

CareerSource Suncoast

EXECUTIVE COMMITTEE MEETING

Thursday, October 14, 2021 - 8:00 a.m. to 9:30 a.m.

[Join Microsoft Teams Meeting](#)

1 786-600-3104

Conference ID: 407 675 565#

AGENDA

Call to Order / Introductions – Eric Troyer, Partner, Kerkering Barberio

Action Items – Eric Troyer, Chair

- Approval of September 9, 2021 Executive Committee Meeting Minutes
- Approval of Revised Support Services Policy – Robin Dawson, CFAO
- Approval of Revised Procurement Policy– Robin Dawson, CFAO
- Approval of Revised Gas Card and Bus Pass Issuance Policy– Robin Dawson, CFAO
- Approval of Client Incentive/Stipend Payments Policy– Robin Dawson, CFAO

Discussion

Transition Discussion

Public Comments/Closing Remarks – Eric Troyer, Chair; Partner, Kerkering Barberio

Adjournment

There is no meeting in November due to the Veteran's Day Holiday

Next Executive Committee Meeting is December 9, 2021

Location: TBD

**CAREERSOURCE SUNCOAST
EXECUTIVE COMMITTEE MEETING**

TEAMS Meeting
Thursday, September 9, 2021

Absent Present	<u>Committee Members</u>
P	Eric Troyer, CPA, Partner, Kerkering Barberio & Company
P	Christy Cardillo, CPA, Partner, Carr, Riggs & Ingram, LLC.
P	David Kraft, President, Vision Consulting Group
P	Rick Mosholder, Human Resource Director, Hoveround Corporation
P	Sharon Hillstrom, President/CEO, Bradenton Area Economic Development Corporation
P	Walter Spikes, Coldwell Banker Realty
A	Peter Hayes, President, Tandem Construction
	Staff Present, Ted Ehrlichman, Josh Matlock, Tracey Barta

I. Call to Order

Eric Troyer, Chair, called the meeting to order at 8:03 a.m.

II. Action Items

Approval of August 19, 2021 Executive Meeting minutes

Mr. Troyer asked for a motion to approve the August 19, 2021 meeting minutes.

Motion: Rick Mosholder

Second: Walter Spikes

The motion to approve the minutes passed unanimously.

III. Discussion

Ted Ehrlichman discussed his pending retirement plans for end of year 2021. He outlined the succession planning activities of the Leadership Team, which has been under development since about 2019. He identified COO Josh Matlock as his recommended internal candidate to assume the CEO role in January 2022, acknowledging that the decision and due diligence is in fact the purview of the Executive Committee and Board. Mr. Ehrlichman recapped the CEO review process stating that one of the discussion points last year was to develop quantitative goals for measurement of performance. As a result of those discussions, he talked about a ‘dashboarding’ project underway to measure the community wide impact, aligning it with our strategic plan, and to include real-time measurables wherever possible. Mr. Ehrlichman introduced Josh Matlock to inform the committee on the status of the new dashboard.

Mr. Matlock discussed the dashboard’s purpose is to demonstrate performance specific to scholarships, clients served, OJT, EWT and WIOA clients. The Microsoft Power BI platform will be the interactive digital system used for flexibility and user ease. A task force of board members was recommended and may be a standing committee in the future. He emphasized that tying the dashboard to our strategic goals and imperatives is ideal.

The CareerSource Suncoast staff exited the meeting, and the executive committee discussed the performance review of the President/CEO.

CEO Evaluation Summary – Eric Troyer presented the summary results of the CEO Evaluation Form that was summarized by Kathy Bouchard. The CEO Evaluation Form was completed by all seven members of the Executive Committee. Based on a weighted average scale (4 points for Exceptional, 3 points for Above Average, 2 points for Meets Expectations, and 1 point for Below Expectations), the CEO scored a 94% that consisted of 123 Exceptional responses, 31 Above Expectation responses, 5 Meets Expectations responses, and no Below Expectations responses. There were 16 Not Observed responses.

Eric Troyer shared the narrative comments from the Evaluation with the entire committee which were all overwhelmingly positive for the outstanding leadership that the CEO has provided to the Organization. A discussion followed that affirmed the positive remarks from the Evaluation and a consensus on the great job that Ted has done as the CEO in many areas.

Sharon Hillstrom commented that she would like to see the CEO evaluation changed in future years to a different format that emphasized measurable goals and performance metrics. It was agreed by the committee that we would like to see this process changed before Josh becomes CEO on January 1, 2022 in order to provide transparency to Josh on what he will be evaluated on each year.

David Kraft commented that he would like to see the Strategic Plan be the feeder for the Microsoft Power BI dashboard that is currently being developed and included as one part of the CEO evaluation annually. The thought being that the performance metrics would come from portions of the Strategic Plan that are measurable.

Annual CEO Compensation Review – Eric Troyer shared a spreadsheet prepared by Robin Dawson that included a summary of CEO salary for 12 CareerSource regions, including CareerSource Suncoast. The spreadsheet included the total WIOA, TANF and Wagner-Peyser fund allocations per region.

In addition, Eric Troyer shared a spreadsheet prepared by Robin Dawson that included historical salaries and increases of the CEO going back to 2014. After discussion, the committee determined the current CEO salary was reasonable, and no increase will be given for the last 6 months before Ted's retirement. Factors included: Based on our funding allocation, Ted was in the high range of compensation compared to other regions; In prior year, a 6% increase was agreed upon in order to bring Ted to the high range based on his strong performance as CEO.

Transition Discussion – The Executive Committee discussed general ideas around the transition of the CEO as of January 1, 2022. See below for a few items noted:

- In October 2021:
 - o Have an interview / discussion with Josh on his vision for the future.
 - o As part of this process, the Executive Committee will assess and document the qualifications and experience of Josh as part of the due diligence process.
- In November or December 2021:
 - o The Executive Committee will ask Josh to provide SMART goals that will be used to evaluate his performance and determine his annual bonus that would be based off a percentage of his salary. These goals would be reviewed and agreed upon with the Executive Committee in November or December 2021.
 - o The Executive Committee will meet to determine compensation for Josh effective January 1, 2022 when he becomes the CEO.
 - o The Executive Committee will discuss the new CEO Evaluation process with Josh.

IV. Public Comment/Closing Remarks – Eric Troyer, Chair

There were no public comments.

V. Adjournment

The next meeting is October 14, 2021. There being no further business, Chair Troyer adjourned the meeting at 9:04 a.m.

Respectfully submitted,



Ted Ehrlichman
President & CEO

CAREERSOURCE SUNCOAST
Policy and Procedures Approval
Executive Committee Summary Report
October 14, 2021

Background Information:

CareerSource Florida Administrative Policies are business rules, requirements, processes and responsibilities that expand, explain, or further specify federal or state legislation or policies developed by the Florida Department of Economic Opportunity. As CareerSource Florida (CSF) approves new Administrative and/or Strategic Policies, CareerSource Suncoast will review these policies to create or revise existing CSS policy and procedures for proper alignment. Earlier this year DEO released a memorandum requiring local boards to present all local policies to the Board of Directors for review and approval. Outlined below are four (4) CSS Board Policies for your review and approval.

Summary of Policy Changes:

Provision of Supportive Services Policy #01-21:

This policy supersedes and replaces Policy #01-04, Provision of Supportive Services to Clients in programs overseen by CareerSource Suncoast. CSS has increased the support services annual cap from \$1,000 to \$1,500 due to the cost-of-living increases and the needs of the clients served. The policy has added methods of payments to clients for increased flexibility. In addition, we have incorporated WIOA Needs Related Payments in the event funding is made available to CSS in the future. The policy allows CSS to exercise maximum flexibility and maintain the highest level of compliance with CSF Administrative Policy #109.

Purchasing and Procurement Policy #02-21:

This policy supersedes and replaces Policy #01-03 R14, Purchasing/Procurement. Changes noted in this policy are in regard to the related party contracts and procurement thresholds outlined below. Procurement thresholds were recommended by Taylor Hall Miller Parker CPAs who perform external program and financial monitoring for local workforce boards.

- Related Party Contracts
 - DEO approval required: lowered from \$25k to \$10k.
 - DEO notification only required: lowered to contracts below \$10k
- Procurement Thresholds
 - Micro Purchases of \$10k or less require no quotes – no change
 - Small purchases requiring two quotes and increased from \$17k to \$25k
 - Small purchase requiring three quotes increased from \$17,000.01-\$80k to \$25,000.01 to \$150K
 - Purchases of \$150,000.01 requires public notice, a formal RFP, and Board approval

Distribution of Gas Card/Bus Passes Policy #03-21:

This policy supersedes and replaces Policy #07-02: R8, Distribution of Gas Card/Bus Passes. The policy reflects minimal changes from the previous version. It has been updated in the new revised policy format and numbering system. As well as updated company verbiage and the frequency in which the inventory counts of cards and bus passes occur, to now be completed on a quarterly basis.

Client Incentive/Stipend Payments Policy #04-21

This is a new CSS policy. As CSS continues to apply for and receive additional funding through special grants, CSS is incorporating a policy that allows for provisions of incentive and stipend payments per federal regulations to be issued to eligible youth and/or TANF clients when allowable.

Requested Action:

A motion that the Executive Committee approve the CSS Provision of Supportive Services Policy #01-2, Purchasing and Procurement Policy# 02-21, Distribution of Gas Card/Bus Passes Policy #03-21, and Incentive/Stipend Payments Policy #04-21.

Respectfully submitted,
Robin Dawson, CFAO



Policy #01-21

Policy: Provision of Supportive Services	Page 1 of 8
Program: Workforce Innovation and Opportunity Act (WIOA), Temporary Assistance to Needy Families (TANF), Special Grant Funding	
Section: Program Operations/Finance	
Date of Issuance:	Revision Date: n/a
Distribution: CareerSource Suncoast Staff Members	

Background

The Workforce Innovation and Opportunity Act (WIOA) and Temporary Assistance to Needy Families (TANF) legislation and guidance provide for the provision of supportive services to clients enrolled in WIOA and TANF funded programs. WIOA provides local areas with the authority to make policy and administrative decisions and the flexibility to tailor their provision of services to meet needs of the local community. To ensure maximum flexibility, WIOA regulations provide local areas the discretion to provide the supportive services they deem appropriate, subject to the conditions prescribed by WIOA.

The term supportive service is defined under WIOA to mean services such as transportation, childcare, dependent care, housing, and needs-related payments that are necessary to enable an individual to participate in activities authorized under this Act that leads to employment.

Supportive services are for eligible individuals with barriers to employment. Section 133(b) defines funds allocated to the local area for dislocated workers under section 133(b)(2)(B), may be used to provide supportive services to adults and dislocated workers, respectively (A) who are participating in programs with activities authorized in paragraph (2) or (3) of subsection (c); and (B) who are unable to obtain such supportive services through other programs providing such services. Section 134(d)(2)(A) of WIOA requires that adults and dislocated workers must be program clients to receive supportive services. Support services are provided based on need and eligibility.

Section 129(vii) defines youth supportive services necessary to enable individuals to participate in the program and to assist individuals, for a period not to exceed 12 months after the completion of training, in obtaining or retaining employment, or applying for and transitioning to postsecondary education or training; and follow-up services for not less than 12 months after the completion of participation, as appropriate.

Chapter 414, F.S., sets forth provisions for receipt of Temporary Cash Assistance (TCA) and requires all individuals who do not meet TCA exemptions to participate in work or alternative plan activities. Chapter 445, F.S., consolidates the state workforce policy direction, oversight, and welfare support functions under one board, CareerSource Florida, Inc., (CSF) and designates the Department of Economic Opportunity (DEO) as the administrative, fiscal, and implementing agency for TCA work activities and supportive services, the Welfare Transition (WT) program.

Purpose

To provide guidance on the various support service/incentive options allowed under the requirements of Workforce Innovation and Opportunity Act (WIOA) Adult, Dislocated Worker, Youth, Special Grants, Temporary Assistance to Needy Families (TANF) and non-WIOA/TANF funded grants.

POLICY:

The provision of all supportive services is contingent upon the availability of funds. This statement of policy and some or all categories of supportive services under it may be cancelled or changed, in whole or in part, by CSS at any time and without notice, effective immediately or at such time as CSS may determine. Exceptions may be made to this policy by CSS when doing so is in the best interest of CSS or its Clients. No contractor or service provider of CSS is authorized to offer assistance different from or in addition to the assistance described in this policy, except as such authority may be expressly granted in this statement of policy.

Determination of Need and Eligibility for Supportive Services:

Support services may only be provided to TANF clients, adults, dislocated workers, or youth who are participating in career or training services authorized under WIOA secs. 129(c)(2) or 134(c) (2) - (3) or the TANF State Plan and who are unable to obtain support services through other programs providing such services.

CSS/Service provider program staff must ensure that the client is in need and eligible for all requested supportive services and that the supportive service is necessary for ongoing participation in the program.

As support services are not an entitlement, CSS staff must first determine a client to be in financial need of supportive services before they are provided. Supportive services should be used to address the client's barriers that have identified through the initial or objective assessment process. The plan for addressing these barriers, to include the CSS's provision of supportive services, must be documented in the client's Individual Employment Plan (IEP) or Individual Service Strategy (ISS), as appropriate.

CSS will use additional supporting documentation that demonstrates the client's financial need with the completion of the Statement of Need/Intent form.

Supportive services are to be provided on an equitable basis, and according to individual program guidelines, with priority given to those clients determined to be "most in need" to enable them to participate in approved activities related to obtaining and retaining employment and/or training. Supportive services are not to be provided to anyone without demonstrated need. Other family or community resources should be evaluated/utilized prior to authorization. Priority of Service guidelines must be followed when issuing support services.

In addition, CSS program staff must ensure clients are provided accurate information about the availability of supportive services in Manatee and Sarasota. When support services are available from other community organizations in the client's resident county, a referral to the organization must occur and be documented in the Management Information System (MIS) of the program they are participating in.

CSS staff will utilize the Crosswalk agency to agency referral system to identify appropriate community-based services available for clients' needs and execute an electronic referral in the Crosswalk portal. In addition, the 2-1-1 Contact Center resource for Manatee and Sarasota County can be found at: [Suncoast Cares · Get Connected. Get Help \(gs-humanservices.org\)](http://SuncoastCares.org).

Both resources should be reviewed for availability of other resources in Manatee and Sarasota County prior to using CSS support service funds. The only exception to this is when the client has an urgent need for supportive service and referral to an outside organization can create a hardship for the client. These exceptions must be approved by Career Services Managers and documented in the clients record in the state MIS.

Availability of supportive services will be based on careful consideration of the region's funding limitations and the availability of community resources.

Clients must meet the following eligibility for receipt of supportive services:

- Be determined eligible and enrolled in one or more workforce or community funded programs operated by CSS;
- Demonstrate and document a need that will prevent them from participating in the program, accepting employment, or retaining employment;
- Document that the client is unable to obtain support services through other community- based programs in Manatee and Sarasota County providing such services;
- Complete a Statement of Need/Intent form which documents the specific supportive service being requested, need/eligibility for service along with allowable reimbursement amount per category of service.

Allowable Support Services:

Based on individual assessment and availability of funds, supportive services may be awarded to eligible program clients. Supportive services are intended to enable an individual to participate in workforce funded programs and activities and to secure and retain employment. Supportive services are provided on in an individual's need as determined by the CSS Career Coach working with the client and may include:

- Assistance with transportation
- Assistance with childcare and dependent care
- Assistance with housing
- Assistance with educational testing
- Reasonable accommodations for individuals with disabilities
- Referrals to health care
- Assistance with uniforms or other appropriate work attire and work-related tools
- Payments and fees for employment and training-related applications, tests, certifications, background checks, drug screening, or other costs to comply with employers' hiring conditions, or other expenses necessary to complete work or alternative requirement plan activities (TANF only), such as paying the fee for a medical form certifying disability or other medical condition to be completed by a physician licensed under Florida Statute Chapter 458 or 459

Note: CSS does not pay deposits or other expenses that may be refunded directly to the client. Determination of the need for “other services” will be reviewed and approved by the Program Director.

Childcare Services:

If an individual is eligible for childcare services funded through the Early Learning Coalitions (ELC) of either county in the region, these childcare funds must be used first. Documentation of the referral sent to the Early learning Coalition is required.

- Childcare will only be provided/reimbursed for those days when the client is engaged in allowable employment and training activities, including work experience. If the client is absent from employment or training for more than 50% of the scheduled training time for the day, no childcare will be reimbursed for that day. Any exceptions due to extenuating circumstances require the approval of the program supervisor and must be documented.
- Childcare during school holidays or breaks will not be paid unless required by the provider to hold the slot open; however, payment to hold slot during the school closure cannot exceed 3 weeks in duration (15 days).
- Client and provider must sign a childcare payment agreement and submit a W-9 form prior to incurring childcare expenses.
- Childcare will only be paid to an ELC approved childcare provider only.
- If the client is in training but the child is not in day care for more than 2 weeks, other than for school holidays or breaks, CSS cannot pay the childcare for the remainder of the month.
- Based on program funding availability, and the supervisor's approval, program clients needing basic skills remediation or GED preparation in the CSS Learning Labs are eligible to receive childcare supportive services in accordance with the following criteria:
 - Additionally, WT clients must meet all other work activity requirements.
 - The need for continuation of childcare must be reviewed monthly. Attendance and childcare invoices are to be handled monthly to ensure expenditure levels can be monitored.
 - Upon completion of remedial/GED lab activities, provision of childcare will be re-determined in conjunction with work activity requirements.
 - All payment requests for childcare will include a copy of the attendance record for that month.
 - Parent fees remaining from their ELC childcare costs cannot be paid with TANF funding.

WT Transitional Support Services:

Transitional support services may be used to assist former WT clients who are working or actively seeking employment with training and education to upgrade their skills. Transitional support services are not an entitlement and are subject to the availability of funds. Transitional support services may include the following:

- 1) Transitional transportation assistance: If funds are available, former TCA clients with family income that does not exceed 200% of the federal poverty level may receive transitional transportation for up to two years to sustain employment or educational opportunities that

promote job retention and upward mobility in accordance with s. 445.031, F.S. CSS will be required to complete an income calculation worksheet to verify the client does not exceed income limitations.

- 2) Transitional education or training: In accordance with s. 445.030, F.S., former recipients of TCA who are working or actively seeking employment in continuing their training and upgrading their skills are eligible to receive employment-related education, training, and related support services, such as childcare and transportation, to continue training or to upgrade skills for up to two years after the family no longer receives assistance. If funds are insufficient for the services, the SWDB may limit or otherwise prioritize transitional education and training
- 3) Transitional childcare: Can be offered to clients who lose eligibility for TCA due to earned income or who opt to receive an up-front diversion payment are eligible to receive transitional childcare (TCC) while they continue employment, and/or improve their employment prospects through Transitional Education in accordance with s. 445.032 F.S., for up to two years if the family's income does not exceed 200% of the federal poverty level and funds are available.

Note: Supportive services must not be used as incentive payments. Incentive payments are allowable for WIOA Youth and TANF clients only and, unlike supportive services, are permitted for recognition of achievements directly tied to training activities and work experiences. WIOA AD/DW program clients are **not** eligible for incentive payments. In regards, to special grant funding for projects being administered through CSS, terms of the grant should be reviewed to determine the allowability/limitations of incentive payments.

Needs Related Payments (WIOA Only):

Needs-related payments are a supportive service that provides financial assistance to participants to enable their participation in training. Unlike other supportive services, LWDBs may only provide needs-related payments to eligible WIOA participants who are enrolled in training or accepted in a training program that will begin within 30 calendar days.

Eligibility for Adults, Dislocated Workers and Out-of-School Youth (OSY):

- Adults and OSY (ages 18-24) must:
 - Be unemployed;
 - Not qualify for, or have ceased qualifying for, Reemployment Assistance(RA) benefits; and
 - Be enrolled in training services authorized under WIOA sec. 134(c) (3)
- Dislocated Workers
 - Have ceased to qualify for RA benefits or Trade Readjustment Allowance (TRA) under the Trade Adjustment Assistance (TAA) program; and
 - Be enrolled in training services authorized under WIOA sec. 134(c)(3) by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or, if later, by the end of the eighth week after the worker is informed that a short-term layoff will exceed six months; or
 - Be unemployed, deemed ineligible for RA benefits or TRA under the TAA program, and be enrolled in training services authorized under WIOA sec. 134(c)(3).

Payment Levels:

- Adults and OSY (ages 18-24)
 - Payment levels will be established within the CSS local operating procedures.
 - For statewide projects, the payment level will be established by the State Workforce

Development Board.

- Dislocated Workers the payment level of needs-related payments must not exceed the greater of:
 - The applicable weekly level of RA benefits for participants who were eligible for RA benefits; or
 - The poverty level for an equivalent period, for participants who did not qualify for unemployment compensation because of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income.

Supportive Service Limitations:

CSS has established limits on the provision of support services issued to clients.

1. CSS Supportive Services cap is established as a maximum of \$1500 per Program Year (PY) per client. CSS/Service Provider staff will track supportive service amounts per PY to ensure that established caps are not exceeded.
2. The Chief Executive Officer may waive the \$1500 limit, up to a maximum of \$2500 limit if circumstances warrant. All waivers' must be documented in the client's case file and clients record in the state MIS with case notes.

Payment Methods for Supportive Services:

CareerSource Florida's Administrative Policy – 109 Supportive Service and Needs- Related Payments allows LWDBs to use a payment methodology that allows them to exercise the highest level of oversight, accountability, and internal controls to ensure the supportive service provided is used for the intended purpose. CSS is required to ensure that supportive services are provided in the actual amount of the client's documented need.

CSS may use a variety of payment methods for the provision of supportive services, depending upon the type of supportive service provided. As examples, assistance with transportation (e.g., assisting a client with fuel costs) may be provided in the form of vendor-specific gas cards or direct deposit. Assistance with uniforms may be paid in the form of a voucher/direct payment to the selected vendor (in alignment with a quote or other form of cost estimate documentation).

All supportive services will be issued in accordance with CSS Supportive Service Local Operating Procedures that outlines the specific categories of supportive services allowable, description of each, and maximum reimbursement rate.

Reloadable or Prepaid Debit or Gift Cards:

The use of reloadable or prepaid debit or gift cards (e.g., Visa, vendor-specific or gas cards), or bus passes may be used for payment of support services when CSS:

- Has a written local operating procedure (LOP) pertaining to separation of duties and internal controls for the secure storage, distribution and use of such cards.
- Ensures a physical inventory is performed, reconciled, and reviewed timely by finance (to include establishing a designated frequency for such reviews to occur no less than quarterly); and
- Obtains supporting documentation before or after the use of such cards to ensure the card was used for the documented need and intended purpose. Such documentation could include, but is not limited to, receipts for actual goods/services purchased or mileage calculations (if the assistance is transportation related).

Direct Deposit:

CSS can issue support services through the form of direct deposit with authorization from the client. The client will be required to complete a CareerSource Suncoast Direct Deposit Authorization form and provide a copy of a voided check or completed direct deposit form from their bank. Direct deposits can be issued for all support services that go directly to the client, including reimbursements.

Note: Direct deposits cannot go to the client for rental/housing assistance, daycare, and any support service that must be paid directly to the vendor.

Reimbursement:

Supportive services may also be paid to clients in the form of reimbursements. Proof of payment for the specific support service (i.e., gas receipts, rideshare receipts, uniform receipts, etc.) is required for reimbursement issuance.

Direct Vendor Payment:

CSS may opt to use the vendor-specific approach. The support services payment is made from CSS directly to the vendor for the support service needed. CSS will use established vendors to issue a voucher on behalf of the client in alignment with a quote or other form of cost estimate documentation for the items needed (i.e., uniforms, tools, shoes). The CSS client will be issued the items outlined on the voucher within the cost limits and the vendor will invoice CSS.

If at any time CSS opts to procure supportive services directly from a third-party vendor the LWDB will follow all federal, state, and local procurement practices.

Documentation:

As supportive services are paid directly to or on behalf of eligible clients, CSS is required to maintain documentation sufficient to satisfy the requirements of the CareerSource Florida Administrative Policy-109, Supportive Services and Needs-Related Payments, to ensure that funds are allowable and used for the intended purpose. At a minimum, documentation must include:

1. Determination of the client's need for support services included in the client's Career Plan/IEP/ISS.
2. Complete a Statement of Need/Intent form signed by the client which documents the specific supportive service need and validates eligibility for service.
3. Case notes entered in the client record in the state MIS including the following elements
 - a. The clients need for support services
 - b. Client's eligibility
 - c. Community resources were not available
 - d. All referrals to community organizations made
 - e. Exception for not making a referral due to urgency of need to prevent a hardship
 - f. Support Service approval
4. Records of vouchers issued and payments to vendors. Including date of receipt, the amount of payment, check/voucher number, validated by signature of the client.
 - a. For clients enrolled in training, proof/verification of attendance in training programs in the form of attendance sheets is required.
5. Reimbursements: Documentation showing the specific type of need that was reimbursed or vendor-specific issued and proof of payment by the client. Supporting documents such as Gazelle Vouchers/Check Requests, payroll receipts, redeemed checks or vouchers paying for the goods or services, travel log.
6. If childcare or dependent care assistance is provided, documentation of other resources explored must be provide such as: community-based referrals, Early Learning Coalition referrals, etc.

7. CSS must enter the appropriate service codes in the state MIS when clients are either referred to or provided supportive services. The [Employ Florida Service Code Guide](#) outlines the various service code titles and definitions as well as the documentation/case note requirements. Any additional MISs utilized for program participation will be outlined in the appropriate LOP.

Monitoring:

Programmatic monitoring will be conducted throughout the program year by our internal Program Monitors under the direction of the CSS Director, Regional Alignment & Programs Development. This will include a formal review conducted by a third-Party Programmatic Monitoring vendor of client records that include supportive service issuance, activities and case noting for all programmatic funding to comply with federal, state, and local policies and procedures.

Policy Exceptions:

Any exceptions to the above stated policy or any part thereof, must be documented and approved by the CareerSource Suncoast CEO or their designee for consideration.

When CSS receives any special grant funding for projects being administered through CSS, terms of the grant should be reviewed to determine the allowability/limitations of support services.

Determination of the need for “other services” will be reviewed and approved by the respective CSS Manager.

Attachments:

- None

Authority

- Workforce Innovation and Opportunity Act, Public Law (WIOA) Sections [3\(59\)](#); [106\(c\)\(1\)\(F\)](#); [133\(b\)\(2\)\(B\)](#); [133\(b\)\(3\)](#); [134\(c\)\(3\)](#); [134\(d\)\(3\)](#); [134\(d\)\(4\)](#); [134\(c\)\(1\)\(A\)\(ii\)](#); [134\(c\)\(1\)\(A\)\(iii\)](#)
- [20 Code of Federal Regulations \(CFR\) Subpart G](#); [680.970](#); [681.570](#); [681.640](#)
- Training and Employment Guidance Letter (TEGL) [19-16](#) and [21-16](#)
- CareerSource Florida Administrative Policy 109 [adminpol109_wioa_supportiveservicesandneedsrelatedpayments---final-02-22-21.pdf \(floridajobs.org\)](#)
- Department of Children and Families TANF State Plan October 1,2020- September 30,2023 [TANF-Plan.pdf \(myflfamilies.com\)](#)

Supersession:

- Supersedes Policy #01-04, Provision of Supportive Services to Clients in Programs Overseen by CareerSource Suncoast dated 02/10/2014.

Inquiries:

Any questions about this policy should be directed to the CEO, COO, CFAO and/or their designee.



Policy #02-21

Policy: Purchasing and Procurement	Page 1 of 9
Program: Workforce Innovation and Opportunity Act (WIOA), Temporary Assistance to Needy Families (TANF), Supplemental Nutritional Assistance Program (SNAP), and Wagner-Peyser (WP)	
Section: Finance	
Date of Issuance:	Revision Date: n/a
Distribution: CareerSource Suncoast Staff Members	

Background

The Office of Management and Budget (OMB) regulation 2 CFR 200, known as the Uniform Guidance, establishes principles and standards for determining allowable activities and costs for federal awards carried out through grants, cost reimbursement contracts, and other agreements.

Purpose

To ensure the purchase of goods and services is conducted in an open manner with competitive pricing, proper management, and oversight controls to ensure Finance accountability and efficiency and to prevent waste, fraud and abuse and avoid acquisition of unnecessary or duplicative items.

POLICY:

General Procurement Standards

CareerSource Suncoast (CSS) will comply with federal and state laws and regulations pertinent to purchasing and procurement and these procurement procedures shall be a reflection of those laws and regulations in accordance with 2 CFR 200.318/45 & CFR 75.327 (general procurement standards). All purchasing is controlled through this policy and procedure and is approved by the President/CEO or the Chief Operating Officer. Prior approval must be obtained before items or services are purchased, unless otherwise stipulated.

These policies and procedures will also apply to all CSS subrecipients purchasing goods and services with funds awarded by CSS, except for governmental units subject to their own procurement guidelines or subrecipients that have submitted their procurement guidelines to CSS for review and have received CSS approval.

Procurements necessary for the day-to-day operation of CSS and the one-stop career centers will be approved by the CSS President/CEO or the Chief Operating Officer (COO) as described herein. The CSS CEO/COO are authorized to approve contracts for goods, services, or training, including (among others) on-the-job training, work experience, customized training, and employed/incumbent worker training, for amounts of \$150,000.00 or less. Contracts for more than \$150,000.00 require approval by a majority of the Board.

Contracts involving a CSS Board member and either a relative (as defined in s. 112.3143(1)(c)) of a local board member or of an employee of the local board, or an employee of the local board or their companies are considered related party contracts. Related party contracts of \$150,000.00 or less **must** be approved by a minimum 2/3 vote of the Board, irrespective of the amount.

Related Party Contracts that are \$10,000 or greater must be submitted to the Department of Economic Opportunity (DEO) for approval; DEO must approve and certify the contract prior to its executions and any expenditures occurring in the contract's fiscal year.

All related party contracts under \$10,000 do not require prior approval by DEO. However, such contracts must be approved by the Board prior to execution and reported to DEO to CareerSource Florida via email at: WorkforceContract.Review@deo.myflorida.com within 30 days of approval by the local board.

Where appropriate, an analysis shall be made of lease and purchase alternatives to determine which would be the most economical and practical procurement. The analysis should only be made when both lease and purchase alternatives are available.

To foster greater economy and efficiency, CareerSource Suncoast may enter into state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services.

CareerSource Suncoast shall comply with the procurement standards in 2 CFR 200.318 - 200.326 when procuring property and services and maintain sufficient oversight to ensure that contractors (vendors) perform in accordance with the terms, conditions, and specification of their contracts or purchase orders. Contracts shall only be awarded to responsible contractors (vendors) who possess the ability to perform successfully under the terms of the procurement. Consideration will be given to such matters as integrity, compliance with public policy, past performance, and financial and technical resources.

All procurement transactions shall be conducted in a manner providing full and open competition as described in OMB Uniform Guidance Part 200.319.

All audit services are required to go out for public notice and request for proposal (RFP). Contracted audit services can be no more than five years and then must follow Florida Statutes and be competitively re-procured. The previous audit firm may be awarded the new contract for audit services through the competitive procurement if the lead partner of the audit firm had not been engaged as the lead partner with the Board for any of the previous five years.

Funds expended for events must be compliant with 2 CFR 200.421, and DEO's Guidance on Use of Funds for the Purchase of Outreach/Informational Items (FG-OGM-84). Documentation must be retained to support the cost of the funds expended and must demonstrate that the costs are reasonable and necessary to connect individuals to employment and training services.

Ethical Considerations in Procurement

CSS has adopted a code of conduct related to the conduct of procurements. CSS Board of Directors and staff must comply with state and federal rules and regulations governing the conflict of interest and appearance of conflict of interest in the procurement process.

No CSS member or officer, or employee or authorized agent of CSS shall cast a vote, nor participate in any decision-making capacity, on the provision of services by such member (or any organization which that member directly represents), or on any matter which would provide any direct financial benefit to the appropriate individual or organization, except when that interest has been placed in a disclosed blind trust.

A conflict of interest is present if the individual, any member of the individual's immediate family, the individual's business partner, or an organization that employs, or is about to employ, any of these individuals has financial or other interest in the firm or organization selected for award. CSS staff and Board members making the award will neither solicit nor accept gratuities, favors, or anything of monetary value from awardees, potential awardees, or parties to sub-agreements. Unsolicited gift items of nominal intrinsic value are excluded from this definition. Any potential conflict, whether real or apparent, must be disclosed to the CSS President/CEO, or, in the case of a Board member, to the Board. Such disclosure must be documented and filed with the procurement file.

In accordance with CareerSource Florida Inc.'s guidance (*Modifications to WorkforceFlorida Inc. Contracting Policy*, May 2012) (CareerSource Florida Contract Guidance), CSS will not enter into a contract with one of its own Board members, with an organization represented by its own Board member or with any entity where a Board member has any relationship with the contracting vendor/subrecipient.

At the Board's discretion, the following may be exempted from the above paragraph:

- A. A contract with an agency (as defined in Florida Statute 112.312[2], including, but not limited to, those statutorily required to be board members) when said agency is represented by a Board member and said member does not personally benefit financially from such contracts;
- B. A contract with a Board member or a vendor (when a Board member has any relationship with the contracting vendor) when the contract relates to the member's appointment to the board under Pub. L. No. 113-128, ("Workforce Innovation and Opportunity Act").
- C. A contract with a member receiving a grant for workforce services under Federal, State, or other governmental workforce programs.
- D. A contract between a Board and a Board member which is not exempted under paragraphs (a), (b) or (c) where the board documents exceptional circumstances and/or need and the Board member does not personally benefit financially from the contract. Based upon criteria developed by CareerSource Florida Inc., the Florida Department of Economic Opportunity shall review the Board's documentation and assure compliance.

Each contract which is exempted from the general prohibition in the paragraph above must meet the requirements set forth in WIOA "conflict of interest" provisions.

In addition, CareerSource Suncoast will use the CareerSource Florida Board approved definition of "employee" as it relates to conflict of interest as follows:

"Employee" means a person employed full-time by a regional workforce board working in a managerial or supervisory capacity or who has direct contract management or direct fiscal involvement with the contract voted on by the board."

Regardless of the type of procurement, if CSS desires to enter into a contract with an organization or individual represented on the Board of Directors, the contract must be approved by a two-thirds vote of the Board members present, a quorum having been established, and the Board member who could benefit financially from the transaction must declare a conflict and abstain from voting on the contract. The Board shall comply with section 445.007(11), Florida Statutes. The Board and its employees

must annually disclose to DEO's financial monitors any conflicts of interest that may arise during the upcoming year or that did arise in the current year and was not previously disclosed.

- Prior to entering into any Related Party Contract, the proposed Related Party Contract must be brought before the Board for consideration and approval. The Board shall ensure that the Board member with the conflict abstains from any vote regarding the Related Party Contract.
- If the disclosure was not made prior to the meeting because the conflict was unknown prior to the meeting, the Board shall ensure that disclosure is made at the next possible meeting after knowledge of the conflict becomes available.

Board members must disclose any such conflicts in accordance with the requirements stated above and complete appropriate conflict-of-interest forms.

No individual in a decision-making capacity or involved in the writing of specifications or administration of the procurement process, shall engage in any activity, including the participation in the selection, award, or administration of a subgrant or contract supported by its funds, if a conflict of interest, real or apparent, would be involved.

Therefore, Financial and Organizational Disclosure Statements must be completed by all CSS board members and the CSS President/CEO. Within 30 days of their appointment or employment, and again annually, on January 1st, and at any other time that organizational affiliations change, such individuals will be notified that they must complete and file the above-mentioned disclosure form.

Procurement Guidelines & Thresholds

Methods of Procurement:

CareerSource Suncoast shall use one of the following methods of procurement:

- A. Micro-purchases (threshold limit set by the authority of the Federal Acquisition Regulations (FAR) as 48 CFR Subpart 2.1 and the Uniform Guidance) of supplies or services, the aggregate dollar amount not to exceed \$10,000 per program year may be awarded without solicitation of competitive quotations, if the price is determined to be reasonable based on research, experience, purchase history, or other information and is documented accordingly. To the maximum extent practicable, CSS shall distribute micro-purchases equitable among qualified suppliers.
- B. Small Purchases from \$10,000.01 to \$25,000.00 shall require minimum of two written quotes. If the lowest price item is not purchased, a written justification will be noted on the electronic purchase requisition. Exceptions to this threshold are when purchases are made during an emergency or are sole sourced. Sole source documentation is required in accordance with 2 CFR 200.
- C. Small Purchases from \$25,000.01 to \$150,000 shall require a minimum of three written quotes. If the lowest price item is not purchased, a written justification will be noted on the electronic purchase requisition. Exceptions to this threshold are when purchases are made during an emergency or are sole sourced. Sole source documentation is required in accordance with 2 CFR 200.
- D. Purchases of \$150,000.01 or More shall be publicly noticed on CSS website. Formal request for proposals (RFP), bids, or quotes shall be issued. The Board will make the final procurement decisions for RFPs.
- E. An annual price analysis to document reasonableness may be conducted for goods and services ordered on an ongoing basis. In lieu of a price comparison for each purchase, an annual price analysis shall be conducted for those goods and services purchased with regularity to operate the organization. An annual estimate shall be made of the value of the

items to be ordered, and the proper procurement in accordance with this section shall be completed based upon the aggregate amount estimated to be necessary.

- F. Purchases made based upon prices established by a state contract administered by the State of Florida, Department of Management Services or CareerSource Florida, will not require further procurement actions. When making a purchase based upon a price established by a state contract or CareerSource FL, the contract number, year, and title will be referenced on the electronic purchase requisition.

Noncompetitive procurement or sole source:

Will be considered in the following situations:

- A. On-the-Job Training (OJT), customized training, and training provided to customers from the approved training vendor list

- B. It may also be used in situations where it is infeasible to follow small purchase or competitive procurement procedures, **and**:
 - i. the goods or services' aggregate cost does not exceed the micro-purchase threshold;
 - ii. The goods or services are available only from a single source;
 - iii. There is a public exigency or emergency that does not permit delay;
 - iv. After solicitation of a number of sources, competition is determined inadequate;
 - v. The awarding agency authorizes noncompetitive proposals.

- C. State policy allows the use of noncompetitive procurement and has determined that it is infeasible to competitively procure utilities, thus allowing noncompetitive procurement of such.
 - i. A failure to properly plan for procurement is not an emergency under these rules.
 - ii. In the event of an exigency or emergency, a competitive procurement must be initiated within two years after the purchase or procurement. In other instances where sole-source procurement was used for a purchase, an attempt to solicit the goods or services through competitive procurement must be initiated within three years after the procurement.
 - iii. Staff shall complete a justification for noncompetitive procurement and an appropriate cost analysis to assure reasonableness, utilizing the appropriate format.

Simplified Acquisition Threshold

Only those purchases exceeding the Simplified Acquisition Threshold of \$250,000 shall require some form of cost price analysis which shall be documented. Documentation shall be retained in the accounts payable files along with any invoices received and payments made.

The method and degree of analysis is dependent on the facts surrounding the particular procurement situation and independent estimates shall be made before receiving bids or proposals.

Items Requiring State Approval Prior to Purchase

The Finance Department will submit annually a request to the State of Florida to purchase items requiring prior grantor approval in accordance with 2 CFR 200 on the appropriate form pursuant to CareerSource Florida's Administrative Policy Number 87 (*Prior Approval Administrative Policy for Regional Workforce Boards*). For the remaining items that require prior approval, and which are not on the annual form, CSS will complete and submit to DEO the "Prior Approval Request Form" prior to incurring expenditures. The request for approval must be followed by an appropriate procurement.

- A. The Board will obtain prior written approval from DEO prior to purchasing any information technology resource or conducting any activity that will, in any way, access DEO data and DEO-owned systems.

Additional Purchasing Requirements

- B. At this time, purchase of food and/or beverages with federal or state funds are not allowed under Florida Statute 445.007 except as expressly authorized by state law. Consult with your immediate supervisor when such issues arise.
- C. In determining approval for dues or memberships, the requestor must first determine if any portion of those dues or membership dollars goes toward lobbying effort and provide documentation from entity. Federal and state funds cannot be used for lobbying, and any percentage of dues or memberships must either be short paid, or paid with non-federal, non-state funds.
- D. CareerSource Suncoast shall take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible and will adhere to OMB Uniform Guidance Part 200.321.
- E. CSS, when appropriate, will seek goods and services through the Prison Rehabilitative Industries and Diversified Enterprises, Inc. (PRIDE), and from RESPECT of Florida (products and services produced by individuals with disabilities).
- F. CSS shall provide a preference to the extent permitted by law, to maximize use of goods, products, and materials produced in the United States when procuring goods and services under Federal awards.
- G. Awards will not be made to a debarred or suspended party. This is required to be verified for all sub-recipient contracts and for vendor contracts greater than or equal to \$25,000, or procurements of Federally- required audit services in any amount.
- H. If SCC enters into a contract in the amount of \$1,000,000 or more, in accordance with the requirements of section 287.135, Florida Statutes, SCC will obtain a certification that the contractor is not listed on the Scrutinized Companies that Boycott Israel List or is engaged in a boycott of Israel, the Scrutinized Companies with Activities in Sudan List, the Scrutinized Companies with Activities in the Iran Petroleum Energy Sector List, engaged in business operations in Cuba or Syria, or meets the conditions for exemption as provided in section 287.135(4), Florida Statutes. These lists are created pursuant to sections 215.4725 and 215.473, Florida Statutes.
- I. CSS will not accept responses to procurement solicitations from, or award a contract to, any entity that appears on the discriminatory vendor list described in section 287.134, Florida Statutes.
- J. All procurement contracts and other transactions between CSS and units of state or local governments using WIOA funds must be conducted only on a cost reimbursement basis. No provision for profit is allowed. Any excess of revenue over costs incurred for services provided is included in program income.
- K. CSS will negotiate profit as a separate element of the price for each contract in which there is no price competition and, in all cases, where cost analysis is performed.
- L. Costs or prices based on estimated costs for contracts are negotiated using the Federal cost principals.
- M. The cost plus a percentage of cost or percentage of construction cost methods of contracting will not be used.
- N. Time and materials type contracts may be used only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk.

SUBRECIPIENT OR VENDOR/CONTRACTOR DETERMINATIONS

Organization staff will evaluate the substance of each relationship to determine whether features represent a subrecipient or vendor/contractor relationship. A Subrecipient and Vendor/Contractor Determination Checklist will be completed by Organization staff in distinguishing between subrecipient and vendor/contractor relationships. Characteristics that are indicative of a subrecipient or contractor relationship are outlined in 2 CFR 200.331.

Process:

Purchase Requisitions (PR) / Purchase Orders (PO):

Microix will be used for requesting and placing orders for: office supplies; office furniture; equipment; intangible purchases, such as consultant's fees, subscriptions, memberships, meeting registrations, repairs, meeting expenses (i.e., room charges), booth fees, etc.

Requesting staff will prepare an electronic Purchase Requisition following all rules outlined above in Section III Procurement Guidelines & Thresholds. All required back up must be attached to the electronic PR, which must be approved through the appropriate Microix system workflow assigned to the requesting staff. The final approval of the workflow will be made by either the President/CEO or Chief Operating Officer. Once that approval is made, Microix recognizes the purchase requisition as a purchase order. A notification of the final approval will be automatically emailed from the Microix system to the Requestor to purchase the items.

When the President/CEO and Chief Operating Officer are both absent, the Chief Financial and Administrative Officer may approve electronic emergency Purchase Requisitions to avoid interruption in services. Should all executive approvers be absent, and an emergency situation arises, a verbal approval will suffice and must be notated in the electronic Purchase Requisition.

The Requestor will forward a copy of the invoice and delivery ticket (signed and dated) referencing the PO number to Finance for payment.

Office Supplies and Printer Toner

Designated Requestor staff assigned with the task of maintaining supply inventory will secure the approval of office supply purchases from their respective supervisors and will then place an online order on hold with the appropriate office supplies store. The Requestor shall then complete an electronic Purchase Requisition, attaching a copy of the order cart. Once electronically assigned a PR/PO number in Microix, the Requestor must reference the PR/PO number in the online office supplies order. When receipt of final approval is received via email, the Requestor must notify Finance of the final approval, who shall then review and release the office supplies order. Once the supplies and invoice are received, the delivery ticket (signed and dated) will be forwarded to Finance for payment. An employee other than the employee who requested the good or service must receive the goods and services to verify the proper count, as well as sign and date the packing slip.

Equipment and Other Capital Expenditures

All expenditures in this category that are \$5,000 or more per item, require individual prior approval by the State, per CareerSource Florida Administrative Policy #87 "Prior Approval Administrative Policy for Local Workforce Development Boards", dated 1-17-17. Any plans for such expenditures should be reviewed in advance with the Chief Financial and Administrative Officer, who will coordinate prior approval process with DEO.

Emergency Facility and Equipment Maintenance

Emergency circumstances for maintenance and repair of facilities and/or equipment may be handled through the Chief Financial and Administrative Officer or Chief Operating Officer without the need for prior approval from the President/CEO.

Service Provider Procurement

With the passage of Florida Senate Bill 428, 2008, Sections 445.004 and 445.007, Florida Statutes; Workforce Innovation & Opportunity Act (WIOA) of 2014 and approval by the Governor, CareerSource Suncoast (CSS) now provides direct services for many programs. CSS reserves the right to procure service providers when appropriate.

CSS staff may periodically issue a Request for Proposals (RFP) for the provision of services to its customers, such as outreach and recruitment, intake and eligibility determination, assessment, case management, core services, intensive services, training services, job placement, and other services.

The procurement will be advertised, and prospective service providers must submit a proposal by the RFP due date which addresses all aspects of the request, such as the services to be provided, target groups to be served, cost, staffing, fiscal and programmatic experience, accountability in operating federal grants and programs, and demonstrated ability to meet the required performance. Proper consideration shall be given to community-based and faith-based organizations (CBO/FBO) and minority-owned businesses, including women's organizations.

When developing the scope of work for the RFP, CSS will take into consideration the updates to 2 CFR 200 that focus on improving the selection process and shifting the focus to the balance between performance and compliance. Specifically, 2 CFR 200 states that the program outlined in a scope of work must be designed with clear goals and objectives that facilitate the delivery of meaningful results. Program performance should be measured based on the goals and objectives developed during program planning. The program must align with the strategic goals and objectives within the Federal awarding agency's performance plan and should support that awarding agency's performance measurement, management, and reporting.

Additionally, when reviewing RFPs CSS will select the recipients most likely to be successful in delivering results based on program objectives by performing a risk evaluation. A risk evaluation may consider factors such as:

- Financial stability
- Quality of management systems
- History of performance
- Audit reports and findings, and
- Ability to effectively implement requirements

All proposals submitted will be reviewed by staff for responsiveness to the RFP requirements. In addition, staff will analyze costs for each responsive proposal. Responsive proposals and cost analysis will be provided to the RFP Review Committee made up of Board members, staff, and community members. Each reviewer will evaluate the proposals according to predetermined criteria and award each proposal a numerical score. Proposals will then be ranked by each reviewer, and those individual rankings will be combined into a Committee Report, which will be presented to the CSS Executive Committee for review and selection/approval of service provider(s) for recommendation to the full Board for final approval.

The Executive Committee may examine the essential details of each proposal and will consider the ranking given by the Review Panel. The Executive Committee may request oral presentations from any or all proposers. The Committee is not bound by the preliminary ranking and may change the order that the Review Panel has ranked the proposals. The Executive Committee, based on its own evaluation, shall make a recommendation to the full Board.

The Board will consider the recommendation of the Executive Committee and may move to (a) fund, (b) table for later consideration, or (c) not fund the proposal. The approval of a proposal by the Board provides approval for only the specific service provider(s). It does not provide approval for any proposed unit cost(s) or for any specific terms and conditions. The Chief Financial Officer will negotiate these details after a full review and discussion of the proposed services and costs with representatives of the proposer.

Protest Procedure

Unsuccessful proposers will be notified in writing within ten calendar (10) days of the final award decision. Proposers who are not awarded contracts may appeal the contract awarding process by submitting a written protest to the President/CEO, which clearly states the reasons for the appeal. This written protest must be received at the board office within ten (10) calendar days of notice. The President/CEO will review the protest and compare it to CSS's established procurement/evaluation procedures to decide on the appropriate action. If it is determined that the action taken in awarding contracts was appropriate and justifiable, the President/CEO will notify the protestor of the decision to deny the appeal within a 10-day period.

If it is determined that the letting of contracts was not in compliance with established procedures, or that other oversights were involved, the President/CEO will notify the protestor, and the proposal process will be re-initialized. Appropriate measures will be taken to ensure that established procedures will be followed, and contracts will be let in compliance with those procedures and all applicable laws.

In cases where the protestor is not satisfied with the President/CEO's determination, the Executive Committee may serve as the Appeals Board. The Executive Committee will follow the procedures outlined above. The Executive Committee will review the case and make a final determination. The President/CEO or Executive Committee will hear no further appeals.

Attachments:

- None

Authority

- DEO Memorandum: Reimagining Education and Career Help Act (House Bill 1507) and Related Party Contracts http://www.floridajobs.org/docs/default-source/lwdb-resources/policy-and-guidance/memos/2021-memoranda/memo_hb1507andrelatedpartycontracts.pdf?sfvrsn=9c004eb0_2
- CareerSource Florida Administrative Policy 87 [federal grant award-priorapprovaladministrativepolicyrwb.pdf](http://www.floridajobs.org/docs/default-source/priorapprovaladministrativepolicyrwb.pdf) (floridajobs.org)
- Department of Labor Employment & Training Administration (ETA), WIOA Final Rules • [2 CFR Part 200](http://www.floridajobs.org/docs/default-source/cfr-part-200-cfr-part-2900) • [2 CFR Part 2900](http://www.floridajobs.org/docs/default-source/cfr-part-200-cfr-part-2900)
- DEO Guidance on Use of Funds for the Purchase of Outreach/Informational Items [fg-use-of-funds-for-the-purchase-of-outreach_information-items-rev-20200304.pdf](http://www.floridajobs.org/docs/default-source/fg-use-of-funds-for-the-purchase-of-outreach-information-items-rev-20200304.pdf) (floridajobs.org)

Supersession:

Supersedes and replaces policy #01-03 R14 dated 02/05/2019.

Inquiries:

Any questions about this policy should be directed to the CEO, COO, CFO and/or their designee.



Policy #03-21

Policy: Distribution of Gas Card/Bus Passes	Page 1 of 2
Program: Workforce Innovation and Opportunity Act (WIOA), Temporary Assistance to Needy Families (TANF), Special Grant Funding	
Section: Program Operations/Finance	
Date of Issuance:	Revision Date: n/a
Distribution: CareerSource Suncoast Staff Members	

Background

The WIOA program, Welfare Transition Program and other special grant projects authorize the provision of various support payments to eligible clients. As funding permits, CareerSource Suncoast (CSS) allows these supportive services for eligible clients to assist them for successful participation and completion of activities related to obtaining and retaining employment and/or training designed to enable them to attain and/or maintain economic self-sufficiency. These benefits are typically provided utilizing pre-paid cards such as a gas/gift card or bus pass. Since these cards are typically purchased in bulk, it is important to have a clear, auditable tracking system to assure that these resources are appropriately utilized.

Purpose

The purpose of this policy will ensure that control procedures and policies are in place to safeguard against loss or fraud related to gas cards and bus passes which are distributed to clients participating in workforce programs. The policy herein will provide for consistent control of all gas cards/bus passes purchased by CareerSource Suncoast staff.

Policy

Gas cards or bus passes are defined as any monetary instrument procured in a credit card or purchase order form that will be issued as a supportive service/incentive activity. The purchase of any cards must follow CSS purchasing and procurement policy and support services policy when applicable.

Safeguarding Cards and Internal Controls:

All CSS administrative, operational and program staff involved in the handling, issuance, and utilization of pre-paid cards are responsible for ensuring cards are safeguarded and will follow all precautions and guidelines outlined in this policy.

Any staff who take possession of pre-paid cards/bus passes are responsible for securing the cards at all times, keeping them locked in designated areas when not being issued. When not in use, cards must remain in a locked drawer or locked cabinet. At no point are staff authorized to leave supportive service cards/bus passes outside of a secured locked area (i.e., placed in desk drawer, left out on desk, in a car, etc.). When cards are being transported from one center to the other, they cannot be left unattended in a vehicle, nor can they be taken home overnight. They must immediately go from one center to the next.

Mismanagement of Cards:

If it is determined that there has been mismanagement, theft and/or loss of cards by CSS staff, this will be immediately reported to the Chief Financial & Administrative Officer (CFAO). The CFAO will investigate circumstances and make a full report to the President/CEO. Remedies for such problems may require repayment by responsible party, filing of police reports, and a corrective action plan for persons involved up to and/or including, termination.

Once cards are issued to a client, any loss or theft is the responsibility of the client, and no replacement cards will be issued.

Inventory:

CSS will not keep an excess of pre-paid gas/gift cards or bus passes on hand at any given time. Inventory counts will be based on the average three-month usage, with consideration of the number of clients in compliance at the time of the request. Each Career Services Manager/Grant Coordinator will provide finance with the appropriate number of cards needed for the three months.

Inventory counts are conducted on gas/gift cards and bus passes on a quarterly basis. The inventory count is conducted quarterly to ensure the inventory is accurately controlled and agrees to card tracker and financial records. This includes taking physical inventory of both passes in the safe and outstanding passes still in program staff's possession. These Reports will be turned in to the CFAO or designated accounting staff.

The Supervisor is responsible for notifying the CFAO immediately upon detecting any lost, stolen, missing or otherwise unaccounted for cards, and will investigate and report an outcome within one week. The supervisor will also ensure staff terminating employment with CSS will return gas cards or bus passes through Card Tracker or through the log. Cards will either be returned to accounting, or the Supervisor will transfer the cards to another staff member.

Issuance:

Pre- Paid gas/gift cards will only be issued according to CSS Supportive Services Policy and Procedure Guidelines. Supervisors will ensure staff issuing support service cards and bus passes will be properly trained on these CSS policy and procedures.

All cards/bus passes must be issued on a First In/First Out basis. CSS policy dictates that the oldest cards of any group are to be utilized first.

Card Tracker System:

CSS utilizes a Card Tracker System to record all issuance of supportive services and/or WIOA Youth-incentives cards issued to program participants. The system records the client's signature and documents the transaction with detailed reports generated to maintain in the client's electronic file. This tracking system utilizing swipe card technology, monitors and streamlines issuance of cards more accurately.

If a malfunction occurs and the card must be issued manually, the accounting staff must receive a copy of the manual issuance within **one business day** of the malfunction.

Bus Passes:

Currently, bus passes issued in our two-county area are not in a form that can be scanned. Bus passes will continue to be manually tracked. Bus pass inventory are maintained on a log sheet created by the accounting staff for each invoice when bus passes are received. Program staff will be provided a tracking log of the bus passes transferred to them for issuance for tacking purposes.

Once a bus pass is issued, staff are responsible for documenting appropriately on the log, having client sign and date receipt form and forwarding a copy to Accounting within **one business day** of the issuance.

Attachments(s):

None

Authority:

None

Supersession:

Supersedes and replaces Policy #07-02: R8 dated 07/01/2018.

Inquiries:

Any questions about this policy should be directed to the CEO, COO, CFAO, or their designee.



Policy #04-21

Policy: Client Incentive/Stipend Payments	Page 1 of 4
Program: Workforce Innovation and Opportunity Act (WIOA), Temporary Assistance to Needy Families (TANF), Special Grant Funding	
Section: Program Operations/Finance	
Date of Issuance:	Revision Date: n/a
Distribution: CareerSource Suncoast Staff Members	

Background

The Workforce Innovation and Opportunity Act, Section 129 (b) (2), states WIOA youth funds can be used for allowable statewide youth activities. This includes the provision to provide incentives for recognition and achievement to eligible youth. Incentives 20 CFR § 681.640 states that “incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. The local program must have written policies and procedures in place governing the award of incentives and must ensure that such incentive payments are tied to the goals of the specific program; outlined in writing before the commencement of the program that may provide incentive payments; align with the local program’s organizational policies; and are in accordance with the requirements contained in 2 CFR part 200.”

TANF Incentives and Compliance with CFR Part 225, states: TANF program activities with objective criteria for the delivery of benefits and the determination of eligibility that are reasonably calculated to accomplish one or more statutory purpose of TANF are allowable; some types of incentives that are provided contingent upon participation in such a TANF activity are also allowable. Cash incentives are an example of an incentive that a TANF program may use to encourage participation in a TANF activity. However, not all types of incentives are allowable. For example, 2 CFR Part 225 explicitly prohibits costs related to entertainment; therefore, entertainment incentives (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities) are unallowable.

Stipends are allowable to youth enrolled into the WIOA Title I Youth summer program and TANF Summer Youth Employment Programs (SYEP).

Purpose

To provide guidance on the Incentive and stipend options allowed under the requirements of Workforce Innovation and Opportunity Act (WIOA) Youth and Special Grants, Temporary Assistance to Needy Families (TANF) and other non-WIOA/TANF funded grants.

POLICY:

The provision of all supportive Incentives is contingent upon the availability of funds. This statement of policy and some or all categories of supportive services under it may be cancelled or changed, in whole or in part, by CSS at any time and without notice, effective immediately or at such time as CSS may determine. Exceptions may be made to this policy by CSS when doing so is in the best interest of CSS or its Clients. No contractor or service provider of CSS is authorized to offer assistance different from or in addition to the assistance described in this policy, except as such authority may be expressly granted in this statement of policy.

Definitions

Incentives:

An incentive is a type of compensation for youth or TANF participants permitted for recognition and achievement directly tied to training activities and work experience. WIOA Youth and TANF funds can be used for incentives for completion of a training course (such as completing a high school equivalency course) and/or of an achievement (such as completing work readiness training). The purpose of offering an incentive is to induce behavior toward achievement of a specific goal.

Note: Incentives may **not** include entertainment, such as movie or sporting event tickets or gift cards to movie theaters, meals, lodging, rentals, transportation, and gratuities or other venues whose sole purpose is entertainment.

Stipends:

An allowable, fixed payment over a defined period of time for participation in summer youth program activities such as work experience, occupational skills training or classroom activities, work readiness, or employability skills training. Stipends can only be issued when an employer-employee relationship does **not** exist. Stipends, in this case, where there is no employer-employee relationship are not considered a taxable income and cannot be issued through payroll. Stipends are offered in order to help youth achieve their goals.

Eligibility:

Clients must meet the following eligibility requirements before receiving incentive or stipend payments.

- Deemed eligible and enrolled in WIOA Youth, TANF, or Special Grant program that allows for the provision of incentives to be provided to program participants.
- Be actively participating and in good standing with their program, including regular contact with CSS staff
- Achieved an outcome related to an educational or work experience activity listed as a goal set in their Individual Services Strategy (ISS) plan or Individualized Career Plan (IEP). The following goal achievements are eligible for incentive payments:
 - GED/High School Diploma Attainment
 - Measurable Skills Gain (MSG) Attainment
 - Credential Attainment (Occupational Skills Training Completion)
 - Successful Completion of Paid Work-Experience
 - Un-Subsidized Employment Obtainment
 - Completion of Work Readiness Training

Additional Stipend Eligibility:

- Enrolled in a WIOA or TANF Summer Youth program.
- Not engaged in an activity where an employer-employee relationship exists as defined by the [Fair Labor Standards Act Advisor](#).
 - Stipends **cannot** be used as a substitution for wages in work experiences.

Limits to the Amount and Duration of Incentives/Stipends:

CSS has established limits on the provision of incentive and stipends issued to clients.

Incentives:

- The incentive cap is established at a maximum of \$1,200 per program year per client. This cap is exclusive of its own category and is not included in the annual support services cap. These caps are maintained separately, as support services are intended to assist a client with removing a barrier and an incentive is used a motivator to youth program participants.
 - Note: The cap may have exceptions with certain grant funded programs.

- Each eligible attainment goal for incentives listed in this policy has a maximum amount of funding that can be issued and is outlined in the CSS local operating procedure. CSS staff are required to track incentive amounts per PY to ensure that established caps are not exceeded.

Stipends:

- The stipend cap is established at a maximum of \$2,100 per program year per client.
- Cannot exceed \$350 per week.
- Cannot exceed a total of six (6) weeks per activity.

Payment Methods for Incentive/Stipend Payments:

Availability of incentives and stipends will be based on careful consideration of the region's funding limitations. CSS may use a variety of payment methods for the provision of supportive services, depending upon the type of supportive service provided. All Incentive/supportive services will be issued in accordance with CSS Supportive Service Local Operating Procedures that outline the specific categories of supportive services allowable, description of each, documentation required and maximum reimbursement rate.

Reloadable or Prepaid Debit or Gift Card:

The use of reloadable or prepaid debit or gift cards (e.g., Visa, vendor-specific or gas cards), or bus passes may be used for payment of Incentive/support services when CSS:

- Has a written LOP pertaining to separation of duties and internal controls for the secure storage, distribution and use of such cards.
- Ensures a physical inventory is performed, reconciled, and reviewed timely by finance (to include establishing a designated frequency for such reviews to occur no less than quarterly); and

Direct Deposit:

CSS can issue incentives/stipends through the form of direct deposit with authorization from the client. The client will be required to complete a CareerSource Suncoast Direct Deposit Authorization form and provide a copy of a voided check or completed direct deposit form from their bank.

Documentation:

As Incentives/Stipends are paid directly to eligible clients, CSS is required to maintain documentation sufficient to satisfy the requirements of the CareerSource Florida Administrative Policy-109, Supportive Services and Needs-Related Payments, to ensure that funds are allowable and used for the intended purpose. At a minimum, documentation must include:

1. Case notes entered in the client record in the state MIS including the following elements
 - a. The eligibility for the Incentive/Stipend
 - b. Allowable activity codes entered into the system to justify Incentive/Stipend issued.
2. Records of Incentive cards/stipends issued. Including date of receipt, the amount of payment, and validated by signature of the client.
3. For clients enrolled in training, proof/verification of attendance in training programs in the CSS form of attendance sheets is required.
4. staff must enter the appropriate service codes in the state MIS when clients are provided incentives/stipends. The [Employ Florida Service Code Guide](#) outlines the various service code titles and definitions as well as the documentation/case note requirements. Any additional MIS utilized for program participation will be outlined in the appropriate LOP.

Monitoring:

Programmatic monitoring will be conducted throughout the program year by our internal Program Monitors under the direction of the CSS Director, Regional Alignment & Programs Development. This will include a formal review conducted by a third-Party Programmatic Monitoring vendor of client records that include supportive service issuance, activities and case noting for all programmatic funding to comply with federal, state, and local policies and procedures.

Policy Exceptions:

Any exceptions to the above stated policy or any part thereof, must be documented and approved by the CareerSource Suncoast CEO or their designee for consideration. When CSS receives any special grant funding for projects being administered through CSS, terms of the grant should be reviewed to determine the allowability/limitations of incentives/stipends.

Attachments:

- None

Authority:

- Workforce Innovation and Opportunity Act, Public Law (WIOA) Sections [3\(59\)](#); [106\(c\)\(1\)\(F\)](#); [133\(b\)\(2\)\(B\)](#); [133\(b\)\(3\)](#); [134\(c\)\(3\)](#); [134\(d\)\(3\)](#); [134\(d\)\(4\)](#); [134\(c\)\(1\)\(A\)\(ii\)](#); [134\(c\)\(1\)\(A\)\(iii\)](#)
- [20 Code of Federal Regulations \(CFR\) Subpart G; 680.970; 681.570; 681.640](#)
- [TANF-ACF-PI-2012-02 \(TANF Incentives and Compliance with 2 CFR Part 225\) | The Administration for Children and Families \(hhs.gov\)](#)
- Training and Employment Guidance Letter (TEGL) [19-16](#) and [21-16](#)
- CareerSource Florida Administrative Policy 109 [adminpol109_wioa_supportiveservicesandneedsrelatedpayments---final-02-22-21.pdf \(floridajobs.org\)](#)
- Department of Children and Families TANF State Plan October 1, 2020- September 30, 2023 [TANF-Plan.pdf \(myflfamilies.com\)](#)
- 2021 DEO WIOA and TANF Summer Youth Employment Program Guide [https://floridajobs.org/docs/default-source/lwdb-resources/programs-and-resources/wioa/2021-wioa/wioa_tanf-summer-youth-employment-guide---updated-04-30-21.pdf?sfvrsn=b3b64fb0_2](#)
- [TANF-ACF-IM-2012-01 \(Use of TANF funds to support summer jobs for youth\) | The Administration for Children and Families \(hhs.gov\)](#)

Supersession:

- None

Inquiries:

Any questions about this policy should be directed to the CEO, COO, CFO and/or their designee.