

Comment Entry	Recommended Resolution	Action Taken
The policy provides that the LWDB Turnaround Plan must be data-based. The data is based on federal performance data which becomes available months after services 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).	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, IVSG, 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 72) 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 TEG1 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 TEG1 11-19, Change 2.	Language revised to clarify this requirement.
Comment (Concern with citation): The policy lists several deficiency triggers but does not indicate whether some deficiencies are considered more serious or require faster escalation. Without prioritization, LWDBs cannot distinguish between technical noncompliance (e.g., minor reporting issues) and issues suggesting systemic risk (e.g., fiscal integrity failures), which may result in inconsistent enforcement across the state.	Comment (Proposed Resolution/Edit): Create a tiered deficiency framework (e.g., Critical, Major, Moderate, Administrative), with examples and corresponding state responses.	Minor reporting issues are not intended to be characterized as deficiencies and is consistent with Federal Law. No change needed.
Comment (Concern with citation): The policy uses the LWDB Letter Grade (specifically bottom-five ranking or D/F grades) as a sanctionable metric, including grounds for leadership removal. However, the REACH Act establishes the 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 ensures compliance with the legislative intent of the Letter Grade system and prevents local boards from being penalized based on a metric not designed for sanctions.	WIOA does not prohibit states from using additional performance measures. Section 1436, F.S. does not prohibit the state board from using letter grades to evaluate LWDBs' performance.
Comment (Concern with citation): Section III.B allows a Turnaround Plan to be initiated based on subgroup outcomes (e.g., veterans, public assistance recipients), yet Section III.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 discussions should occur during required annual performance review meetings, with escalation only if a LWDB fails to take documented steps to address identified issues.	Language revised to clarify this requirement.
Comment (Concern with citation): The policy states that "poor letter grade performance" means two consecutive D grades, but the state issues quarterly Letter Grades. This creates ambiguity: two D grades may occur within a single program year, which would not constitute sustained underperformance.	Comment (Proposed Resolution/Edit): If Letter Grades are not removed, clarify that "two consecutive letter grades" means two consecutive annual grades, not quarterly grades. This preserves the intent to identify systemic, long-term performance issues.	Language revised to clarify this requirement.
Comment (Concern with citation): The policy simultaneously: • flags LWDBs for Turnaround Plans if they are in the bottom five statewide, regardless of actual grade, and • defines poor performance as two D grades or one F. A board could earn a B but still fall in the bottom five statewide, resulting in sanctions despite meeting expectations.	Comment (Proposed Resolution/Edit): Remove Letter Grades for reasons outlined before. If not, remove bottom-five ranking from trigger.	Language revised to clarify this requirement.
Comment (Concern with citation): This section stipulates "other identified performance requirements" and notes that corrective actions may be imposed if failing two or more years of local adjusted performance "...AND being among the lowest five scoring LWDBs in the state...". This seems very arbitrary.	Comment (Proposed Resolution/Edit): The policy should state a threshold for corrective action triggers. All of the policies rely on subjective 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 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. Clarity needs to be provided on the type of notice: call or written, and the time frame of the notice- within ____ days of any action.	Policy revised to include Board Chair in notifications.

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