

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 Operations	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@careersourcegfc.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@careersourceclm.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@careersourcecgc.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@careersourcecfc.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@careersourcecgc.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 Operational	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%