Policy/Template	Line	Select your Local Workforce Development Board.	Comment Entry	Recommended Resolution
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 37	CareerSource Palm Beach County	The policy states a "state-level statistical adjustment model," which may conflict with federal framing. While states operationalize the model, it is based on the federal statistical adjustment model under WIOA §116.	Revise to: "a statistical adjustment model developed and applied by the State in accordance with WIOA §116, 20 CFR 677.220 and applicable waivers authorized by USDOL."
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 85	CareerSource Palm Beach County	Tier 2 includes "failure to meet negotiated levels of performance for any subgroup population" as a trigger. Subgroup performance is not a primary indicator under WIOA §116 and is not recognized in 20 CFR Part 677 or TEGL 11-19 as a basis for corrective action.	Remove subgroup performance as a trigger for Tier 2. Subgroup data may be used for contextual analysis within technical assistance or PIP development but should not initiate escalation within the performance accountability framework.
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 100	CareerSource Palm Beach County	LWDBs have not yet received adjusted performance data for Program Years 2023 or 2024, resulting in a massive lag between service delivery and performance evaluation. This delay limits the ability of LWDBs to accurately assess performance against adjusted levels in a timely manner. If this trend continues, technical assistance and PIPs will be applied to performance outcomes that are several years old, reducing their effectiveness and increasing the risk that corrective actions occur too late to influence current program operations.,	Establish and communicate a defined timeline for the release of adjusted performance data to ensure LWDBs receive this information in a timely manner. Timely access to adjusted performance levels is critical to enabling proactive management, effective technical assistance, and meaningful corrective action aligned with current program performance.
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 115	CareerSource Palm Beach County	The language suggests subgroup performance may influence whether a PIP is required. TEGL 11-19 ties corrective action (including PIPs) to failure of WIOA primary indicators, not subgroup outcomes.	Clarify that subgroup performance may inform PIP content (root cause analysis, strategy development), but not the determination of whether a PIP is required.
P89 Business and Employer Services	Line Number: 123	CareerSource Okaloosa Walton	Comment (Concern with citation): Utilizing WIOA funds to providing human resource consultation services such as i. …employee handbooks; ii. Developing…personnel policies; and V. analyzing employee turnover may be cost prohibitive for a smaller region that may need to utilize an external organization to meet these expectations. In addition, would CSOW assume legal liability if the personnel policies violated any state or federal laws?	Comment (Proposed Resolution/Edit): The Boards should be in a facilitator's role: The Board and its service provider should not directly develop or author employer personnel policies or employee handbooks. Instead, staff will facilitate access to qualified third-party resources, tools, or referrals to support employers in developing compliant human resource practices.
P5 Registered Apprenticeship	Line Number: 56	CareerSource Okaloosa Walton	Comment (Concern with citation): Requiring LWDBs to serve as Registered Apprenticeship Sponsors, which includes the development and customization of program standards, registration of apprentices, maintenance of program and apprentice records, assurance of requirements, assurance of requirements for RTI delivery, and periodic evaluation of apprentice progress may be prohibitive for a smaller region due to inherent costs and limited staffing model.	Comment (Proposed Resolution/Edit): LWDBs may serve as Registered Apprenticeship Sponsors where capacity exists; however, sponsorship is not required. LWDBs may instead support apprenticeship expansion through partnership, coordination, and funding strategies.
P123 Planning Region Identification and Requirements	Line Number: 95	CareerSource Suncoast	Comment (Concern with citation): Fiscal and administrative requirements appear throughout page 3, lines 95-114, and page 4, lines 169-178. The draft requires regional service strategies, cooperative service delivery agreements, administrative and operational cost arrangements, data-sharing methods, and state oversight of implementation. However, language is needed to provide protection against unfunded mandates and compliance risk.,	Comment (Proposed Resolution/Edit): Add: "All fiscal and administrative coordination activities are subject to available funding, mutual agreement, and applicable federal and state requirements."
P123 Planning Region Identification and Requirements	Line Number: 104	CareerSource Suncoast	Comment (Concern with citation): On page 3, lines 104-106. Directs planning regions to coordinate administrative and operational costs. The recommended language clarifies accountability and reduces audit and liability risk.	Comment (Proposed Resolution/Edit): Add: "Each LWDB retains responsibility for its own fiscal management, reporting, and compliance."
P123 Planning Region Identification and Requirements	Line Number: 110	CareerSource Suncoast	Comment (Concern with citation): On page 3, lines 108-114, accountability moves to a regional perspective. The recommended change ensures alignment with WIOA accountability structure and avoids unintended shared liability across boards.	Comment (Proposed Resolution/Edit): Change to: "coordinate with Florida Commerce on performance expectations, while maintaining individual LWDB accountability for local performance outcomes."
P123 Planning Region Identification and Requirements	Line Number: 105	CareerSource Suncoast	Comment (Concern with citation): On page 3, lines 104-105, directs boards to pool funds where appropriate. Recommended change adds uniform guidance protections and ensures fiscal participation is voluntary and auditable.	Comment (Proposed Resolution/Edit): Change to: "pooling of funds on a voluntary basis, subject to agreement among LWDBs, and in compliance with federal cost allocation requirements."
P123 Planning Region Identification and Requirements	Line Number: 30	CareerSource Suncoast	Comment (Concern with citation): On page 2, lines 30-31 and related language on page 3, lines 124-129, planning regions are directed to make efforts to reduce or share costs by minimizing duplication and effectively using technology, tools, and services among areas in their planning region. Additional language recommended prevents unintended mandates and ensures flexibility for boards of varying size and capacity.	Comment (Proposed Resolution/Edit): Add: "where mutually agreed upon by LWDBs and consistent with available funding and operational capacity."
P123 Planning Region Identification and Requirements	Line Number: 11	CareerSource Suncoast	Comment (Concern with citation): On page 1, lines 11-14, the draft references the SWDB's role in guiding regional collaboration and Florida Commerce's responsibility for monitoring compliance with federal and state planning requirements. The recommended change prevents duplicative or conflicting monitoring findings and clarifies ownership of corrective actions.	Comment (Proposed Resolution/Edit): Add: "Monitoring will distinguish between regional planning requirements and individual LWDB fiscal and programmatic responsibilities."
P5 Registered Apprenticeship	Line Number: 172	CareerSource Suncoast	Comment (Concern with citation): On page 4, lines 172-175, the recommended change is needed to limit responsibility to LWDB-controlled data and reduces exposure to third-party delays.,	Comment (Proposed Resolution/Edit): Change to: "LWDBs must ensure that all service-related data within the control of the LWDB is entered into Employ Florida within 15 calendar days of service delivery, to the extent practicable."
P5 Registered Apprenticeship	Line Number: 137	CareerSource Suncoast	Comment (Concern with citation): On page 4, lines 137-144, the recommended change maintains intent while avoiding a requirement to create a new full-time position dedicated solely to apprenticeships.	Comment (Proposed Resolution/Edit): Change to: "Each LWDB will designate an Apprenticeship Navigator, or assign these responsibilities to existing staff, subject to available funding and staffing capacity."
P5 Registered Apprenticeship	Line Number: 56	CareerSource Suncoast	Comment (Concern with citation): On page 2, lines 55-57 boards are directed to serve as RAP sponsors, and on page 3, lines 92-101, related sponsorship duties are listed. While boards are strongly encouraged to increase the number of registered apprenticeships, not all boards have the capability. Thus, language is needed to clarify that RAP sponsorship is optional, reducing liability and administrative burden for LWDBs without capacity.	Comment (Proposed Resolution/Edit): Change to: With: "LWDBs may serve as RAP sponsors when employer interest exists and no other sponsor is available, provided the LWDB has the administrative capacity, staffing, and financial resources to do so."
P89 Business and Employer Services	Line Number: 253	CareerSource Suncoast	Comment (Concern with citation): Implementation and monitoring requirements appear on page 5, lines 226-241, and page 6, lines 243-253. The draft requires LOPs, local plan updates, business partnership assessment, employer feedback measurement, ongoing internal monitoring, regular reports, and state monitoring through annual programmatic reviews, quarterly data validation, and ongoing oversight. Additional language is needed to provide protection against unfunded mandates, fiscal risk, and compliance exposure.	Comment (Proposed Resolution/Edit): Add: "All requirements within this policy are subject to available funding, resources, and alignment with federal and state allowable cost and program requirements."
P89 Business and Employer Services	Line Number: 250	CareerSource Suncoast	Comment (Concern with citation): On page 6, lines 250-253, the recommended change encourages coordination and reduces risk of duplicative reviews and conflicting findings.	Comment (Proposed Resolution/Edit): Change to: "FloridaCommerce will monitor compliance through annual programmatic reviews, quarterly data validation and ongoing oversight, coordinated with LWDB monitoring activities to ensure efficiency and avoid duplication."
P89 Business and Employer Services	Line Number: 158	CareerSource Suncoast	Comment (Concern with citation): Original P89 draft, page 4, lines 158, should be revised to ensure feasibility of implementation, particularly for smaller or rural boards, and acknowledges dependency on available infrastructure.	Comment (Proposed Resolution/Edit): Change to: "LWDBs must establish and maintain early warning systems, to the extent practicable and supported by available tools, data, and resources."
P89 Business and Employer Services	Line Number: 123	CareerSource Suncoast	Comment (Concern with citation): On page 3, lines 123-132, the draft lists required business and employer services, including outreach, workforce planning, recruitment assistance, labor market information, training solution design, rapid response coordination, hiring incentives, and customized business services. The recommended change clarifies boundaries of service delivery and reduces risk of expansion into activities that may create fiscal or compliance issues.	Comment (Proposed Resolution/Edit): Add: "Business and employer services must align with allowable WIOA activities and applicable federal and state guidance."
P89 Business and Employer Services	Line Number: -131,	CareerSource Suncoast	Comment (Concern with citation): On page 3, line 131-132 requires local boards to explain labor and employment laws, which is beyond their scope. The recommended change reduces potential legal liability associated with LWDB staff providing employment law guidance.	Comment (Proposed Resolution/Edit): Change to: "Human resource consultation services, including general workforce guidance, consistent with allowable activities and not constituting legal advice."
P89 Business and Employer Services	Line Number: -91,	CareerSource Suncoast	Comment (Concern with citation): On page 3, lines 91-94 does not allow for differences of resources of local boards. The recommended change prevents creation of an unfunded mandate and aligns expectations with LWDB operational capacity.	Comment (Proposed Resolution/Edit): On page 3, line 91-94, change to: "LWDBs must maintain staff capacity, technology systems, and outreach strategies necessary to deliver business services, subject to available funding and resources."

P5 Registered Apprenticeship	Line Number: 66	CareerSource Research Coast	Comment (Concern with citation): Does monitoring expectations just involve having general awareness of available RAPs in the LWDA?	Comment (Proposed Resolution/Edit): Provide specific details regarding the expectation of monitoring the FDOE inventory.
P5 Registered Apprenticeship	Line Number: 80	CareerSource Research Coast	Comment (Concern with citation): Policy refers to all applicable federal and state requirements governing RA/WIOA, but does not reference actual requirements/statutes.	Comment (Proposed Resolution/Edit): Provide specific references to the federal and state requirements.
P5 Registered Apprenticeship	Line Number: 149	CareerSource Research Coast	Comment (Concern with citation): Need clarification regarding Apprentice Florida leads	Comment (Proposed Resolution/Edit): Expand upon how ANs obtain leads from Apprentice Florida if it's different from leads worked through Salesforce.
P89 Business and Employer Services	Line Number: 105	CareerSource Research Coast	Comment (Concern with citation): Policy states WIOA Adult and Dislocated Worker funds may be used for labor exchange, job posting, candidate matching, referrals, and labor market information, which are core Wagner-Peyser Employment Service functions.	Comment (Proposed Resolution/Edit): Clarify that WIOA funds may support these activities only when directly tied to WIOA participants, individualized career services, or integrated service delivery, and may not be used to fund general labor exchange functions.
P5 Registered Apprenticeship	Line Number: 54	CareerSource Research Coast	Comment (Concern with citation): Policy states LWDBs "should serve as RAP sponsors" when no sponsor exists but does not account for fiscal and staffing capacity required to operate as a sponsor. This may impose an unreasonable burden on LWDBs.,	Comment (Proposed Resolution/Edit): Clarify that LWDB sponsorship is optional and contingent upon local capacity, provide minimum standards, and/or additional funding support for LWDBs who operate as sponsors.
P89 Business and Employer Services	Line Number: -29,	CareerSource Suncoast	Comment (Concern with citation): Language should provide flexibility to account for economic cycles and regional differences beyond a board's control. The recommended change Prevents creation of an unfunded mandate and aligns expectations with LWDB operational capacity.	Comment (Proposed Resolution/Edit): Change to: "LWDBs must maintain staff capacity, technology systems, and outreach strategies necessary to deliver business services, subject to available funding and resources."
P89 Business and Employer Services	Line Number: -32,	CareerSource Suncoast	Comment (Concern with citation): On page 1, lines 33-37 reference performance outcomes that are influenced by external factors; revised language ensures LWDBs are not held accountable for elements outside their control.	Comment (Proposed Resolution/Edit): Change to read: "LWDBs must demonstrate measurable improvements in employer engagement, hiring outcomes, and earnings, to the extent influenced by regional economic conditions, employer participation, and available resources."
P89 Business and Employer Services	Line Number: -20,	CareerSource Suncoast	Comment (Concern with citation): Page 1, Lines 17-21 The draft establishes statewide requirements for proactive planning, delivery, documentation, and continuous improvement of business and employer services "to ensure consistent, high-quality service delivery across local areas and planning regions."Replace: "ensure consistent, high-quality service delivery across local areas and planning regions"	Line Number: -20, Type of Comment (see directions): Critical,, Comment (Proposed Resolution/Edit): Change to: "ensure consistent, high-quality service delivery across local areas and planning regions while preserving flexibility to address local labor market needs." Balances statewide consistency with WIOA's local flexibility framework.
P5 Registered Apprenticeship	Line Number: 56	CareerSource Northeast Florida	Comment (Concern with citation): LWDBs should serve as RAP sponsors when employer interest exists and no other sponsor is available, in alignment with state and local plans.	Comment (Proposed Resolution/Edit): Request technical assistance on best practices for an LWDB to become a RAP sponsor including funding sources that are available to support LWDB sponsorship.
P5 Registered Apprenticeship	Line Number: 36	CareerSource Northeast Florida	Comment (Concern with citation): Measurable Performance Outcomes.	Comment (Proposed Resolution/Edit): Request technical assistance regarding how performance outcomes will be measured and tracked. In particular, what data will be measured, how will it be measured and where is it located?
P89 Business and Employer Services	Line Number: 1,	CareerSource Palm Beach County	Comment (Concern with citation): CareerSource Palm Beach County requests additional clarity regarding the State's transition to Workforce Policies and Technical Assistance Letters (TALs), particularly as it relates to the sunset of established Administrative Policies. While the modernization of legacy policies is appreciated, the current approach has resulted in gaps in guidance and increased confusion for local areas. Policies are being sunset without a defined replacement, leaving programs without operational direction. Further, TALs raise concerns that operational guidance, previously conveyed through Administrative Policy, is being shifted outside of the State Board approval process. We have been informed that TALs are expected to function as policy, yet they do not consistently provide: •Formal public comment opportunities •Board-level oversight and approval •Transparency into how requirements are developed This shift may limit the ability of the local areas to provide feedback on potential overreach, administrative burden, or misalignment with real-world operations. There is also a concern that much of this guidance is being developed in silo by FloridaCommerce staff who, in many cases, have not worked within a career center environment. Without structured input from frontline practitioners, guidance may not fully reflect operational realities, leading to inefficiencies and unintended consequences in service delivery.	Comment (Proposed Resolution/Edit): •Establish and publish a clear governance framework defining the role and authority of Workforce Policies, TALs, and other guidance •Ensure that all substantive operational requirements remain subject to State Board approval and public comment •Require that any administrative policy sunset include a simultaneous replacement •Incorporate structured input, with a defined and reasonable timeframe for review and comment from LWDBs and frontline staff to ensure guidance reflects practical implementation realities. •Clarify that any guidance that establishes requirements, expectations, or monitoring criteria must be issued through formally adopted Workforce Policy, not through informal guidance or technical assistance.
P89 Business and Employer Services	Line Number: 2	CareerSource Palm Beach County	Comment (Concern with citation): CareerSource Palm Beach County recommends that CareerSource Florida retain Administrative Policy 114, as it remains essential to effective Rapid Response delivery. As currently proposed, Rapid Response is being reduced to a small component within a broader business services policy. This approach understates the true purpose of Rapid Response. While employer engagement is important, the most significant impact of Rapid Response is on workers who have already been or are about to be laid off. Once a WARN notice is issued, layoff aversion is rarely successful, and the focus must shift quickly to helping affected individuals transition back into employment. Rapid Response, as defined under WIOA and TEGL 19-16, is fundamentally a worker-focused intervention designed to ensure rapid reemployment and minimize unemployment duration following layoffs. Administrative Policy 114 ensures that this worker-centered response happens consistently and without delay. It provides the necessary clarity so that staff know exactly how to respond in these time-sensitive situations. Without it, there is a risk that services become inconsistent or overly focused on the employer, rather than ensuring workers receive immediate access to reemployment assistance and support.	Comment (Proposed Resolution/Edit): Retain Administrative Policy 114 as the governing framework for Rapid Response, while allowing Policy 89 to align and elevate it within a broader business engagement strategy, not replace it.
P89 Business and Employer Services	Line Number: 30	CareerSource Palm Beach County	Comment (Concern with citation): The policy includes legacy performance measures such as "repeat business" and "business penetration" as expectations for LWDB performance. These measures are not aligned with USDOL's Final Rule (February 2024), which established "Retention with the Same Employer in the 2nd and 4th Quarters After Exit" as the standardized definition for Effectiveness in Serving Employers. USDOL explicitly declined to adopt repeat business and employer penetration due to data validation and consistency concerns. These concerns are not theoretical. Florida has previously experienced issues where locally reported performance measures were manipulated or overstated, contributing to the State being placed on a Corrective Action Plan (CAP) by USDOL in 2019. Reintroducing these measures as performance expectations, without standardized validation methodologies, creates significant risk of non-compliance, inconsistent reporting, and repeat findings at the federal level.	Comment (Proposed Resolution/Edit): Remove repeat business and business penetration as performance expectations. If retained, clearly define them as not compliance or performance measures tied to WIOA outcomes.
P89 Business and Employer Services	Line Number: 243	CareerSource Palm Beach County	Comment (Concern with citation): The policy requires compliance with "FloridaCommerce reporting protocols" and "data quality standards" without formally defining these requirements in policy. This creates a risk that guidance documents (e.g., Employ Florida Service Code Guide) may be enforced through monitoring without formal adoption, bypassing State Workforce Board approval and public comment. For employer services, WIOA does not require transaction-level reporting or validation, and enforcement of additional requirements without policy adoption introduces unreasonable administrative burden and governance concerns.	Comment (Proposed Resolution/Edit): All enforceable reporting and documentation requirements must be formally adopted within policy. Clarify that guidance documents are not enforceable unless explicitly incorporated into State Workforce Board-approved policy.

P89 Business and Employer Services	Line Number: 158	CareerSource Palm Beach County	Comment (Concern with citation): The policy requires LWDBs to "establish and maintain early warning systems" to identify at-risk businesses. There is no federal requirement under WIOA or TEGL 19-16 mandating formal early warning systems at the local level. This introduces a new, undefined operational requirement without: •Minimum standards •Defined responsibilities (state vs. local) •Consideration of resource constraints •Corresponding guidance, infrastructure, or dedicated resources Historically, elements of early warning and detection have been supported at the state level, ensuring consistency and reducing burden on LWDBs.	Comment (Proposed Resolution/Edit): Clarify that early warning activities are encouraged, not required, or define minimum standards and delineate state vs. local responsibilities, including available state support. The state has typically provided Econovue (I procured the contract while at DEO so this should be stated if to continue)
P89 Business and Employer Services	Line Number: 33	CareerSource Palm Beach County	Comment (Concern with citation): The policy establishes a performance expectation to increase participation in work-based training models (e.g., OJT, customized training, apprenticeships). While these are allowable and valuable tools under WIOA, training strategies are locally driven and based on in-demand occupations and industry needs within each LWDB's service area. WIOA places responsibility on LWDBs to align training investments with local labor market demand, and in some regions, the most effective or feasible training solutions may not include work-based training models. Establishing a statewide expectation to increase work-based training may create misalignment with local demand, employer capacity, and participant needs. It may also disproportionately impact smaller or rural regions, where limited employer base, administrative capacity, and available funding can make scaling these models more resource-intensive, potentially leading to inequitable performance expectations across LWDBs.	Comment (Proposed Resolution/Edit): Revise the language to reflect that work-based training is an allowable strategy to be used where appropriate based on local labor market conditions, rather than a statewide performance expectation. Alternatively, position this as a recommended practice rather than a required outcome.
P123 Planning Region Identification and Requirements	Line Number: 108	CareerSource Palm Beach County	Comment (Concern with citation): The policy states that Planning Regions will "collectively negotiate and reach agreement with FloridaCommerce on local levels of performance for all LWDBs in the region," citing 20 CFR 679.510(a)(1)(viii). However, this appears to misinterpret federal requirements. Under WIOA Section 116(c) and 20 CFR 679.510(a)(1)(viii), regional planning must include a description of how LWDBs will coordinate and align performance accountability measures across the region, but performance negotiations remain the responsibility of each individual LWDB and its Chief Elected Official (CLEO) in agreement with the Governor (or state). The CFR does not authorize a Planning Region to negotiate a single set of performance levels on behalf of all LWDBs collectively. Instead, it requires coordination and alignment (not consolidation) of performance negotiations. The current language could be interpreted as requiring regional-level negotiation authority that is inconsistent with WIOA's statutory framework, potentially creating compliance risk and confusion regarding accountability structures.,	Comment (Proposed Resolution/Edit): Revise the language to clarify that LWDBs and CLEOs within a Planning Region must coordinate and align performance strategies, and may collaborate during the negotiation process, but that formal negotiation and agreement on performance levels remains at the individual LWDB level in accordance with WIOA Section 116(c). Alternatively, reframe this section to require a regional strategy for performance alignment rather than collective negotiation.
P89 Business and Employer Services	Line Number: 74	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): 74–84: The requirement to establish formal partnerships through MOUs or comparable agreements appears broad and could create unnecessary administrative burden if applied to all partner relationships. Not every useful coordination relationship requires a formal agreement.,	Comment (Proposed Resolution/Edit): Narrow this requirement by identifying when formal agreements are required versus when informal coordination is sufficient.
P89 Business and Employer Service	Line Number: 123	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): 123–132: The human resource consultation examples are very broad, including job descriptions, handbooks, personnel policies, interview techniques, turnover analysis, accommodations, and explanation of labor and employment laws. Without guardrails, this could be read as encouraging LWDB staff to provide detailed HR or legal compliance consulting beyond their expertise.	Comment (Proposed Resolution/Edit): Add clarifying language that LWDBs may provide general workforce-related assistance and referrals, but do not provide legal advice and should refer employers to qualified professionals when appropriate.
P89 Business and Employer Services	Line Number: 236	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): 236–248: This section includes "productivity" as something LWDBs must measure, but it is not clear what that means or how boards would realistically track it. Unlike things like employer satisfaction, repeat business, or hiring outcomes, productivity is not a simple or standard workforce measure, and it may be difficult for boards to collect in a consistent way.	Comment (Proposed Resolution/Edit): Consider removing "productivity" from this section. If the state wants to keep it, it should clearly define what it means and provide a standard way for boards to measure it.
Select Policy: G103 Performance Requirements for Local Workforce Development Boards	Line Number: 89	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): Lines 89–109 and 113–116: The triggers for a Performance Improvement Plan (PIP) are inconsistent. The Tier 2 table says a PIP is triggered only when an indicator falls below 50 percent for one year, below 90 percent for two consecutive years, or when a program score falls below 90 percent for one year. However, Section III.C says factors for requiring a PIP include failure to meet adjusted levels of local performance in one or more federal indicators for one year. These are not the same thresholds.	Comment (Proposed Resolution/Edit): Reconcile the Tier 2b table and Section III.C so the policy states one clear, consistent standard for when a PIP is required.
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 89	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): 93-99: The trigger for Tier 3 is vague. The policy states Tier 3 occurs when an LWDB fails to achieve "performance compliance" following Tier 2 interventions, but "performance compliance" is not defined. The policy also does not explain whether escalation is automatic, who determines escalation, or what specific criteria must remain unmet before Tier 3 is imposed.	Comment (Proposed Resolution/Edit): Define "performance compliance" and specify the objective criteria, decision-maker, and process for escalation to Tier 3.
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 167	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): 167–174: The policy states that LWDBs must upload all required supporting documentation using Employ Florida. This is very broad and may be difficult to interpret operationally. The policy does not indicate whether any exceptions apply for documents maintained in partner systems, confidential records, or supporting documentation retained outside Employ Florida consistent with state guidance.	Comment (Proposed Resolution/Edit): Clarify whether all documentation must be maintained in Employ Florida without exception, or whether certain categories of records may be maintained elsewhere if they remain available for monitoring and validation.
P123 Planning Region Identification and Requirements	Line Number: 20	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): Lines 20–29 and 35–40: The section is called "Measurable Performance Outcomes," but the items listed are more like general goals than things that can actually be measured as written. For example, "reduction in costs," "use of shared resources," and "meeting or exceeding targets" do not say compared to what, over what time period, or how that will be measured.	Comment (Proposed Resolution/Edit): Either add more detail so these are true measurable outcomes, or rename the section so it is clear these are intended goals rather than specific performance measures.
P5 Registered Apprenticeship	Line Number: 52	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): Lines 52–57, 84–107, and 207–214: The draft says LWDBs should act as RAP sponsors when an employer is interested and no other sponsor is available. Later, it lists many sponsor responsibilities and planning expectations. This makes it unclear whether being a sponsor is just encouraged or is something boards are expected to do. Acting as a sponsor can take a lot of staff time and resources. It can include building the program, handling standards, registering apprentices, keeping records, overseeing related instruction, tracking progress, and meeting sponsorship goals. Many LWDBs may not have the staff or capacity to take this on, even with partners.	Comment (Proposed Resolution/Edit): Revise the policy to clearly say that LWDB sponsorship is optional, not the default expectation. The policy should also list the things a board should consider before agreeing to serve as a sponsor, such as staff capacity, budget, expertise, employer commitment, and whether another sponsor is available. It may also help to emphasize other ways LWDBs can support apprenticeship, such as bringing employers together, connecting them to ATRs, helping with ETPL opt-in, and funding allowable participant services.
P5 Registered Apprenticeship	Line Number: 73	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): Lines 73–78 and 182–185: The policy says LWDBs should encourage and support RAPs in their area to be part of the ETPL, while later stating that RAPs opted into the state ETPL must also be added to all local lists and that LWDBs may not require additional forms or information beyond TEGL 08-19. The overall direction is generally clear, but it would benefit from a more direct explanation of what LWDBs are and are not allowed to do once a RAP opts in.	Comment (Proposed Resolution/Edit): Add a short clarifying paragraph stating that LWDBs may promote ETPL opt-in and assist RAPs with the process, but may not impose additional local screening or application requirements once a RAP has opted into the state ETPL.
P5 Registered Apprenticeship	Line Number: 149	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): 149-151: The policy directs Navigators to use Apprentice Florida leads and statewide tools including EconoVue and Salesforce, but it is not clear that all LWDBs have the same access, required use, or operational authority for each tool.	Comment (Proposed Resolution/Edit): Clarify whether these tools are required statewide tools, optional tools where available, or examples of tools that may be used.

P5 Registered Apprenticeship	Line Number: 179	CareerSource Brevard Flagler Volusia	Comment (Concern with citation): Lines 179–185 and 202–203: This ETPL section could be clearer about the distinction between using ITAs for RAP-related training on the ETPL and supporting apprenticeship through OJT, IWT, and customized training without ETPL inclusion. The draft mentions both, but boards may still need a clearer explanation of when ETPL status matters and when it does not.	Comment (Proposed Resolution/Edit): Add a short clarifying sentence that ETPL inclusion is necessary when WIOA training is funded through an ITA, but RAPs may also be supported through other allowable work-based training mechanisms without ETPL participation.
P89 Business and Employer Services	Line Number: 41-48	CareerSource Central Florida	Comment: The policy expands expectations for employer-driven services without clearly identifying the funding and capacity to support them. While Wagner-Peyser (Florida Commerce) staff are managed regionally and WP is the primary resource for employer services, current WP funding levels do not support a significant expansion of these activities. WIOA Title I funds are primarily intended for participant services. This creates risk of reliance on WIOA funds for employer-focused activities, potential misalignment with allowable uses of funds, and inconsistent implementation across regions.	Comment (Proposed Resolution/Edit): Clarify funding alignment by distinguishing WP-funded employer services from WIOA Title I participant services and ensure expectations align with available staffing and funding capacity.
P89 Business and Employer Services, Designation	Line(s): 29–32, 87-94, 236-241	CareerSource Central Florida	Comment: The requirement to "demonstrate measurable improvements" and references to business metrics (e.g., penetration, repeat business) are not aligned with State Policy G104 on performance and sanctions, which defines performance deficiencies based on multi-year failure and established indicators.	Comment (Proposed Resolution/Edit): Revise to reflect continuous improvement aligned with federally negotiated performance levels and define business metrics using standardized methodology aligned with federal measures.
P89 Business and Employer Services	Line Numbers: 123	CareerSource Central Florida	Comment (Concern with citation): ine(s): 123–132 Comment Type: (S) Substantive	Comment: The inclusion of HR consulting services (e.g., personnel policies, labor law guidance) may exceed allowable WP/WIOA activities and create legal and compliance risk. , Comment (Proposed Resolution/Edit): Limit to general informational guidance and clarify that services do not constitute legal advice.
P89 Business and Employer Services	Line Numbers: 123; 96–97	CareerSource Central Florida	Comment: Minor grammatical and formatting issues identified, including "including but not limits to" and citation formatting for TEGL 19-16.	Comment (Proposed Resolution/Edit): Correct grammar and citation formatting for clarity and consistency.
P123 Planning Region Identification and Requirements	Line(s): 95–103; 169–171	CareerSource Central Florida	Comment: The policy promotes strong regional alignment through shared service strategies, common processes, and alignment of local operating procedures. While this supports consistency and collaboration, clarification would be helpful to ensure alignment efforts do not unintentionally limit the authority of LWDBs under WIOA Section 107(d) to design and implement services responsive to local needs.	Comment (Proposed Resolution/Edit): Clarify that regional alignment is intended to support coordination and efficiency, while LWDBs retain authority over local policies, service delivery decisions, and administration in accordance with WIOA.
P123 Planning Region Identification and Requirements	Line Numbers: 108–112; 39–40	CareerSource Central Florida	Comment: The policy references collective negotiation of performance levels and achieving performance outcomes through regional partnerships. Additional clarity would be beneficial to ensure alignment with WIOA Section 116, which establishes performance accountability at the local area level.	Comment (Proposed Resolution/Edit): Clarify that performance negotiation remains the responsibility of each LWDB, while regional coordination may support shared strategies to improve outcomes across the region.
Policy: P123 Planning Region Identification and Requirements	Line Numbers: 45	CareerSource Central Florida	Comment (Concern with citation): Lines 45-51 -- Regions are expected to reduce or share costs and minimize duplication, which will require difficult standardization and changes to local practices.	Comment (Proposed Resolution/Edit): CareerSource Florida should prioritize high-impact areas for consistency, while using shared service models (like centralized data, IT, or fiscal functions) to reduce duplication and costs. Changes should be implemented gradually and maintain local flexibility within a common framework to ensure smoother adoption and continued responsiveness to local needs.
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 52	CareerSource Central Florida	Comment (Concern with citation): Line(s): Section III.A.2: The methodology for calculating program scores as a simple average of individual indicator scores may disproportionately impact LWDBs with small participant cohorts. In certain measures (e.g., Measurable Skill Gains), a small number of participants can significantly influence overall program scores, potentially resulting in outcomes that do not fully reflect overall program performance.,	Comment (Proposed Resolution/Edit): Consider incorporating safeguards for small cohort sizes or additional context in performance evaluation to ensure results are interpreted consistently and fairly across LWDBs of varying size.
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 110	CareerSource Central Florida	Comment (Concern with citation): Line(s): Section III.A.4; III.B: The policy outlines technical assistance and Performance Improvement Plans (PIPs) but does not clearly define the criteria or thresholds for escalation between these stages. Additional clarity would support consistency and transparency in how performance concerns are addressed across LWDBs.	Comment (Proposed Resolution/Edit): Provide clearer guidance on the conditions under which technical assistance escalates to a PIP and how decisions are applied consistently across local areas.
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 175	CareerSource Central Florida	Comment (Concern with citation): Section III.D; Letter Grades / Quartiles: The policy incorporates state-defined measures such as letter grades, return on investment, and quartile comparisons. While these support broader accountability goals, additional clarity would help ensure alignment with WIOA performance structures, which account for economic conditions and participant characteristics through adjusted performance levels.	Comment (Proposed Resolution/Edit): Clarify how state-defined metrics (e.g., letter grades, quartiles, ROI) are used in conjunction with federally required performance measures and how differences in local economic conditions and populations served are considered in evaluation.
G103 Performance Requirements for Local Workforce Development Boards	Line Number: 150	CareerSource Central Florida	Comment (Concern with citation): WIOA performance outcomes are cohort-based and subject to reporting lag (e.g., employment and earnings measures). As a result, quarterly monitoring of performance improvement efforts may rely on data that reflects prior periods rather than current operations.	Comment (Proposed Resolution/Edit): Clarify what interim indicators or leading measures will be used during quarterly reviews to assess progress in a way that aligns with WIOA reporting timelines.