CareerSource FLORIDA

Joint Strategic Policy and Performance and Finance Council Meeting Agenda

AUGUST 26, 2026 • 10:00 A.M. – 12:00 P.M., CT
UNIVERSITY OF WEST FLORIDA CONFERENCE CENTER

Chair's Welcome and Remarks — ***Sophia Eccleston***

Finance Council Consent Item

1. June 2026 Finance Council Meeting Minutes

Strategic Policy and Performance Council Consent Agenda

1. June 2026 Strategic Policy and Performance Council Meeting Minutes
2. Recommendation to Sunset 9 Workforce Policies and Guidance Documents
    - Workforce Policy P101 – (TAA) Training and Other Activities Funding
    - Workforce Policy P107 – (TAA) Training Services
    - Workforce Policy P108 – (TAA) Employment and Case Management Services
    - Workforce Policy P116 – (TAA) and Workforce Innovation and Opportunity Act Dislocated Worker Co-Enrollment
    - Workforce Policy F63 – Subrecipient and Vendor Determinations – Federal Funds
    - Workforce Policy F64 – Subrecipient and Vendor Determinations – State Funds
    - Workforce Policy P71 – I-9 and 516 INS Procedures
    - Workforce Policy P78 – H-2A Job Order Referral Procedures
    - Workforce Policy P114 – Rapid Response Program Administration

Action Items — ***Victoria Gaitanis***

1. Workforce Policy G104 – Sanctions and Other Corrective Action for Local Workforce Development Boards
2. Request to Revise Policies Related to Eligible Provider Training List Requirements
3. Request to Waive State Individual Training Account Expenditure Requirements
4. Request to Develop Wagner-Peyser Program Staffing Policy

Financial Operations Update — ***Dana Davis***

Grants Management Update — ***Malissa Counts***

Work Requirement Participant Performance Accountability Update — ***Rick Beasley***
Executive Director, CareerSource South Florida

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lead.

Set-aside Initiatives Outcomes — ***Erin Sampson***

Workforce Program Development Initiatives Update — ***Victoria Gaitanis***

Business Engagement Training Efforts and Next Steps — ***Nilda Blanco***

Hope Florida in Action:
CareerSource PBC & CarePortal — ***Steven Gustafson***
COO & Vice President, CareerSource PBC

Statewide Labor Market and
Workforce Performance Update — ***Kristy Farina***
Economic Research & Analysis Administrator
Florida Commerce

Open Discussion/Public Comment

Chair's Closing Remarks — ***Sophia Eccleston***

Information Items

CareerSource Florida
Joint Strategic Policy and
Performance and Finance
Council Meeting
August 26, 2026
Consent Item 1
Approved______________
Disapproved______________

Consent Item 1

June 2026 FINANCE COUNCIL MEETING MINUTES

In accordance with Article VII, Section 7.3 of the approved bylaws, the corporation is required to keep correct and complete books and records of accounts and shall keep minutes on the proceedings of the board of directors.

FOR CONSIDERATION

- **Approval of June 2, 2026, Finance Council Meeting Minutes, to include any modifications or changes noted by the council.**

CareerSource Florida
Finance Council Meeting Minutes
June 2, 2026

I. Call to Order

Chair Kevin McDonald called the Finance Council meeting to order at 10:00 a.m. on June 2, 2026.

II. Roll Call

Chair McDonald introduced CareerSource Florida Board Relations Director Madison Frazee and invited her to conduct a roll call. The following members were present:

Kevin McDonald
Robert Salonen
Jennifer O'Flannery Anderson
Les Sims
Meredith Standfield

A quorum was present.

III. Welcome Address

Dr. Malou Harrison, Executive Vice President and Provost of Miami Dade College, welcomed the council to Miami Dade College and expressed appreciation for the opportunity to host the meeting. She highlighted the strong partnership between Miami Dade College and CareerSource Florida in advancing workforce education and emphasized the importance of continued collaboration among education, workforce, and industry partners to strengthen Florida's workforce and maintain its national leadership.

IV. Consent Item

1. November 2025 Finance Council Meeting Minutes

Chair McDonald called for a vote to approve the consent item.

Motion: Robert Salonen
Second: Meredith Stanfield

The consent item passed unanimously. There were no comments from the public.

V. CareerSource Florida Financial Operations Update and Network Fiscal Performance

Chief Financial Officer Dana Davis provided an overview of CareerSource Florida's proposed budget for the upcoming fiscal year, noting that it aligns with the Governor's priorities and supports the Board's workforce development responsibilities.

She highlighted the organization's strong financial position, reviewed key funding sources and proposed investments in workforce initiatives, and thanked

FloridaCommerce and the local workforce development boards for their collaboration in developing the budget recommendations.

VI. Action Item

1. Fiscal Year 2026-2027 CareerSource Florida Network Funding

Chair McDonald called for a vote to approve the action item.

Motion: Robert Salonen
Second: Les Sims

The action item passed unanimously. There were no comments from the public.

VII. CareerSource Florida Grants Management Update

CareerSource Florida Grants and Office Services Manager Malissa Counts provided an overview of the Quick Response Training (QRT) and Incumbent Worker Training (IWT) grant programs, highlighting their role in supporting employer-driven workforce development, business growth, and employee upskilling across Florida's key industries.

She shared examples of successful employer partnerships and emphasized the continued impact of these investments in strengthening Florida's workforce and economy.

VIII. Open Discussion/Public Comment

Chair McDonald asked if any board members or members of the public wished to comment.

There were no public comments.

IX. Chair's Closing Remarks

Chair McDonald thanked council members for their time and attention and reminded them of upcoming events and meetings. He adjourned the meeting at 10:37 a.m.

*Additional meeting dialogue is recorded and available online at **this link**.*

Consent Item 1

June 2026, SPPC MEETING MINUTES

In accordance with Article VII, Section 7.3 of the approved bylaws, the corporation is required to keep correct and complete books and records of accounts and shall keep minutes on the proceedings of the board of directors.

FOR CONSIDERATION

- **Approval of June 2, 2026, Strategic Policy and Performance Council Meeting Minutes, to include any modifications or changes noted by the council.**

CareerSource Florida
Strategic Policy and Performance Council Meeting Minutes
June 2, 2026

I. **Call to Order**
Chair Sophia Eccleston called the Strategic Policy and Performance Council meeting to order at 1:00 p.m. on June 2, 2026.

II. **Roll Call**
CareerSource Florida Board Relations Director Madison Frazee conducted a roll call. The following members were present:

Sophia Eccleston
Erik Arroyo
Bayne Beecher
Bridget Royster
Laurie Sallarulo
Scott Singer

III. **Consent Agenda**
Chair Eccleston called for a vote to approve the Consent Agenda.

1. **January 2026 Joint Council Meeting Minutes**
2. **Recommendation to Sunset CareerSource Florida Policies P83 – Direct Provider of Workforce Services**
    - **G12 Regional Planning Areas**
    - **P10 Comprehensive Employment, Education and Training Strategy**
    - **P26 Guidance Domestic Violence**
    - **P27 Guidance Individual Development Accounts**
    - **P23 Guidance Relocation Assistance**
    - **O4 Grievance and Hearing Procedures**
    - **O42 Collection of Demographic Data Final Guidance**
    - **O75 Guidelines for the Disclosure of Financial Interests**
    - **P72 Projecting Employment Hours**
    - **P7 Rapid Response and Layoff Aversion System Strategy**
    - **F76 – Annual Submission of Regional Workforce Board Budget to Career Source Florida**

Motion: Erik Arroyo
Second: Bayne Beecher

The consent agenda passed unanimously. There were no public comments.

IV. **WIOA State Plan Two-year Modification**
CareerSource Florida Vice President of Workforce Program Development Victoria Gaitanis provided an update on Florida's Workforce Innovation and Opportunity Act (WIOA) two-year state plan modification, highlighting the integration of the Perkins V career and technical education program to strengthen coordination between workforce and education partners.

She also summarized proposed waiver requests and plan enhancements designed to increase flexibility, improve accountability, and better align workforce investments with Florida's economic and employer needs.

V. Action Items

CareerSource Florida Senior Director of Workforce Program Development Erin Sampson presented action item 1 and action item 2 for the council's consideration.

1. P5 Registered Apprenticeship

Chair Eccleston called for a vote to approve the action item.

Motion: Erik Arroyo
Second: Bayne Beecher

The action item passed. There were no public comments.

2. P123 Planning Region Identification and Requirements

Chair Eccleston called for a vote to approve the action item.

Motion: Erik Arroyo
Second: Bridget Royster

The action item passed unanimously. There were no public comments.

3. G103 Performance Requirements for Local Workforce Development Boards

Chair Eccleston called for a vote to approve the action item.

Motion: Laurie Sallarulo
Second: Bridget Royster

The action item passed, with council member Erik Arroyo opposed. There were no public comments.

4. P89 Business and Employer Services

Chair Eccleston called for a vote to approve the action item.

Motion: Erik Arroyo
Second: Bayne Beecher

The action item passed unanimously. There were no public comments.

5. Subsequent Designation of Local Workforce Development Areas and Local Workforce Development Board Composition and Certification
- **a. Full Approvals**
- **b. Conditional Approvals**

Chair Eccleston called for a vote to approve the action item.

Motion: Erik Arroyo
Second: Laurie Sallarulo

The action item passed unanimously. There were no public comments.

6. Local Workforce Development Board Requests for Designation as Direct Service Provider(s) and Requests to Serve as One Stop Operators

- **a. Full Approvals**
- **b. Conditional Approvals**
- **c. Denials**

Chair Eccleston called for a vote to approve the action item.

Motion: Erik Arroyo
Second: Bridget Royster

The action item passed unanimously. There were public comments from Rusty Skinner, Marti Coli, and Brian Bauer. They expressed support for accountability while requesting additional consideration before requiring local workforce boards operating under a Performance Improvement Plan (PIP) to reprocure direct service operations.

They also emphasized that affected boards were making measurable progress under existing corrective actions, requested a more gradual approach before imposing procurement requirements, and noted a technical correction to the presentation regarding the procurement status of a one-stop operator.

7. CareerSource Florida Designation of Two Regional Planning Areas

- **a. Northwest Florida Workforce Collective**
- **b. Nature Coast Regional Planning Area**

Chair Eccleston called for a vote to approve the action item.

Motion: Erik Arroyo
Second: Bayne Beecher

The action item passed unanimously. There were no public comments.

VI. Supporting Business Engagement and Outreach

CareerSource Florida Director of Business and Partner Engagement Kelli Walter provided an update on CareerSource Florida's statewide business engagement, highlighting the rollout of a comprehensive training initiative designed to strengthen employer relationships and position the workforce system as a strategic talent partner.

She noted that the training supports implementation of board policy, promotes consistent business engagement across the network, and recognized staff and local workforce boards for their leadership and collaboration in delivering the training sessions.

VII. LWDB Monitoring Updates

CareerSource Florida Director Erin Sampson and FloridaCommerce Bureau Chief of One Stop & Program Support Karmyn Hill presented a new tiered, data-driven monitoring framework designed to strengthen oversight of Florida's local workforce development boards while emphasizing continuous improvement over compliance alone. They explained that the enhanced approach integrates performance data, labor market information, and technical assistance to identify systemic issues, support local boards with targeted improvements, and promote greater accountability, consistency, and stronger workforce outcomes statewide.

VIII. Statewide Labor Market and Workforce Performance Update

FloridaCommerce Bureau Chief of Workforce Statistics and Economic Research Jimmy Heckman provided an overview of Florida's labor market, noting continued job growth, a growing labor force, and overall economic strength despite signs of slowing hiring in some sectors. He highlighted that recent increases in unemployment are being driven primarily by new entrants to the labor force – particularly younger workers – rather than job losses, underscoring the importance of workforce training and targeted support to help individuals successfully enter the job market.

FloridaCommerce Economic Research and Analysis Administrator Kristy Farina provided an update on Florida's Workforce Innovation and Opportunity Act (WIOA) performance, reporting that the state exceeded the federal performance threshold across all primary indicators in the latest reporting period. She also reviewed performance for key populations, including veterans and individuals with barriers to employment, and outlined the upcoming performance negotiation and accountability process with local workforce development boards for the next two program years.

IX. Florida's Statistical Adjustment Model

CareerSource Florida Vice President of Workforce Program Development Victoria Gaitanis and FloridaCommerce Economic Research and Analysis Administrator Kristy Farina presented updates to Florida's WIOA statistical adjustment model, explaining that the revised approach better aligns with federal guidance by focusing on barriers to employment and local economic conditions rather than demographic characteristics.

They highlighted that the enhanced model is designed to improve fairness and accountability, better reflect local workforce conditions, and continue supporting annual performance negotiations and evaluations for local workforce development boards.

X. Open Discussion/Public Comment

Chair Eccleston thanked the members for their time and participation before asking if any council members or members of the public wished to comment.

There was one public comment from Rusty Skinner, who highlighted a successful workforce development initiative funded through a state general revenue grant, describing partnerships among local governments, educational institutions, and economic development organizations to support workforce training and economic growth in rural Levy County. He emphasized the success of new short-term training programs, including FAA drone certification for high school students, and thanked the board for its support in expanding career opportunities for rural communities.

XI. Chair's Closing Remarks

Chair Eccleston thanked the council for their attention and engagement before reminding council members of upcoming meetings and events.

The meeting was adjourned at 3:35 p.m.

*Additional meeting dialogue is recorded and available online at **this link**.*

Consent Item 2

RECOMMENDATION TO SUNSET 9 CAREERSOURCE FLORIDA WORKFORCE POLICIES

The CareerSource Florida Board of Directors serves as the principal workforce policy organization for the state as described in Section 445.004(2), Florida Statutes. The state board establishes and directs the vision for the state workforce system. Federal and state law describes what items the state workforce development board (SWDB) must review, approve, or consider, including workforce development policies.

CareerSource Florida and the Florida Department of Commerce (FloridaCommerce) review policies for their effectiveness and efficiency and recommend the recission of policies, as necessary. Four of the policies recommended for sunset relate to the Trade Adjustment Assistance (TAA) program which is being eliminated. TAA services are currently delivered within American Job Centers, and participants have access to all partner programs including WIOA. These four policies recommended for recission are:

Workforce Policy P101 – (TAA) Training and Other Activities Funding was developed by FloridaCommerce in 2021 as an administrative policy to provide LWDBs the requirements for TAA Training and Other Activities. Expiration of the program eliminates the need for this policy.

Workforce Policy P107 – (TAA) Training Services was developed by FloridaCommerce in 2020 as an administrative policy to provide LWDBs the minimum requirements for administering training to trade-affected workers. Expiration of the program eliminates the need for this policy.

Workforce Policy P108 – (TAA) Employment and Case Management Services was developed in 2020 by FloridaCommerce to provide LWDBs the minimum requirements for providing employment and case management services under the TAA program. Expiration of the program eliminates the need for this policy.

Workforce Policy P116 – (TAA) and Workforce Innovation and Opportunity Act Dislocated Worker Co-Enrollment was developed by FloridaCommerce in 2021 as an administrative policy by FloridaCommerce to communicate the requirements to co-enroll eligible trade-affected workers in the WIOA Dislocated Worker program and the TAA program. Expiration of the program eliminates the need for this policy.

Other policies identified for recission include:

Workforce Policy F63 - Subrecipient and Vendor Determinations – Federal Funds is guidance issued by FloridaCommerce in 2008, prior to the implementation of WIOA to provide guidance to regional workforce boards, early learning coalitions and other subrecipients of federal funds for determining whether payments to third parties create subrecipient or vendor relationships for federal funds. This policy is obsolete. Any required elements will be used to inform updated technical assistance and guidance consistent with federal and state law.

Workforce Policy F64 – Subrecipient and Vendor Determinations – State Funds is guidance issued by FloridaCommerce in 2008, prior to the implementation of WIOA to provide guidance to regional workforce boards, early learning coalitions and other subrecipients of funds from for determining whether payments to third parties create subrecipient or vendor relationships for state funds. This policy is obsolete. Any required elements will be used to inform updated technical assistance and guidance consistent with federal and state law.

Workforce Policy P71 – I-9 and 516 INS Procedures is guidance issued by FloridaCommerce in 2013 related to the Migrant and Seasonal Farmworker Program to provide guidance to regional workforce boards, one-stop career center employees and other workforce system partners on processing federal I-9 forms and the 516 INS forms. This guidance was issued prior to the implementation of WIOA and is no longer consistent with federal law and guidance.

Workforce Policy P78 - H-2A Job Order Referral Procedures is guidance issued by FloridaCommerce in 2013 to provide guidance to regional workforce boards, career center employees and other workforce system partners on processing job seeker referrals to H-2A job orders. This guidance was issued prior to the implementation of WIOA and is no longer consistent with federal law and guidance. This obsolete policy will be updated to inform technical assistance and guidance consistent with federal regulations and guidance.

Workforce Policy P114 – Rapid Response Program Administration was developed by FloridaCommerce as administrative policy and approved by the CareerSource Florida Board of Directors in 2021. This policy relates to the WIOA Dislocated Worker Program and notifies LWDBs of the minimum rapid response requirements and activities mandated by WIOA. Information about required rapid response and layoff aversion activities is included in CareerSource Florida Workforce Policy P89 – Business and Employer Services approved by the CareerSource Florida Board of Directors, acting as the State Workforce Development Board, at its meeting on June 3, 2026. Technical Assistance Letters (TAL) related to rapid response and to layoff aversion, informed by consultation feedback from LWDBs, will be issued by FloridaCommerce.

Sunset of these policies is consistent with the Florida workforce system's goals to remove duplication of services and reduce administrative redundancies. CareerSource

Florida and FloridaCommerce recommend the sunset of these policies and their removal from the CareerSource Florida list of active and current state workforce policies.

FOR CONSIDERATION

- **Approve the sunset of 9 workforce policies and guidance documents and remove them from the CareerSource Florida list of active and current state workforce policies.**

Approved_____________
Disapproved_____________

Action Item 1

CAREERSOURCE FLORIDA WORKFORCE POLICY G104 SANCTIONS AND OTHER REQUIRED CORRECTIVE ACTION FOR LOCAL WORKFORCE DEVELOPMENT BOARDS

Federal and state law describes what items the state workforce development board (SWDB) must review, approve, or consider, including state workforce policies. CareerSource Florida and the Florida Department of Commerce (FloridaCommerce) review policies for alignment, effectiveness, and efficiency.

The Workforce Innovation and Opportunity Act (WIOA), Section 116, establishes performance accountability requirements for core programs that support employment and training outcomes. Training and Employment Guidance Letter No. 11-19, Change 2, issued by the U.S. Departments of Labor and Education, updates how state performance is evaluated and clarifies that states will be sanctioned for repeated performance failure or non-reporting of results. CareerSource Florida requires Local Workforce Development Boards (LWDBs) to promptly address performance, programmatic, or financial deficiencies to protect funding and avoid penalties. LWDBs play a critical role in advancing the strategic and operational goals of the Governor and the SWDB for Florida's Workforce Development System.

On January 28, 2026, the CareerSource Florida Board of Directors, acting as the SWDB, approved revisions to Workforce Policy G104 – Sanctions and Other Required Corrective Action for Local Workforce Development Boards Who Fail to Meet Federal and State Standards. This policy informs LWDBs administering WIOA Title I and other funds authorized by the SWDB about potential consequences, including corrective actions, remedies and sanctions, for failing to meet performance requirements or complying with applicable laws, regulations, standards, monitoring requirements, or agreement terms with FloridaCommerce.

Following continued engagement with LWDBs regarding performance accountability and corrective action, CareerSource Florida and FloridaCommerce developed additional revisions to Policy G104. The revisions strengthen the state's ability to respond proportionately when an LWDB does not meet performance, programmatic, fiscal, or compliance requirements, while providing a clearer progression from early intervention and technical assistance to formal corrective action and, when warranted, sanctions or reorganization. The revised policy:

- Broadens the assessment of federal performance from reliance on a single individual measure to consideration of an LWDB's overall program scores and overall indicator scores, providing a more balanced assessment of sustained performance. The revised policy identifies two consecutive years below the 90 percent target for an overall program score or overall indicator score as a potential performance deficiency.

- Clarifies the authority of the Governor to enact corrective actions and sanctions, clarifies with sanctions may be considered and preserves applicable notice and appeal protections for significant actions such as revocation of a local plan or imposition of a reorganization plan.

To obtain additional, focused stakeholder input before SWDB consideration, CareerSource Florida and FloridaCommerce distributed the proposed revisions to all 21 LWDBs for targeted consultation from August 11 through August 21, 2026. CareerSource Florida received 17 comments from 5 LWDB and the Florida Workforce Development Association, on behalf of its membership. In total, 82% of the feedback was either integrated into the policy language or will be addressed through upcoming technical assistance issued by FloridaCommerce.

This policy applies to CareerSource Florida, FloridaCommerce, all 21 LWDBs and all planning regions.

FOR CONSIDERATION

- **Approve to move forward to the full State Workforce Development Board Workforce Policy G104 – Sanctions and Other Required Corrective Action for Local Workforce Development Boards.**

Workforce Policy

			POLICY NUMBER G104
Title:	Sanctions and Other Corrective Action for Local Workforce Development Boards		
Policy Type:	Programmatic		
Program:	Workforce Innovation and Opportunity Act		
Adopted:	02/20/2020	**Revised:** 01/28/2026	

I. PURPOSE AND SCOPE

The Workforce Innovation and Opportunity Act (WIOA), Section 116, establishes performance accountability requirements for core programs that support employment and training outcomes. Training and Employment Guidance Letter No. 11-19, Change 2,[1] issued by the U.S. Departments of Labor and Education, updates how state performance is evaluated and clarifies that states may lose up to 10% of the Governor's Reserve funds for repeated failure or non-reporting of results. CareerSource Florida requires Local Workforce Development Boards (LWDBs) to promptly address performance, programmatic, or financial deficiencies to protect funding and avoid penalties.

LWDBs play a critical role in advancing the strategic and operational goals of the Governor and the State Workforce Development Board (SWDB) for Florida's Workforce Development System. The CareerSource Florida Board of Directors, acting as the SWDB, issues policy and guidance aligned with federal and state laws and its strategic priorities to ensure LWDBs, service providers, and career centers deliver services effectively and efficiently. This policy informs LWDBs utilizing WIOA Title I and other funds authorized by the SWDB about potential consequences, including sanctions and remedies, for failing to meet performance measures or violating applicable laws, regulations, standards, or agreement terms with the Florida Department of Commerce (FloridaCommerce).

II. KEY OBJECTIVES

1. Increase awareness and develop training, as needed for Chief Local Elected Officials (CLEOs), LWDB members, leadership, and staff of LWDBs and career centers about board responsibilities and potential sanctions and remedies for failing to meet performance measures or violating federal and state laws, regulations, standards, or the terms of

[1] Training and Employment Guidance Letter No. 11-19, Change 2

agreements between LWDBs and FloridaCommerce.

2. Employ sound management practices and controls for the proper expenditure of funds passed to LWDBs and administered through FloridaCommerce.
3. Develop strategies, procedures, and policies to meet or exceed identified state and federal performance standards in alignment with state goals and objectives.

III. POLICY AND PROCEDURES

The CareerSource Florida Board of Directors seeks to ensure all LWDBs maintain credibility and accountability for meeting performance, programmatic, and financial requirements. CLEOs and LWDBs have access to a data dashboard and receive quarterly updates and annual notifications on whether they meet federal performance accountability measures and state-issued letter grades. FloridaCommerce and CareerSource Florida may use any level of intervention warranted by the severity, duration, or risk of the deficiency. When appropriate, the response should progress as follows:

- **Technical Assistance and Early Intervention:** Governed by Workforce Policy G103, these actions may be provided when performance concerns, compliance concerns, data issues, or operational risks are identified and are intended to help resolve emerging concerns before formal corrective action is required.
- **Corrective Action Notice:** Issued when a deficiency requires formal correction, LWDBs will generally be given a reasonable opportunity to correct the deficiency before sanctions are imposed unless immediate action is necessary to protect public funds, participants, program integrity, or compliance with law.
- **Corrective Actions Including: Specific Conditions, Turnaround Plan, Sanctions or Reorganization:** Consistent with guidance in Section III-B of this policy.

A. Deficiencies

In the following circumstances, corrective actions may be imposed on LWDBs:

1. Failure by the LWDB to execute a Grantee-Subgrantee Agreement between FloridaCommerce and the LWDB within the timeframe prescribed by FloridaCommerce.
2. Failure by the LWDB's board members, staff, fiscal agent, or administrative entity to appropriately oversee the delivery of services and ensure the effective and efficient use of funds.
3. Failure to:
   a. Carry out the required functions of a LWDB as set forth in WIOA sec. 107(d).
   b. Achieve certification.
   c. Sustain program and fiscal integrity.
   d. Properly use federal or state funds resulting in disallowed costs.
   e. Act in a manner necessary to prevent waste, fraud, or abuse of federal or state funds.
   f. Submit timely and accurate required financial and performance reports, including annual Single Audits or financial statement audits.
   g. Meet the agreed-upon ITA expenditure requirement under section 445.003(3), Florida Statutes (F.S.).
   h. Take corrective actions to resolve findings of non-compliance identified during programmatic, fiscal, or investigative monitoring or audit reviews conducted by the USDOL, FloridaCommerce, or other legally authorized entity.
   i. Resolve or address performance improvement plans, notices of deficiencies, or corrective action requirements within the timeframe determined by the authorized monitoring or reviewing authority.
   j. Resolve or address all independent audit findings or questioned costs.

k. Comply with administrative and service contract requirements.
l. Retain and produce required service delivery, program participant, and/or financial records.
m. Address and resolve reported threats to health and safety of program participants or staff, which may include investigating complaints, taking appropriate corrective actions, or making referrals to the appropriate authorities.
n. Meet performance requirements, including:
    i. Two or more years of failing to meet adjusted local levels of performance consistent with WIOA sec. 116 and TEGL 11-19, Change 2[2] as measured through two consecutive years of a failure of an LWDB to meet the 90% target for an overall program score or an overall indicator score; or
    ii. Two consecutive years with an annual letter grade of F under the criteria established pursuant to s. 14.36, Florida Statutes.[3]
    iii. Three consecutive years with a score below 50% for the veterans and individuals receiving public assistance subgroup populations, under the criteria established pursuant to s. 14.36, Florida Statutes.[4]

B. Actions

FloridaCommerce will at a minimum provide notice to the CLEO, the executive director, board chair, and/or the designated person responsible for operational and administrative functions of the board of the need for a Turnaround Plan or corrective action to secure prompt compliance. The notice may include additional performance, programmatic, or financial reviews, or additional technical assistance activities. The notice will include a timeline for required implementation and provide the opportunity for the LWDB to resolve any deficiencies."

The CareerSource Florida Board of Directors and FloridaCommerce may impose the following actions in response to identified deficiencies:

1. **Specific Conditions** – FloridaCommerce may impose specific conditions when an LWDB presents elevated risk or fails to make sufficient progress under a Corrective Action Notice. Specific conditions may be imposed consistent with 2 CFR 200.208 and may include additional reporting, additional monitoring, technical or management assistance, prior approval requirements, reimbursement-only payments, restrictions on drawdowns or expenditures, withholding authority to proceed to a project phase, or other conditions allowed by federal or state law.

   The written notice imposing specific conditions must identify the condition, the reason for the condition, the action needed to remove the condition, the timeframe for compliance, and the method for requesting reconsideration, when applicable.

2. **Turnaround Plan:** CareerSource Florida and FloridaCommerce will examine LWDB performance on each of the criteria developed under s. 14.36(3)(h) for various subgroups served, including, but not limited to, veterans, individuals on public assistance as defined in s. 414.0252(10), and businesses. LWDBs with two consecutive years of failure to meet the 90% target for an adjusted overall program score or an overall indicator score and two consecutive state-issued LWDB annual Letter Grades of a D or one annual letter grade of an F, including data isolated for the veteran or individuals receiving public assistance subgroups, will be required to submit an LWDB Turnaround

[2] Training and Employment Guidance Letter No. 11-19, Change 2
[3] Letter grade methodology described at https://analytics.careersourceflorida.com/LetterGrades/Methodolog[3]y
[4] When evaluating subgroup performance, cohort size will be considered to ensure statistical validity and fairness in the assessment process

Plan to the SWDB for review and approval. An LWDB that fails to submit a timely Turnaround Plan or completes a Turnaround Plan cycle and does not improve to a grade of "C" or higher is subject to corrective action, including, but not limited to, removal of board members and executive directors under s. 445.007(2)(b) and possible board decertification under WIOA s. 107(c)(3).

a. LWDB Turnaround Requirements: After notification, the LWDB will have 6 months to develop and submit this plan, which must be data-based and designed to create the conditions to improve the LWDB's performance during a two-year implementation period. FloridaCommerce shall apply intensive monitoring until the plan's closure. Requirements for LWDB Turnaround include:

    i. If cause exists under s. 445.007(2), F.S., the removal of the current LWDB Chair.
    ii. The results of a review of the performance of the executive director and/or the designated person responsible for operational and administrative functions of the board and a plan based on that review for the improvement of leadership performance designed to support LWDB improvement in administrative function of the board.

b. The development of a professional development plan that provides ongoing, targeted support to increased performance by staff and leaders.
c. The results from a review of practices in hiring, recruitment, retention, and reassignment of staff supporting the identified population and the associated actions identified for improvements in this area.
d. A description of local, data-based monitoring efforts, aligned to SWDB standards, that will be enacted to support improvement in the identified area(s).
e. A description of the review and update of any applicable local policies or operating procedures and how these will be updated to improve alignment and performance with the identified subgroup, if applicable; and
f. A description of how plan implementation will be documented and tracked.

3. **Sanctions** – Failure by the LWDB to fully resolve the deficiencies stated in the corrective notice or failure to fulfill the specific conditions placed on the LWDB may result in one or more of the following sanctions, as appropriate and consistent with applicable law:

    a. Disallowing all or part of the cost or activity determined to be non-compliant.
    b. Temporarily withholding reimbursement.
    c. Reduction or otherwise adjustment of the LWDB's funding (by disqualification from distributions of incentive monies, reallocated formula funding, and/or state-level reserve funds).
    d. Suspension or termination, in whole or in part, of the federal or state award.
    e. Issuance of a notice of intent to revoke approval of all or part of the local plan affected.
    f. Imposing a reorganization plan which may include:
        i. Decertifying the LWDB and requiring that a new board be appointed and certified for the local area.
        ii. Prohibiting the use of eligible providers and one-stop partners identified as achieving a poor level of performance; or
        iii. Taking such other significant actions as the Governor determines appropriate, which may include:
            - Selecting an alternative entity as defined in WIOA Section 107 to administer the program for the local area involved.
            - Merging the local area into one or more other local areas,

after consultation with CLEO(s) in the local areas; or
- Making such other changes necessary to secure compliance.

g. Initiation of suspension or debarment proceedings.
h. Any other penalty or action deemed appropriate by the Governor, SWDB, or FloridaCommerce.

C. Appeal Processes

A local area that has been found in substantial violation of WIOA and has received notification that either all or part of the local plan will be revoked or that a reorganization will occur may appeal such sanctions to the Secretary of Labor, USDOL under 20 CFR 683.650. The appeal must be filed no later than 30 days after receipt of written notification of the revoked plan or imposed reorganization. A copy of the appeal must be simultaneously provided to the CareerSource Florida Board of Directors and the Governor. The sanctions do not become effective until the time for appeal has expired or USDOL has issued a decision. USDOL will notify the Governor and the appellant in writing of the Secretary's decision within 45 days after receipt of the appeal.

A local area that has failed to meet local performance indicators for three consecutive program years and has received the Governor's notice of intent to impose a reorganization plan[5] may appeal to the Governor to rescind or revise such plan no later than 30 days after receiving written notice of the reorganization plan. The Governor must make a final decision within 30 days after receiving the appeal. The local area may appeal the final decision of the Governor to USDOL under 20 CFR 677.225 no later than 30 days after receiving the Governor's final decision. Any appeal of the Governor's final decision must be appealed jointly by the LWDB and the Chief Elected Official. USDOL will make its final decision within 30 days after receipt of the appeal. The decision by the Governor on the appeal becomes effective at the time it is issued and remains effective unless USDOL rescinds or revises the reorganization plan.

IV. IMPLEMENTATION

LWDBs must establish and maintain Local Operating Procedures (LOPs) that ensure all staff understand performance accountability requirements, including those outlined in TEGL No. 11-19, Change 2, 20 CFR 677.220, and 20 CFR 683.720. LOPs should outline the processes the LWDB uses to collect, validate, and report performance data; monitor internal program quality; implement corrective actions at the staff and provider level; and ensure timely resolution of findings identified through local or state monitoring. These procedures should focus on strengthening internal controls, supporting continuous improvement, and promoting program integrity. LOPs should be data-informed, aligned with state and federal standards, and reviewed regularly to ensure responsiveness to evolving compliance and reporting requirements.

Implementation of this policy requires LWDBs to integrate local policies, procedures, and training in alignment with this policy. LWDBs must document and track all efforts to meet performance expectations, including training, monitoring, and leadership development activities.

FloridaCommerce, in consultation with CareerSource Florida, will monitor LWDB compliance through intensive reviews, fiscal and programmatic audits, and evaluation of LOPs. This oversight ensures that LWDBs maintain accountability and transparency while working toward continuous improvement and alignment with state workforce goals.

[5] 20 CFR 683.650(c)

Policy/Template	Line	Type of Comment	Submission Date	Name	Title	Email	Local Workforce Development Board	Comment Entry	Recommended Resolution	Action Taken
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Number: 39	Performance Accountability Measures	08-21-2026 16:32:58	Gina Ronokarijo	VP Workforce Operat	gronokarijo@careersourcecf.com	CareerSource Central Florida	The policy states that LWDBs have “access to a real-time dashboard.” However, the performance reporting used for LWDBs accountability and oversight relies on lagging indicators and retrospective results, rather than real-time performance measures.	Remove the inaccurate language.	"real-time" will be removed.
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Numbers: 89-93 and 125-129	Performance Accountability Measures	08-19-2026 13:15:27	Marti Coley	FWDA Executive Director	marti@pinpointresults.com	CareerSource Suncoast;/FWDA	FWDA supports the revision to evaluate performance using overall program scores and overall indicator scores rather than relying on failure of a single individual performance indicator. This approach has the potential to provide a more balanced assessment of overall board performance. However, the proposed language does not clearly state that the two consecutive years of failure must involve the same overall program score or the same overall indicator score. As written, an LWDB could potentially fail one program or indicator score in one year and a different program or indicator score in the following year and nevertheless be considered to have experienced two consecutive years of performance failure. Federal regulations expressly apply consecutive-year performance consequences based on failure of the same performance measure. For local areas, 20 C.F.R. § 677.220(b) requires failure involving the same primary indicators of performance for the same core program. Similarly, the State performance provisions in 20 C.F.R. § 677.190(e) require consecutive failure of the same core program or same primary indicator. WIOA § 116(g)(2) provides the underlying statutory framework for corrective action when local-area performance failure continues for a third consecutive year; the specific same-indicator/same-program requirement is stated in the implementing regulation at 20 C.F.R. § 677.220(b). Requiring consecutive failure of the same measure would more accurately identify sustained performance concerns while still holding boards accountable for improvement.	Two consecutive years of failure by an LWDB to meet the 90% target for the same overall program score or the same overall indicator score. The corresponding language in the Turnaround Plan section should be revised in the same manner.	Additional details on methodology will be provided as part of issued technical assistance.
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Numbers: 89-93 and 125-129	Performance Accountability Measures	08-20-2026 13:15:27	Marti Coley	FWDA Executive Director	marti@pinpointresults.com	CareerSource Suncoast;/FWDA	The proposed policy establishes failure to achieve 90% of an overall program score or overall indicator score as a basis for corrective action and potentially a Turnaround Plan, but the policy does not define how these scores will be calculated or applied at the LWDB level. Federal regulations expressly define the methodology for calculating an overall State program score and an overall State indicator score, including the measures incorporated into those calculations. However, local performance accountability under WIOA is based on locally negotiated and adjusted performance levels established pursuant to 20 C.F.R. § 677.210. Florida law likewise provides that local performance accountability measures consist of the applicable indicators and a local level of performance established pursuant to WIOA. If Florida intends to adapt the overall program score and overall indicator score methodology for use at the LWDB level, the methodology should be clearly established and published before the scores are used as the basis for corrective action or sanctions. LWDBs should be able to understand, independently calculate, and verify the performance standard against which they will be evaluated. At a minimum, the methodology should identify the components included in each score, calculation methodology, treatment of unavailable or incomplete measures, applicable performance periods, adjustments, and when a score becomes final.	CareerSource Florida and Florida Commerce shall publish and provide to LWDBs the methodology used to calculate overall program scores and overall indicator scores, including the measures included, calculation methodology, applicable adjustments, performance periods, treatment of unavailable data, and other calculation rules, prior to using such scores as the basis for corrective action or sanctions.	Additional details on methodology will be provided as part of issued technical assistance.
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Numbers: 89-93 and 125-129	Performance Accountability Measures	08-21-2026 13:15:27	Marti Coley	FWDA Executive Director	marti@pinpointresults.com	CareerSource Suncoast;/FWDA	The revised language references “two consecutive years” of failure but does not specify how prior program years will be treated when implementing the revised overall program score and overall indicator score methodology. Federal law establishes local performance through negotiated levels agreed upon by the local board, chief elected official, and Governor, with adjustments based on economic conditions and participant characteristics. 20 C.F.R. § 677.210 further requires agreement on local negotiated levels through a negotiations process before the start of a program year and requires that process to be disseminated to LWDBs and chief elected officials. Additionally, 20 C.F.R. § 677.220(a)(1) requires the State to establish its threshold for local performance failure before reaching agreement on negotiated local performance levels. If the revised overall program score and overall indicator score methodology represents a new or materially revised standard for determining local performance failure, applying it retrospectively could result in an LWDB entering corrective action or Turnaround status based on performance periods during which the board was not being formally evaluated under that methodology. Historical data may appropriately be used for benchmarking, technical assistance, and performance improvement; however, consequences under a newly adopted accountability methodology should apply prospectively so boards have notice of the standard against which performance will be evaluated.	For purposes of determining consecutive-year failure under this provision, the revised overall program score and overall indicator score methodology shall be applied prospectively beginning with the first applicable program year following implementation of the revised methodology.	Additional details on methodology will be provided as part of issued technical assistance.
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Number: 93	Performance Accountability Measures	08-21-2026 16:32:38	Kim Bodine	Executive Director	kbodine@careersourcegc.com	CareerSource Gulf Coast	Where can local board access their overall program scores? This has not been used in the past. How is the overall program score calculated?	Provide information in the policy or as an attachment	Additional requested details will be provided in issued technical assistance.

G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Numbers: 96-98 and related footnote 4	Performance Accountability Measures	08-24-2026 13:15:27	Marti Coley	FWDA Executive Director	marti@pinpointresults.com	CareerSource Suncoast;/FWDA	The proposed policy establishes a deficiency when an LWDB has three consecutive years with a score below 50% for the veterans and individuals receiving public assistance subgroup populations. The draft states that this standard is being applied under criteria established pursuant to § 14.36, Florida Statutes. Section 14.36(3)(h), Florida Statutes, directs the REACH Office to develop criteria for assigning a letter grade to each LWDB and provides that the criteria are to be based in part on LWDB performance accountability measures and return on investment. The statute does not itself establish a three-year, 50% performance threshold for the veterans or public-assistance subgroups. The related footnote states that cohort size will be considered "to ensure statistical validity and fairness in the assessment process," but the policy does not establish a minimum cohort size, define what constitutes statistical validity, or explain how cohort size will affect whether a board is determined to have failed the measure. The need for an objective statistical standard is also consistent with WIOA's treatment of subgroup data. WIOA § 116(d)(6)(C) provides that disaggregated reporting is not required when the number of participants in a category is insufficient to yield statistically reliable information. This is particularly important for the veteran subgroup because cohort sizes may vary considerably among local workforce areas. With a small cohort, the outcomes of only a few participants could substantially affect whether an LWDB falls above or below the 50% threshold. Because three consecutive years below the threshold may result in a deficiency determination and subsequent corrective action, the policy should establish the statistical parameters that will apply before subgroup performance is used for accountability purposes. FWDA recommends that CareerSource Florida and Florida Commerce publish the subgroup methodology, including the minimum cohort size, calculation method, applicable data period, treatment of suppressed or insufficient data, and methodology for determining consecutive-year failure, before subgroup performance is used as the basis for corrective action or sanctions.	Three consecutive years with a score below 50% for the veterans or individuals receiving public assistance subgroup populations, provided the subgroup meets a minimum cohort size and other statistical validity requirements established and published by CareerSource Florida and Florida Commerce. Years in which the applicable subgroup does not meet the established minimum cohort size shall not be counted as a year of performance failure for purposes of determining consecutive-year failure.	Additional details on methodology, including cohort size will be provided in issued technical assistance.
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Policy Line Numbers: 96-98	Performance Accountability Measures	08-25-2026 13:15:27	Marti Coley	FWDA Executive Director	marti@pinpointresults.com	CareerSource Suncoast;/FWDA	Interpreted as this referring to 50% participation rates for TANF participants, the addition of this requirement (n.iii) places an undue, unfair burden on the workforce boards and will continue to do so until the referrals for participation (TANF recipients referred by DCF) are limited to work-ready individuals. Under the current process, a large number of TANF recipients who are referred for participation have serious medical conditions, including being determined by doctors as totally disabled and unable to work, with poor prognoses moving forward. Several have applied for SSI or disability. Based on the information provided by their physicians, these individuals are generally medically deferred by workforce boards but still count in denominators toward participation. Even in cases where someone's prognosis is good, the level of participation as approved by their physician until they are fully released to go to work negatively impacts the 50% participation rate calculations. Until individuals who are not ready for work are not referred to workforce boards, or until these individuals are not counted in the 50% requirement, it is unreasonable to sanction workforce boards for this, since it is beyond the boards' control.	Please remove item n.3 from this policy.	Thank you for your comment - no change needed
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Number: 96-98	Performance Accountability Measures	08-20-2026 11:51:06	Donna Doubleday	President/CEO	ddoubleday@careersourceheartlan	CareerSource Heartland	Interpreted as this referring to 50% participation rates for TANF participants, the addition of this requirement (n.iii) places an undue, unfair burden on the workforce boards and will continue to do so until the referrals for participation (TANF recipients referred by DCF) are limited to work-ready individuals. Under the current process, a large number of TANF recipients who are referred for participation have serious medical conditions, including being determined by doctors as totally disabled and unable to work, with poor prognoses moving forward. Several have applied for SSI or disability. Based on the information provided by their physicians, these individuals are generally medically deferred by workforce boards but still count in denominators toward participation. Even in cases where someone's prognosis is good, the level of participation as approved by their physician until they are fully released to go to work negatively impacts the 50% participation rate calculations. Until individuals who are not ready for work are not referred to workforce boards, or until these individuals are not counted in the 50% requirement, it is unreasonable to sanction	Please remove item n.3 from this policy.	Thank you for your comment - no change needed
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Numbers: 96-98; 128-129,	Performance Accountability Measures	08-17-2026 09:55:00	Rusty Skinner	CEO	rskinner@carersourceclm.com	CareerSource Citrus Levy Marion	Select Policy: G104 - Sanctions and Other Corrective Action for LWDBs Who Fail to Meet Federal Standards It is unclear what the 50% performance covers. Other than the customer groups, there is no reference to the metric that requires a 50% performance. Also where do we find the data so that it can be monitored to improve performance during the year. Perhaps this question will be resolved when we know the metric.	Hard to suggest since I am clueless on what is subject to 50%.	Individual technical assistance will be scheduled.
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Numbers: 96,97,98	Performance Accountability Measures	08-22-2026 16:32:38	Kim Bodine	Executive Director	kbodine@careersourcegc.com	CareerSource Gulf Coast	There is currently no report to measure the population groups within the letter grades report. In order to track improvement LWDBs need to be able to easily access population group data within letter grades.	Please list the population group measures as a separate measure since they will be treated as such. Define in policy or attachment.	Additional requested details will be provided in issued technical assistance.
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Numbers: 110-116,	Performance Accountability Measures	08-23-2026 16:32:58	Gina Ronokarijo	VP Workforce Operat	gronokarijo@careersourcecf.com	CareerSource Central Florida	There is too much discretion for FloridaCommerce and no objective triggers for "Specific Conditions."	Define "elevated risk" and "sufficient progress."	Additional requested details will be provided in issued technical assistance.
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Number: 111	Performance Accountability Measures	08-20-2026 22:43:05	Anthony Gagliano	COO	agagliano@careersourcesc.com	CareerSource Suncoast	Elevated risk is not defined	Can we get an agreed upon definition or at least a couple of examples to help narrow down what would meet this criterion of elevated risk?	Additional requested details will be provided in issued technical assistance.
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Numbers: 126,127,128,129	Performance Accountability Measures	08-23-2026 16:32:38	Kim Bodine	Executive Director	kbodine@careersourcegc.com	CareerSource Gulf Coast	The letter grades methodology has changed two times in approximately two years. Moving targets are much harder to hit, and federal law does not require or even encourage state developed measures to be a source for sanctions. The data entered into Employ Florida for registrants is not validated unless the customer is enrolled into WIOA or another means tested program. Customers may or may not be checking their veteran status, low income/public assistance status, or disability status accurately. Conversely, others may check it believing it may help them. Wagner Peyser	Remove letter grades from sanctions/actions. Use the letter grades to guide better performance for populations and state goals, not punitive actions driven by unvalidated data.	Thank you for your comment - no change needed
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Numbers: 127	Performance Accountability Measures	08-21-2026 22:43:05	Anthony Gagliano	COO	agagliano@careersourcesc.com	CareerSource Suncoast	It mentions the need for a turnaround plan for boards that earn Ds for two consecutive years but there is no mitigation for boards earning A or B letter grades.	There should be exemption from a Turnaround Plan for boards that have earned consecutive letter grades of A or B. The need for a turnaround plan seems drastic for a board that is excelling at the state metrics for the letter grade but may have fallen tenths of a point short of its required score for a small subpopulation or 1 of the 18 required performance metrics.	Additional requested details will be provided in issued technical assistance.

G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Numbers: 49-52	Governor's Authority Regarding Corrective Actions and Sanctions	08-22-2026 16:32:58	Gina Ronokarijo	VP Workforce Operat	gronokarijo@careersourcecf.com	CareerSource Central Florida	The language regarding a Corrective Action Notice needs to be defined. A LWDB "will generally be given a reasonable opportunity to correct the deficiencies" . . . "unless immediate action is necessary to protect public funds, participants, program integrity, or compliance with law."	Revise the Corrective Action Notice section to (i) replace the word "generally" with a defined notice-and-cure process, (ii) add measurable triggers for when a Corrective Action Notice may be issued and when escalation is permitted, (iii) provide minimum cure periods by deficiency type and provide an extension for good-faith progress, and (iv) define the "immediate action" exception to be a temporary protective action.	Additional requested details will be provided in issued technical assistance.
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Numbers: 160-163, Type of Comment:	Governor's Authority Regarding Corrective Actions and Sanctions	08-22-2026 13:15:27	Marti Coley	FWDA Executive Director	marti@pinpointresults.com	CareerSource Suncoast;/FWDA	The proposed language states that failure to "fully resolve" deficiencies identified in a corrective notice or failure to fulfill specific conditions may result in one or more sanctions. FWDA recommends greater clarity regarding what constitutes failure to "fully resolve" a deficiency before sanctions may be considered. WIOA distinguishes between the requirement to take corrective action and the circumstances supporting significant sanctions. Under WIOA § 184(a)(5), when a local area is not in compliance with applicable administrative requirements, the Governor must require corrective action and may impose sanctions if the required corrective action is not taken. For the significant structural actions authorized under WIOA § 184(b)(1), the statute requires a determination of a substantial violation of a specific provision of WIOA and that corrective action has not been taken. The current wording does not distinguish between an LWDB that has failed to take the corrective action required by the notice and an LWDB that has substantially complied and made documented progress but may have an outstanding element requiring additional time, data, or verification. An objective standard would provide greater consistency while preserving the authority to take appropriate action when an LWDB does not comply with a corrective action notice.	Failure by the LWDB to materially comply with the corrective actions and timelines specifically identified in a written corrective action notice, after consideration of documented progress and circumstances affecting completion of the required corrective action, may result in additional corrective action or sanctions, as appropriate and consistent with applicable law.	This is language that will appear in any applicable corrective action notice. This information will be shared as part of future technical assistance.
G104 Sanctions and Other Corrective Action for Local Workforce Development Boards	Line Numbers: 160-177	Governor's Authority Regarding Corrective Actions and Sanctions	08-23-2026 13:15:27	Marti Coley	FWDA Executive Director	marti@pinpointresults.com	CareerSource Suncoast;/FWDA	Lines 160-177 provide that failure to fully resolve a corrective notice may result in sanctions ranging from financial consequences to revocation of a local plan and imposition of a reorganization plan, including decertification of the LWDB and prohibition of certain eligible providers or one-stop partners. The revised policy should more clearly distinguish between sanctions that may appropriately follow an unresolved corrective action and the specific statutory and regulatory prerequisites governing the significant structural sanctions listed in these lines. WIOA § 184(b)(1) authorizes revocation of all or part of a local plan or imposition of a reorganization plan when the Governor determines that there is a substantial violation of a specific provision of WIOA and corrective action has not been taken. Such a reorganization plan may include decertification of the local board or prohibition of eligible providers. Separate authority under WIOA § 107(c)(3) establishes circumstances under which a Governor may decertify a local board, including specified misconduct or two consecutive program years of nonperformance. While lines 160-163 state generally that sanctions must be consistent with applicable law, greater clarity is needed so that the policy itself communicates that the significant sanctions identified in lines 171-177 are subject to the statutory and regulatory prerequisites applicable to those particular actions. This clarification would preserve the Governor's authority while providing LWDBs with clearer notice regarding when those sanctions may be imposed.	Add the following clarification following in line 163: "Any sanction imposed under this section shall be subject to the specific statutory and regulatory prerequisites applicable to that sanction. Revocation of all or part of a local plan or imposition of a reorganization plan, including decertification of the LWDB or prohibition of eligible providers or one-stop partners, may occur only when the statutory and regulatory prerequisites authorizing such action have been satisfied.	The policy presupposes that the state follows all applicable laws specific to these actions but this language will be included as part of issued technical assistance.

Feedback Response Key			
Incorporated	**Future Action**	**No change**	**TOTAL**
1	13	3	17
6%	76%	18%	100%

CareerSource Florida
Joint Strategic Policy and
Performance and Finance
Council Meeting
August 26, 2026
Action Item 2

Approved____________
Disapproved____________

Action Item 2

ELIGIBLE TRAINING PROVIDERS LIST POLICIES

The Eligible Training Provider List (ETPL) is mandated by Section 122 of WIOA, which requires the Governor, through the state workforce development board, to establish criteria, information requirements, and procedures on the eligibility of training providers of training services in the state. Additionally, Florida's 2021 Reimagining Education and Career Help (REACH) Act charges the Florida Department of Commerce (FloridaCommerce) with establishing Eligible Training Provider (ETP) criteria focused on participant outcomes. Per WIOA sec. 134(c)(3)(D), training provided to eligible participants must be aligned with in-demand industry sectors or occupations.

Over the last decade, Florida's workforce training system has evolved in response to changing employer needs, credential requirements, and industry demand. Florida created, consistent with the requirements in Section 14.36, Florida Statutes, the Credentials Review Committee to identify credentials of value for current and emerging industries, resulting in the creation of the Master Credentials List (MCL). Additionally, FloridaCommerce maintains the Targeted Industry List and the Regional Demand Occupation List (RDOL) to support education and industry needs. Per 20 CFR 680.430(e), local Workforce Development Boards (LWDBs) may supplement eligibility criteria for training providers (except registered apprenticeship programs) on the ETPL. Currently, Florida's LWDBs have local ETP lists, some of which may differ from the state list. These multiple lists impact businesses, participants, and training providers.

Factors affecting this action item:

- Industry partners and training providers shared feedback that the different requirements and processes for initial and subsequent eligibility across multiple LWDBs is a challenge.
- FloridaCommerce is developing ETPL rules.
- TEGL No. 08-19, Attachment 1, states on p. I-5: "The Department [USDOL] encourages states to streamline the processes and policies for ETPs to reduce the number of local ETP lists and the degree to which they vary from the state list and one another."

Recommended Action:

CareerSource Florida is directed to recommend policies to the board that align the RDOL, MCL, and ETPL to support WIOA-funded training. The changes should streamline administrative processes, standardized implementation across LWDBs, and improve communication with training providers and industry partners.

FOR CONSIDERATION

- **Approve to move forward to the full State Workforce Development Board this action item.**

CareerSource Florida
Joint Strategic Policy and
Performance and Finance
Council Meeting
August 26, 2026
Action Item 3

Approved____________
Disapproved____________

Action Item 3

REQUEST TO WAIVE INDIVIDUAL TRAINING ACCOUNT (ITA) EXPENDITURE REQUIREMENTS

CareerSource Florida, the state workforce development board, leads collaboration among the state's workforce development system, with a shared goal to accelerate employment opportunities that build economic prosperity for Floridians. CareerSource Florida works to ensure all Floridians have access to the best workforce training and education available.

Public Law 113-128, the Workforce Innovation and Opportunity Act (WIOA), emphasizes training services including occupational skills training, on-the-job training, incumbent worker training, programs that combined worker workplace training with related instruction, training programs operated by the private sector, skill upgrading and retraining, entrepreneurial training, transitional jobs, job readiness training, adult education and literacy activities, and customized training. Individual Training Accounts (ITA) are used for Floridians seeking training services from eligible providers of training services. Local workforce development boards (LWDB) coordinate funding for individual training accounts.

Section 445.003(3)(a)1, Florida Statutes (F.S.), requires that at least 50 percent of the Title I WIOA Adult and Dislocated Worker funds that are passed through to LWDBs be allocated to ITAs. The Allowable Programmatic Training and ITA Costs Crosswalk for WIOA Adult and Dislocated Worker Programs developed by the FloridaCommerce Bureau of Financial Management provides details on what expenditures may be allocated and expended on ITAs.

Workforce Policy 074, approved by the CareerSource Florida Board of Directors in 2026, requires LWDBs to expend at least 50% of WIOA Adult and Dislocated Worker funds on Individual Training Accounts (ITAs) unless a waiver is approved. The policy establishes waiver request, reporting, and documentation requirements, including strategies to expand access to training and reduce future reliance on waivers, ensuring continued investment in workforce training that meets the needs of Florida businesses and job seekers.

FloridaCommerce and CareerSource Florida received timely waiver requests from 12 LWDBs seeking approval to expend less than the required 50 percent on ITAs for Program Year 2026-27.

In accordance with Workforce Policy 074, FloridaCommerce reviewed all waiver applications for completeness and, where necessary, requested additional information. FloridaCommerce and CareerSource Florida also met with each requesting LWDB to discuss the application and, if applicable, negotiate the recommended Program Year 2026-27 waiver level.

FloridaCommerce and CareerSource Florida recommend approval of the waivers as described below. FloridaCommerce and CareerSource Florida will provide updates to the CareerSource Florida Board of Directors on LWDB Training Expenditures.

FOR CONSIDERATION

Local Workforce Development Board	Recommended ITA Level
CareerSource Escarosa	42%
CareerSource Capital Region	35%
CareerSource North Florida	35%
CareerSource Northeast Florida	43%
CareerSource Central Florida	45%
CareerSource Pasco Hernando	48%
CareerSource Suncoast	48%
CareerSource Heartland	35%
CareerSource Research Coast	45%
CareerSource Palm Beach County	35%
CareerSource South Florida	40%
CareerSource Brevard Flagler Volusia	45%

Action Item 4

REQUEST TO DEVELOP WAGNER-PEYSER PROGRAM STAFFING WORKFORCE POLICY

The Wagner-Peyser Employment Service Program is a core workforce program that provides labor exchange services to employers and job seekers through Florida's one-stop delivery system. Currently, FloridaCommerce administers Wagner-Peyser services through state merit staff.

A recent U.S. Department of Labor rule change has removed the federal requirement that Wagner-Peyser services be delivered by state merit staff. This provides states flexibility to adopt the staffing model that best supports effective and efficient service delivery, while maintaining federal program accountability.

In response, CareerSource Florida and FloridaCommerce request direction from the State Workforce Development Board to develop a workforce policy that establishes Florida's framework for Local Workforce Development Boards who will now have direct control over Wagner-Peyser staffing and service delivery. The proposed should include direction that all local Wagner-Peyser services be provided by local workforce development board staffing models and no longer through state merit staff. The policy is to be developed in collaboration with FloridaCommerce, local workforce development boards and stakeholders and presented to the Strategic Policy and Performance Council and Board of Directors for consideration at their December 2026 meetings.

FOR CONSIDERATION

- **Direct CareerSource Florida, in coordination with FloridaCommerce, to develop a Workforce Policy to transition Wagner-Peyser Employment Services Activities and Staffing from state merit staff to local board managed staff.**

ATTACHMENTS

- **Wagner-Peyser Act Employment Service Staffing Memo from U.S. Department of Labor.**

- **Training and Employment Notice 02-26 Announcing the Publication of the Wagner-Peyser Act Employment Service Staffing Final Rule (August 20, 2026).**

TRAINING AND EMPLOYMENT NOTICE	NO. 02-26
	DATE August 20, 2026

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
STATE WORKFORCE ADMINISTRATORS
STATE AND LOCAL WORKFORCE BOARDS
LABOR COMMISSIONERS
AMERICAN JOB CENTERS
STATE MONITOR ADVOCATES
ALL ETA GRANTEES

FROM: MAREK LACO /s/
Acting Assistant Secretary

SUBJECT: Announcing the Publication of the Wagner-Peyser Act Employment Service Staffing Final Rule

1. **Purpose.** The purpose of this Training and Employment Notice (TEN) is to announce the publication of the Wagner-Peyser Act Employment Service Staffing Final Rule, which makes changes to the regulations regarding the Wagner-Peyser Act Employment Service (ES). Additionally, this TEN provides information to states seeking to implement the flexibility provided in the Final Rule as part of their Workforce Innovation and Opportunity Act (WIOA) Unified or Combined State Plan.

2. **Action Requested.** Please share this information with interested stakeholders and review the regulations and information collections. This Final Rule is effective October 19, 2026.

3. **Summary and Background.**

   a. Summary – On August 20, 2026, the U.S. Department of Labor (Department) published the Wagner-Peyser Act Employment Service Staffing Final Rule (91 FR 54024, Aug. 20, 2026) that removes the requirement that states must use state merit staff to provide ES services.

   b. Background – The Wagner-Peyser Act of 1933, 29 U.S.C. 49 et seq., established the ES program, a nationwide system of public employment offices that provide public labor-exchange services. The ES program seeks to improve the functioning of the nation's labor markets by matching job seekers with employers that are seeking workers. The Department's implementing regulations for the ES program are prescribed at 20 CFR parts 651, 652, 653, 654, and 658. Section 3(a) of the Wagner-Peyser Act requires the Department to assist in coordinating State ES offices by developing and prescribing "minimum standards of efficiency" in the provision of ES programs, and for decades the

Department used its statutory discretion to require state merit staff to deliver ES services but allowed demonstration status for three states (Colorado, Massachusetts, and Michigan) to use alternative staffing models.

The January 2020 Wagner-Peyser Act Staffing Flexibility Final Rule (85 FR 592, January 6, 2020) removed the requirement that ES services be provided only through state merit staff. On November 24, 2023, the Department published the Wagner-Peyser Act Staffing Final Rule (88 FR 82658, November 24, 2023) that required states (with the exception of Colorado, Massachusetts, and Michigan) to use state merit staff to provide ES services, including those states that began using alternative staffing models under the January 2020 Wagner-Peyser Act Staffing Flexibility Final Rule (2020 Final Rule). In January 2026, the Department published the Wagner-Peyser Act Staffing, Delay of Merit Staffing Compliance Date Final Rule (91 FR 2486, January 21, 2026) that delayed the compliance date for the regulatory requirement to use state merit staff until 2027. The August 20, 2026 Wagner-Peyser Act Employment Service Staffing Final Rule removes the requirement that states use state merit staff to provide ES services. In light of the Supreme Court's decision in *Loper Bright Enterprises v. Raimondo*, the Department has reassessed the State merit-staffing requirement in the ES program and has determined that the State merit-staffing requirement does not comport with the best reading of the statute. Rather, the single best reading of the Wagner-Peyser Act is that it does not provide statutory authority for the Department to require merit-staffing for the delivery of Wagner-Peyser Act ES services.

4. **Final Rule Changes.** The *Federal Register* published the Wagner-Peyser Act Employment Service Staffing Final Rule on August 20, 2026, available at (Wagner-Peyser Act Employment Service Staffing). This Final Rule allows states to use the staffing model that provides the required ES services with the most efficient and cost-effective model for their state.

   The Department is eliminating the state merit-staffing requirement by removing § 652.215 from the Wagner-Peyser Act regulations. In addition to the merit-staffing requirement in paragraph (a), § 652.215 included an exception for Colorado, Massachusetts, and Michigan to continue to use staffing flexibilities in paragraph (b), a requirement for these three states to participate in an evaluation concerning their delivery of ES services in paragraph (c), and a date by which all states must comply with the requirements of the section in paragraph (d). Without a state merit-staffing requirement in paragraph (a), the remaining paragraphs are no longer necessary. As such, the Department is removing all paragraphs of § 652.215 from the CFR.

   The Final rule impacts an associated information collection for the WIOA State Plans. For future WIOA State Plan submissions or modifications, states should use the approved information collection request requirements under OMB No. 1205-0522, which revises planning elements specific to ES staffing. States may opt to change their ES staffing model from that described in their most recently approved WIOA State Plan at any time. States that make such a change prior to the next statutorily required four-year plan for Program Years 2028-2031 must submit a modification to the Department via the WIOA State Plan portal.

5. **Inquiries.** Please direct inquiries to the appropriate ETA Regional Office.

6. **References.**
    - 2026 Wagner-Peyser Act Employment Service Staffing Final Rule (91 FR 54024, Aug. 20, 2026);
    - 2026 Wagner-Peyser Act Staffing, Delay of Merit Staffing Compliance Date (91 FR 2486, January 21, 2026);
    - *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024);
    - 2023 Wagner-Peyser Act Staffing Final Rule (88 FR 82658, November 24, 2023);
    - 2020 Wagner-Peyser Act Staffing Flexibility Final Rule (85 FR 592, January 6, 2020);
    - The Wagner-Peyser Act of 1933, 29 U.S.C. 49 et seq; and
    - Wagner-Peyser Act Employment Service Regulations at 20 CFR parts 651, 652, 653, 654 and 658.

7. **Attachment(s).** N/A

Information Items

CareerSource FLORIDA

Speaker Bios

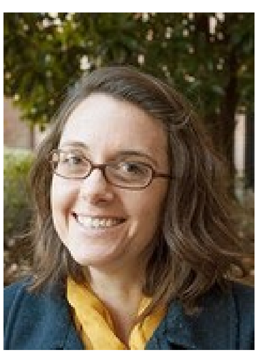
Rick Beasley

Rick Beasley has served as the Executive Director for the South Florida Workforce Investment Board (SFWIB), CareerSource South Florida (CSSF), since August 2005. In this position, he oversees workforce programs in Miami-Dade and Monroe counties with an operating budget of $75 million. He is in charge of one of the nation’s most dynamic “melting pots” – a diverse socioeconomic region. His vision for CareerSource South Florida is to create a model for the nation by establishing a world-class talent supply chain that fosters economic growth.

Beasley has provided leadership for a number of important workforce initiatives including the development of an Online Balance Scorecard, deployment of the CSSF Mobile Workforce Assistance Centers (five mobile units), development and implementation of the Miami-Dade County First Source Ordinance, and the South Florida Workforce State of the Workforce Report. CareerSource South Florida is one of the few Local Workforce Development Boards that sponsor career development offices on the campus of partner colleges and universities including St. Thomas University and Florida Memorial University as a way of increasing the talent pool and gaining early access/exposure to college graduates.

Prior to joining CareerSource South Florida, Beasley was the Director of the Missouri Department of Economic Development, Division of Workforce Development. In this position, he was responsible for managing Missouri's workforce development system and advising key policymakers on a broad range of workforce and economic development issues. Under Beasley's leadership, the Department of Economic Development Division of Workforce Development received the Governor's Award for Quality and Productivity in recognition for outstanding work.

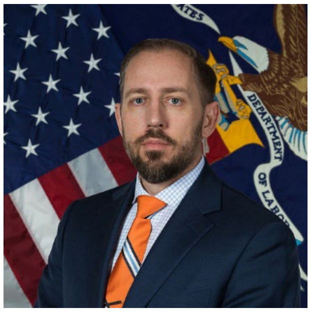
Kristy Farina



Kristy Farina serves as the administrator of economic research and program performance in FloridaCommerce’s Bureau of Workforce Statistics and Economic Research. Farina’s team analyzes labor market and workforce data to support economic decision-making and policy planning across Florida.

Before her role with FloridaCommerce, Farina served as faculty at Florida State University, supporting K-12 education research through data analysis and measure design.

Steven Gustafson



Steven Gustafson serves as First Vice President and Chief Operating Officer of CareerSource Palm Beach County, where he helps lead the organization's efforts to connect individuals with meaningful career opportunities and businesses with the talent they need to grow. In his role, he oversees key operational and workforce initiatives focused on expanding access to employment, training and supportive services throughout Palm Beach County.

A U.S. Marine Corps veteran, Gustafson brings a strong commitment to serving individuals who face barriers to employment, including veterans and other priority populations. Under his operational leadership, CareerSource Palm Beach County has advanced innovative approaches to service delivery and strengthened partnerships that help connect job seekers with sustainable careers. He also represents CareerSource Palm Beach County through community partnerships and serves on local boards and advisory committees supporting workforce and community development.

LOCAL WORKFORCE DEVELOPMENT AREA 23 | MIAMI-DADE COUNTY

Serving Participants Subject to Federal Work Requirements

A proposal submitted to CareerSource Florida and FloridaCommerce

Joint Committee Meeting • August 25, 2026

Rick Beasley, Executive Director
South Florida Workforce Investment Board

OVERVIEW

A sound outcome, with a consequence

1

Referrals are increasing

A new federal law substantially expands the number of individuals required to work, train, or volunteer to retain food assistance. Those individuals are now presenting at the career centers.

2

Performance results decline

Most are not pursuing a career. They participate to satisfy a requirement, work limited hours, and exit. Averaged with all other participants, measured performance declines.

3

An adverse incentive results

Current measurement makes minimal service and non-enrollment the course of least risk to a board's performance record. Correcting that incentive is the purpose of this proposal.

The remedy: All six measures continue to be collected and reported for every participant. Only the performance expectation applied to this cohort is adjusted.

STATUTORY CHANGE

Federal law enacted in July 2025

CareerSource SOUTH FLORIDA

2.59M	1 in 8	181,000	80 hrs
Floridians receiving food assistance	of Florida's population	may lose benefits absent compliance	of work or approved activity required monthly

Individuals now subject to the work requirement

1. **Expanded age range** — Adults through age 64 are now subject to the requirement; the prior threshold was 54.
2. **Coverage of parents** — Applicable once the youngest child reaches age 14.
3. **Elimination of exemptions** — Exemptions for veterans, individuals experiencing homelessness, and former foster youth have been rescinded.

The Florida Department of Children and Families refers these individuals to the CareerSource Florida network.

THE PROBLEM

An inverted incentive, absent fault

1

PARTICIPANT IS REFERRED

Referred by DCF to satisfy a federal work requirement.

2

FULL SERVICES ARE PROVIDED

Case management, assessment, referral, and enrollment.

3

REQUIREMENT IS SATISFIED; PARTICIPANT EXITS

Part-time hours, brief duration, no credential sought.

4

MEASURED PERFORMANCE DECLINES

Outcomes are averaged with those of all participants.

CONSEQUENCE

A board that fully serves these participants records poorer measured performance than one that does not.

No board has acted improperly, and each participant received the assistance requested. The deficiency lies in the measurement.

MEASUREMENT EFFECT

The six federal performance indicators

PERFORMANCE INDICATOR	ANTICIPATED EFFECT FOR THIS COHORT	IMPACT
Median earnings	Part-time employment undertaken to satisfy a benefit requirement reduces average earnings.	High
Measurable skill gains	Short-term, activity-based participation frequently yields no documented skill gain.	High
Employment, 2nd quarter after exit	Intermittent labor force attachment reduces the predictability of this indicator.	Moderate
Employment, 4th quarter after exit	Retention is less likely where participation was compliance-driven.	Moderate
Credential attainment	Largely inapplicable, as most participants do not enter training.	Low
Effectiveness in serving employers	Neutral to favorable, given a larger pool of available entry-level workers.	Low

Each indicator continues to be collected and reported in full. No element is removed.

SCOPE OF THE REQUEST

What is requested — and what is not

WHAT IS REQUESTED

- ✓ Identify the cohort in the data so that it may be examined separately.
- ✓ Continue collecting and reporting all six indicators for every participant.
- ✓ Establish a separate, realistic target for the cohort, negotiated with USDOL.
- ✓ Report publicly on the cohort's actual outcomes, which is not done today.

WHAT IS NOT REQUESTED

- ✕ Conceal these participants or omit them from federal reporting.
- ✕ Discontinue measurement, or reduce the standard applied to the general public.
- ✕ Reduce or limit the services available to these participants.
- ✕ Avoid accountability; accountability is increased under this proposal.

BY ANALOGY. Hospitals report outcomes for every patient, including those admitted in the most serious condition, but results are assessed against expectations adjusted for case severity. No patient is excluded from the record; only the standard of comparison reflects who was treated.

Two requests; both were denied

CareerSource SOUTH FLORIDA

Illinois

Submitted March 2026

Denied June 2026

Tennessee

Submitted April 2026

Denied July 2026

Both requested identical relief: removal of these participants from federal reporting. USDOL declined, stating that it does not waive performance results as a matter of policy and that its statistical adjustment model already accounts for the population served.

THIS PRECEDENT FAVORS FLORIDA. Removal of participants from reporting is relief USDOL has consistently declined to grant, and CareerSource South Florida does not recommend seeking it. Florida's proposal is a different request.

A CONSTRUCTIVE INDICATION IN THE TENNESSEE DETERMINATION

USDOL advised Tennessee that a state may raise an anticipated increase in food-assistance referrals during the standard annual target-setting process, and encouraged it to do so. That is, in effect, an invitation to pursue the course this proposal contemplates.

DISTINGUISHING FEATURES

How this proposal differs

CareerSource SOUTH FLORIDA

	ILLINOIS AND TENNESSEE (DENIED)	THIS PROPOSAL
Population reported	Requested removal of participants from the reports.	All participants remain in the reports; only the target is adjusted.
Cohort definition	Any individual referred from food assistance — a broad and loosely defined population.	Only individuals with a formal federal work-requirement determination — narrow and verifiable.
Evidentiary basis	No data quantifying the magnitude of the effect.	A statewide data match is underway to measure the actual effect before any filing.

No filing will rest on estimates. FloridaCommerce has agreed to draw a statewide sample and construct the analysis at the state level. Should the data indicate the effect is limited, no filing should be made, and we recommend that this be stated plainly in any submission.

THE STATE CONSEQUENCE

Eighty points turn on this cohort

CareerSource SOUTH FLORIDA

FloridaCommerce Letter Grade methodology as revised for Program Year 2026-27, first reflected in the October 2027 release.

LETTER GRADE METRIC	POINTS	HOW THIS COHORT DETERMINES THE SCORE
1. Participants with Increased Earnings *target 50% → 55%*	25	**FAVORABLE** · The cohort enters with little or no prior earnings. Covered employment registers as an increase.
2. Reduction in Public Assistance *target 50% → 55%*	25	**DETERMINATIVE** · The cohort is the population being measured. These are the food-assistance recipients whose exit from benefits is scored.
3. Employment and Training Outcomes *at least 90% of negotiated federal targets*	20	**AT RISK** · Imports Florida's federal result directly. The indicators most exposed to referral volume are the ones scored here.
4. Participants in Work-Related Training *target 25% → 70%*	10	**AT RISK** · Compliance-only enrollment enters the denominator and never the numerator. Volume drives the ratio down.

THE POPULATION AT THE CENTER OF THIS PROPOSAL IS THE POPULATION THE STATE GRADE NOW MEASURES.
Fifty points move with how well these participants are served. Twenty points pass through from Florida's federal result. Ten points are placed at risk by referral volume alone.

THE OPERATIONAL ANSWER

One placement reaches six measures

What a single on-the-job training placement for a work-requirement participant produces.

25	**Metric 1 · Increased Earnings** Covered wages above a near-zero baseline register as an increase.
25	**Metric 2 · Reduction in Public Assistance** Earned income is what ends the benefit by the fourth quarter after exit.
10	**Metric 4 · Work-Related Training** On-the-job training is counted. Job search and work activity are not.
5	**Metric 5 · Continued Repeat Business** An employer transaction inside the new one-year lookback.
5	**Metric 6 · Business Penetration** A distinct employer under agreement in the measured year.
5	**Metric 7 · Completion-to-Funding Ratio** A recorded completion against the board's share of statewide funding.

THE FINANCING IS ALREADY APPROVED

The USDOL on-the-job training waiver

Up to 90 percent of training wages statewide, and up to 100 percent for employers in an Opportunity Zone or hiring an Opportunity Zone resident.

Approved through June 30, 2027 — coterminous with Program Year 2026-27, the first year measured under the revised methodology.

Twenty of the eighty points pass through from Florida's federal result and are addressed by Step One. The remaining sixty are reached locally, principally by moving these participants into work-based training rather than serving them at the front counter.

THE RECOMMENDATION

Two steps, in sequence

STEP ONE — PREFERRED

Use the established channel

Raise the anticipated increase in food-assistance referrals directly with USDOL during the regular annual process in which Florida's performance targets are established.

RATIONALE

Faster and lower in risk, and it seeks only what USDOL has already indicated a state may do. If successful, no waiver is required.

STEP TWO — CONTINGENT

File a narrow waiver request

Should the established channel prove insufficient, approve and submit a narrow waiver request to USDOL on behalf of the Governor.

RATIONALE

The cohort would then be evaluated against separately negotiated targets, and all participants remain in the reports.

These are not competing alternatives but sequential steps, and CareerSource South Florida is prepared to support either.

CANDID ASSESSMENT

Considerations the Board should weigh

- In the 2026 review cycle, USDOL denied every request it received involving workforce performance measurement — not only the two food-assistance requests, but approximately half a dozen others on unrelated grounds.
- This proposal is narrower, better evidenced, and more transparent than either denied request, and it has the advantage of having been drafted after review of both determinations.
- Approval nonetheless remains a federal judgment, and a denial would become part of the record.

FOR THAT REASON, the two-step approach is recommended in preference to filing a waiver at the outset. The initial step seeks only what USDOL has already indicated a state may do, and it entails no cost to the State.

INTENDED BENEFICIARIES

Two groups; neither is this board

CareerSource SOUTH FLORIDA

INDIVIDUALS NOW REQUIRED TO WORK TO RETAIN FOOD ASSISTANCE

Under current measurement, the course of least risk to a board's performance record is limited front-counter service and non-enrollment — no case management, no assessment, no referral to training, and no pathway out of the benefit system.

They presented because a federal rule required it; they should depart with more than a signature.

THE REMAINING 20 LOCAL WORKFORCE DEVELOPMENT BOARDS

Every local board confronts the same arithmetic, and none can resolve it independently. A statewide solution provides one definition, one data pull, one set of results, and one negotiation, rather than twenty-one separate efforts.

A remedy that protects the twenty-one boards also protects the results Florida reports to USDOL.

MIAMI-DADE SEEKS NO ADVANTAGE FOR ITSELF.
CareerSource South Florida will provide the definitions and analysis already developed, validate statewide figures against Miami-Dade experience, and serve as the pilot site in LWDA 23 at no cost to the other boards, so that the remaining twenty inherit a tested approach.

SEQUENCE OF ACTIONS

Seven steps, beginning with the Board

	ACTION	RESPONSIBLE PARTY
1	**Determine whether to adopt the approach and authorize a waiver submission**	**CareerSource Florida and FloridaCommerce**
2	Draw the statewide data and measure the actual effect	FloridaCommerce
3	Raise the matter with federal staff through the annual target-setting process	CareerSource Florida
4	If a waiver remains necessary: review by the state board and local elected officials	CareerSource Florida
5	Public comment period of not less than 30 days	CareerSource Florida
6	Submission to USDOL; determination within 90 days	The Governor, through both agencies
7	Upon approval, establish systems and train staff statewide	FloridaCommerce and the 21 local boards

Step 1 is the sole decision requested at this time; all subsequent steps rest with the State.

THE REQUEST

A single decision

1

Adopt the approach

Raise the anticipated increase in food-assistance referrals with USDOL through the annual target-setting process.

2

Authorize the contingency

Approve submission of a narrow waiver request only if the established channel proves insufficient.

3

Accept the offered support

CareerSource South Florida will provide its analysis, validate statewide figures, and serve as the pilot site.

The statute is already operative, and referrals will continue. A decision not to act is itself a decision, and its consequences appear in the performance results Florida reports.