

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@careersourcectb.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 referenced 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	jwtson@careersourcecbfv.com	CareerSource Brevard Flagler Volusia	Lines 65-67 appropriately explain that certain "other training services" do not meet federal ITA requirements but may be counted toward the state requirement;	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@careersourcecgc.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 12, according to Nilda) 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.	Language updated in policy to reflect this. The Crosswalk will be updated and additional technical assistance will be provided.
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 82	Substantive	1/5/26 17:39	Tracey McMorris	VP of Operations	tmc Morris@careersourcerc.com	CareerSource Research Coast	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 (8/18/25)", OJT 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 included OJT expenditures and update the crosswalk category for #3-#11 to Other WIOA Specified Training.	Note has been made to update the crosswalk as an after the policy is adopted by the SWDB.
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 128	Substantive	1/7/2026 9:49	Rebecca Livingston	Executive Vice-President	rlivingston@careersourcenefl.com	CareerSource Northeast Florida	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
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 146	Critical	1/4/26 11:36	Gina Ronokarijo	VP Workforce Operations	GRonokarijo@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 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 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.	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	tmc Morris@careersourcerc.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 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.	Language in policy clarifies this.

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

P74 Individual Training Account Expenditure Requirements and Waiver Request Process	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.	TA will be provided to LWDBs on how to calculate % if there is carry-over (in collaboration with Finance and Accounting)
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 182	Substantive	01-06-2026 16:43:35	James Watson	COO	jwatson@careersourcebfv.com	CareerSource Brevard Flagler Volusia	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	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	WIOA training is already including and is not limited to OST to encourage all applicable WIOA training services.
P74 Individual Training Account Expenditure Requirements and Waiver Request	Line 208	Substantive	1/7/2026 9:49	Rebecca Livingston	Executive Vice-President	rivingston@careersourcecnfl.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?	TA will be provided.
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 217	Critical	1/4/26 11:36	Gina Ronokarijo	VP Workforce Operations	GRonokarijo@careersourcecf.com	CareerSource Central Florida	Below 30% of what?	Specify what this means.	Language added to clarify this in policy.
P74 Individual Training Account Expenditure Requirements and Waiver Request Process	Line 249	Substantive	01-06-2026 16:29:41	Michelle Schultz	Senior Director of Development	schultzm@careersourcetb.com	CareerSource Tampa Bay	Comment (Concern with citation): Frequency of ITA Committee reviews	Would CSF and FIComm give consideration to an amended initial approach to the frequency of ITA Committee reviews to semi-annually versus quarterly for the first two years of new policy issuance due to the associated burden or use of both state and LWDB resources plus how expenditures accrue across the program year.	This will be made available as needed and on a case by case basis and as part of conditional waiver acceptance determination and review and will be clarified through technical assistance.