

## **Strategic Policy and Performance Council Meeting Agenda**

**JANUARY 27, 2026 • 10:00 A.M. – 12:00 P.M., ET  
TALLAHASSEE STATE COLLEGE – WORKFORCE DEVELOPMENT (WD) BUILDING**

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### **Chair's Welcome and Remarks**

***Sophia Eccleston***

### **Consent Agenda**

1. November 2025 Strategic Policy and Performance Council Meeting Minutes
2. 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

### **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

### **Workforce Program Development Initiatives Update**

***Victoria Gaitanis  
Dr. Erin Sampson***

- 2025 Policy Review
- Rural Set-aside Initiatives



## Statewide Labor Market and Workforce Performance Update

**Jimmy Heckman**

*Chief, Bureau of Workforce Statistics and Economic Research  
FloridaCommerce*

**Kristy Farina**

*Economic Research and Analysis Administrator  
FloridaCommerce*

## Program Performance Update

**Daniel Harper**

*Victoria Gaitanis*

## Open Discussion/Public Comment

## Chair's Closing Remarks

**Sophia Eccleston**

collaborate.  
innovate.  
lead.

CareerSource Florida  
Strategic Policy and  
Performance Council Meeting  
January 27, 2026  
**Consent Item 1**  
Approved \_\_\_\_\_  
Disapproved \_\_\_\_\_

## **Consent Item 1**

### **November 12, 2025, SPPC MEETING MINUTES**

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

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### **FOR CONSIDERATION**

- **Approval of November 12, 2025, Strategic Policy and Performance Council Meeting Minutes, to include any modifications or changes noted by the council.**

**CareerSource Florida**  
**Strategic Policy and Performance Council Meeting Minutes**  
**November 12, 2025**

**I. Call to Order**

Chair Sophia Eccleston called the Strategic Policy and Performance Council meeting to order at 10:00 a.m. on November 12, 2025.

**II. Roll Call**

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

Sophia Eccleston  
Bayne Beecher  
Robert Doyle  
Bridget Royster  
Tim Hinson  
Joe Marino  
Laurie Sallarulo  
Scott Singer

**III. Consent Agenda**

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

**1. August 2025 Joint Council Meeting Minutes**

**2. Sunset Policies:**

- **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**

**Motion:** Joe Marino

**Second:** Scott Singer

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

**IV. Action Items**

CareerSource Florida Vice President of Workforce Program Development Victoria Gaitanis presented four action items for the council's consideration.

**1. Workforce Policy - Policy O92 – Staff Training and Credentialing**

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

**Motion:** Joe Marino

**Second:** Bayne Beecher

There was one public comment from Cheryl Taylor, CareerSource Northeast Florida President and CEO. Cheryl thanked CareerSource Florida and the Florida Department of Commerce for including local boards in policy development and emphasized the value of practitioner input. On behalf of the policy work group, she recommended allowing more time for collaboration before policies are released for consultation, reconvening the work group after consultation to ensure adopted feedback aligns with policy intent and is practical to implement locally, and better aligning policy development with technical assistance.

Chair Eccleston acknowledged receiving similar feedback from multiple workforce boards, confirmed she shared those concerns with CareerSource Florida, and emphasized her hope that Florida Commerce, CareerSource Florida, and local boards can continue working together to develop a more effective and strategic policy process. She recognized the concerns raised, noted that progress has been made but improvements are still needed on all sides, and expressed appreciation for both the boards that voiced concerns and the CareerSource Florida team for being willing to listen and collaborate to address them.

The action item passed, with Tim Hinson opposed.

## **2. Workforce Policy O124 – Statewide Standardization of Tools and Services**

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

**Motion:** Bridget Royster

**Second:** Joe Marino

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

## **3. Workforce Policy P95 – WIOA Youth Program Eligibility and Service Provider Selection**

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

**Motion:** Robert Doyle

**Second:** Bridget Royster

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

## **4. Workforce Policy P111 – Services for Veterans, Members of the Military and Spouses -the-Job Training Policy**

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

**Motion:** Joe Marino

**Second:** Robert Doyle

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

**V. Workforce Program Development Initiatives Update**

CareerSource Florida Director of Planning and Evaluation Liz Glenn gave an update on 2026-2026 Master Credentials List (MCL) applications as well as MCL trainings and credential communication updates.

**VI. Statewide Labor Market & Program Performance Analysis**

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

FloridaCommerce Economic Research and Analysis Administrator Kristy Farina updated the council on most recent Workforce Innovation and Opportunity Act (WIOA) program performance.

**VII. Open Discussion/Public Comment**

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

There were no public comments.

**VIII. Chair's Closing Remarks**

Chair Eccleston thanked the council for their participation, noting their input and perspectives provide valuable information for consideration. She also thanked any veterans online for their service in recognition of upcoming Veterans Day.

The meeting was adjourned at 11:06 a.m.

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

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

## Consent Item 2

### 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 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 the 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 the 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 the 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**

- **Authorize the presentation of this request to the CareerSource Florida Board of Directors.**
- **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](http://careersourceflorida.com) for 30 calendar days before submission to USDOL.**

## 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,<sup>1</sup> 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

<sup>1</sup> [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. Deficiencies<sup>2</sup>**

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.  
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<sup>2</sup> [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;<sup>3</sup>  
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,<sup>4</sup> or  
102 iii. Two consecutive years with an annual letter grade of F.<sup>5</sup>

103 **B. Actions**

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

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

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

<sup>5</sup> 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

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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 requires that the LWDB Turnaround Plan must be data-based. The data is based on federal performance data when 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.	Recommended solution -- a turnaround plan should be based on real-time leading indicators, performance measures, and local administrative data (i.e., community college enrollment/graduation 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 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.	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 5 ranking or D/F grades) as a sanctionable metric, including grounds for terminating a LWDB's Letter Grade as 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 eases 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 14.36, F.S. does not prohibit the state board from using letter grades to evaluate LWDBs' performance.
Comment (Concern with citation): Section II A above 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 declines, 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 declines 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 methodology 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 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 that 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. Clarify 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="448 559 971 623">Workforce Policy</h2>	<b>POLICY NUMBER</b>  <b>G105</b>
<b>Title:</b> Composition and Certification of Local Workforce Development Boards; Certification of One-Stop Systems; and Direct Service Provider Designation	
<b>Policy Type:</b> Governance	
<b>Program:</b> Workforce Innovation and Opportunity Act	
<b>Effective:</b>	<b>Revised:</b>

## 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,<sup>1</sup> 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.

<sup>1</sup> 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 requirements<sup>2</sup> 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

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<sup>2</sup> [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:<sup>3</sup>

1. Fraud, abuse, or failure to carry out the functions set forth in WIOA Section 107(d) and [20 CFR 679.370](#).<sup>4</sup>
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

<sup>3</sup> WIOA Section 107(c)(3).

<sup>4</sup> 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.<sup>5</sup>

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.<sup>6</sup> 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.<sup>7</sup> 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.<sup>8</sup>

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.**

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<sup>5</sup> WIOA Section 107(c)(3)(C).

<sup>6</sup> WIOA Section 121(g).

<sup>7</sup> 20 CFR 679.410(b) and WIOA Section 107(g).

<sup>8</sup> [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](mailto: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. <b>BOARD COMPOSITION:</b> 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. <b>PERFORMANCE:</b> 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. <b>SERVICE PROVISION:</b> 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. <b>FISCAL INTEGRITY:</b> 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"> <li>b. The publishing of its most recent IRS Form 990 and all required contracts</li> <li>c. The submission of required compensation disclosures</li> <li>d. The submission of required infrastructure funding agreements</li> <li>e. The submission of documentation demonstrating that LWDB workforce investment activities are aligned the needs of local employers and support local economic growth</li> </ul>				
<p><b>5. MONITORING:</b> 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"> <li>a) annual self-assessments to evaluate compliance with certification criteria, including board composition, service delivery, and accessibility,</li> <li>b) internal monitoring results, including any corrective actions taken,</li> <li>c) Local Operating Procedures (LOPs) and Local Policies are in alignment with State Workforce Policies</li> <li>d) Any required or executed Memorandum(s) of Understanding</li> <li>e) Those related to the certification of one-stop centers,</li> </ul>	s. 445.007, F.S.	20 CFR 679.310, 20 CFR 679.370	Choose an item.	
<p><b>6. PARTNERSHIP:</b> There is documentation that the board actively and effectively partnered and coordinated with</p> <ul style="list-style-type: none"> <li>a. economic development organization,</li> <li>b. public and private educational entities,</li> <li>c. local businesses,</li> <li>d. community organizations, and</li> <li>e. required WIOA partners.</li> </ul>	s. 445.007, F.S.	20 CFR 679.370	Choose an item.	
<p><b>7. COMPLIANCE:</b> There is documentation that the board ensured compliance with</p> <ul style="list-style-type: none"> <li>a. transparency and public access to meetings and records requirements,</li> <li>b. the conflict-of-interest provisions,</li> <li>c. requirements specific to Education and Industry Consortiums</li> <li>d. the timely submission of a local plan in alignment with the State Plan.</li> </ul>	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><b>Workforce Research and Regional Labor Market Analysis:</b> 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
<b>CLEO Agreement:</b> 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); <a href="#">20 CFR 679.410(b)</a>		Submission of documents by LWDB required.
<b>Firewall Implementation:</b> 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.	<a href="#">20 CFR 679.430</a>		Submission of documents by LWDB required.
<b>Cost Analysis:</b> 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.
<b>Performance Improvement:</b> Description of anticipated improvements to service delivery and performance outcomes.	s. 445.007(6), F.S.			Submission of documents by LWDB required.
<b>Grant Program Identification:</b> Identification of grant programs funding the direct service activities.	s. 445.007(6), F.S.			Submission of documents by LWDB required.
<b>Oversight and Monitoring:</b> Internal controls and procedures (including LOPs) for oversight and evaluation of LWDB performance as a direct provider.	s. 445.007(6), F.S.	<a href="#">20 CFR 679.430</a>		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 Criteria<sup>1</sup>

Requirement	Citation (State)	Citation (Federal)	Met/Not Met	Notes
<b>Procurement:</b> Documentation was provided that sole source procurement <sup>2</sup> or successful competition <sup>3</sup> 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.
<b>Approval:</b> 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.
<b>Performance:</b> 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.
<b>Performance Monitoring:</b> Evidence was submitted indicated there is a regular process for local performance monitoring that includes: <ul style="list-style-type: none"><li>• The identification and provision of aligned and approved technical assistance designed to support performance improvement;</li><li>• Customer feedback in alignment with Workforce Policy P9, Availability of Services to Floridians, for both jobseekers and businesses; and</li></ul>	ss. 445.007(6 ) and 445.009	20 CFR 678.800(c)		Submission of documents required by LWDB.

<sup>1</sup> s. 445.007(6), Fla. Stat.

<sup>2</sup> [20 CFR 679.410\(a\)\(1\)\(i\)](#)

<sup>3</sup> [20 CFR 679.410\(a\)\(1\)\(ii\)](#)

<ul style="list-style-type: none"> <li>The implementation of a regular system of professional development and skills training in alignment with Workforce Policy O92, Staff Training and Credentialing Skill Standards.</li> </ul>				
<p><b>Programmatic Effectiveness:</b> 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"> <li>Local labor force participation rates at or below the state average;</li> <li>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;</li> <li>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</li> <li>Compliance with relevant state workforce policies, state and federal law, and agency technical assistance is locally monitored.</li> </ul>	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><b>Programmatic Compliance:</b> Documentation is provided that programmatic compliance is achieved, including:</p> <ul style="list-style-type: none"> <li>All state and federally required services, including core services, are made available to Floridians consistent with the law, including electronically available services;</li> <li>All required memorandums of understanding with mandatory or optional partners participating in the one-stop delivery system have been executed;</li> <li>Submission of required information for employees of FloridaCommerce who deliver employment services; and</li> <li>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.</li> <li>Requirements specific to Education and Industry Consortium, consistent with section 445.007(15), Florida Statutes, have been met.</li> </ul>	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><b>Fiscal Effectiveness:</b> 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"> <li>• Documentation related to indirect cost agreement(s); and</li> <li>• That at least 90% of Wagner-Peyser funding is going into direct customer service costs;</li> <li>• The implementation of a regular system of fiscal monitoring to identify and improve fiscal compliance and performance.</li> </ul>				required by LWDB if a review of available information is not sufficient.
<p><b>Accessibility Compliance:</b> Documentation was provided that centers meet accessibility requirements consistent with state and federal law, including the following:</p> <ul style="list-style-type: none"> <li>• Compliance with ADA and disability-related regulations implementing WIOA sec. 188, set forth at <a href="#">29 CFR Part 38</a>. This includes how the physical accessibility of one stop centers will be ensured.</li> <li>• Provision of reasonable accommodation, auxiliary aids, services, and assistive technology.</li> <li>• Provision of reasonable modifications to policies, practices, or procedures where necessary.</li> <li>• The administering of programs that encourage participation.</li> <li>• Policies and practices are designed to communicate effectively with all potential customers, including those with disabilities.</li> </ul>		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
<b>Business Representative Criteria</b>		
Percentage members from business in the local area		
COUNT of members from small business as defined by the U.S. Small Business Administration.		
<b>Workforce Representative Criteria</b>		
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.		
<b>Additional Requirements</b>		
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		
<b>MAY include</b>		
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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<b>LWDB Composition Requirements</b>	<b>CFR</b>	<b>FL Statute</b>
<b>Business Representative Criteria</b>		
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)	
<b>Workforce Representative Criteria</b>		
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)	
<b>Additional Requirements</b>		
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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<b>MAY include</b>		
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: 80	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): PS 185-87: 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/E.D.): 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: 81	CareerSource Brevard Flagler Volusia	The policy indicates that CSF and FloridaCommerce "use the evaluation for LWDBs to determine if they are to be granted a One-Stop certification, how often, and whether LWDBs are expected to come in 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/E.D.): Clarify whether the Evaluation for LWDBs is a formal form or completed only by CSF/Commerce or by FloridaCommerce. 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.	10	3	3	16
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 82	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P4 159: Section D provides detailed requirements for LWDB Direct Provider designation, while Section E provides detailed requirements for LWDB certification and one-stop certification including the required documentation. This may 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/E.D.): 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 144-144: The policy references WIOA Section 1337, which requires LWDBs to obtain SWDB approval but does not provide any specific details on the certification process. LWDBs must submit, is unclear whether the MOS-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/E.D.): Clarify the required components of the one-stop certification submission, including whether the MOS-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: 149	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P4 145-146: The policy supports the review, designation, and certification of LWDBs, service providers for the one-stop system, and direct providers. The policy also states that only Section D contains detailed procedural requirements (Direct Provider designation), while LWDB certification and one-stop certification are not included. This may lead to confusion about whether the policy governs all three areas equally.	Comment (Proposed Resolution/E.D.): 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: 150	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P5 197-201: The policy requires LWDBs to conduct an annual internal review of governance and service delivery. The policy also states that direct providers must submit a report of required documentation of these reviews. This may result in inconsistent implementation across local areas and potential monitoring inconsistencies.	Comment (Proposed Resolution/E.D.): Define the minimum required elements of the annual internal review or provide a template/shortcut to the one-stop certification application. Consider documenting the internal review process or providing a template for the required documentation that 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: 151	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): Multiple Sections: Required for LWDBs to obtain SWDB approval. The policy references several standardized forms (LWDB Certification, One-Stop Certification, Direct Provider Designation) but does not consistently specify which forms are required for each. LWDBs may use internal evaluation tools used by CSF/Commerce. This has the potential to result in incorrect or incomplete submissions.	Comment (Proposed Resolution/E.D.): 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: 159	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P5 140-143, P4 153-157, P5 158-159: The policy states that LWDBs must obtain SWDB approval to serve as their own One-Stop Operator but does not clearly define the nature of action (e.g., prior to programmatic removal, or whether removal or other response is required during each three-year certification cycle).	Comment (Proposed Resolution/E.D.): Clarify the procedural sequence for requesting and obtaining SWDB approval to serve as a One-Stop Operator, but does not clearly define the nature of action (e.g., prior to programmatic removal, or whether removal or other response is required during each three-year certification cycle).	This will be provided via Technical Assistance				
G105 LWDB Composition; Certification of One-Stop Systems and Boards	Line Number: 150	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): P5 143-145: The policy specifies conditions under which certification or designation may be revoked. This includes the removal of the corrective action, reinstatement, or replacement process following revocation.	Comment (Proposed Resolution/E.D.): Consider including a description of the corrective action or reinstatement process to ensure LWDBs understand the steps required to return to compliant status following revocation.	This will be provided via Technical Assistance				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 151	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): The policy contains multiple provisions for LWDBs to obtain SWDB approval to serve as their own One-Stop Operator and Direct Provider Designation. Direct Provider designation is a single certificate, Direct Provider designation but does present them in a single narrative format. This may create ambiguity for new boards or staff unfamiliar with the distinctions.	Comment (Proposed Resolution/E.D.): Consider separating the three provisions directly, and clearly defining with clarity liability requirements, timelines, and form usage. This will improve readability and ensure consistent statewide interpretation.	This will be provided via Technical Assistance				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 160	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. The policy also states that the LWDB Letter Grade is a consumer-informed metric, designed to support the removal of individuals from the LWDB. The metric is as a validated, performance-accountability measure for personnel decisions. Unlike the federally governed WIOA Primary Indicators of Performance, the Letter Grade is not a validated, performance-accountability measure. The Letter Grade is a performance metric, not a validation testing, and no statistical adjustment model to account for varying participant characteristics, economic conditions, or regional labor markets. The Letter Grade is a compliance tool, not a communication tool rather than a rigorously adjusted performance metric. Using it as grounds for "for cause" removal misrepresents its purpose and creates significant fairness and compliance concerns.	Comment (Proposed Resolution/E.D.): Revise the section to clarify that "for cause" removal applies to individual "fack of performance" if the Letter Grade is a consumer-informed metric, designed to support the removal of individuals from the LWDB. The metric is as a validated, performance-accountability measure for personnel decisions. Unlike the federally governed WIOA Primary Indicators of Performance, the Letter Grade is not a validated, performance-accountability mechanism in G103 and G104, not through individual removal provisions intended to address misconduct or individual-level deficiencies. The Letter Grade is a performance metric, not a validation testing, and no statistical adjustment model to account for varying participant characteristics, economic conditions, or regional labor markets. The Letter Grade is a compliance tool, not a communication tool rather than a rigorously adjusted performance metric. Using it as grounds for "for cause" removal misrepresents its purpose and creates significant fairness and compliance concerns.	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: 160	CareerSource Palm Beach County	Comment (Concern with citation): The policy includes persistent performance measures and a range of performance metrics as a factor in determining "fack of performance" for the purpose of removing individual LWDB members or the executive director. This is problematic because the LWDB Letter Grade is a validated, performance metric to 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 superfluous and inconsistent with application across local areas.	Comment (Proposed Resolution/E.D.): Remove subgroup performance as a sole basis for individual removal. The letter grade is a performance metric, not a validation testing, and no statistical adjustment model to account for varying participant characteristics, economic conditions, or regional labor markets. The Letter Grade is a compliance tool, not a communication tool rather than a rigorously adjusted performance metric. Using it as grounds for "for cause" removal misrepresents its purpose and creates significant fairness and compliance concerns.	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: 161	CareerSource Palm Beach County	Comment (Concern with citation): The policy lists "fack to convene education and industry consortium meetings in accordance with s. 445.007" as an element of "fack of performance" that may justify removal. This is problematic because the LWDB Letter Grade is a validated, performance metric to 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 superfluous and inconsistent with application across local areas.	Comment (Proposed Resolution/E.D.): Remove failure to convene consortium meetings as a compliance issue to be addressed through monitoring and corrective action, not as grounds for individual removal. The Letter Grade is a consumer-informed metric, designed to support the removal of individuals from the LWDB. The metric is as a validated, performance-accountability measure for personnel decisions. Unlike the federally governed WIOA Primary Indicators of Performance, the Letter Grade is not a validated, performance-accountability mechanism in G103 and G104, not through individual removal provisions intended to address misconduct or individual-level deficiencies. The Letter Grade is a performance metric, not a validation testing, and no statistical adjustment model to account for varying participant characteristics, economic conditions, or regional labor markets. The Letter Grade is a compliance tool, not a communication tool rather than a rigorously adjusted performance metric. Using it as grounds for "for cause" removal misrepresents its purpose and creates significant fairness and compliance concerns.	Policy added to remove this from this section.				
G105 LWDB Composition; Certification of One-Stop Systems and Boards; and Direct Service Provider Designation	Line Number: 170	CareerSource Palm Beach County	Comment (Concern with citation): The policy lists "fack to provide individual-level conduct or inexperience, not whether the organization met procedural requirements." When would this begin?	Comment (Proposed Resolution/E.D.): Redefine failure to convene consortium meetings as a compliance issue to be addressed through monitoring and corrective action, not as grounds for individual removal. The Letter Grade is a consumer-informed metric, designed to support the removal of individuals from the LWDB. The metric is as a validated, performance-accountability measure for personnel decisions. Unlike the federally governed WIOA Primary Indicators of Performance, the Letter Grade is not a validated, performance-accountability mechanism in G103 and G104, not through individual removal provisions. This will ensure fairness, transparency, and consistent statewide application.	Policy added 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 not 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/E.D.): The state should provide 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	State 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/E.D.): 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. <a href="https://www.dol.gov/agencies/eta/performance/reporting">https://www.dol.gov/agencies/eta/performance/reporting</a> . 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/Workshop Development Board	Comment Text	Recommended Resolution	Action Taken
Evaluation for One-Stop Certification Form	Line Number: 11	CarverSource Reward Ringer Vehicle	Comment (Concern with current) 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 the One-Stop Delivery System does not clarify which sections UWDBs are required to complete, submit, or use internally.	Comment (Proposed Revision/Edit) Clarify regarding the criteria for UWDB operator approval from the One-Stop system certification or clarify which portions of the form apply to each process. Clarify which sections UWDBs must complete versus which sections are completed by CSC/Commerce.	Resolved to clarify which sections UWDBs must complete versus which sections are completed by CSC/Commerce. A submission direction will be provided as part of section of assistance.
Evaluation for One-Stop Certification Form	Line Number: 12	CarverSource Reward Ringer Vehicle	Comment (Concern with current) Several criteria mentioned in the One-Stop Certification Form are not clearly defined (e.g., P6, OWS or whether these criteria will be monitored or reviewed internally). This may create uncertainty in the certification packet. This may create uncertainty in the certification packet.	Comment (Proposed Revision/Edit) Clarify whether UWDBs must attach evidence of compliance with referenced UWDB policies (e.g., P6, OWS) or whether these criteria will be monitored or reviewed internally.	Resolved to clarify which sections UWDBs must attach evidence of compliance for with referenced UWDB policies (e.g., P6, OWS) or whether these criteria will be monitored or reviewed internally.

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>	<b>POLICY NUMBER</b> <b>O125</b>		
<b>Title:</b>	Business Engagement and Economic Development Support		
<b>Policy Type:</b>	Operational		
<b>Programs:</b>	Workforce Innovation and Opportunity Act & Wagner-Peyser		
<b>Effective:</b>	06/11/2019	<b>Revised:</b>	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.<sup>1</sup>

### A. Key Objectives

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

<sup>1</sup> [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.<sup>2</sup>

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.<sup>3</sup>

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.<sup>4</sup> 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.<sup>5</sup> The 2021 REACH Act<sup>6</sup> 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,

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

<sup>3</sup> [EconoVue Business Engagement Success Metrics](#)

<sup>4</sup> [20 CFR 679.370](#)

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

<sup>6</sup> [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 eligible activities and measurable performance outcomes and confirm what is required by state and federal regulations.	Recommend solution – add clarifications for each business services listed in this policy in the relevant WIOA section.	Classification 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 include core business services through their one-stop delivery systems. These services have three primary objectives: to provide job seekers with job placement services and other related services. Additionally, Florida has established additional requirements for these services. For example, under WIOA, in the State of Florida, WIOA must provide ongoing oversight related to administration costs, administration of funds, and program delivery, fiscal management, fiscal rules, compliance and accountability, and performance outcomes.	Recommend solution – add clarifications for each business services listed in this policy in the relevant WIOA section.	Classification provided within policy.
	Lines 183-185	CareerSource Central Florida	By whom do 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 185	CareerSource Tampa Bay	Comment: It is recommended to remove PAF as an employer incentive. The program functions more as a recruiting incentive and a saving opportunity for the job seeker rather than a tangible benefit to the business, since participants in the job placement program are not required to pay back the amount received. The acronym "PAF" can bring a negative connotation.	Remove PAF as an employer incentive. It is suggested to remove the acronym "PAF" as it can bring a negative connotation that can have a more positive and value-driven message.	Policy was revised to add INT and remove PAF.
Q125 Business Services	Line Number 177	CareerSource Capital Region	Comment (Proposed Resolution)(a)(2) Supporting language indicates that participating employers must commit to bringing participants upon successful completion of training.	Comment (Proposed Resolution)(a)(2) Support adding this language in this framed, considering the inclusion of Q17 as an employer incentive, and the language in the proposed resolution that individuals be held liable for failing Q17 training.	Language in Employee Commitments section of this policy has been revised to reflect requirements to hire Q17.
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 Q17 partners are already assigned to the same group of the public.	Comment (Proposed Resolution)(a)(2) Clarification	Language in Employee Commitments section of this policy has been revised to reflect requirements to hire Q17.
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 and economic development partners to expand and enhance the scope of WIOA authority under WIOA. Reducing business failure rates and increasing business retention and expansion.	Comment (Proposed Resolution)(a)(2) Author the requirement to hire WIOA responsibilities to workforce development partners to expand and enhance the scope of WIOA authority under WIOA. Reducing business failure rates and increasing business retention and expansion.	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 funds are for the purpose of incentives for employers. "This training is incentives with federal regulation guiding the delivery of training services. WIOA funds may not be used for business induction or economic development partners to provide training services to business. WIOA funds may be used to provide training services to benefit employers outside the context of training eligible workers. Describing WIOA funded work-based training as an "incentive" risks misinterpretation and potential legal challenges.	Comment (Proposed Resolution)(a)(2) Review the language in this section to reflect WIOA authority under WIOA. Reducing business failure rates and increasing business retention and expansion.	Change the section name from Available Incentive Training Models to Business Higher Training Models. Assess rationale in 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 training services to business. WIOA funds may not be used for business induction or economic development partners to provide training services to business. WIOA funds may be used to provide training services to benefit employers outside the context of training eligible workers. Describing WIOA funded work-based training as an "incentive" risks misinterpretation and potential legal challenges.	Comment (Proposed Resolution)(a)(2) Review the requirement to reflect that coordination with WIOA partners is required to hire WIOA responsibilities to workforce development partners to expand and enhance the scope of WIOA authority under WIOA. Reducing business failure rates and increasing business retention and expansion.	Revised 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 misleading. WIOA funds are for the purpose of incentives for employers. "This training is incentives with federal regulation guiding the delivery of training services. WIOA funds may not be used for business induction or economic development partners to provide training services to business. WIOA funds may be used to provide training services to benefit employers outside the context of training eligible workers. Describing WIOA funded work-based training as an "incentive" risks misinterpretation and creates compliance risk. The real opportunity is to increase employer participation in Q17, INT, Customized Training, and other work-based training models. This will reduce the cost of training, increase employer participation, and creates compliance risk. The real opportunity is to increase employer participation in Q17, INT, Customized Training, and other work-based training models. This will reduce the cost of training, increase employer participation, and creates compliance risk. The real opportunity is to increase employer participation without manufacturing compliance as requirements.	Comment (Proposed Resolution)(a)(2) Review the section to reflect WIOA authority under WIOA. Reducing business failure rates and increasing business retention and expansion.	Changed the section name from Available Incentive Training Models to Business Higher Training Models. Assess rationale in policy in alignment with Economic Development partners and speaking the language of business.



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

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

### I. PURPOSE AND SCOPE

The Workforce Innovation and Opportunity Act (WIOA)<sup>1</sup> and Florida law<sup>2</sup> 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.<sup>3</sup>
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.

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

<sup>2</sup> Section 445.003(3)(a)1., F.S.

<sup>3</sup> [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.<sup>4</sup> 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.<sup>5</sup> LWDBs may not provide  
59 training services themselves<sup>6</sup> 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

<sup>4</sup> Section 445.003(3)(a)1., F.S.

<sup>5</sup> [20 CFR Part 680 Subpart C](#)

<sup>6</sup> 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.

<b>P74 Individual Training Account Expenditure Requirements and Waiver Request Process</b>	Line 82	Substantive						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"	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 include OJT expenditures and update the crosswalk category for #3-#11 to Other WIOA Specified Training.	Note has been made to update the crosswalk as soon after the policy is adopted by the SWDB.
<b>P74 Individual Training Account Expenditure Requirements and Waiver Request</b>	Line 128	Substantive	1/7/2026 9:49	Rebecca Livingston	Executive Vice-President	rlivingston@careersourcenefl.com	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.	Citation to the LWDB Performance Policy added to clarify
<b>P74 Individual Training Account Expenditure Requirements and Waiver Request Process</b>	Line 146	Critical						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 will be updated prior to the posting of this policy.

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.

<b>P74 Individual Training Account Expenditure Requirements and Waiver Request Process</b>	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>
<b>P74 Individual Training Account Expenditure Requirements and Waiver Request Process</b>	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 <del>req</del></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>

<b>P74 Individual Training Account Expenditure Requirements and Waiver Request</b>	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.
<b>P74 Individual Training Account Expenditure Requirements and Waiver Request Process</b>	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.
<b>P74 Individual Training Account Expenditure Requirements and Waiver Request Process</b>	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
<b>11</b>	<b>3</b>	<b>1</b>	<b>15</b>
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	rivingston@careersourcefl.com	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	rivingston@careersourcefl.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 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	rivingston@careersourcefl.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 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 ITA requirements but may be counted toward the state requirement; however, later references to these services (lines 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	Lines 179-180	Substantive	01-06-2026 16:43:35	James	Watson	COO	jwatson@careersourcebfv.com	CareerSource Brevard Flagler Volusia	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-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	Line 182	Substantive							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 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 administrative complexity without improving accountability or outcomes. The Provision Conflicts with the Purpose of an "EZ" Waiver. By definition, the EZ Waiver should: Reduce administrative burden Rely on readily verifiable data Avoid multi-layered analytical thresholds Instead, this provision requires LWDBs to: Aggregate expenditures and participants across seven distinct categories Calculate year-over-year averages Normalize growth across dissimilar training models (e.g., OJT vs. supportive services) This effectively mirrors the Standard Waiver analytical workload, undermining the distinction between EZ and Standard options and negating the value of having two waiver paths. 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: Scale specific training models based on local need Reduce or pause others as market demand shifts The "average increase" requirement unintentionally:	To maintain accountability while restoring the EZ Waiver's intended simplicity, this section should be removed in its entirety, relying instead on: 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: Actively expanding training services Aligning resources toward skill development Operating in good faith toward the 50% statutory goal	
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 35	Substantive							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.		
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 249	Substantive	01-06-2026 16:29:41	Michelle	Schultz	Senior Director of Development	schultzm@careersourcecb.com	CareerSource Tampa Bay	Comment (Concern with citation): Clarification regarding the timeframe.	Would CSF and FICo 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.	
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 77	Substantive							Comment (Concern with citation): Under the section Allowable Non-ITA Expenditures, it is believed 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 12, according to NIDB) internships and have resulted in many permanent job placements as I know it also has in other regions, and it would seem inconsistent not to include it as 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	Line 82	Substantive	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 on the "Allowable Programmatic Training and ITA Costs Crosswalk (9/18/25)", OIT is listed as Work-Based Training which is not a category for the State ITA reporting in SERA.	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 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	Line 177	Substantive	1/5/26 17:39	Tracey	McMorris	VP of Operations/COO	tmcmorris@careersourcerc.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	Line 47	Critical							The policy referenced 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	Line 146	Critical	1/4/26 11:36	Gina	Ronokarjo	VP Workforce Operations	GRonokarjo@careersourcecf.com	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 directs 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	Line 177	Critical	1/4/26 11:36	Gina	Ronokarjo	VP Workforce Operations	GRonokarjo@careersourcecf.com	CareerSource Central Florida	What is "EZ"?	Define EZ or remove the reference.	
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 217	Critical	1/4/26 11:36	Gina	Ronokarjo	VP Workforce Operations	GRonokarjo@careersourcecf.com	CareerSource Central Florida	Below 30% of what?	Specify what this means.	
G104 Sanctions and Other 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.com	CareerSource Central Florida	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 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.	Recommended solution -- a turnaround plan should be based on real-time leading indicators, process measures, and local administrative data (i.e., community college enrollment/completion records, regional economic development data, local unemployment claims).	
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.com	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.com	CareerSource Central Florida	Citations 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.		
O125 Business Services	Lines 89-115	Critical	12/11/2025 0:39	Gina	Ronokarjo	Vice President of Workforce Operations	GRonokarjo@careersourcecf.com	CareerSource Central Florida	Core business services and additional allowable business services listed in this policy are not lining up with state and federal requirements. Under WIOA, local workforce development boards in Florida must provide 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 mandates. Under Section 445.007 of the Florida Statutes, 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 recategorize 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.com	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@careersourcecb.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 "employer 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 mean low enrollment of a sub group such 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. Career Centers 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 are burdensome, and without a state developed dashboard or system where this information can be used to monitor our performance it would be difficult to achieve. Even the state has struggled to come up with an ROI for the workforce system/network, and are we to define how well our services met 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): P3 185–87: The policy states that LWDBs "submit requests for certification using standardized forms provided by FloridaCommerce 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: 89-91	Substantive	12-10-2025 16:13:09	Ashley	Ziemann	Operations Manager	aziemann@careersourcebfv.com	CareerSource Brevard Flagler Volusia	The policy indicates that CSF and FloridaCommerce "use the Evaluation for LWDB Certification Form" to assess LWDB submissions, but it is unclear whether 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 also 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 L159–160: The policy provides detailed requirements for LWDB Direct Provider designation, while other sections governing LWDB certification and one-stop certification include less procedural detail. This creates ambiguity 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 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): P4 L141–143: The policy references MOU–IPIA, accessibility 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 and whether the MOU–IPIA 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 L10-11 Scope of Policy: The Purpose and Scope section states that the policy "supports the review, designation, and certification of LWDBs, service providers for the one-stop delivery system, and one-stop career centers." However, only Section D contains 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 L197–201: 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	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 PV 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 a concern. The labor force participation rate is used to decide what is needed to meet the target. The participation rate in work related training and 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): Clarification	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards, Designation	Line Number: 209	Substantive	12-10-2025 10:10:43	Cory	Weaver	Director of Operations	cweaver@careersourceclm.com	CareerSource Citrus Levy Marion	Comment (Concern with citation): Line 208 states "Measures of Return on Investment" will be included as part of LWDB accountability measures. How will ROI be measured?	Comment (Proposed Resolution/Edit): Provide methodology/detail on how ROI will be calculated.	
O125 Business Service	Line Number: 52	Substantive	12-09-2025 10:27:36	Christina	Coble	Business Services Manager	ccoble@careersourcer.com	CareerSource Research Coast	Comment (Concern with citation): Please clarify what metrics and methodology will be used to measure these performance outcomes.	Comment (Proposed Resolution/Edit): Clarification	
O125 Business Services	Line Number: 60	Substantive	12-09-2025 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	
G104 Sanctions and Other Required Corrective Action for LWDBs who Fail to Meet Federal and State Standards	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): The policy states that deficiencies may be triggered when 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. 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): 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 TEGL 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: 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 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: 92	Substantive	12-09-2025 09:43:36	Steven	Gustafson	First Vice President & CO					

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 "workforce development incentives" to WIOA participants "as part of a package of incentives for employees." 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 "workforce development incentives" to WIOA participants "as part of a package of incentives for employees," 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 683.211(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 economic development incentives for employees. The language of this section appears to be strengthening employer participation in OTT, IWT, Customized Training, and other work-based models. If this 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 Admin, 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 language is inconsistent with how 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 more holistic approach that considers the broader context of the 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@carersourceclm.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@carersourceclm.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@carersourceclm.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@carersourceclm.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@carersourceclm.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@carersourceclm.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@carersourceclm.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@carersourceclm.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@carersourceclm.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@carersourceclm.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@carersourceclm.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@carersourceclm.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@carersourceclm.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 metrics should be the same 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

### Jimmy Heckman



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

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

### Kristy Farina



Kristy Farina serves as the administrator of economic research and program performance in FloridaCommerce's Bureau of Workforce Statistics and Economic Research. Farina's team analyzes labor market and workforce data to support economic decision-making and policy planning across Florida.

Before her role with FloridaCommerce, Farina served as faculty at Florida State University, supporting K-12 education research through data analysis and measure design.