

Policy/Template	Line	Local Workforce Development Board	Comment Entry	Recommended Resolution	Action Taken
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 6	CareerSource Brevard Flagler Volusia	Comment (Concurs with citation) PS 185-87: The policy states that LWDBs must use the 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/E4E): Specify whether FloridaCommerce or CareerSource Florida distributes LWDB certification 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.
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 6	CareerSource Brevard Flagler Volusia	The policy indicates that CDF and FloridaCommerce "use the LWDB certification forms" 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/E4E): Clarify whether the Evaluation for LWDB Certification forms is completed only by CDF/Commerce or also by LWDBs. Consider adding explicit guidance on the required documents LWDBs must submit and the expected submission timeline.	Language added to forms to clarify. The draft forms were shared along with this policy for feedback and will be linked with the policy revision when adopted by the SWDB. Technical assistance will follow to provide additional support for LWDBs on this process.
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 139	CareerSource Brevard Flagler Volusia	Comment (Concurs with citation) PA 1139: Section 5 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 8.	Comment (Proposed Resolution/E4E): 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.	The draft forms were shared along with this policy for feedback and will be linked with the policy revision when adopted by the SWDB.
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 143	CareerSource Brevard Flagler Volusia	Comment (Concurs with citation) PA 143-143: The policy references WIOA Section 372(a) as the authority for one-stop certification but does not define what constitutes the "certification packet" LWDBs must submit. It is unclear whether the MCO's accessibility assessment, 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/E4E): Clarify the required components of the one-stop certification submission and whether the MCO's IA 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.	Policy revised to add clarity and specification as requested.
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 151	CareerSource Brevard Flagler Volusia	Comment (Concurs with citation) PS 110-113: Scope of Policy. The Purpose and Scope sections state that the policy "supports the review, designation, and certification of LWDBs, service providers for the one-stop delivery system and one-stop care services." However, only Section 3 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/E4E): 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.
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 159	CareerSource Brevard Flagler Volusia	Comment (Concurs with citation) PS 197-205: The policy requires LWDBs to conduct annual internal review of governance and service delivery systems but does not clarify the maximum components or required documentation of these reviews. This may result in inconsistent implementation across local areas and potential monitoring inconsistencies.	Comment (Proposed Resolution/E4E): 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.	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.
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 17	CareerSource Brevard Flagler Volusia	Comment (Concurs with citation): Multiple Sections - Clarification of Required Forms vs. Internal Evaluation Tools: 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 CDF/Commerce. This has the potential to result in incorrect or incomplete submissions.	Comment (Proposed Resolution/E4E): For each referenced form, explicitly state whether the LWDB completes and submits the form or whether the form is used internally by CDF/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.
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 139	CareerSource Brevard Flagler Volusia	Comment (Concurs 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 approval is required during their own certification cycle.	Comment (Proposed Resolution/E4E): 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 322(a) and 20 CFR 678.620.	This will be provided via Technical Assistance
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards</b>	Line Number: 102	CareerSource Brevard Flagler Volusia	Comment (Concurs with citation) PA 1103-123; PA 1103-131; PS 1289-193: The policy specifies conditions under which certification or designation may be revoked but does not describe the corrective action, reinstatement, or reapplication process following revocation.	Comment (Proposed Resolution/E4E): 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
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 1	CareerSource Brevard Flagler Volusia	Comment (Concurs with citation): The policy contains multiple provisions with different caseload 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 board or staff unfamiliar with the distinctions.	Comment (Proposed Resolution/E4E): Consider separating the three provisions into distinct subsections with clearly labeled requirements, timelines, and form usage. This will improve readability and ensure consistent statewide interpretation.	Policy revised to add clarity and specification as requested.
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 62	CareerSource Palm Beach County	Comment (Concurs with citation): The policy repeats the statutory definition of "for cause" removal by linking it to LWDB performance outcomes such as failing WIOA performance indicators, REACH Act Letter Grade, and subgrant performance measures. This interpretation is inconsistent with both Florida Statutes and WIOA. Under 445.002(2), F.S., "for cause" refers to the conduct or performance of the individual, including fraud, criminal acts, incapacity, unfitness, neglect of duty, misconduct, mismanagement, or individual lack of performance. It does not refer to "lack of performance" to the LWDB, federal or state performance outcomes. WIOA likewise prohibits CDFs with appointment authority but does not authorize the removal of board members or CEOs based on program-level performance metrics. Clarifying organizational performance with individual misconduct or incompetence exceeds statutory intent.	Comment (Proposed Resolution/E4E): 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 other 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.	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.
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 65	CareerSource Palm Beach County	Comment (Concurs 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 the LWDB Letter Grade is a contextualized 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 Indicator of Performance, the Letter Grade undergoes no federal audit check, no validation testing, and no statistical adjustment needed to account for varying participant characteristics, economic conditions, or regional labor market differences. As a result, the Letter Grade reflects a communication tool rather than a rigorously evaluated performance metric. Using it as grounds for "for cause" removal misapplies its purpose and creates significant fairness and compliance concerns.	Comment (Proposed Resolution/E4E): 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 consumer information purposes, it should continue to operate strictly as a public-facing informational metric, not 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 unvalidated metric for personnel decisions.	WIOA does not prohibit states from using additional performance measures. Section 34.36, F.S. does not prohibit the state board from using letter grades to evaluate LWDB performance. Letter Grades provide additional data and information on LWDB performance. Letter Grades are not the sole metric for this determination and will be used in addition to data from federally required performance measures.
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 68	CareerSource Palm Beach County	Comment (Concurs 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/E4E): 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, methodologies, 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.	Subgroup performance is not currently listed as a sole basis for individual removal.
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Line Number: 79	CareerSource Palm Beach County	Comment (Concurs with citation): The policy 811: "Failure to convene consortium 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 misapplication. Convening consortium meetings is a compliance requirement, not a performance measure. Treating a compliance requirement 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/E4E): Revisely failure to convene consortium meeting as a compliance issue to be addressed through monitoring and corrective action, 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 statute and preserves a clear distinction between individual performance and compliance obligations.	Policy added to remove this from this section.
<b>Select Policy: G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Policy Line Number: 122	CareerSource Citrus Levy Marion	Comment (Concurs with citation): This section states boards can be decertified for measurable declines in business customer satisfaction. For 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 business 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/E4E): The state should procure a standardized tool and manage the survey process as it 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.
<b>G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation</b>	Policy Line Number: 122	CareerSource Citrus Levy Marion	Select Policy: G105 LWDB Composition, Certification of One-Stop Systems and Boards, and Direct Service Provider Designation. Comment (Concurs with citation): measure of employer satisfaction.	Comment (Proposed Resolution/E4E): This needs more definition: what are the measures? How is reduced funding being considered? Etc.	This particular metric aligns with the updated federal measure on employer satisfaction, finalized in two rules by DDCS on March 20, 2024, which establish a definition of Effectiveness in Serving Employment. <a href="https://www.dcs.gov/agencies/eta/performance/reporting">https://www.dcs.gov/agencies/eta/performance/reporting</a> . Additional technical assistance and information will be provided.

Feedback Response Key			
Incorporated	Future Action	No change	TOTAL
10	3	3	16
62.50%	18.75%	18.75%	

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

Full/Partial	Unit	Course/Workforce Development Board	Comment Entry	Recommendation/Resolution	Action Taken
Evaluation for One-Step Certification Form	Unit Number: 1	CareerSource Broward Region Virtual	Comment (Concern with citation): The Evaluation for One-Step Certification Form appears to contain criteria for LMSB approval to serve as the One-Step Operator with criteria for certifying the One-Step Operator System. These are distinct processes under WIDA 22305 and 22306, and CDS does not clearly which sections LMSBs are required to complete, submit, or use internally.	Comment (Proposed Resolution/CR): Consider separating the criteria for LMSB operator approval from criteria for system certification or clarify which portions of the form apply to each process. Clarify which sections LMSBs must complete versus which sections are completed by CSD/Commencement.	Revised to clarify which sections LMSBs must complete versus which sections are completed by CSD/Commencement. A submission checklist will be provided as part of the revised application.
Evaluation for One-Step Certification Form	Unit Number: 12	CareerSource Broward Region Virtual	Comment (Concern with citation): Several criteria reference other statewide policies (e.g., PA, CR) without clarifying whether documentation must be included in the certification packet. This may create the potential for inconsistent submissions.	Comment (Proposed Resolution/CR): Clarify whether LMSBs must attach evidence of compliance with referenced statewide policies (e.g., PA, CR) or whether these criteria will be satisfied through reviewing or internal review.	Revised to clarify which sections LMSBs must attach evidence of compliance for with referenced statewide policies (e.g., PA, CR) or whether these criteria will be satisfied through reviewing or internal review.

Predictive Response Key			
Incorporated	Future Action	No change	TOTAL
			2

Policy/Template	Line	Local Workforce Development	Comment Entry	Recommended Resolution	Action Taken
Evaluation for LWDB Direct Service Provider Designation	Line Number: 1	Board 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