

Policy/Template	Line	Local Workforce Development Issue	Comment Entry	Recommended Revision	Action Taken
025 Business Services	Line 16-62	CenterSource Central Florida	Clarification should be provided for such key objective and measurable performance outcomes based on the goals to the relevant WDA section. Clear if unclear. Regulations or Florida Statutes. It is difficult to track the intended objective and measurable performance outcomes and/or metrics which is required by state and federal law.		Clarification provided within policy.
025 Business Services	Line 16-115	CenterSource Central Florida	One business services and additional allowable business services listed in this policy are not being used with state and federal requirements. Under WDA, local workforce development boards in Florida must provide specific core business services through their one-stop delivery systems. These services fall into three categories: core business services, permissible additional services, and additional business services. Additionally, Florida has established additional requirements for WDA's Impact Federal Initiatives. Under Section 465.027 of the Florida Statutes, WDA's must provide ongoing oversight related to administrative costs, budgeted revenues, career counseling, economic development, right-to-work compliance and accountability, and performance outcomes.	Revised the list of allowable business services and reorganized the services into the appropriate categories.	Clarification provided within policy.
025 Business Services	Line 16-185	CenterSource Central Florida	Is when do the local Operating Procedures need to be prepared?	Revised the list of allowable business services and reorganized the services into the appropriate categories.	This will be addressed in technical assistance and training.
025 Business Services	Line Number 185	CenterSource Tampa Bay	Comment: It is recommended to remove PWD as an employer incentive. The program has not been used in any way and is not a benefit to the participants. It is a program that is a tangible benefit to the business, since participants often lack the ability to work for a business. It is a program that is a tangible benefit to the business, since participants often lack the ability to work for a business. It is a program that is a tangible benefit to the business, since participants often lack the ability to work for a business.	Remove PWD as an employer incentive. It is a program that is a tangible benefit to the business, since participants often lack the ability to work for a business. It is a program that is a tangible benefit to the business, since participants often lack the ability to work for a business. It is a program that is a tangible benefit to the business, since participants often lack the ability to work for a business.	Policy was revised to add OIT and replace PWD.
025 Business Services	Line Number 177	CenterSource Capital Region	Comment: Consistent with Section 2.0 Language Commitments indicates that participating employers must consent to being participants upon successful completion of training.	Comment: Proposed Revisions (025) Suggest adding how this is tracked, considering the inclusion of OIT as an allowable business incentive, as it implies that individuals be allowed to track OIT training.	Language in Employer Commitments section of this policy has been revised to reflect requirement to have OIT status.
025 Business Services	Line Number 17	CenterSource Broward	Comment: Consistent with Objectives. The policy states that one of the Measurable Performance Outcomes is "Time to Service Measurements".	Comment: Proposed Revisions (025) Suggest clarification from the date on how this is calculated.	This will be addressed in technical assistance and training.
025 Business Services	Line Number 81	CenterSource Broward	Comment: Consistent with Objectives. Policy indicates that the workforce board should enter into a MOU with the State's 13 Unemployed Citizens. These are also local government employees.	Comment: Proposed Revisions (025) Suggest clarification from the date on how this is calculated.	This will be addressed in technical assistance and training.
025 Business Services	Line Number 60	CenterSource Research Coast	Comment: Consistent with Objectives. Please clarify what metrics and methodology will be used to measure the effectiveness of the program.	Comment: Proposed Revisions (025) Clarification	This will be addressed in technical assistance and training.
025 Business Services	Line Number 60	CenterSource Research Coast	Comment: Consistent with Objectives. Please clarify what metrics and methodology will be used to measure the effectiveness of the program.	Comment: Proposed Revisions (025) Develop an employer code to reflect a provision of information regarding local business services to employers similar to other codes developed to reflect provision of information.	This proposal change will be reviewed with case management technical staff.
025 Business Services	Line Number 177	CenterSource Research Coast	Comment: Consistent with Objectives. Is this also applicable to Real Work Experience having participants is currently not required?	Comment: Proposed Revisions (025) Clarification	There is a commitment requirement that to bring or relating upon completion for OIT (046-700, 047 (1 046-700) and Customer Training (0 046-700). Language in Employer Commitments section revised to reflect requirement to have OIT status and PWD has been removed.
025 Business Services	Line Number 49	CenterSource Research Coast	Comment: Consistent with Objectives. Please clarify which program participants will be required to complete OIT, OIT and EA participants are already employed by business.	Comment: Proposed Revisions (025) Clarification	Language in Employer Commitments section revised to reflect requirement to have OIT status and PWD has been removed.
025 Business Services	Line Number 126	CenterSource Palm Beach County	Comment: Consistent with Objectives. The requirement that WDA "provide technical assistance to small businesses to reduce the cost of business" is not within the scope of WDA authority under WDA. Reducing business failure rates is outside the WDA's statutory role and role responsibilities.	Comment: Proposed Revisions (025) Revise this requirement to the OIT responsibilities to economic development support (e.g., labor pipeline development, work-based training, and right-to-work compliance coordination with economic development partners) focused exclusively on the workforce preparation of business recruitment, expansion, and retention efforts. Language should be added to refer to partner agencies that perform this function such as the Small Business Development Center agencies. Business Service staff should have partnerships with organizations serving small businesses for job placement and referrals.	Language revised to read should instead of must.
025 Business Services	Line Number 111	CenterSource Palm Beach County	Comment: Consistent with Objectives. The policy states that WDA must offer work-based training options and other eligible WDA programs "as part of a package of services for employers." This training is inconsistent with federal regulations governing the use of WDA Title I funds. Under 20 CFR 683.240 and 683.260, WDA funds may not be used for business relocation 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. Scheduling WDA-funded work-based training as an "incentive" may misinterpretation and could be non-compliant federal funding federal or state monitoring.	Comment: Proposed Revisions (025) Revise the language to clarify that work-based training is an allowable training option for eligible individuals, not a business incentive. Suggested replacement: "WDA may coordinate with economic development partners to ensure that WDA-funded work-based training options are available as part of the workforce preparation of business, consistent with WDA eligibility, documentation, and training requirements."	Change the section name from Allowable Incentive Training Methods to Business-Related Training Methods. Focus maintained in policy on Alignment with Economic Development partners and speaking the language of business.
025 Business Services	Line Number 117	CenterSource Palm Beach County	Comment: Consistent with Objectives. The policy requires WDA to establish Memoranda of Understanding (MOUs) with regional and local economic development agencies. WDA does not have authority to establish MOUs with entities that are not designated as regional one-stop partners under WDA (1110) and 20 CFR 683.005. Economic development agencies are not designated one-stop partners in the one-stop delivery system. Which MOUs encourage through.	Comment: Proposed Revisions (025) Revise the requirement to reflect that coordination with economic development partners should be encouraged, but not mandated through MOUs, unless a local area voluntarily agrees to formalize such partnership. Language should emphasize planning, alignment, information sharing, and	Revised to "should" and expanding options for documentation beyond MOUs.
025 Business Services	Line Number 146	CenterSource Palm Beach County	Comment: Consistent with Objectives. The use of the term "incentive" in this section is inconsistent with the language included in the paragraph (Paragraph 20 CFR 683.240 and 683.260). WDA funds cannot be used as economic development or business relocation incentives. The purpose of this section appears to be strengthening employer participation in OIT, WDA, Customized Training, and other work-based training. If that is the intent, framing these options as "incentives" is inaccurate and creates compliance risk. The real opportunity is to encourage employers to take administrative burden, and improve employer experience, ensuring participants without misrepresenting training services as incentives.	Comment: Proposed Revisions (025) Reframe the section to focus on employer/employer-facing processes and using work-based training to create access. Revise the title (e.g., "Employer-Focused Training Solutions") and emphasize operational documentation, focus connecting plan language forms, and user-friendly workflows. This approach aligns with WDA, improve employer participation, and remove terminology that may conflict with federal regulation.	Change the section name from Allowable Incentive Training Methods to Business-Related Training Methods. Focus maintained in policy on Alignment with Economic Development partners and speaking the language of business.

022 Business Services	Policy Line Number: 105	CareerSource Palm Beach County	Comment (Concern with related): Including Paid Work Experience (PWE) in this policy is appropriate because PWE enables business "on-site" or employee-extern training strategy. PWE is a participant-focused activity designed to provide direct work experience and foundational skill-building, most commonly used in WDA youth. Under WDA/AAJ, PWE is explicitly identified as a Career Service, not a training service, and it is intended to meet employer skill needs, offset training costs, or function as a career pipeline mechanism either via CDT, IET, or Customized Training, etc. The inclusion of PWE as a business incentive mechanism is its stated purpose and may cause confusion or misinterpretation regarding documentation and employer expectations.	Comment (Proposed Resolution/ED): Remove Paid Work Experience from this section.	Revised to add IET and remove PWE.
022 Business Services	Policy Line Number: 105	CareerSource Palm Beach County	Comment (Concern with related): The policy misses an opportunity to highlight and fund Community Service from work experience as an effective employer engagement tool. Fund Community Service can be paraded to employers as a "free service" or "subsidy". This activity allows employers to connect with potential talent, work setting, and cultural engagement. It is an additional tool for employers to find participants for their CDTs. It also serves as a valuable talent pipeline mechanism, an individualized approach to recruitment, and a means to create candidates for subsequent WDA Funded On-the-Job Training (OTJ) placements.	Comment (Proposed Resolution/ED): Add language recognizing and fund Community Service as an employer engagement strategy that can introduce an applicant to the workplace, allow employers to assess fit, and assist a customer in their hiring process. CDTs offer work-based training results. This additional social strength aligns with funding streams, address employer expectations, and address the integrated service delivery approach outlined elsewhere in the policy.	This will be addressed in technical assistance and training support. Once IET and OTJ are in ED, we may want to reconsider these policies, as appropriate.
022 Policy 022 Business Services	Policy Line Number: 127	CareerSource North Florida	Policy does not provide guidance on how to document the linkage, allocation costs, and documentation is completed and does not provide examples of allowable costs non-allowable business services activities. Concern: will cause disallowance cost.	Comment (Proposed Resolution/ED): Clarify allocation and non-allowable expenditures under WDA Title 1 such as allowable employer contracts to conduct CDT, IET, and on-the-job training opportunities, including but not limited to: materials to support employer training activities, pre-screen eligible candidates for positions that include training components. Clarify eligible documentation methods such as position description clearly stating training focused roles, activity logs, training contracts between employer contacts and training programs, allocation formulas for shared job positions.	This will be addressed in technical assistance and training support.
022 Policy 022 Business Services	Policy Line Number: 46	CareerSource Citrus Levy Marion	Comment (Concern with related): The measurable performance outcome metrics states that an increase in work based training will be measured. However, there is no language for how and how to measure and does not mention if cost of training, economic conditions, etc. will be taken into account.	Comment (Proposed Resolution/ED): Review that state a performance measure should include the formula for calculating and all factors considered apply.	Revised to add to related guidance on this policy.
022 Policy 022 Business Services	Policy Line Number: 60	CareerSource Citrus Levy Marion	Comment (Concern with related): The section needs to improve program goals and performance on RACT services. It does not state if the goal is to increase or decrease the number of trainees. This can lead to confusion as to what is to be an area where we should be seeking "performance". Additionally, this is completely dependent on the local economy.	Comment (Proposed Resolution/ED): It is approved that CDT is a training activity based on the Rapid Response Fund intended to be used for the economy. This is a training and does not cover all expenses of Rapid Response activities to begin with. This should be reviewed to base funding on the number of customers seeking BA assistance in the centers which consume 80% of our time from low staff time which we get no funding for.	Revised.
022 Business Services	Policy Line Number: 23	CareerSource Citrus Levy Marion	Comment (Concern with related): Key Objective: metrics.	Comment (Proposed Resolution/ED): Throughout this section various metrics are referenced without clarity on how they will be measured and how the states defining them in terms of acceptable and non-acceptable. This needs to be corrected with this latest edit.	Language clarified in policy.
022 Business Services	Policy Line Number: 47	CareerSource Citrus Levy Marion	Comment (Concern with related): within 90 day Select Policy.	Comment (Proposed Resolution/ED): within 90 days of what? again how is the state meeting if to develop and implement.	Revised.
022 Business Services	Policy Line Number: 46	CareerSource Citrus Levy Marion	Comment (Concern with related): The term measures that are out of place. And we hope we get more staff before we have to consider that measure. This is often the case. Why are we including that in our? Modern earnings... why? Why the Dr metrics aren't? what are being used?	Comment (Proposed Resolution/ED): The Dr measures should be used and the criteria under it clarified. This time this is totally unrelated to our mission and beyond our scope.	Revised.
022 Business Services	Number: 137	CareerSource Tampa Bay	Comment (Concern with related): training participants upon successful completion of training. Further training opportunities for CDT, IET, and Customized Training already employed. If this referring to CDT, the training provider must list as accountable to offer quality training that prepares students for employment...	Comment (Proposed Resolution/ED): Example of some training components: 1. use CDT participants 2. include training and necessary safety of IET and Customized Training participants 3. Screen and hire qualified candidates who have recently completed training 4. Screen Candidates upon referral candidates	Revised.
022 Business Services	Policy Line Number: 102	CareerSource Tampa Bay	Comment (Concern with related): Paid Work Experience is a participant service and should be paid as an incentive to employer. While employer may indirectly benefit from training a PWE participant, in no way should it be paid as an expense for employer engagement. CRS 64.460 What are work experience for youth? (a) Work experience are programs, structured training experiences that take place in a workplace for a limited period of time. As provided in section 128.02(2)(b) and 64.475, work experience may be paid or unpaid. (b) Work experience workforces may be in the private, for-profit sector, the non-profit sector, or the public sector. (c) Work experience are designed to enable youth gain exposure to the working world and to requirements. Work experience are organized and describe activities for many youth throughout the year. Work experience should help youth acquire the personal attributes, knowledge, and skills needed to obtain a job and advance in employment. The program is to provide the youth participant with the opportunities for career exploration and development and is not to benefit the employer, although the employer may, in fact, benefit from the activities performed by the youth. Work experience may be substituted or substituted and it may be the following elements: (1) instruction in employability skills or generic workplace skills such as those identified by the industry's Commission on Training Heavy Industry (CTAHI); (2) exposure to various aspects of an industry; (3) opportunity to learn specific skills; (4) on-the-job and job shadowing; (5) the integration of basic academic skills into work activities; (6) supported work, work adjustment, and other transition activities; (7) mentoring; (8) career planning.	Remove PWE as a paid employer incentive and replace with IET which is missing from the narrative text.	Revised to add IET and remove PWE. Language in Employee Commitments section revised to reflect requirement to have DR signs.
022 Business Services	Policy Line Number: 161	CareerSource Tampa Bay	Comment (Concern with related): There is nothing in the reg that requires PWE but this to employer participants after PWE ends. The language in ED that about what conditions training. Only CDT can pay for training. 20 CFR 648.300 (b)(4) are the requirements for the job training? CRS 64.460 What are the requirements for the job training? (a) CDTs are provided in WDA sec. 64.461, CDTs are provided under a contract with an employer or employer of participating program operator in the public, private, non-profit, or private sector. Through the CDT contract, occupational training is provided for the WDA participant as a right for the circumstances, typically at 50 percent of the wage rate of the participant, for the educational costs of providing the training and support related to the training. In limited circumstances, as provided in WDA sec. 128.02(2)(b) and 64.735, the reimbursement may be up to 75 percent of the wage rate of the participant. (b) CDT contracts under WDA/AAJ must not be entered into with an employer who has received previous under previous contracts under WDA or with a new employer who initiates a pattern of failing to provide CDT participants with continued and long-term employment opportunities with wages and employment benefits (including health benefits) and working conditions as the least paid and to the same extent as other employees working a similar length of time and doing the same type of work. (c) A CDT contract must be entered for the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the address, and occupational skill level of the participant, prior work experience, and the participant's CDT.	Comment (Proposed Resolution/ED): Determines that this requirement is only applied to CDT employer partners.	Revised to add IET and remove PWE. Language in Employee Commitments section revised to reflect requirement to have DR signs.
022 Business Services	Policy Line Number: 124	CareerSource Tampa Bay	Comment (Concern with related): The eligible training programs need to be based on training and not general training. We provide criteria and guidance provide the information for this file.	Comment (Proposed Resolution/ED): Determines that work based training programs can be used as employer incentives. I suggest replacing "work based training" with "work based learning" to be more aligned with language in the reg.	Language added to include WDA funded education and training programs.

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

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