



Board of Directors Meeting

Thursday, May 25, 2023 - 8:00 a.m. to 9:30 a.m.

Location: 3660 N. Washington Blvd, Sarasota, FL

This is an in-person meeting with virtual or call-in capabilities

[Join Microsoft Teams Meeting](#)

Phone 1-786-600-3104

Conference ID: 981137817#

AGENDA

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

New Board Member Introductions- Eric Troyer

- Cintia Elenstar – UnidosNow
- Brian Gurucharri – Manatee Memorial Hospital
- Craig Warzecha – Bradenton Marauders/Pittsburg Pirates

Action Items – Eric Troyer, Chair

- Consent Agenda – Eric Troyer
 - Approval of March 23, 2023 Board Meeting Minutes
 - Approval of CSS Board Policy # 20-23 Revenue Diversification and Non-Federal Funds
- Approval of Related Party Agreements – Christina Witt

Other Board Business

- DEO Annual Performance Presentation PY 21-22 – Daniel Harper, DEO
- Finance and Performance Committee Update – Lisa Eding, Treasurer

CEO Report – Joshua Matlock

Staff Reports

- Kathy Bouchard
- Robin Dawson
- Anthony Gagliano

Public Comments/Closing Remarks – Eric Troyer, Chair

Adjournment - Eric Troyer, Chair

Next Board of Directors Meeting is June 22, 2023

Location: 3660 N. Washington Blvd, Sarasota, FL

*Members shall disclose any voting conflict as required under Florida Statute 112.2143 and abstain from discussion or voting on any business that would inure to his or her special private gain or loss.

Revised 5/23/2023



Consent
Agenda

**CareerSource Suncoast
Board Meeting Minutes**

Virtual TEAMS Meeting & In-person at 3660 N. Washington Blvd., Sarasota, FL
Thursday March 23, 2023
8:00 A.M.

I. Call to Order

Eric Troyer, Chair, called the meeting to order at 8:01 a.m., roll call was performed, quorum confirmed.

II. Action Items

Consent Agenda

- Approval of January 26, 2023, Board Meeting Minutes.
- Approval of CSS Board Policy # 18-22 Eligible Training Providers List

Eric Troyer asked for a motion to approve the Consent Agenda.

Motion: Jim Boss Second: Lisa Eding

The motion passed unanimously.

Related Party Approvals

- Approval of Related Party Agreements for Boys & Girls Club of Manatee County for PY2023/2024 not to exceed \$25,000.

Eric Troyer asked for a motion to approve the related party agreements.

Motion: Allison Imre Second: Lisa Eding
Abstain: Roscelyn Guenther, Sharon Hillstrom, Doug Wagner, and Jamie Kahns

The motion passed unanimously.

- Approval of Related Party Agreements for Sun Hydraulics Corporation for PY2023/2024 not to exceed \$25,000.

Eric Troyer asked for a motion to approve the related party agreements.

Motion: David Kraft Second: Ron Dipillo
Abstain: Shaun Polasky

The motion passed unanimously.

- Approval of Related Party Agreements for Boys & Girls Club of Sarasota County for PY2022/2023 not to exceed \$9,995 and PY2023/2024 not to exceed \$25,000.

Eric Troyer asked for a motion to approve the related party agreements.

Motion: Dr. Deborah Hawkes Second: Lisa Eding
Abstain: Roscelyn Guenther and Jamie Kahns

The motion passed unanimously.

III. CEO Report

Josh provided an overview of the results of the Ernst and Young (EY) regional alignment study. EY provided three recommendations to CareerSource Florida (CSF) for realignment of the twenty-four (24) workforce boards. The first option was a reduction to 21 boards, the second option was a reduction to 19 boards and the third option was a reduction to 16 boards. CSF Board of Directors voted on the recommendation to consolidate and realign to 21 boards. In all three options, CareerSource Suncoast (CSS) remained untouched. The consolidation is with the Governor's office currently and will then need to be signed off by the U.S. Department of Labor and the Chief Local Elected officials.

An update to the Bradenton office relocation was provided. CSS is currently working with the Early Learning Coalition of Manatee County for a sublease of its Palmetto location. The cost of the space is significantly lower than the other locations previously shared with the Board. The location has additional mandated partners in the same location such as Vocational Rehabilitation and Division of Blind Services. The floor plan for the space was shared.

The U.S. Department of Labor has approved a waiver for the state of Florida to allow for an increase from 25% to 50% of youth funding on In-School youth. DEO is working on a policy for implementing the waiver.

DEO is anticipating having a draft budget allocation released in the next week to begin drafting an operating budget for next program year. Additionally, DEO is behind on the performance presentations, and it is anticipated that CSS will be having that completed at the upcoming Board meetings within this program year.

IV. Other Board Business

Eric Troyer notified the committee that the following Board Members have resigned.

- Pranov Mayor- Star Student with the Boys and Girls Club.
 - Representing a workforce organization addressing the employment and training/education needs of eligible youth.
- Christine Clyne – Life Star Living, LLC
 - Representing a Business Sector
- Jamie Kahns- Bank of America
 - Representing a Business Sector

Mandatory Annual Refresher Training for Board Members was conducted and presented by CSS Leadership Team.

V. Staff Reports

Kathy Bouchard, V.P./Chief Talent Officer

CSS is currently planning the upcoming staff retreat on Friday, March 24th. The retreat will include a trainer focusing on customer service, next quarter focus points, and the Humanocracy principle of openness.

The Covid-19 grant is ending March 31, 2023. The grant served 111 clients in temporary employment and provided seven clients with scholarships.

Robin Dawson, V.P./Chief Financial and Administrative Officer

Funding allocations for the next fiscal year are expected to be coming soon, and a new budget will be drafted for Board review and approval.

The interlocal agreement is in process of approval with both Manatee and Sarasota Counties.

The comment period has ended for the Direct Service provider extension. This is completed every three years and submitted to DEO and CareerSource Florida for us to continue providing direct services. The ability to provide direct services has resulted in a cost savings of \$1.3 million that would have otherwise been contract with a service provider.

Anthony Gagliano, V.P./Chief Operating Officer

This summer, CSS is anticipating serving eighty (80) youth in the TANF Summer Youth Employment Program. Alicia Cruz-Otero, the Youth Development Manager, has her team already working with students to enroll them and prepare for the summer employment when school ends in May. There are already thirteen (13) in the pipeline after just opening the application.

Hurricane Ian grant work continues to move forward, with nearly \$100,000 expended in temporary employment wages. There have been sixteen clients enrolled, with seven clients placed in temporary employment. One of the clients was a disabled Veteran placed at the United Way, assisting with recovery efforts and providing humanitarian aid.

This program year, CSS has provided more than \$700,000 in either scholarship, training dollars and client wages.

Michael and Patrick just finished the 30th cohort of the CEO Platform for Success program and will be gearing up to launch the next session starting on Monday, March 27, 2023.

Chet, CSS IT Director, will be demonstrating the new Artificial Intelligence (AI) technology at an upcoming Board meeting once the implementation is underway. The AI will assist with document verification and processing applications to streamline processes for clients and Career Coaches.

The DEO monitoring preliminary summary has been received. There were no findings in Welfare Transition, Youth or Special Projects. Special recognition to Karima, Linda, Michelle, Deborah and the project coordinators for continuing to improve those programs. The final report is anticipated to be received in September of this year.

James Disbro and Diane Seavers continue to work in expanding apprenticeship throughout the region. They have been working with multiple employers, one of them being King Plastics discussing the development of a manufacturing electrical work apprenticeship program. CSS continues to be a leader in the state with the development of apprenticeship programs and expansion.

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

Ron DiPillo thanked the CSS leadership and support team for all of their work and customer service.

Doug Wagner commented on the support of the ELC/Manatee County location.

Eric Troyer commented on re-alignment and CareerSource Suncoast not being consolidated with any other regions.

VII. Adjournment – Eric Troyer, Chair

Meeting was adjourned at 9:11 am

Next Board of Directors Meeting is May 25, 2023
Location 3660 N. Washington Blvd, Sarasota, FL

CAREERSOURCE SUNCOAST - BOARD MEETING ATTENDANCE

Absent Present	Board Member
P	Jim Bos, MBJ Group
P*	Ashley Brown, Women's Resource Center
A	Christy Cardillo, Carr, Riggs & Ingram, LLC.
P*	Jackie Dezelski, Manatee Chamber of Commerce
P	Ron DiPillo, Sarasota County Schools
P	Lisa Eding, Teak Decking Systems
A	Luis Font, LIUNA, Laborers International Union
P*	Roscelyn Guenther, Boys & Girls Club of Sarasota County
P*	Peter Hayes, Tandem Construction
P*	Sharon Hillstrom, Bradenton Area Economic Development Corporation
P*	William Zack Holland, Local 123 Plumbers and Pipefitters Union
P*	Allison Imre, Grapevine Communications
P*	Jamie Kahns, Bank of America
P*	Heather Kasten, Sarasota Chamber of Commerce
P	David Kraft, Vision Consulting Group
P*	Tim Novak, LECOM
P*	Ericka Randall, Vocational Rehabilitation
P*	Ronald Serpliss, State College of Florida
P*	Walter Spikes, Coldwell Banker Realty
P	Eric Troyer, Kerkering Barberio & Company
P	Doug Wagner, Manatee County School Board
P*	Ken Waters, Sarasota Housing Authority
P	Shaun Polasky, Helios Technologies
P*	Deborah Hawkes, CAN Community Health
	Staff Present: Josh Matlock, Robin Dawson, Kathy Bouchard, Anthony Gagliano, Karima Habity*, Linda Benedict, Michael Meerman, Christina Witt, Michelle Snyder*, James Disbro, Chet Filanowski*, Cody Soler
P*	Commissioner George Kruse
P*	Commissioner Joe Neunder

24 Board Members – 22 present, 2 absent

Respectfully submitted,

Joshua Matlock

[Joshua Matlock \(Apr 5, 2023 07:39 EDT\)](#)

Josh Matlock
 President & CEO

CAREERSOURCE SUNCOAST
Consent Agenda Policy Approval
Board Summary Report
May 25, 2023

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. DEO requires all local boards to present local policies to the Board of Directors for review and approval. Outlined below is one (1) CSS Board Policy for your review and approval.

Summary of Policy Changes:

CSS Board Policy #20-23 Revenue Diversification and Non-Federal Funds

This policy supersedes and replaces Policy #14-02, Revenue Diversification, dated 08/21/2014. The Policy was updated to include CSS guidelines on revenue diversification, generation of restricted and unrestricted non-federal funds, restricted and unrestricted non-federal funds uses, and establishing a unrestricted non-federal funds reserve.

Requested Action:

A motion that the Board approve the CSS Board Policy # 114-02, Revenue Diversification and Non-Federal Funds.

Respectfully submitted,
Christina Witt, Organizational Support Services Director



POLICY# 20-23

Policy: Revenue Diversification and Non-Federal Funds	Page 1 of 3
Program: Workforce Innovation and Opportunity Act (WIOA)	
Section: Operations	
Date of Issuance:	Revision Date:
Distribution: CareerSource Suncoast (CSS) Team Members and Board of Directors	

Background

The Workforce Innovation and Opportunity Act allows local workforce development boards to customize employer-related services to provide on a fee-for service basis. In accordance with the Code of Federal Regulations (CFR) [20 CFR 678.440](#). A fee may be charged for services provided under [20 CFR 678.435\(b\)](#) and [20 CFR 678.435\(c\)](#). Services provided under [20 CFR 678.435\(c\)](#) may be provided through effective business intermediaries working in conjunction with the Local Workforce Development Board (LWDB) and may also be provided on a fee-for-service basis or through the leveraging of economic development, philanthropic, and other public and private resources in a manner determined appropriate by the LWDB. The LWDB may examine the services provided compared with the assets and resources available within the local one-stop delivery system and through its partners to determine an appropriate cost structure for services, if any. Any fees earned are recognized as program income and must be expended by the partner in accordance with the partner program's authorizing statute, implementing regulations, and Federal cost principles identified in Uniform Guidance.

The program income generated from fee-for- service activities must be used in accordance with the WIOA guidelines.

DEO has determined Social Security Administration's Ticket to Work Program and FL Department of Health – Tobacco Free Funds are examples of Federal & State incentives deemed as unrestricted funds. These funds will be accounted for separately as unrestricted revenue in the accounting system. Funds received from local community-based organizations will be considered unrestricted funds. Based on the CSS indirect rate methodology each fund source will absorb their fair share of indirect costs based on the cost allocation method.

Purpose

To provide guidance on revenue diversification for fee-based services for program income and the generation and management of non-federal funding sources.

Policy

Program income is the gross income received that is directly generated by a grant-supported activity, earned only as a result of the grant agreement during the grant period, or given a service agreement on a fee for service basis.

Revenue generation is important to diversifying and increasing system resources. A critical element in the development of a fee for service program is to identify those services that are provided at no charge and to identify additional services that can be provided on a fee for service basis.

Fee-based services allow CSS to respond to service gaps in the local community when federal dollars are insufficient to meet the demand for services beyond basic services offered to employers. The primary motivation of developing a fee for service program is to:

- Offer specialized services,
- Serve more customers, and
- Enhance service levels in the face of declining federal dollars.

Revenue Diversification Guidelines:

In order to maintain the integrity of the workforce system the following guidelines on revenue diversification must be followed:

1. Basic and Individualized Career services must be maintained and provided at no cost to the public at all times.
2. Fee-based services will be clearly identified as to how they differ from those provided at no cost to the business customer.
3. The fee for services can be packaged into a proposal meeting customer need. Fee for service examples might include:
 - Customized screening and referral of qualified participants in training services to employers;
 - Customized services to employers, employer associations, or other such organizations, on employment-related issues;
 - Customized recruitment events and related services for employers including targeted job fairs;
 - Human resource consultation services, including but not limited to assistance with:
 - Writing/reviewing job descriptions and employee handbooks;
 - Developing performance evaluation and personnel policies;
 - Creating orientation sessions for new workers;
 - Honing job interview techniques for efficiency and compliance;
 - Analyzing employee turnover;
 - Creating job accommodations and using assistive technologies; or
 - Explaining labor and employment laws to help employers comply with discrimination, wage/hour, and safety/health regulations;
 - Customized labor market information for specific employers, sectors, industries, or clusters; and
 - Other similar customized services
4. The employer agreement will define which fee-based services will be offered with consideration for the examples provided.
5. Conflict of interest shall be avoided, and the program income rules will be adhered to for tracking revenue, expenses, and reporting accordingly.

Non-Federal Funds:

CareerSource Suncoast may generate non-federal income through participation in State or Federal incentive initiatives, private grants, etc. The non-federal funds generated are not reported as program income. Non-federal funds can be received as restricted or unrestricted.

Examples of restricted non-federal funds include but are not limited to:

- Application and receipt of private grants
- Application and receipt of local government grants

Examples of unrestricted non-federal funds include but are not limited to:

- Ticket-To-Work Program Participation
- Tobacco-Free Florida Program Participation
- Event Sponsorship

Non-federal funds generated may be used for, but not limited to, CSS operations, employee engagement, client support services, client program expansion, facility costs, and expenses not allowable with Federal funds.

Non-Federal Unrestricted Fund Reserves:

The purpose of non-federal unrestricted fund reserves for CSS is to ensure the long-term ability of the organization to meet its mission. Reserve funds are defined as funds set aside to enable CSS to sustain operations through delays in payments from committed fund sources or for a specific purpose/project.

Reserve funds are not intended to replace permanent loss of funds or eliminate an ongoing budget gap.

Minimum Amount

The target minimum reserve fund is equal to one (1) month of operating expenses for the program year. The calculation of monthly operating expenses includes all recurring, predictable expenses such as salaries, benefits, facility costs, travel, and ongoing professional services. Depreciation, in-kind, and other non-cash expenses are not included in the calculation.

CSS will review surpluses after the end of each fiscal year to determine if any additional unrestricted funds need to be transferred into the reserve account.

Use of Non-Federal Unrestricted Reserves

CSS Executive Leadership will identify purposes for accessing the reserve funds and confirm that the use is consistent with the purpose of the reserves as described in this Policy. As a part of this process, the Executive Leadership will do the following:

- Analyze the reason for the needed funds;
- Assess the availability of any other sources of funds before using reserves;
- Evaluate the time period that the funds will be required, and then replenished;
- Obtain CSS Board of Directors approval.
 - Note: The Executive Committee may approve the request in the event the Board of Directors is not scheduled to meet.

Non-Federal Unrestricted Fund Surplus:

Once CSS has funded the minimum reserve, the balance of the unrestricted non-federal funds may be used for the purposes outlined in this Policy. Expenditures will be reported quarterly to the Board.

Attachments:

- None

Authority:

- CareerSource Suncoast Administration
- [20 Code of Federal Regulation 678.440](#)
- [20 Code of Federal Regulation 678.435\(b\)](#)
- [20 Code of Federal Regulation 678.435\(c\)](#)

Supersession:

This Policy supersedes and replaces CSS Policy #14-02 Revenue Diversification, dated 08/21/2014.

Inquiries:

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

CAREERSOURCE SUNCOAST
Related Party Agreements
Board of Directors Summary Report
May 25, 2023

Background Information:

CareerSource Suncoast and the Department of Economic Opportunity's grantee-sub-grantee agreement provides clear guidance and rules in regard to related party contracts. These rules ensure transparency and accountability, prevent impropriety or the appearance of impropriety in public business, and limit the possibility of the improper expenditure of state or federal funds. "Related Party" includes any: Board member; Board employee or staff; relative of any Board member, employee or staff; any organization represented by or employing a Board member, employee or staff; any organization, the board of directors of which a Board member or employee or staff holds a board position; or any vendor with which a Board member has a relationship.

Any member of the Board of Directors must abstain from discussion and voting if they meet the definition outlined above.

Related Party Agreements/Amounts:

The following presented for approval are for client training, staff development, and worksite host agreements. Training provider agreements allow CareerSource Suncoast enrolled clients to be issued Individual Training Account funding vouchers for occupational skills training or work-based training. The worksite agreement is to host youth enrolled in the Career StartUp paid work experience program. Staff development agreements may include but are not limited to providing staff development training courses for individuals or groups.

- Sarasota County School District/Suncoast Technical College - \$175,000 maximum for PY2023-2024 for training provider and work-based learning/training agreements.
- Manatee County School District/Manatee Technical College - \$175,000 maximum for PY2023-2024 for training provider and work-based learning/training agreements
- State College of Florida - \$175,000 maximum for PY2023-2024 training provider and work-based learning/training agreements.

The following approvals are for outreach and business services provided to assist with recruitment, retention, and enhancement of the current workforce to benefit the employers CareerSource Suncoast serves in Manatee County for the purposes outlined in the Workforce Innovation and Opportunity Act.

- Manatee Chamber Foundation - \$20,000 maximum for PY2023-2024
- Bradenton Area Economic Development Corp. - \$20,000 maximum for PY2023-2024

Requested Action:

A motion for the Board of Directors to approve the Related Party agreements for PY 2023/2024 with Sarasota County School Board-Suncoast Technical College for a maximum of \$175,000.

A motion for the Board of Directors to approve the Related Party agreements for PY 2023/2024 with Manatee County School Board-Manatee Technical College for a maximum of \$175,000.

CAREERSOURCE SUNCOAST
Related Party Agreements
Board of Directors Summary Report
May 25, 2023

A motion for the Board of Directors to approve the Related Party agreements for PY 2023/2024 with State College of Florida for a maximum of \$175,000.

A motion for the Board of Directors to approve the Related Party agreement for PY 2023/2024 with the Manatee Chamber Foundation for a maximum of \$20,000.

A motion for the Board of Directors to approve the Related Party agreement for PY 2023/2024 with the Bradenton Area Economic Development Corp. for a maximum of \$20,000.

Respectfully submitted,
Christina Witt
Organizational Support Services Director



OTHER BOARD BUSINESS



DEO Annual Performance Report

CareerSource Suncoast

Florida Department of Economic Opportunity Annual Performance Presentation

Daniel S. Harper, Senior Management Analyst Supervisor
Valerie Peacock, Chief, Financial Monitoring & Accountability
Yvette McCullough, Revenue Program Administrator I
Chadwick Myrick, Revenue Program Administrator I

May 25, 2023



Workforce System Funding Sources

- United States Department of Labor (USDOL)
 - Employment and Training Administration (ETA) ~\$170 million
 - Veterans' Employment and Training Service (VETS) ~8.4 million
- United States Department of Health and Human Services (HHS)~56 million
- United States Department of Agriculture (USDA) ~8.2 million
- State of Florida General Revenue (GR)
- Other Sources

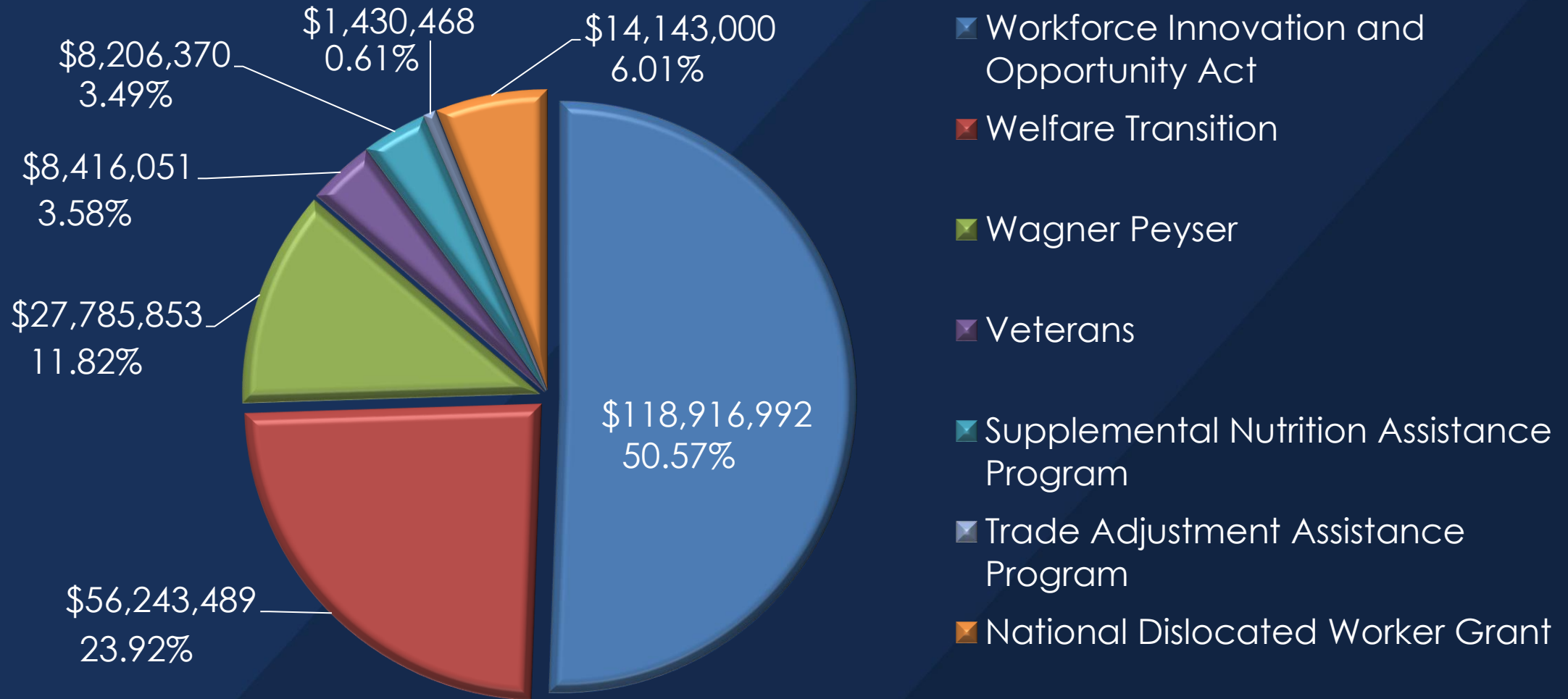
Workforce System Oversight

- United States Department of Labor Employment and Training Administration (USDOL - ETA)
- Florida Legislature
- Reimagining Education and Career Help (REACH) Office
- Department of Economic Opportunity (DEO)
- CareerSource Florida (CSF)
- Chief Local Elected Officials or Consortiums (CLEO)
- Local Workforce Development Boards (LWDB)

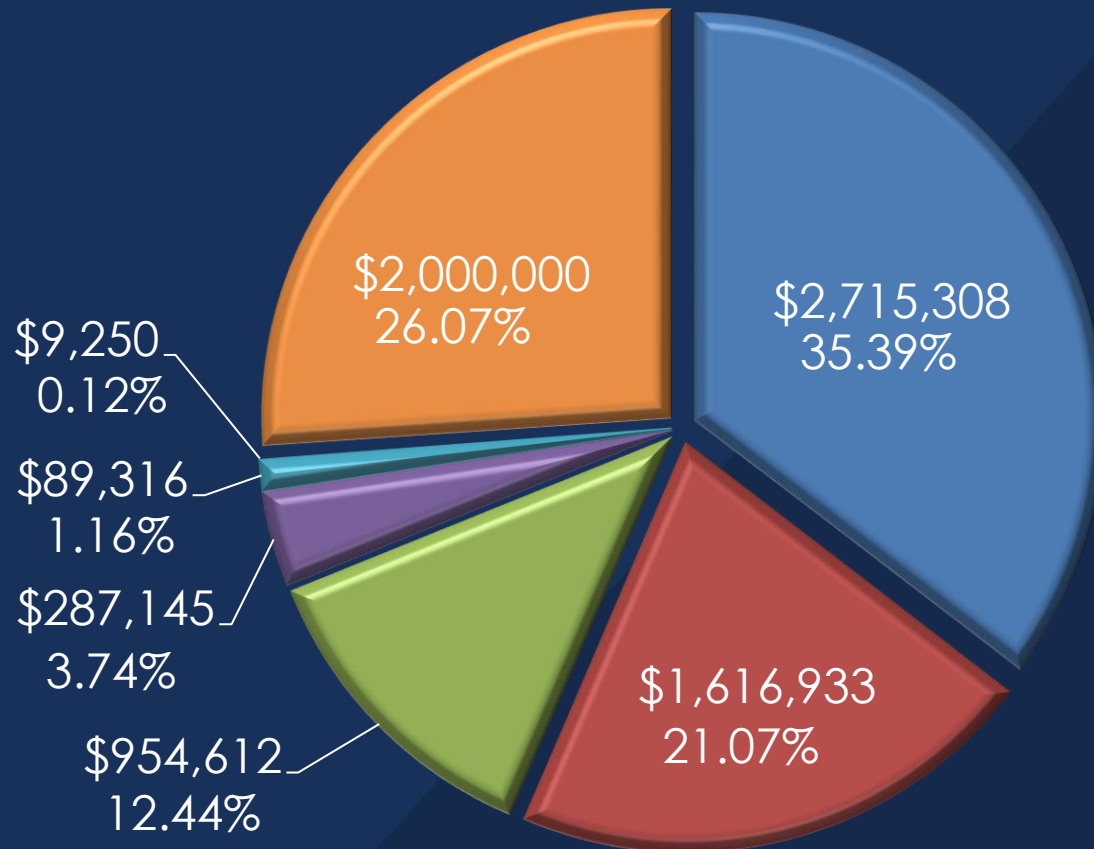
Local Service Delivery

- One-Stop Career Centers
 - Core Partners and Required Partners
 - Other Local Partnerships
- Job Seekers
- Employers

State Fiscal Year 2022 Statewide Funding \$235,142,223

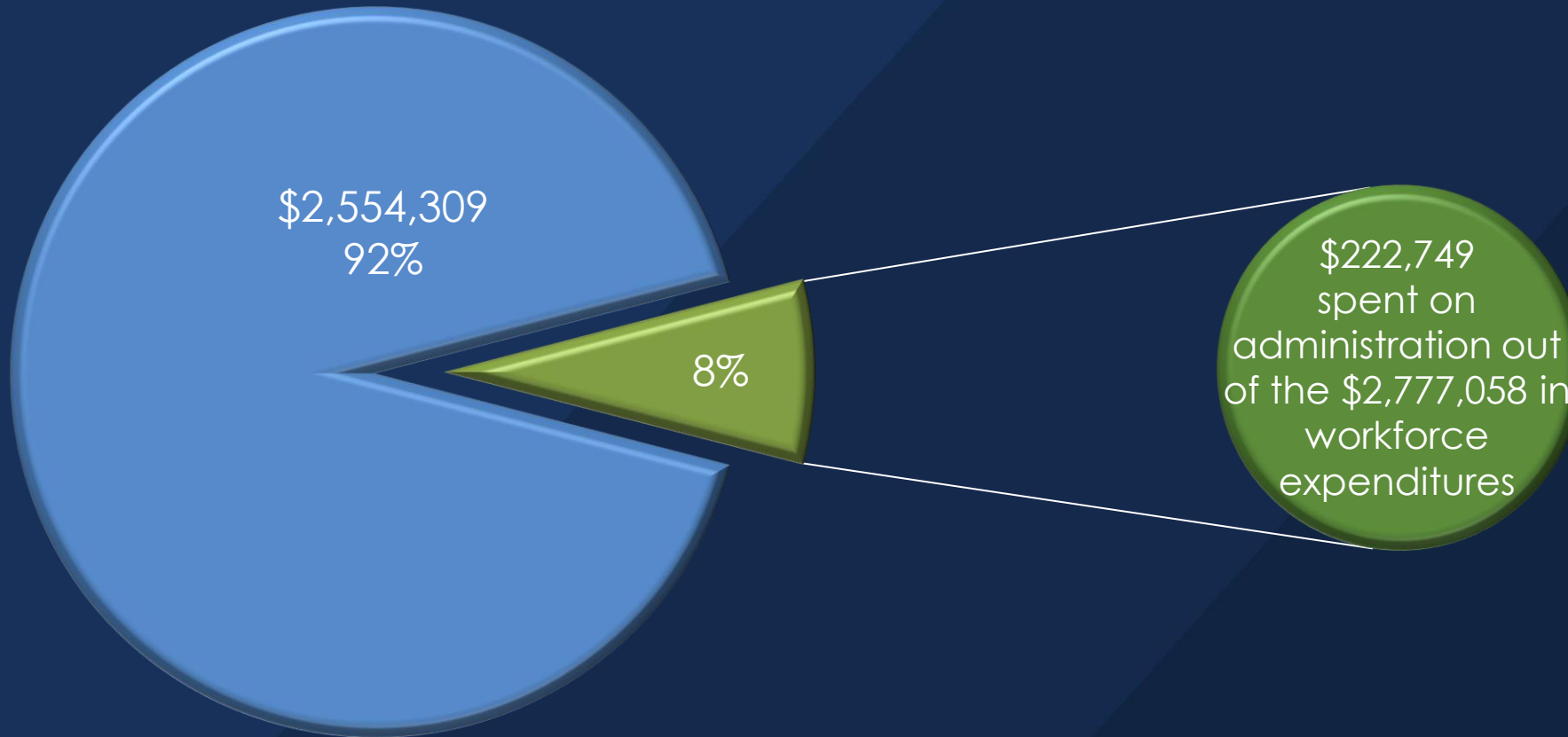


Local Board Funding \$7,672,564



- Workforce Innovation and Opportunity Act
- Welfare Transition
- Wagner Peyser
- Veterans
- Supplemental Nutrition Assistance Program
- Trade Adjustment Assistance Program
- National Dislocated Worker Grant

Direct Client Services and Administrative Expenditures



■ Direct Client Services

■ Administrative Expenditures

Individual Training Account (ITA) Expenditures



Annual ITA Expenditure Requirement



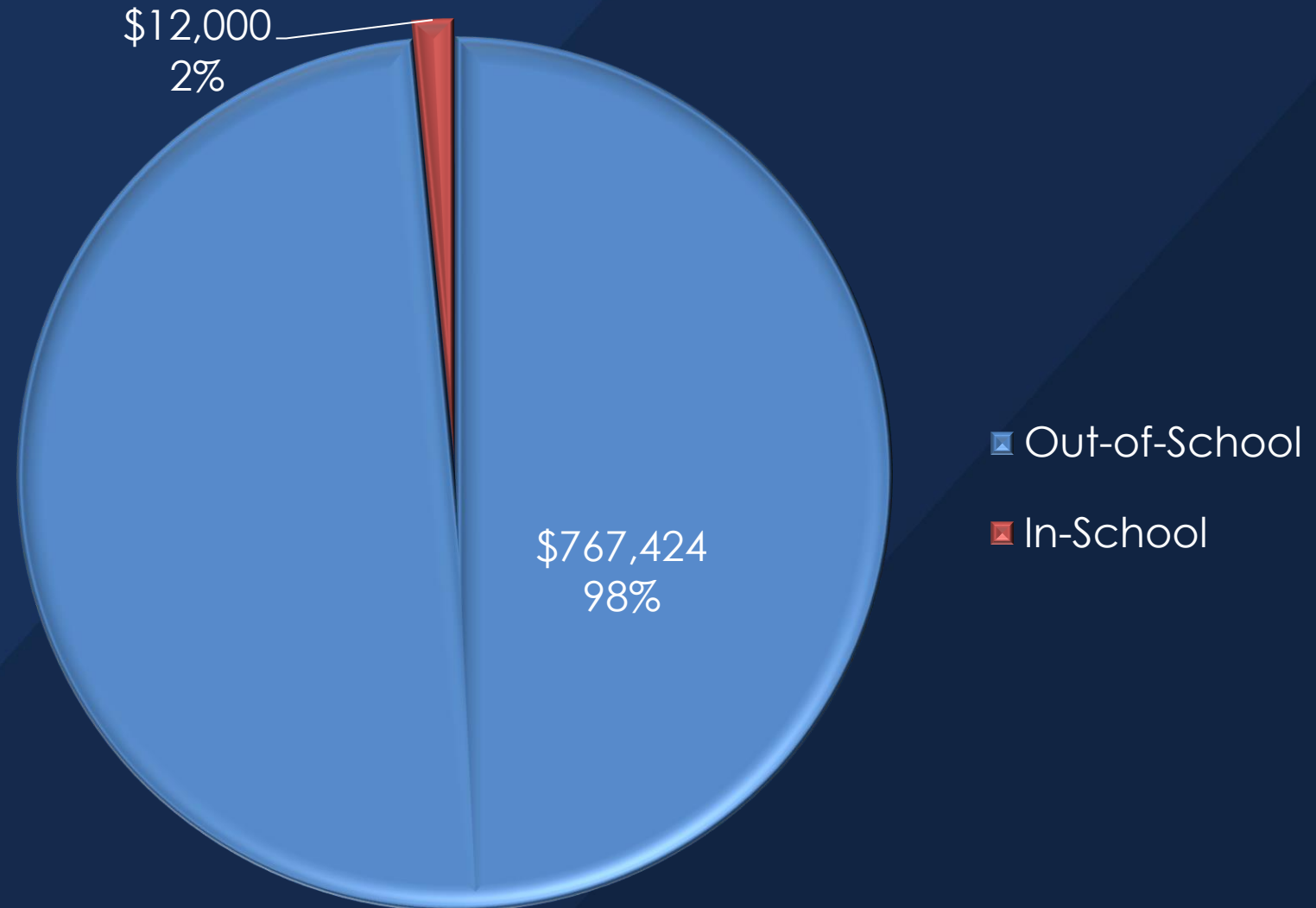
ITA Expenditures

Work Experience Expenditures

WIOA Requirement: Greater than 20% Work Experience Expenditures



Out-of-School Youth Expenditures



Primary Indicators of Performance

Customer Groups

- Adult Metrics (5)
- Dislocated Worker Metrics (5)
- Youth Metrics (5)
- Wagner Peyser Metrics (3)

Metrics

1. Employed in 2nd quarter after exiting the program
2. Employed in 4th quarter after exiting the program
3. Median wages in 2nd quarter after exiting the program
4. Credential attainment rate (Not applicable for Wagner Peyser)
5. Measurable Skill Gains (Not applicable for Wagner Peyser)

Primary Indicators of Performance Results

LWDB 18 Program Year (PY) 2020 & 2021 Performance for July 1– June 30	PY2020 Performance Goals	PY2020 4th Quarter Performance	PY2021 Performance Goals	PY2021 4th Quarter Performance
Adult Programs:				
Employed 2nd Quarter After Exit	95.0	91.1	95.0	90.0
Median Wage 2nd Quarter After Exit	\$9,500	\$10,192	\$9,900	\$12,636
Employed 4th Quarter After Exit	95.0	83.3	95.0	90.3
Credential Attainment Rate	84.0	75.7	84.0	71.4
Measurable Skill Gains	55.0	70.6	55.0	71.1
Dislocated Workers Programs:				
Employed 2nd Quarter After Exit	93.0	77.8	95.0	71.6
Median Wage 2nd Quarter After Exit	\$7,900	\$11,107	\$8,400	\$9,615
Employed 4th Quarter After Exit	88.0	75.0	90.0	85.7
Credential Attainment Rate	70.0	57.1	70.0	18.8
Measurable Skill Gains	47.6	77.8	49.0	80.6
Youth Programs:				
Employed 2nd Quarter After Exit	87.0	92.6	90.0	62.5
Median Wage 2nd Quarter After Exit	\$5,900	\$4,174	\$6,100	\$7,625
Employed 4th Quarter After Exit	92.5	89.2	95.0	75.0
Credential Attainment Rate	76.5	85.0	76.5	77.8
Measurable Skill Gains	50.0	56.0	55.0	66.7
Wagner Peyser Programs:				
Employed 2nd Quarter After Exit	73.0	64.3	75.0	62.5
Median Wage 2nd Quarter After Exit	\$5,400	\$5,935	\$5,500	\$6,930
Employed 4th Quarter After Exit	70.0	63.1	72.0	62.6



Not Met (less than 90% of negotiated)



Met (90 - 100% of negotiated)



Exceeded (greater than 100% of negotiated)

Self-Sufficiency Quarterly Performance Report

Customer Groups

- Welfare Transition
- Supplemental Nutrition Assistance Program
Employment & Training

Metrics

1. Employed in 2nd quarter after exiting the program
2. Median wages in 2nd quarter after exiting the program
3. Closure Rate
4. Co-Enrollment
5. Benefit Sanction and Restoration
6. Participation Rates (Not applicable for SNAP)

Self-Sufficiency Quarterly Report Results

LWDB 18 Program Year (PY) 2021 Performance for July 1, 2021 – June 30, 2022	PY2021 Performance	Statewide
Supplemental Nutrition Assistance Program:		
Employed 2nd Quarter After Exit	48.3	46.6
Median Wage 2nd Quarter After Exit	\$5,765	\$5,902
Employed 4th Quarter After Exit	48.8	47.2
Co-Enrollment WIOA	12	1604
Co-Enrollment WP	56	6520
Welfare Transition:		
Employed 2nd Quarter After Exit	53.3	45.5
Median Wage 2nd Quarter After Exit	\$4,959	\$4,364
Employed 4th Quarter After Exit	55.8	49.1
Co-Enrollment WIOA	6	494
Co-Enrollment WP	27	2880
All-Families Participation Rate	3.0	11.3
Two-Parents Participation Rate	0.0	7.2

Letter Grades

Customer Groups

- WIOA (Adult, Dislocated Worker, Youth), Wagner-Peyser, Supplemental Nutrition Assistance Program, Welfare Transition, National Dislocated Worker Grant, Trade Adjustment Assistance, Employers

Metrics

1. Participants with Increased Earnings
2. Reduction in Public Assistance
3. Employment and Training Outcomes
4. Participants in Work-Related Training
5. Continued Repeat Business
6. Year-Over-Year Business Penetration
7. Completion-To-Funding
8. Extra Credit: Serving Individuals on Public Assistance

Letter Grades

The screenshot shows a web browser at the URL <https://analytics.careersourceflorida.com/LetterGrades>. The page features a dark blue header with the CareerSource Florida Analytics logo and navigation links for ANALYTICS HOME, LETTER GRADES, CLIFF DASHBOARD, BUSINESS & WORKFORCE, GIG DASHBOARD, and CIP INITIATIVE. Below this is a white sub-header with the Letter Grades logo and navigation links for HOME, PERFORMANCE, METHODOLOGY, FAQ, and RESOURCES, along with a LOG IN button. The main content area contains a large banner with a blue map of Florida on the left and a blue box on the right containing the Letter Grades logo and the text "Grading Success".

Programmatic Monitoring Activities

LWDB 18 Program Year (PY) 2021 January 1, 2021 – December 31, 2021	PY 2020 Findings	PY 2021 Findings
Welfare Transition	3	1
Wagner-Peyser / MSFW / MIS	10	4
Supplemental Nutrition Assistance Program - Employment and Training	3	2
WIOA Adult / Dislocated Worker / Youth	5	4
Trade Adjustment Assistance	0	0
Jobs for Veterans State Grants	0	1
Other	0	0
Total Findings	21	12

Financial Monitoring Activities

LWDB 18 Program Year (PY) January 1, 2021 – December 31, 2021	PY 2020	PY 2021
Findings	0	0
Issues of Non-Compliance	0	0
Observations	1	0
Technical Assistance	0	0

Q&A



Contact



Thank You

Please contact our office with questions or comments about this presentation.



Office: DEO Bureau of One-Stop & Program Support

Main Line: 850-921-3327

Email: Daniel.Harper@DEO.MyFlorida.com

CAREERSOURCE SUNCOAST
Finance & Performance
Board of Directors Summary
May 25, 2023

The Finance & Performance Committee met on April 25, 2023.

Review of Budget to Expenditure Report PY 22-23 as of 3-31-2023:

A copy of the report was included in the meeting materials. This report covers the period July 1, 2022 – March 31, 2023 for PY 22-23. Overall burn rate as of 3-31-2023 was 53%. Program Services are running under the expected 50% burn rate due to last budget mod increased client training and support for Hurricane Ian temp jobs, TANF Summer Youth Employment/June, and the Non-Custodial Parent Employment Program. A Budget to Expenditure Report By Fundsource was also shared with the committee to report on burn rates by grant.

State and federal expenditure requirements reported as of 3-31-2023:

- Admin expenditure rate – 9.9%; max allowed 10%
- Individual training accounts (ITAs) – 35.8%; min requirement 30%
- Youth paid internships PY21 – 24.2%; min requirement 20%
- Youth out of school expenditures PY21 – 98.5%; min requirement 75%

Review of Summary of Non-Federal Funds as of 3-31-2023:

Balance of funds \$699,058

Discussion & Review of Revenue Diversification & Non-Federal Funds Policy:

The Committee discussed the Revenue Diversification and Non-Federal Funds Policy presented with revision from the last proposal to reduce non-federal funds reserve from three months to one month. The committee agreed to meet the following week on May 4th to finalize the policy to submit to the Executive Committee for review at the upcoming May 11, 2023 meeting and present to the full Board for approval on May 25, 2023.

Performance Update:

Anthony Gagliano reviewed the CSS WIOA performance indicators for the second quarter of PY 2022-23. A copy of the report was included in the meeting materials. CSS currently has a B grade of 84.39. DEO will be updating the WIOA performance indicator measures and the letter grades on a quarterly basis, being available approximately 45 days from the end of the quarter.

The DEO 2022-2023 Preliminary Review Exit Summary from the recent program monitoring visit in March was shared with the committee. CSS responded within the 10-day response window to several of the findings and provided supporting documentation to remove the issue from the final review summary.

CAREERSOURCE SUNCOAST
Finance & Performance Committee
Executive Committee Summary
May 11, 2023

The Equal Opportunity monitoring report from 2022 was reviewed. Christina Witt has now assumed the role of the Equal Employment Officer role, as noted in the summary shared with the committee.

General Comments & Updates:

CSS is still pending funding allocations from DEO for next program year. The DEO Financial Monitoring has still not been completed. DEO has two other regions ahead of CSS to complete monitoring before starting CSS.

Next meeting of the Finance & Performance Committee is scheduled for Tuesday May 4, 2023 at 8:00 a.m. Then budget review for PY 23-24 will be a combined meeting with the Executive Committee on Thursday, June 8, 2023 at 8:00 a.m.

Respectfully Submitted,

Lisa Eding
CSS Treasurer

CareerSource Suncoast
 Expenditure To Budget Report - Summary
 Program Year July 1, 2022 thru June 30, 2023
 As Of 03/31/2023 (with accruals)

MOD #3

	PY TOTAL BUDGET	RESTRICTED EXPENSES YTD	BUDGET BALANCE	% OF BUDGET EXPENDED	NON-FEDERAL EXPENSES YTD	NOTES
PERSONNEL COSTS						
SALARIESFRINGE BENEFITS	\$4,315,154	\$2,866,268	\$1,448,886	66%	\$17	
STAFF TRAINING & EDU	\$42,000	\$35,440	\$6,560	84%	\$147	
TOTAL PERSONNEL COSTS	\$4,357,154	\$2,901,708	\$1,455,446	67%	\$164	
FACILITY COSTS	\$976,671	\$765,121	\$211,550	78%	\$1,058	
OFFICE FURNITURE & EQUIP	\$45,000	(\$21,449)	\$66,449	(\$0)	\$0	Insurance proceeds from North Port location
OPERATING COSTS:						
ACCOUNTING/AUDIT	\$82,871	\$49,740	\$33,131	60%	\$4,271	
CONSULTANTS/LEGAL	\$40,000	\$23,333	\$16,667	58%	\$0	OSO Oblig bal \$11,667
GENERAL INSURANCE	\$59,124	\$59,164	(\$40)	100%	\$0	Policies begin July 1
OFFICE EXP & SUPP	\$43,862	\$20,663	\$23,199	47%	\$7,591	
TRAVEL & MEETINGS	\$69,000	\$42,431	\$26,569	61%	\$8,052	
TOTAL OPERATING COSTS	\$294,857	\$195,333	\$99,524	66%	\$19,914	
PROGRAM SERVICES:						
CLIENT TRAINING/SUPPORT	\$3,167,170	\$829,867	\$2,337,303	26%	\$966	Oblig + exp 45%
CLIENT & EMPLOYER SERVICES	\$117,000	\$87,807	\$29,193	75%	\$8,225	Fees for svc - \$3,490
OUTREACH	\$107,000	\$55,027	\$51,973	51%	\$6,906	Oblig + exp 88%
TOTAL PROGRAM SERVICES	\$3,391,170	\$972,701	\$2,418,469	29%	\$16,097	
TOTALS	\$9,064,852	\$4,813,414	\$4,251,438	53%	\$37,234	Rates below as of 03/31/23: Admin 9.89 % Max 10% ITA 35.8%. Min Req 30% Paid Internships Exp: PY21 24.2% / PY22 9.8%, Min Req 20% Yth Out of Sch Exp: PY21 98.5% PY22 100%, Min Req 75%.
			Expected burn rate as of 03/31/23	75%		
			Actual burn rate as of 03/31/23	53%	\$699,058	Non-Federal Funds Balance as of 03/31/2023



**Budget to Expenditure Report
By Fundsource
PY 22-23
7/1/2022 - 03/31/2023**

	Annual Budget Mod #3	TANF	WIOA Adult	WIOA Dis Wkr	WIOA Youth	WIOA Rap Resp	WIOA CDL Trng	NEG COVID	NEG Opioid Foster Rec	NEG Hurr Ian	Wag Pey	Wag Pey App Nav	SNAP	RESEA	NCPEP	RR Cred	Others		
Revenue:																			
Carry Forward Funds from PY 21-22	\$1,974,820	\$193,912	\$0	\$111,717	\$604,445	\$12,461	\$0	\$362,895	\$470,820	\$0	\$158,044	\$0		\$60,526				\$0	
Allocation Awards PY 22-23	\$8,306,378	\$1,616,933	\$929,003	\$963,959	\$747,202	\$75,144	\$200,000	-\$75,000	\$0	\$2,000,000	\$553,142	\$62,500	\$122,000	\$183,474	\$338,177	\$400,000	\$189,844		
Total Available Funding	\$10,281,198	\$1,810,845	\$929,003	\$1,075,676	\$1,351,647	\$87,605	\$200,000	\$287,895	\$470,820	\$2,000,000	\$711,186	\$62,500	\$122,000	\$244,000	\$338,177	\$400,000	\$189,844		
LESS: Planned Carry Forward (Reserve) for PY 23-24	\$1,216,348	\$180,178	\$0	\$227,909	\$0	\$0	\$0	\$0	\$206,128	\$250,000	\$33,533	\$0	\$0	\$0	\$0	\$318,600	\$0		
Total Revenue Budgeted PY 22-23	\$9,064,850	\$1,630,667	\$929,003	\$847,767	\$1,351,647	\$87,605	\$200,000	\$287,895	\$264,692	\$1,750,000	\$677,653	\$62,500	\$122,000	\$244,000	\$338,177	\$81,400	\$189,844	\$9,064,850	

Budgeted Expenditures:		Expenditures To Date:																	Total Expenditures	% of Budget
Salaries & Benefits	\$4,315,154	\$736,319	\$569,124	\$263,185	\$534,116	\$63,909	\$5,318	\$74,324	\$66,465	\$78,784	\$245,943	\$39,507	\$59,191	\$73,009	\$16,585	\$1	\$40,453	\$2,866,232	66.4%	
Staff Training & Education	\$42,000	\$8,841	\$6,920	\$3,885	\$5,785	\$19	\$9	\$99	\$426	\$42	\$5,761	\$37	\$485	\$710	\$45	\$0	\$2,375	\$35,440	84.4%	
Facility Costs	\$976,671	\$171,863	\$77,674	\$85,070	\$110,546	\$1,350	\$130	\$672	\$484	\$3,925	\$231,109	\$70	\$9,598	\$17,544	\$3,882	\$0	\$51,134	\$765,049	78.3%	
Furniture & Equipment	\$45,000	-\$6,407	-\$6,087	-\$2,840	-\$4,706	\$0	\$0	\$0	\$0	\$0	-\$3,504	\$0	-\$391	-\$590	\$72	\$0	\$3,004	-\$21,449	-47.7%	
Operating Costs	\$294,857	\$51,161	\$38,625	\$16,380	\$25,415	\$1,687	\$647	\$3,283	\$3,103	\$2,450	\$29,369	\$2,020	\$5,807	\$3,535	\$135	\$43	\$11,673	\$195,332	66.2%	
Program Services	\$3,391,170	\$70,347	\$242,747	\$42,604	\$99,212	\$0	\$162,098	\$174,306	\$85,905	\$54,546	\$35,349	\$0	\$460	\$674	\$20	\$0	\$4,505	\$972,773	28.7%	
Total Expenditures	\$9,064,852	\$1,032,124	\$929,003	\$408,284	\$770,368	\$66,965	\$168,201	\$252,684	\$156,383	\$139,747	\$544,028	\$41,634	\$75,150	\$94,881	\$20,739	\$43	\$113,143	\$4,813,378	53.1%	

Remaining Available Funds	\$598,543	\$0	\$439,483	\$581,279	\$20,640	\$31,799	\$35,211	\$108,309	\$1,610,253	\$133,625	\$20,866	\$46,850	\$149,119	\$317,438	\$81,357	\$76,701	\$4,251,474
% of Funds Expended by Grant	63.3%	100.0%	48.2%	57.0%	76.4%	84.1%	87.8%	59.1%	8.0%	80.3%	66.6%	61.6%	38.9%	6.1%	0.1%	59.6%	53.1%

Federal & State Requirements as of 03/31/23:	Actual %
ITA % - 30% Min Expenditure Rate	35.8%
Youth Out of Sch Expend Rate-Min 75%	98.5% & 100%
Youth Paid WE/Internships Expend Rate-Min 20%	24.2% & 9.8%
Administrative Cost %-Max 10%	9.9%
NFA -DW Funding Used for Adult Activities	\$93,138

CareerSource Suncoast
 Summary of Non-Federal Funds
 as of 03/31/2023 (with accruals)

	Business Support - 707	Unrestricted Tobacco Free - 719	Consolidated Workforce ED - 720	Unrestricted Ticket to Work - 724	Misc Client Supp - 730	Totals
Wells Fargo Non-Federal Funds						
Fund Balance as of 7/1/2022	\$39,677	\$9,020	\$124,361	\$159,101	\$1,515	\$343,417.57
Revenue						
Current Year	\$100	\$0	\$21,775	\$29,689	\$0	
Bank Interest Income	\$0	\$1,391	\$0	\$0	\$0	
Inter Transfer	<u>\$9,744</u>	<u>\$0</u>	<u>\$0</u>	<u>\$508</u>	<u>\$0</u>	
	\$9,844	\$1,391	\$21,775	\$30,197	\$0	\$53,463
Expenditures - Current Year	<u>\$1,112</u>	<u>\$10,410</u>	<u>\$14,935</u>	<u>\$9,881</u>	<u>\$896</u>	\$37,234
Increase/(Decrease) in Cash - Current Year	<u>\$8,732</u>	<u>(\$9,020)</u>	<u>\$6,840</u>	<u>\$20,316</u>	<u>(\$896)</u>	\$16,229
Wells Fargo Cash Balance as of 03/31/2023	<u>\$48,409</u>	<u>\$0</u>	<u>\$131,201</u>	<u>\$179,417</u>	<u>\$619</u>	\$359,646

Deposits After 3/31/23:

\$113,330	wk 4/2-8/23
<u>\$11,950</u>	wk 4/9-15/23
\$125,280	
\$304,697	Bal 4/15

Truist Bank - MM Unrestricted Funds	SWB Misc - 901
Fund Balance as of 7/1/2022	\$162,741
Revenue	
Current Year	\$0
Bank Interest Income	<u>\$12</u>
	\$12
Expenditures-Current year	\$0
Increase/(Decrease) in Cash - Current Year	<u>\$12</u>
Truist Cash Balance as of 03/31/2023	<u>\$162,753</u>

Baroda Bank - Unrestricted Funds	
CD Fund Balance (increments \$1k)	\$174,000
Savings Account Balance (under \$1k)	<u>\$302</u>
	\$174,302
Revenue	
Current Year	\$0
Bank Interest Income	<u>\$2,357</u>
	\$2,357
Expenditures-Current year	\$0
Increase/(Decrease) in Cash - Current Year	\$2,357
Baroda Bank Balance as of 03/31/2023	<u>\$176,659</u>

Total Non-Federal Funds Restricted	\$180,229
Total Non-Federal Funds Unrestricted	\$518,829
Total Non-Federal Funds as of 03/31/2023	\$699,058

LWDB 18

Measures	PY2021-2022 4th Quarter Performance	PY2021-2022 % of Performance Goal Met For Q4	PY2021-2022 Performance Goals	PY2022-2023 1st Quarter Performance	PY2022-2023 % of Performance Goal Met For Q1	PY2022-2023 2nd Quarter Performance	PY2022-2023 % of Performance Goal Met For Q2	PY2022-2023 Performance Goals
Adults:								
Employed 2nd Qtr After Exit	90.00	94.74	95.00	88.00	97.13	84.30	93.05	90.60
Median Wage 2nd Quarter After Exit	\$12,636	127.64	\$9,900	\$11,996.00	128.29	\$11,066	118.34	\$9,351
Employed 4th Qtr After Exit	90.30	95.05	95.00	91.70	105.40	88.30	101.49	87.00
Credential Attainment Rate	71.40	85.00	84.00	84.50	108.33	67.30	86.28	78.00
Measurable Skill Gains	71.10	129.27	55.00	76.00	103.54	78.30	106.68	73.40
Dislocated Workers:								
Employed 2nd Qtr After Exit	71.60	75.37	95.00	71.70	92.40	71.30	91.88	77.60
Median Wage 2nd Quarter After Exit	\$9,615	114.46	\$8,400	\$9,692.00	96.17	\$10,025	99.47	\$10,078
Employed 4th Qtr After Exit	85.70	95.22	90.00	100.00	149.25	68.70	102.54	67.00
Credential Attainment Rate	18.80	26.86	70.00	25.00	42.81	25.90	44.35	58.40
Measurable Skill Gains	80.60	164.49	49.00	76.90	108.16	56.50	79.47	71.10
Youth:								
Employed 2nd Qtr After Exit	62.50	69.44	90.00	57.50	69.28	54.10	65.18	83.00
Median Wage 2nd Quarter After Exit	\$7,625	125.00	\$6,100	\$7,065.00	159.48	\$7,001	158.04	\$4,430
Employed 4th Qtr After Exit	75.00	78.95	95.00	75.00	108.70	70.00	101.45	69.00
Credential Attainment Rate	77.80	101.70	76.50	87.50	108.43	87.00	107.81	80.70
Measurable Skill Gains	66.70	121.27	55.00	61.90	91.03	66.70	98.09	68.00
Wagner Peyser:								
Employed 2nd Qtr After Exit	62.50	83.33	75.00	64.50	99.23	63.60	97.85	65.00
Median Wage 2nd Quarter After Exit	\$6,930	126.00	\$5,500	\$7,079.00	118.97	\$6,768.00	113.75	\$5,950
Employed 4th Qtr After Exit	62.60	86.94	72.00	64.50	101.57	61.00	96.06	63.50

Not Met (less than 90% of negotiated)
Met (90-100% of negotiated)
Exceeded (greater than 100% of negotiated)



Local Board Performance

CareerSource Suncoast | Program Year 2022-2023

Letter grades are assigned to local workforce development boards on an annual basis once the program year has ended and all program year data is finalized. The information displayed on this page is preliminary until all program data is complete and deemed final for the program year.

CareerSource Florida, in collaboration with the REACH Office and the Florida Department of Economic Opportunity, updates this website on a quarterly basis as the data is made available.

Metrics Data

The table below shows the preliminary data on a rolling four-quarter basis. Visit the [Methodology](#) page of this website for more information on each metric including numerator and denominator definitions. Visit the [Resources](#) page to view or download methodology desk reference documents, a metric cohort timeline spreadsheet and lists of the Employ Florida service codes included in the metrics.

Data as of: 12/31/2022

Metric	Metric Category	Weight	Numerator	Denominator	Rate (%)	YOY Rate Difference	Target (%)	Target Met ¹ (%)	Weighted Performance ² (%)
1. Participants with Increased Earnings	Employment and Training Services, Self-Sufficiency	0.25	1,146	2,607	43.96	-	45.00	97.69	24.42
2. Reduction in Public Assistance	Employment and Training Services, Self-Sufficiency	0.25	580	1,299	44.65	-	35.00	100.00	25.00
3. Employment and Training Outcomes	Employment and Training Services	0.20	14	18	77.78	-	100.00	77.78	15.56
4. Participants in Work-Related Training	Training Services	0.10	326	2,313	14.09	-	25.00	56.36	5.64
5. Continued Repeat Business	Business Services	0.05	521	3,603	14.46	-	35.00	41.31	2.07
6. Year-Over-Year Business Penetration	Business Services	0.05	-	-	-	-2.94	100.00	60.00	3.00
PY 2021-2022 Business Penetration		-	1,370	13,196	10.38	-	-	-	-
PY 2022-2023 Business Penetration		-	1,025	13,777	7.44	-	-	-	-
7. Completion-to-Funding Ratio	Employment and Training Services	0.10	2.36	2.71	87.08	-	100.00	87.08	8.71
Exiters: Local Board (N) / Statewide (D)		-	1,980	83,798	2.36	-	-	-	-
Budget: Local Board (N) / Statewide (D)		-	\$4,262,617	\$157,402,477	2.71	-	-	-	-
Extra Credit: Serving Individuals on Public Assistance	Employment and Training Services, Self-Sufficiency	Up to 0.05 points	981	2,455	39.96	-	-	-	0.00
TOTAL									84.39

¹ Percentage of Target Met for the Business Penetration metric is based on year-over-year percentage point difference as follows:

- $\geq 4 = 100\%$
- $2 \text{ to } < 4 = 90\%$
- $0 \text{ to } < 2 = 80\%$
- $-2 \text{ to } < 0 = 70\%$
- $-4 \text{ to } < -2 = 60\%$
- $-6 \text{ to } < -4 = 40\%$
- $-8 \text{ to } < -6 = 20\%$
- $< -8 = 0\%$



DEPARTMENT OF ECONOMIC OPPORTUNITY
 CareerSource Suncoast
 March 6 -- 10, 2023
 LWDB 18 Preliminary Review Exit Summary

WELFARE TRANSITION (WT) PROGRAM

Participant Case File Review

A total of 18 participant case files were reviewed.

2022-2023 Monitoring Results								
Workforce Program	Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
WT	1.An Individual Responsibility Plan (IRP) did not include one of the three required elements (support services).	<u>45 CFR 261.11-14, Temporary Assistance for Needy Families (TANF) State Plan 2017-2020; Memorandum dated October 22, 2014- titled Individual Responsibility Plan (IRP), Alternative Requirement Plan (ARP), and Initial Assessment (IA) in One Stop Service Tracking (OSST) System.</u>	N/A	N/A	N	Y	N/A	The LWDB must ensure that an IRP is completed to include all required elements (i.e. employment goals, assigned weekly activities, and services provided to participants) moving the participant toward self-sufficiency as soon as possible.
	2. A participant should have had “deferred other” entered in OSST prior to a penalty being initiated.	<u>45 CFR 261.14, 414.065 (F.S.), 65A-4.205, Florida Administrative Code, and FG 03-037.</u>	N/A	N/A	N/A	N/A	Y	Staff must ensure the pre-penalty sanction process is initiated according to the guidance.
<u>Summer Youth Employment Program (SYEP)</u>	1. Summer Youth participants (5) had the incorrect Benchmark (8) entered in OSST.	<u>(SYEP) Reporting Instructions.</u>	N/A	N/A	N	Y	N/A	The LWDB must ensure data entry requirements for tracking TANF funded summer youth participation have a TANF Benchmark according to the SYEP reporting instructions.
Totals			0	0	0	1	1	

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM- EMPLOYMENT AND TRAINING (SNAP E&T)

Participant Case File Review

A total of 17 participant case files were reviewed.

2022-2023 Monitoring Results								
Workforce Program	Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
SNAP E&T	1. A participant’s case file was missing documentation to support JPR hours entered in OSST.	<u>7 CFR 273.24(a)(1)(i); 7 CFR 273.7(e)(4)(ii); SNAP State Plan.</u>	N	Y	N/A	N/A	N/A	The LWDB must ensure that documentation used to enter hours in OSST supports those hours and is maintained in the case file.
	2. A participant was exempted from SNAP participation by DCF and later sanctioned.	<u>State Plan; 7 CFR 273.7(f); Memo dated January 5, 2017</u>	N	Y	N/A	N/A	N/A	The LWDB must monitor exemption alerts from DCF and only sanction enrolled SNAP participants for noncompliance.
	3. In several instances, participants did not have their initial appointment code 590-status code ended timely (e.g., within two business days).	<u>Memo dated January 5, 2017.</u>	N/A	N/A	Y	Y	N/A	The LWDB must ensure that the 590-status code is ended in OSST within two business days of completion of the appointment or no-show date.
Totals			0	2	1	1	0	

COLLECTION OF DEMOGRAPHIC DATA

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

FINANCIAL DISCLOSURE

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

LOCAL DEO MERIT STAFFING STRUCTURE

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

SECTOR STRATEGIES

2022-2023 Monitoring Results

Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
Sector Strategy	1. LWDB failed to provide documentation reflecting the number of individuals trained in the designated targeted sectors.	Title 20 CFR 678.435 and Local Plan.	N/A	N/A	N/A	Y	N/A	The LWDB must provide documentation reflecting the number of individuals trained in the designated targeted sectors.
	2. LWDB failed to provide documentation of the outreach/services to employers in their targeted sector, including the percentage of businesses touched within the specific sector.	20 CFR 678.435 and Local Plan.	N/A	N/A	N/A	Y	N/A	LWDB must provide documentation of outreach/services to employers in their targeted sectors to include the percentage of businesses touched within the specific sector.
Totals			0	0	0	2	0	

ETHICS

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

BOARD GOVERNANCE

2022-2023 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
Board Governance	1. Establishment of Local Board: The local board did not provide documentation to confirm the date of the last certification by the Governor.	<u>Administrative Policy Number 91 (Section H-1)</u>	N	Y	N/A	N/A	N/A	The LWDB must develop specific procedures and processes to confirm the board is certified in a timely manner.
	2. Local Board Membership: All local board members did not complete the annual refresher training as required and documentation was not provided	<u>DEO Administrative Policy 110 (G)(2)(a).</u>	N	Y	N/A	N/A	N/A	The LWDB must develop specific procedures, processes and/or guidelines to make sure that all board members complete the

	to confirm that the training that was provided to the board members met the training requirements.	Administrative Policy 110 (IV)(G)(1)						required annual refresher training, and the training meets the training requirements.
Total			0	2	0	0	0	

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

WIOA ADULT AND DISLOCATED WORKER PROGRAM

A total of 22 participant case files (12 adults and 10 dislocated workers) were reviewed.

2022-2023 Monitoring Results								
Workforce Program	Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
WIOA Adult and Dislocated Worker	1. Documentation to support veteran status was missing in a participant’s case file.	<u>29 USC 2939(h), 50 U.S.C. App. 453, JVA 38 U.S.C. Section 4215 and 101, WIOA Sec.189(h), Sec.3(63)(A) and (B), TEN 15-10, and Local Workforce Service Plan.</u>	N	Y	N/A	N/A	N/A	The LWDB must ensure that documentation to support veteran status is collected from the participant when the participant is enrolled in WIOA and provided priority of service.
	2. Documentation to support the expenditure of funds for the classroom training portion of the Registered Apprenticeship (RA) training activity was missing in one participant’s case file. Additionally, the RA activity was not recorded in Employ Florida and documentation was missing from a participant case file. Note: this is a combined issue.	<u>20 CFR 680.410-420, WIOA Sec. 122 (b)(1)(D), WIOA Sec. 122 (b)(4)(A), WIOA Sec. 122 (a)(3), Administrative Policy 90 and 100, TEGl 13-16.</u>	N	Y	N/A	N/A	N/A	The LWDB must ensure that documentation of funds used to pay for the related instructions (classroom) or work-based training portion of the RA training activity is maintained in the participant’s case file or made available upon request. Additionally, the LWDB must ensure that applicable activities are recorded in Employ Florida for participants enrolled in the WIOA program. It should be noted that the expenditures associated with the training may be a questioned cost.
	3. Documentation to support the credential attainment recorded in Employ Florida was missing from a	<u>Federal Data Validation Requirements</u>	N	Y	N/A	N/A	N/A	The LWDB must ensure that documentation of the credential attainment recorded in Employ Florida

	<p>couple of participant case files. Additionally, the credential attainment recorded in Employ Florida did not meet the definition of an industry recognized credential for one participant.</p> <p>Note: this is a combined issue.</p>	<p><u>TEGL 10-16 Change 1, WIOA Sec. 3(52).</u></p>						<p>is maintained in the participant's case file or made available upon request. Additionally, the LWDB must ensure that certificates entered in Employ Florida under the credential tab meet the definition of a credential attainment as defined in TEGL10-16 Change 1. The type of credentials recorded do not provide measurable technical or industry /occupational skills necessary to obtain employment or advance within an occupation.</p>
	<p>4. In one instance, follow-up services were not offered or provided.</p>	<p><u>20 CFR 680.150, WIOA Sec. 134(c)(2)(A)(xiii), TEGL 19-16, Local Follow-up Policy.</u></p>	<p>Y</p>	<p>Y</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>The LWDB must ensure follow-up services are offered and/or provided to each adult participant who exit the WIOA program with unsubsidized employment.</p>
	<p>5. In several instances, Measurable Skill Gains (MSG) were not recorded in Employ Florida for the applicable program year in which the participants were enrolled in educational or training programs. Additionally, documentation to support the MSG recorded in Employ Florida was missing in several participant case files.</p> <p>Note: this is a combined issue.</p>	<p><u>20 CFR Part 677.155 (a)(v), WIOA Sec. 116 and TEGL 10-16 Change 1.</u></p>	<p>N/A</p>	<p>N/A</p>	<p>Y</p>	<p>Y</p>	<p>N/A</p>	<p>The LWDB must ensure that participants who are enrolled in an education or training program have an MSG recorded in the applicable program year. If the includable activity crosses program years, an MSG for each program year must be documented and recorded. Additionally, documentation of the MSG recorded in Employ Florida must be maintained in the participant's case file.</p>
	<p>6. In a few instances, verification of the employment information recorded during exit and/or during quarter follow-ups did not match the documentation maintained in the participant's case file. Additionally, in one instance, the employment information was not recorded during exit. However, employment at exit was documented in the participant's case file.</p> <p>Note: this is a combined issue.</p>	<p><u>20 CFR 677.175, Federal Data Validation Requirements, and Special Project Contract.</u></p>	<p>N/A</p>	<p>N/A</p>	<p>Y</p>	<p>Y</p>	<p>N/A</p>	<p>The LWDB must ensure that employment information is accurately entered in the State MIS.</p>

	7. In one instance, a quarterly follow-up was not conducted by the required due date identified in the follow-up table in Employ Florida.	<u>20 CFR 677.155 and 175, WIOA Sec.116 and Follow-up Memorandum 3/23/07, Master Cooperative Agreement.</u>	N/A	N/A	Y	Y	N/A	The LWDB must ensure that quarterly follow-ups are conducted and recorded in Employ Florida by the required due date.
	8. In several instances, IEPs remained open after the participant's exit.	<u>TEGL 10-16 Change 1, Master Cooperative Agreement and Federal Data Validation Requirements.</u>	N/A	N/A	N/A	N/A	Y	The LWDB staff must provide adequate case management for all participants receiving services that require staff assistance. When An IEP remains active after closure, it is a strong indication that case management was not properly provided. It is strongly recommended that case managers pay close attention to projected end dates and close or extend activities as needed.
Totals			1	4	3	3	1	

WIOA YOUTH PROGRAM

A total of 13 Out-of-School Youth participant case files were reviewed.

2022-2023 Monitoring Results								
Workforce Program	Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
WIOA Youth	1. In several instances, the Individual Service Strategy (ISS) was not updated as activities and goals were achieved and/or the youth's needs changed.	<u>WIOA Sec. 129 (c) (1) (B) and (c) (2), 20 CFR 681.420(a)(2).</u>	N/A	N/A	N	Y	N/A	The ISS must be updated when the youth goals are completed or changes to the strategy are made based on the youth needs.
	2. In a couple of instances, Measurable Skills Gains were not recorded in Employ Florida for the applicable program year in which the participants were enrolled in an educational or training program.	<u>20 CFR Part 677.155 (a)(v), WIOA Sec. 116 and TEGL 10-16 Change 1.</u>	N/A	N/A	Y	Y	N/A	The LWDB must ensure that an MSG is captured and recorded for all participants who are enrolled in an education or training program. If the includable activity crosses program years, an MSG for each program year must be documented and recorded.

	3. In one instance the source of verification used to determine the participant's barrier was not recorded in Employ Florida. However, the document was maintained in the participant file.	<u>WIOA Sec. 3(24), WIOA Sec. 129 (a)(1), 20 CFR 681.210-240; TEGL 21-16, Local Workforce Services Plan and Special Project Contract.</u>	N/A	N/A	N/A	N/A	Y	The LWDB must ensure that eligibility information is accurately entered in the State MIS.
	4. In several instances, IEPs remained open after the participant's exit.	<u>TEGL 10-16 Change 1, Master Cooperative Agreement and Federal Data Validation Requirements.</u>	N/A	N/A	N/A	N/A	Y	The LWDB staff must provide adequate case management for all participants receiving services that require staff assistance. When An IEP remains active after closure, it is a strong indication that case management was not properly provided. It is strongly recommended that case managers pay close attention to projected end dates and close or extend activities as needed.
Totals			0	0	1	2	2	

WIOA SPECIAL PROJECTS

- COVID-19 Public Health Emergency – Three participant case files.
- WIOA-Incumbent Worker-20% Non-Waiver Local Only - Three participant case files.
- Opioid Health Emergency DWG - Three participant case files.
- 814 - Fostering Opioid Recovery DWG – Three participant case files.
- PY21 IWT 15% Governor's Reserve – One participant case file.
- Commercial Drivers License 2022 – Statewide Adult - Three participant case files.
- Commercial Drivers License 2022 – Statewide Youth - One participant case file.
- Hurricane Ian DWG – Three participant case files.

A total of 20 participant case files were reviewed.

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

TRADE ADJUSTMENT ASSISTANCE (TAA) PROGRAM

A total of three participant cases were reviewed.

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

WAGNER PEYSER (WP) PROGRAM

Participant Case File Review

A total of 50 (20 job seekers, 15 job orders, 10 job seeker placements, and five RESEA) case files were reviewed.

2022-2023 Monitoring Results								
Workforce Program	Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
WP	<p>1. The following issues were noted with assessments and EDPs:</p> <ul style="list-style-type: none"> • One job seeker’s EDP was not available in Employ Florida or a paper copy. • Multiple job seekers’ initial assessments were missing several components of the jobseekers’ skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive service’s needs or, the specific testing used, etc. 	<p><u>20 CFR 651.10; UI Handbook -NO. 401-ETA 9048; 20 CFR 680.170; TEGL 19-16; and Employ Florida Service Code Guide.</u></p>	N	Y	N/A	N/A	N/A	<p>Staff must assure job seekers’ EDPs, and assessments are documented in case note in Employ Florida wizard, or in a paper copy. The plan must be conducted jointly with the customer to address their specific needs and should not be uniform.</p> <p>Also, the initial assessment must include documentation of an evaluation of the jobseeker’s skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive services, and the specific testing used.</p>
	<p>2. A few job seekers with staff-assisted referrals did not have a full registration in Employ Florida prior to the provision of the referral.</p>	<p><u>DEO AP 099.</u></p>	Y	Y	N/A	N/A	N/A	<p>Staff must ensure all staff-assisted referrals have a full registration in Employ Florida prior to the provision of a staff-assisted referral, which includes listing the jobseeker’s prior work history, if applicable.</p>
	<p>3. Multiple job orders reviewed by LWDB staff for compliance were immediately closed before the employer was notified and allowed the opportunity to correct or update the job order for compliance.</p>	<p><u>20 CFR 651.10 and DEO AP 099.</u></p>	N	Y	N/A	N/A	N/A	<p>The LWDB staff must attempt to notify the employer and allow them the opportunity to correct any non-compliant elements in the job orders, prior to closing them. The LWDB must ensure all steps to contact the employer and resolve compliance issues are documented in a case note in Employ Florida.</p>
	<p>4. A job order with multiple job seeker placements did not have</p>	<p><u>20 CFR 651.10 and DEO AP 099</u></p>	N/A	N/A	N	Y	N/A	<p>LWDB staff must ensure job orders with multiply job seeker placements include</p>

	case notes recorded on the job order identifying the job seekers and the wage rates at which each job seeker was hired.							case notes on the job order identifying the job seekers and the wage rates, at which each job seeker was hired.
Totals			1	3	0	1	0	

CAREER CENTER CREDENTIALING

A Career Center Credentialing review was conducted to determine compliance with program guidance for non-significant Migrant and Seasonal Farmworker Career Centers. The methodology for conducting the included self-certification by the LWDB that the following credentialing requirements had been met for the review period at each of the career center locations in the LWDA (posters, signage, and resource room verification). All other administrative requirements and records (listing of front-line staff, continuing education hours attained, etc.) were reviewed by the monitor. The monitor also reviewed the administrative documents provided to determine whether all “front-line” staff members had completed their required Tier I Certification courses and the 15 hours of continuing education courses in related subjects. No issues were observed.

MANAGEMENT INFORMATION SYSTEMS (MIS)

The LWDB provided policies and procedures ensuring that individuals who are no longer employed in the LWDB are promptly removed from having access to the MIS. No issues were observed. The LWDB provided documentation to support the policies and procedures ensuring a background screening was conducted for new staff (Board, contractor, or provider) hired during the review period. Although the identification of background rescreening for current employees is tracked through administrative means, it is highly recommended that the LWDB develop a formal process, policy, and/or procedural document to strengthen the administrative process and complement periodic compliance reviews. Additionally, the LWDB provided documentation that all newly hired staff completed Individual Non-Disclosure and Confidentiality Certification forms and security access agreements. No issues were observed.

JOBS FOR STATE VETERANS (JVSG)

The monitor conducted interviews with one DVOP, one LVER, the Veteran’s Program Manager, and one career center staff member. No issues were observed in the interviews.

A total of 15 Veteran case files were reviewed.

2022-2023 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
JVSG	1. A veteran was referred to a DVOP for Individualize Career Services. No record of DVOP ever contacting the Veteran.	<u>Administrative Policies 102, 117, and the Employ Florida Service Code Guide.</u>	N	Y	N	N	N	The LWDB must ensure that the the DVOP specialist who receives the referral attempt to contact the eligible veteran or person within two (2) business days of receipt of the referral.
	2. A veteran intake was not conducted/recorded utilizing activity code 159 (JVSG-Veteran Intake.) Veteran is an SBE veteran	<u>DEO Administrative Policy 102 and the Employ</u>	N	Y	N	N	N	The LWDB must ensure that the provision of the veteran intake screening for DVOP eligibility is recorded in

	and was not referred to a DVOP for individualized career services. No case note indicating why veteran was not referred to a DVOP.	<u>Florida Service Code Guide.</u>							Employ Florida using service code 159 (Initial Intake Screening – DVOP Services) and include a case note that aligns with the requirements
	3. A veteran did not have a priority of service (POS) code (089 automated or 189 manual) recorded in Employ Florida or a case note was not located for service code service code 189.	<u>20 CFR Part 1010; DEO Administrative Policies 096, 102, and 111, and the Employ Florida Service Code Guide.</u>	N	Y	N	N	N	N	The LWDB must ensure POS is provided and captured/ recorded on Employ Florida to include a case note that is clear and concise, identifies the notification of priority of service.
Totals			0	3	0	0	0	0	

MIGRANT AND SEASONAL FARMWORKER (MSFW) SERVICES AND OUTREACH PROGRAM

Management Review and Operational Process Review

A review of the CSS local operating processes and practices revealed that the region has policies and procedures in place for providing services to migrant and seasonal farmworkers(MSFWs). Additionally, the outreach staff is knowledgeable on the requirements of serving MSFW customers.

Participant Case File Review

A total of 19 (10 job seekers, nine job orders) case files were reviewed.

2022-2023 Monitoring Results

Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
Migrant and Seasonal Farmworker	1. A complaint log did not contain all required information.	<u>20 CFR 658.411, DEO Employment Service</u>	Y	Y	N/A	N/A	N/A	Staff must ensure complaint logs contain all necessary information for reporting purposes.

	<p>2. MSFW Outreach Reports- Outreach logs were not completed properly to illustrate complete outreach activities. Reports did not include follow-up activities with MSFWs and the YTD cumulative information in the outreach reports were incorrect. (Combined issue between MSFW outreach services and MSFW outreach reports).</p>	<p><u>653.107; WIOA Unified Plan; Local Workforce Services Plan; FG 03-040; 658.400.</u></p>	<p>Y</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>Y</p>	<p>The Outreach Worker did not meet the outreach contacts and quality contacts during the review process. Outreach activities should be expanded to places, agencies and employers not visited regularly by the Outreach Worker. Additionally, outreach services report narratives must be expanded to include visits/meetings held with FCDP partner and MSFW service providers. Narratives should include sufficient information to allow SWA to report performance of outreach activities in significant service area.</p>
	<p>3. The Bradenton significant office did not meet all required Equity Ratio Indicators during the review period. The Equity Ratio Indicator not met was staff-assisted career guidance services, received staff-assisted job search activities and received Unemployment Insurance (UI) claim assistance. In addition, the office did not meet two Minimum Service Level Indicators. The Minimum Service Level Indicators not met were median earnings of individuals in unsubsidized employment and individuals placed long term in non-agricultural jobs.</p>	<p><u>20 CFR 653, DEO FG 03-040, and Local Workforce Services Plan.</u></p>	<p>N/A</p>	<p>Y</p>	<p>Y</p>	<p>N/A</p>	<p>N/A</p>	<p>Staff should ensure every effort is made to provide the required services to MSFWs and to place MSFWs in jobs. Management should continue monitoring the MSFW Service Level Indicators Report regularly to identify service gaps.</p>

	<p>4. MSFW Applications- The same service codes were recorded multiple times for the same MSFW contact date. Applications were missing service code documentation requirements.</p>	<p><u>20 CFR 653.101,</u> <u>DEO FG 03-040,</u> <u>AOP, Desk Aid</u></p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>Y</p>	<p>Staff should ensure service code documentation requirements are correctly recorded in Employ Florida, when a referral to supportive services is conducted for MSFWs. It is recommended the outreach staff maintain a copy of service codes 169-178, while conducting outreach activities for reference purposes.</p>
	<p>5. Agricultural job orders had wage rate discrepancies for employment in which hired workers were to perform the same job duties. Additionally, there was a job order that had a position for a forklift operator, in the same job order soliciting a grader and stacker.</p>	<p><u>20 CFR 653.501,</u> <u>DEO FG 03-040,</u> <u>Migrant and</u> <u>Seasonal</u> <u>Agricultural</u> <u>Worker</u> <u>Protection Act</u></p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>Y</p>	<p>Staff must ensure job orders contain all terms and conditions of employment, including correct wage rates. Job orders must be specific to the employment needs of the employer and job seeker. Multiple positions should not be advertised into one job order.</p>
<p>Totals</p>			<p>2</p>	<p>2</p>	<p>1</p>	<p>0</p>	<p>3</p>	

General Comment

The State Monitor Advocate provided technical assistance to the outreach staff and LWDB management team on MSFW outreach services, MSFW outreach reports, the Complaint System, MSFW applications and job orders. The SMA ran a preliminary MSFW Indicators of Compliance report for the review period, however the SMA will run a full report in 30 days. The LWDB was informed the 30-day report may yield the same/different Indicators of Compliance results. The summary may/may not be updated, based on the 30-day report results.

Department of Economic Opportunity
Office for Civil Rights

**Draft Report on the Nondiscrimination Program Compliance Review of
Region 18 – CareerSource Suncoast
April 26, 2022**

I. INTRODUCTION

On April 26, 2022, the Department of Economic Opportunity’s (Department) Office for Civil Rights (OCR) conducted a nondiscrimination program compliance review Region 18 – CareerSource Suncoast (Region).

Julisa Nnorom, Equal Opportunity Officer (Reviewer), conducted the nondiscrimination program compliance review on behalf of the Department’s OCR.

On April 26, 2022, the Reviewer held the entrance conference with Ms. Deborah Lee, Quality Assurance Coordinator, and the Region’s administrative team. The exit conference was conducted via phone.

The Reviewer visited the following centers:

Bradenton One-Stop Career Center;
Sarasota One-Stop Career Center; and
North Port One-Stop Career Center.

II. DISCUSSION.

Element 1 – Designation of State and Local Level Equal Opportunity Officers.

Current Practices.

Ms. Deborah Lee serves as the Region’s Equal Opportunity (EO) Officer. Her contact information is readily available to the public and employees. Ms. Lee’s information is made known to employees during the onboarding process. Ms. Lee’s information is made known to participants by being displayed on the Region’s website. Ms. Lee appeared very knowledgeable and committed to ensuring that Region 18 is in compliance with all equal opportunity laws and regulations.

Each center has an employee to assist Ms. Lee and notice her of any issues or discrimination complaints that arise.

The EO Officer has attended professional trainings and has expressed a desire to be advised of additional training opportunities. Virtual (modules) equal opportunity training has been provided to staff.

The one-stop centers post nondiscrimination information and complaint procedures on the walls of the career centers. Participants also receive a copy of the Grievance/Complaint Form and EEO/Discrimination Form.

The Region's nondiscrimination policy is reviewed annually. It addresses EO, nondiscrimination, sexual harassment, disability, and reasonable accommodation. There is also a policy explaining the procedures for assisting participants with LEP. The region employs bilingual staff and provides interpretive services.

Identified Deficiencies and Recommended Corrective Actions.

Ms. Lee is not a senior-level employee.

- Please reconsider Ms. Lee's position in the Region's organizational structure or assign the role of Equal Opportunity Officer to a senior-level employee.

Ms. Lee, as the Equal Opportunity Officer, does not report to the highest-level position of authority for the Local Workforce Development Board.

- Please reconsider Ms. Lee's position in the Region's organizational structure or assign the role of Equal Opportunity Officer to a senior-level employee.
- The Equal Opportunity Officer must report to the highest-level position of authority for the Local Workforce Development Board.

Ms. Lee has no support staff.

- Please provide the Equal Opportunity Officer with support staff.

Additional EO training needs to be provided to EO Officer, staff, and contractors.

- Please attend OCR's virtual EO training.
- Please review 29 CFR 38.28 – 33 for guidance on the roles, responsibilities, and requirements for EO Officers. In accordance with statute, please make the necessary corrections.
- Please feel free to contact OCR for additional assistance.

Comments from the Region.

Ms. Lee is not a senior-level employee.

- Please reconsider Ms. Lee's position in the Region's organizational structure or assign the role of Equal Opportunity Officer to a senior-level employee.

CSS Response: CSS has taken the recommendation and has appointed a new EEO officer. The new EEO officer effective 06/2022, is Christina Witt – Organizational Support Services Director

Ms. Lee, as the Equal Opportunity Officer, does not report to the highest-level position of authority for the Local Workforce Development Board.

- Please reconsider Ms. Lee's position in the Region's organizational structure or assign the role of Equal Opportunity Officer to a senior-level employee.

CSS Response: Please note previous response.

- The Equal Opportunity Officer must report to the highest-level position of authority for the Local Workforce Development Board.

CSS Response: The new EEO is a direct report to Joshua Matlock, president/CEO of CSS.

Ms. Lee has no support staff.

- Please provide the Equal Opportunity Officer with support staff.

CSS Response: The Organizational Support Services Director has one assigned support staff. Eddie Fernandez, Operations Support Coordinator

Additional EO training needs to be provided to EO Officer, staff, and contractors.

- Please attend OCR's virtual EO training.
- Please review 29 CFR 38.28 – 33 for guidance on the roles, responsibilities, and requirements for EO Officers. In accordance with statute, please make the necessary corrections.
- Please feel free to contact OCR for additional assistance.

CSS Response: The CFR has been reviewed.

Element 2 – Notice and Communication.

Current Practices.

The Region provides program participants with notice of their right to file a complaint. This information is provided on the grievance form and placed in the lobbies of each career center. Staff is also knowledgeable and able to convey this information as needed.

The Equal Opportunity is the Law notice, Interpretive Services poster, and Florida Law Prohibits Discrimination poster are displayed in at least one area at each one-stop career center.

The Region has a plan and procedure in place to provide services to visually impaired and hearing-impaired customers. Each center has adequate assistive equipment, which includes screen readers and an accessible desk.

The Region's EO taglines include auxiliary aids, and TDD/TTY services. This information appears on flyers, printed material, emails, and on the Region's website. This information is included in public announcements and in communications intended for both employees and participants.

Photo displays are on the walls throughout the CareerSource centers include depictions of women, minorities, and disabled individuals engaged in workplace activities. These are also included on flyers.

Identified Deficiencies and Recommended Corrective Actions.

None.

Comments from the Region.

None.

Element 3 – Review Assurances, Job Training Plans, Contracts, Policies, and Procedures.

Current Practices.

The contract provided by the Region contained the complete set of assurances required by 29 CFR 38.

An Employee Handbook available to advise employees of the EO and nondiscrimination policies.

Identified Deficiencies and Recommended Corrective Actions.

None.

Comments from the Region.

None.

Element 4 – Universal Access.

Current Practices.

The Region's management and staff are dedicated and knowledgeable. The Region has a policy in place to meet the needs of customers with limited English proficiency (LEP) and disabilities.

The Region takes steps to ensure services and other information is provided to LEP customers. Bilingual staff are available to serve as interpreters if needed and telephone services are also available. The Region has documents translated into English, Spanish, and/or Haitian-Creole.

TDD/TTY or relay services are noticed on all forms. The Region has equipment for video to allow system access. Readers are available as needed for the visually impaired.

The Region partners with local service providers and organizations to conduct outreach activities. The Region also partners with various organizations to ensure they reach diverse groups.

Identified Deficiencies and Recommended Corrective Actions.

None.

Comments from the Region.

None.

Element 5 – Compliance with Laws Concerning Individuals with Disabilities.

Current Practices.

The Region's one-stop centers are fully accessible with wheelchair entrances and international accessibility symbols visible.

Information-Technology (IT) Equipment Accessibility is met.

Chief Talent Officer determines whether a reasonable accommodation is made. The Chief Talent Officer maintains separate, secure files for medical information.

The Region's one-stop career center facilities were adequate to serve individuals with disabilities.

The one-stop career centers each contain accessible workstations with software appropriate to assist customers with disabilities.

Identified Deficiencies and Recommended Corrective Actions.

Reasonable accommodation determinations should be made by or in collaboration with the Equal Opportunity Officer.

- Please assign this responsibility to the Equal Opportunity Officer.

Comments from the Region.

If accommodation is requested, it will be reviewed with the EEO officer in collaboration with Human Resources.

Element 6 – Data and Information Collection and Maintenance.

Current Practices.

The Region collects EO data via Employ Florida registration. The Region also collects demographic information when the participants sign-in at the kiosk. The data collected from the kiosk is then stored in the electronic data management system (EDMS) known as Atlas. The data is stored electronically in the management information system and maintained for at least 3 years.

Demographic reports, representing 6-month periods, are created and posted on the Operations SharePoint portal and available for review by the Programs Development Director, the Business and Economic Development Director and/or COO.

Identified Deficiencies and Recommended Corrective Actions.

Demographic reports must be provided to or made available to the EO Officer.

Comments from the Region.

The EEO has access to the shared demographic reports in the Operations folder.

Element 7 – Monitoring Recipients for Compliance.

Current Practices.

The Region operates the one-stop career centers and periodic self-evaluations (monitoring for compliance). The Region applies consideration for such, as needed, prior to making any changes.

Identified Deficiencies and Recommended Corrective Actions.

The Region's EO Officer is supposed to conduct monitoring of its one-stop career center facilities and service providers at least annually, but more frequently if needed. All monitoring must include an EO review.

- EO Officer must begin conducting onsite visits of the one-stop career centers. The EO Officer must also create an internal monitoring report after each visit and uses that report to address any concerns.

Comments from the Region.

CSS conducts an annual one-stop credentialing review that includes the review of Equal Employment posting requirements. CSS will include additional EEO reviews as needed.

Element 8 – Discrimination Complaint Processing Procedures.

Current Practices.

The Region conveys EO and nondiscrimination rights to staff and customers.

The Region has comprehensive discrimination complaint policies and procedures which are provided to participants at each center. Program staff is trained as to these procedures and able to review them with participants if requested.

Identified Deficiencies and Recommended Corrective Actions.

None.

Comments from the Region.

None.

III. CONCLUSION.

The Department's Office for Civil Rights sincerely thanks Ms. Lee for preparing for and assisting with this monitoring visit. The aforementioned corrections must be made to ensure that the Region provides nondiscriminatory and effective services to all of its customers. The Office for Civil Rights welcomes comments from the Region.



CEO Report



STAFF REPORTS



Kathy Bouchard
VP/CTO



Robin Dawson
VP/CFAO



Anthony Gagliano
VP/COO