19:30	Keidian Kunkel	President & CEO	kunkelk@careersourcectb.com	CareerSource Tampa Bay	Comment (Concern with citation): The eligible training programs need to be delineated here. My previous citations and comments provide the information for this line.	Comment (Proposed Resolution/Edit): Delineate what work-based training programs can be used as employer incentives. I suggest replacing "work-based training" with "work-based learning" to remain aligned with language in the reg.	



Information Items



Speaker Bios

Rick Beasley



Rick Beasley has served as the Executive Director for the South Florida Workforce Investment Board (SFWIB), CareerSource South Florida (CSSF), since August 2005. In this position, he oversees workforce programs in Miami-Dade and Monroe counties with an operating budget of \$75 million. He is in charge of one of the nation's most dynamic "melting pots" – a diverse socioeconomic region. His vision for CareerSource South Florida is to create a model for the nation by establishing a world-class talent supply chain that fosters economic growth.

Beasley has provided leadership for a number of important workforce initiatives including the development of an Online Balance Scorecard, deployment of the CSSF Mobile Workforce Assistance Centers (five mobile units), development and implementation of the Miami-Dade County First Source Ordinance, and the South Florida Workforce State of the Workforce Report. CareerSource South Florida is one of the few Local Workforce Development Boards that sponsor career development offices on the campus of partner colleges and universities including St. Thomas University and Florida Memorial University as a way of increasing the talent pool and gaining early access/exposure to college graduates.

Prior to joining CareerSource South Florida, Beasley was the Director of the Missouri Department of Economic Development, Division of Workforce Development. In this position, he was responsible for managing Missouri's workforce development system and advising key policymakers on a broad range of workforce and economic development issues. Under Beasley's leadership, the Department of Economic Development Division of Workforce Development received the Governor's Award for Quality and Productivity in recognition for outstanding work.

Jason Mahon



Jason Mahon serves as Deputy Secretary of Economic Development and Chief Manufacturing Officer at FloridaCommerce. Since 2015, Mahon has served the State of Florida in many roles, including Communications Director to Governor Ron DeSantis. Prior to working in the Governor's office, Mahon served at multiple state agencies, including Emergency Management, the Department of Health and the Department of Environmental Protection.

A native Floridian from Charlotte County, Mahon graduated from Florida State University and resides in Tallahassee with his wife Ashley and their children Jonah and Macy.

Joshua Matlock



Josh Matlock is the President and CEO of CareerSource Suncoast, a private nonprofit dedicated to strengthening businesses and communities in Manatee and Sarasota counties by cultivating a highly skilled and adaptable workforce. With over a decade of experience in workforce development, Matlock has been committed to making strategic investments in people and partnerships, fostering opportunities that empower individuals and drive long-term prosperity.

Matlock has the honor of serving on Manatee Technical College's Board of Governors, the board of directors for the Boys & Girls Club of Manatee County, Manatee Chamber of Commerce, Bradenton Area EDC, and Vice President of the Florida Workforce Development Association.

Matlock holds a BS in criminal justice, MA in political science, and MS in public administration from Midwestern State University.

Cheryl Taylor



As President of CareerSource Northeast Florida, Cheryl Taylor leads one of Florida's largest workforce systems, consisting of seven Career Centers within a six-county region of Northeast Florida. She has over 25 years of experience in workforce development, beginning in 1995 as an Unemployment Customer Service Representative for the Department of Labor. In 1997, Taylor began work at First Coast Workforce Development, dba, CareerSource Northeast Florida as a WAGES Program Manager. Over the next two decades, Taylor held several senior leadership positions. In these roles she developed a keen understanding of workforce development policies, practices and trends in policy and programs such as: the Workforce Investment and Opportunity Act (WIOA), Welfare Transition (WT), and Supplemental Nutrition Assistance (SNAP).

Taylor's passion for the workforce aligns with the time she has spent in the industry. Her strategic leadership in workforce development has been instrumental in connecting talent with gainful employment and supporting economic growth. She believes fostering partnerships in the community is essential to pave the way for career training, technical skills development and innovative opportunities that open doors to higher-wage jobs.

April Torregiante



April Torregiante is a mission-driven leader with over 17 years of experience in workforce development. As Vice President of Program Services for CareerSource Tampa Bay, she leads organizational strategy and oversees programs and initiatives that improve service delivery, strengthen talent pipelines, and drive regional economic growth.

Torregiante is recognized for her collaborative, impact-focused leadership and works closely with community partners, educational institutions, and employers to align workforce strategies with regional priorities, always with a focus on equity, access, and long-term impact. April is passionate about helping others overcome challenges through realizing their

potential and volunteers with various community organizations, mostly focused on serving veterans.