



## **Combined Executive Committee and Board of Directors Meeting**

Thursday, January 25, 2024 - 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 Teams Meeting](#)

Phone 1-786-600-3104

Conference ID: 774 642 715#

### **AGENDA**

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

**Introductions: Chief Local Elected officials for 2024**

- Sarasota Commissioner Neil Rainford
- Manatee Commissioner George Kruse, reappointed

**Board Membership Updates:**

- Dr. Deborah Hawkes resigned from the Board Effective January 5, 2024.
  - Vacant Business Seat Open

**Action Items**

- Acceptance of Financial Audit Report for Program Year Ending June 30, 2023 – Ben Clark, James Moore & Co.
- Approval of December 14, 2023 Executive Committee Meeting Minutes - Eric Troyer
- Consent Agenda – Eric Troyer
  - Approval of November 9, 2023, Board Meeting Minutes – Eric Troyer
  - Approval of Revised Policy #09-21 Client Grievance and Reporting Policy and Procedure
  - Approval of Revised Policy # 13-21 Disaster Recovery Dislocated Worker Grants
- Approval of Transfer of Funds from Dislocated Worker to Adult – Robin Dawson
- Approval of Strategic Plan Updates – Josh Matlock
- Approval of Related Party Agreements- Christina Witt

**CEO Report – Joshua Matlock**

## **Other Board Business**

- One-Stop Operator Semi-Annual Report- Dr. Ron. Natale
- Finance and Performance Committee Report – Lisa Eding

## **Staff Reports**

- Kathy Bouchard, CTO
- Anthony Gagliano, COO

**Public Comments/ Board of Directors Meeting Closing Remarks – Eric Troyer**

**Meeting Adjournment- Eric Troyer**

**Next Executive Committee Meeting is February 8, 2024**

*Location: Virtual Teams Meeting*

**Next Board of Directors Meeting is March 28, 2024**

*Location: 3660 N. Washington Blvd, Sarasota, FL*



ACCEPTANCE  
FINANCIAL  
AUDIT

**SUNCOAST WORKFORCE BOARD, INC. D/B/A  
CAREERSOURCE SUNCOAST**

**FINANCIAL STATEMENTS**

**JUNE 30, 2023 WITH SUMMARIZED  
INFORMATION AS OF JUNE 30, 2022**

DRAFT

**SUNCOAST WORKFORCE BOARD, INC.  
D/B/A CAREERSOURCE SUNCOAST  
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## INDEPENDENT AUDITORS' REPORT

To the Board of Directors,  
Suncoast Workforce Board, Inc.  
d/b/a CareerSource Suncoast

### **Report on the Audit of the Financial Statements**

#### ***Opinion***

We have audited the accompanying financial statements of Suncoast Workforce Board, Inc., d/b/a CareerSource Suncoast (the Organization), which comprise the statement of financial position as of June 30, 2023, and the related statements of activities, functional expenses, and cash flows for the year then ended, and the related notes to the financial statements.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Organization as of June 30, 2023, and the changes in its net assets and its cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

#### ***Basis for Opinion***

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditors' Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Organization and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

#### ***Responsibilities of Management for the Financial Statements***

The Organization's management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Organization's ability to continue as a going concern for one year after the date that the financial statements are issued.

### ***Auditors' Responsibilities for the Audit of the Financial Statements***

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Organization's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Organization's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

### **Report on Summarized Comparative Information**

We have previously audited Suncoast Workforce Board, Inc. d/b/a CareerSource Suncoast's June 30, 2022 financial statements, and we expressed an unmodified audit opinion on those audited financial statements in our report dated November 16, 2022. In our opinion, the summarized comparative information presented herein as of and for the year ended June 30, 2022, is consistent, in all material respects, with the audited financial statements from which it has been derived.

## Supplementary Information

Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying Schedule of Expenditures of Federal Awards is presented for purposes of additional analysis as required by the audit requirements of Title 2 U.S. Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the Schedule of Expenditures of Federal Awards is fairly stated in all material respects in relation to the financial statements as a whole.

## Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated January 31, 2035, on our consideration of the Organization's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Organization's internal control over financial reporting and compliance.

James Moore & Co., P.L.

Tallahassee, Florida  
January 31, 2035



**SUNCOAST WORKFORCE BOARD, INC.  
D/B/A CAREERSOURCE SUNCOAST  
STATEMENT OF FINANCIAL POSITION  
JUNE 30, 2023 WITH SUMMARIZED  
INFORMATION AS OF JUNE 30, 2022**

	<b>2023</b>	<b>2022</b>
<b><u>ASSETS</u></b>		
<b>Current assets</b>		
Cash and cash equivalents	\$ 771,178	\$ 932,769
Certificate of deposit	475,000	174,503
Accounts receivable	4,159	1,264
Grants receivable	35,152	35,335
Prepaid expenses	38,803	1,491
Total current assets	1,324,292	1,145,362
<b>Noncurrent assets</b>		
Fixed assets		
Furniture and equipment	323,246	407,481
Accumulated depreciation	(323,246)	(404,891)
Net fixed assets	-	2,590
<b>Total Assets</b>	<b>\$1,324,292</b>	<b>\$1,147,952</b>
<b><u>LIABILITIES AND NET ASSETS</u></b>		
<b>Current liabilities</b>		
Accounts payable	\$ 61,624	\$ 135,719
Accrued expenses	111,880	62,039
Accrued leave	217,069	188,244
Refundable advances	271,674	217,392
Total current liabilities	662,247	603,394
<b>Total Liabilities</b>	<b>662,247</b>	<b>603,394</b>
<b>Net assets</b>		
Without donor restrictions:		
Undesignated	662,045	544,558
Total Net Assets	662,045	544,558
<b>Total Liabilities and Net Assets</b>	<b>\$1,324,292</b>	<b>\$1,147,952</b>

The accompanying notes to the financial statements  
are an integral part of this statement.

**SUNCOAST WORKFORCE BOARD, INC.  
D/B/A CAREERSOURCE SUNCOAST  
STATEMENT OF ACTIVITIES  
FOR THE YEAR ENDED JUNE 30, 2023 WITH SUMMARIZED  
INFORMATION FOR THE YEAR ENDED JUNE 30, 2022**

	<u>2023</u>	<u>2022</u>
	<u>Without Donor Restrictions</u>	<u>Without Donor Restrictions</u>
<b>Support and Revenue</b>		
Contract and grant revenue	\$ 6,667,714	\$ 6,897,972
Interest	6,349	1,635
Rental revenue	90,080	92,982
Other revenue	194,620	155,609
Total support and revenue	<u>6,958,763</u>	<u>7,148,198</u>
<b>Expenses</b>		
Program services	6,143,964	6,346,186
General and Administrative	697,312	683,748
Total expenses	<u>6,841,276</u>	<u>7,029,934</u>
<b>Change in net assets without donor restrictions</b>	<u>117,487</u>	<u>118,264</u>
<b>Net assets without donor restrictions, beginning of year</b>	544,558	426,294
<b>Net assets without donor restrictions, end of year</b>	<u>\$ 662,045</u>	<u>\$ 544,558</u>

The accompanying notes to the financial statements  
are an integral part of this statement.

**SUNCOAST WORKFORCE BOARD, INC.**  
**D/B/A CAREERSOURCE SUNCOAST**  
**STATEMENT OF FUNCTIONAL EXPENSES**  
**FOR THE YEAR ENDED JUNE 30, 2023 WITH SUMMARIZED**  
**INFORMATION FOR THE YEAR ENDED JUNE 30, 2022**

	2023						2022	
	WIOA Programs	Welfare Transition	Wagner Peyser and Veterans	Other Employment Related Programs	Other Funds	General and Administrative	Total	Total
Salaries and wages	\$ 1,125,587	\$ 667,105	\$ 270,174	\$ 469,141	\$ 534	\$ 407,668	\$ 2,940,209	\$ 3,213,820
Payroll taxes and benefits	366,706	219,839	77,114	127,144	6,769	93,969	891,541	964,837
Client training	422,752	11,739	-	374,885	2,299	-	811,675	819,082
Other client-related services	79,193	235,381	32,814	402,387	12,632	-	762,407	586,719
Short-term lease	172,788	124,682	233,423	28,580	-	92,341	651,814	641,354
Repairs and maintenance	111,444	58,625	75,137	14,311	716	-	260,233	229,130
Telephone and communications	50,812	25,757	28,831	5,132	-	1,646	112,178	103,567
Professional services	10,616	19,299	-	5,085	-	72,517	107,517	120,300
Meetings and seminars	28,852	16,368	25,740	9,075	12,220	14,786	107,041	122,207
Outreach and recruitment	84,000	-	11,029	3,909	7,037	-	105,975	100,580
Insurance	23,654	13,978	12,090	2,184	-	7,407	59,313	56,067
Dues and subscriptions	2,515	1,365	4,211	463	4,524	1,921	14,999	16,449
Materials and supplies	985	753	3,461	825	3,257	532	9,813	51,730
Depreciation	-	-	-	-	-	2,590	2,590	2,590
Postage	922	481	530	103	-	72	2,108	1,245
Interest	-	-	-	-	-	1,863	1,863	257
Total Expenses	<u>\$ 2,480,826</u>	<u>\$ 1,395,372</u>	<u>\$ 774,554</u>	<u>\$ 1,443,224</u>	<u>\$ 49,988</u>	<u>\$ 697,312</u>	<u>\$ 6,841,276</u>	<u>\$ 7,029,934</u>

The accompanying notes to the financial statements  
are an integral part of this statement.

**SUNCOAST WORKFORCE BOARD, INC.**  
**D/B/A CAREERSOURCE SUNCOAST**  
**STATEMENT OF CASH FLOWS**  
**FOR THE YEAR ENDED JUNE 30, 2023 WITH SUMMARIZED**  
**INFORMATION FOR THE YEAR ENDED JUNE 30, 2022**

	<u>2023</u>	<u>2022</u>
<b>Cash flows from operating activities</b>		
Cash received from grantors, contractors and contributors	\$ 7,003,984	\$ 7,098,025
Cash paid to employees and vendors	(6,871,427)	(7,135,705)
Interest received	6,349	880
Net cash provided by (used in) operating activities	<u>138,906</u>	<u>(36,800)</u>
<b>Cash flows from investing activities</b>		
Purchases of certificates of deposit	(300,497)	(755)
Net cash provided by (used in) investing activities	<u>(300,497)</u>	<u>(755)</u>
<b>Net increase (decrease) in cash and cash equivalents</b>	<u>(161,591)</u>	<u>(37,555)</u>
<b>Cash and cash equivalents, beginning of year</b>	932,769	970,324
<b>Cash and cash equivalents, end of year</b>	<u>\$ 771,178</u>	<u>\$ 932,769</u>
<b>Reconciliation of change in net assets to net cash provided by (used in) operating activities</b>		
Change in net assets	<u>\$ 117,487</u>	<u>\$ 118,264</u>
Adjustments to reconcile change in net assets to net cash provided by (used in) operating activities:		
Depreciation	2,590	2,590
Decrease in grants receivable	183	15,151
(Increase) decrease in accounts receivable	(2,895)	16,732
(Increase) decrease in prepaid expenses	(37,312)	265
Increase (decrease) in accounts payable	(74,095)	41,034
Increase (decrease) in accrued expenses	49,841	(133,957)
Increase (decrease) in deferred revenue	54,282	(81,176)
Increase (decrease) in accrued leave	28,825	(15,703)
Total adjustments	<u>21,419</u>	<u>(155,064)</u>
<b>Net cash provided by (used in) operating activities</b>	<u>\$ 138,906</u>	<u>\$ (36,800)</u>

The accompanying notes to the financial statements  
are an integral part of this statement.

**SUNCOAST WORKFORCE BOARD, INC.**  
**D/B/A CAREERSOURCE SUNCOAST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2023**

(1) **Summary of Significant Accounting Policies:**

The following is a summary of the more significant accounting policies of the Suncoast Workforce Board, Inc. d/b/a CareerSource Suncoast (the Organization), which affect significant elements of the financial statements:

(a) **Reporting entity**—The Organization is a nonprofit organization under the state of Florida Not-for-Profit Corporation Act and is exempt from income taxes according to the provisions of Section 501(c)(3) of the Internal Revenue Code (IRC). In addition, the Organization qualifies for the charitable contribution deduction and has been classified as an organization that is not a private foundation.

The Organization was incorporated under the laws of the State of Florida on September 2, 1983, as Manasota Industry Council, Inc. (the Council), a not-for-profit corporation organized to serve as the administrative entity and grant recipient with the State of Florida Department of Labor and Employment Security for the Job Training Partnership Act (JTPA) Program. Effective October 1, 1996, the Council was restructured under the Workforce Florida Act and changed its legal name to the Suncoast Workforce Development Board, Inc. The name was subsequently changed to the Suncoast Workforce Board, Inc., effective April 16, 2001. Effective February, 2014 Suncoast Workforce Board, Inc. changed to d/b/a CareerSource Suncoast as part of a statewide rebranding initiative for all 24 regional workforce boards to align as a single universal brand identity.

On August 7, 1998, the Federal Workforce Investment Act of 1998 (WIA) was signed into law. It replaced the JTPA, which was repealed effective July 1, 2000. This act combined many of the services supported by the JTPA using a "One-Stop" approach providing universal access to core services for both job seekers and employers. The State of Florida enacted legislation, the Workforce Innovation Act of 2000, which implemented provisions of the WIA. On July 22, 2014 the Workforce Innovation and Opportunity Act (WIOA) was signed into law and took effect on July 1, 2015. WIOA supersedes the Workforce Investment Act of 1998 and amends the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973. WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy.

The Organization, a 26-member public-private partnership, serves as the Administrative entity and Grant Recipient for Florida Region 18, comprising Sarasota and Manatee Counties, for various funding streams including WIOA Adult, Youth and Dislocated Worker programs, Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), and Reemployment Services and Eligibility Assessments (RESEA). In addition, the Organization administers jointly managed programs with the Florida Department of Commerce (DOC) including Wagner Peyser Labor Exchange and Reemployment Services and Veterans' programs. Career and training services are offered in three One-Stop Career Centers located in Sarasota, Bradenton, and North Port, Florida; at public schools in the Manatee and Sarasota County School Districts (including Pre-Apprenticeship, Career Counseling, After School and Out-of-School programs within the school system), and within the local community. The Organization also serves as Administrative Entity and/or Fiscal Agent for workforce related programs that complement and further the goals and mission of the Organization.

**SUNCOAST WORKFORCE BOARD, INC.**  
**D/B/A CAREERSOURCE SUNCOAST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2023**

(1) **Summary of Significant Accounting Policies:** (Continued)

The Organization develops, plans, monitors, and administrates the following grants and programs:

- Wagner Peyser
- Disabled Veterans' Outreach Program
- Local Veterans' Outreach Program
- Trade Adjustment Assistance
- Unemployment Insurance
- Workforce Innovation and Opportunity Act – Adult, Youth, and Dislocated Worker
- Supplemental Nutrition Assistance Program
- Temporary Assistance for Needy Families

(b) **Basis of accounting**—The accompanying financial statements have been prepared on the accrual basis of accounting in accordance with the generally accepted in the United States of America.

(c) **Basis of financial statement presentation and accounting for contributions**—The accompanying financial statements include all funds and activities over which the board of directors of the Organization has oversight and financial responsibility.

The Organization prepares its financial statements in accordance to the Financial Accounting Standards Board (FASB) *Accounting Standards Codification (ASC) 958, Not-for-Profit Entities*.

(d) **Net assets**—Net assets, revenues, gains, and losses are classified based on the existence or absence of donor or grantor-imposed restrictions. Accordingly, net assets and changes therein are classified and reported as follows:

*Net Assets Without Donor Restrictions* – Net assets available for use in general operations and not subject to donor (or certain grantor) restrictions

*Net assets with donor restrictions*—Net assets subject to donor- (or certain grantor-) imposed restrictions. Some donor-imposed restrictions are temporary in nature, such as those that will be met by the passage of time or other events specified by the donor. Other donor-imposed restrictions are perpetual in nature, where the donor stipulates that resources be maintained in perpetuity. Restricted contributions by donors are reported as increases in net assets without donor restrictions if the restrictions expire (that is, when a stipulated time restriction ends or purpose restriction is accomplished) in the reporting period in which the revenue is recognized. All other donor-restricted contributions are reported as increases in net assets with donor restrictions, depending on the nature of the restrictions. When a restriction expires, net assets with donor restrictions are reclassified to net assets without donor restrictions and reported in the statements of activities as net assets released from restrictions. There are no net assets with donor restrictions as of June 30, 2023.

**SUNCOAST WORKFORCE BOARD, INC.**  
**D/B/A CAREERSOURCE SUNCOAST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2023**

(1) **Summary of Significant Accounting Policies:** (Continued)

Contributions are recognized when cash, securities or other assets, an unconditional promise to give, or a notification of a beneficial interest is received. Conditional promises to give, that is, those with a measurable performance or other barrier, and a right of return, are not recognized until the conditions on which they depend have been substantially met.

A significant portion of the Organization’s revenue is derived from cost-reimbursable federal, state, and local contracts and grants, which are conditioned upon certain performance requirements and/ or the incurrence of allowable qualifying expenses. Amounts received are recognized as revenue when we have incurred expenditures in compliance with specific contract or grant provisions. Amounts received prior to incurring qualifying expenditures are reported as deferred revenue in the statement of financial position. At June 30, 2023, \$271,674 have been received in advance and/or have not been recognized because qualifying expenditures have not yet been incurred under our federal, state, and local contracts and grants.

(e) **Use of estimates**—The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amount of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the reporting period. Actual results could differ from those estimates.

(f) **Functional allocation of expenses**—The costs of providing the various programs and other activities have been summarized on a functional basis in the Statement of Activities. Accordingly, certain costs have been allocated among the programs and supporting services benefited.

(g) **Fixed assets and depreciation**—Fixed Assets are defined by the Board as assets with an initial, individual cost of \$5,000 or more and an estimated useful life of more than one year. Such assets are recorded at historical cost. Donated capital assets are recorded at estimated acquisition value at the date of the donation. The Federal Government has a reversionary interest in those assets purchased with its funds which have a cost of \$5,000 or more and an estimated useful life of at least one year. Depreciation of capital assets is computed using the straight-line method over estimated useful lives as follows:

Assets	Years
Computer Equipment	5
Furniture	7

(h) **Federal income taxes**— Income taxes are not provided for in the financial statements since the Organization is exempt from federal and state income taxes under Section 501(c)(3) of the Internal Revenue Code and similar state provisions. Management is not aware of any activities that would jeopardize the Organization’s tax exempt status. The Organization is not aware of any tax positions it has taken that are subject to a significant degree of uncertainty. Tax years for the past three years remain subject to examination by taxing authorities.

**SUNCOAST WORKFORCE BOARD, INC.**  
**D/B/A CAREERSOURCE SUNCOAST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2023**

(1) **Summary of Significant Accounting Policies:** (Continued)

(i) **Accrued leave**—It is the Organization’s policy to allow employees upon separation of employment, other than for cause, to be compensated up to 200 hours of accrued leave at their regular hourly rate of pay, conditional upon availability of funding. The Organization’s liability for compensated absences of their employees was \$217,069, as of June 30, 2023.

(j) **Cash and cash equivalents**— For the purpose of reporting cash flows, cash and cash equivalents include cash on hand, demand deposits due from banks, and short-term investments with an original maturity of 90 days or less.

(k) **Certificate of deposit**—The Organization maintains three certificates of deposit with federally insured banks. They are valued at fair value on the last day of the fiscal year and mature in 2024.

(l) **Prepaid expenses**— Prepaid expenses consist of participant transportation cards used by the Organization’s clients. These expenses are recognized as they are incurred.

(m) **Recent accounting pronouncements**—The FASB and other entities issued new or modifications to, or interpretations of, existing accounting guidance during 2023 and 2022. The Organization has considered the new pronouncements that altered accounting principles generally accepted in the United States of America, and other than as disclosed in the notes to the financial statements, does not believe that any other new or modified principles will have a material impact on the Organization’s reported financial position or operations in the near term.

(2) **2022 Presentation:**

The accompanying financial statements include certain prior year summarized comparative information in total. Such information does not include sufficient detail to constitute a presentation in conformity with accounting principles generally accepted in the United States. Accordingly, such information should be read in conjunction with the Organization’s financial statements for the year ended June 30, 2022, from which the summarized information was derived.

(3) **Subsequent Events:**

Management has performed an analysis of the activities and transactions subsequent to June 30, 2023, to determine the need for any adjustments to and/or disclosures within the audited financial statements for the year ended June 30, 2023. Management has performed their analysis through January 31, 2025, the date the financial statements were available to be issued.



**SUNCOAST WORKFORCE BOARD, INC.**  
**D/B/A CAREERSOURCE SUNCOAST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2023**

(4) **Employee Benefits:**

The Organization offers a tax-deferred savings plan, which qualifies as a voluntary contribution savings plan under Internal Revenue Code Section 401(k). Employees may provide tax-deferred contributions to fully-vested individual retirement accounts up to the Internal Revenue Code limit. The plan covers all employees over age twenty and one-half and after six months of continuous employment. The Organization makes discretionary contributions based on eligible employee wages. Employees are immediately vested in salary deferral contributions and become vested in employer matching and discretionary profit-sharing contributions in accordance with a schedule of years of service. Total expense recorded for the Organization's match was \$207,259 for the year ended June 30, 2023.

(5) **Concentration of Credit Risk and Significant Funding Source:**

(a) **Cash and cash equivalents**—As of June 30, 2023, the Organization had demand and time deposits with multiple financial institutions of \$771,178. The bank balance of these demand and time deposits was \$827,891 as of June 30, 2023. The Organization has no policy requiring collateral or other security to support its deposits, although all demand and time deposits with banks are federally insured up to FDIC limitations. The demand and time deposits with the financial institutions are insured up to \$250,000.

(b) **Grants receivable**—The Organization's receivables are for amounts due under contracts with the State of Florida and Federal government agencies. The Board has no policy requiring collateral or other security to support its receivables.

(c) **Significant funding source**—During the year ended June 30, 2023, the Organization received approximately 96%, of its funding from the United States Department of Labor, the United States Department of Health and Human Services, and the United States Department of Agriculture passed through the Department of Commerce. If a significant reduction in the level of this funding were to occur, it could have an adverse effect on the Organization's program and activities.

(6) **Related Parties Transactions:**

In accordance with applicable regulations, the Organization's board of directors includes representatives of private and public sector industries. During the fiscal year ended June 30, 2023, the Organization entered into contracts with certain private and public sector industries, with which certain board members associated, for the purpose of providing services to participants. During the year ended June 30, 2023, total payments for providing training to participants were \$143,066 and total payments for dues and outreach payments were \$48,080. Accounts payable to related parties were \$3,485 at June 30, 2023.

**SUNCOAST WORKFORCE BOARD, INC.**  
**D/B/A CAREERSOURCE SUNCOAST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2023**

**(7) Indirect Costs:**

The Organization records costs that can be directly identified as benefiting a specific WIOA, TANF, or DOC Joint Managed Programs funding stream as direct expenses of the related program. Certain costs which are directly shared, have been allocated to programs based upon the relative benefit received. The Organization allocates indirect costs that cannot be identified as benefiting a specific program. Indirect costs are allocated to benefiting programs based upon an indirect cost rate approved by the Florida Department of Commerce. The following is a table of cost allocation methodologies for expenditures which are allocated:

<b>Expense</b>	<b>Method of Allocation</b>
Salaries and benefits	Time and effort
Facilities costs and rent	Full time employees located in the facilities
Staff training, dues, subscriptions, insurance, consultants, travel, and supplies	Allocated directly to the benefiting program or the appropriate indirect cost pool
Equipment	Charged directly or directly allocated to benefiting programs
Accounting, advertising, legal	Charged to the appropriate indirect pool unless the service can be directly tied to a grant
Auditing and monitoring	Allocated based upon relative expenditures of the grants audited and monitored
Service provider contracts	Directly allocated to programs or by the relative time the provider spent on the programs

**(8) Property Leased to Others:**

During the year ended June 30, 2023, The Organization recognized rental income from properties leased to others in the amount of \$90,080. The following is a schedule of future rentals under non-cancellable operating leases as of June 30, 2023. Leases have an annual non-cancellable term and will be on a month to month basis upon expiration unless renewed. The amounts reflected below may differ from actual future rental income due to new leases entered into, the expiration of existing leases, or the recognition of rental income resulting from escalators, if any:

<b>Year Ending June 30,</b>	<b>Rental Revenue</b>
2024	\$ 10,544

**SUNCOAST WORKFORCE BOARD, INC.**  
**D/B/A CAREERSOURCE SUNCOAST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2023**

(9) **Liquidity and Availability:**

Financial assets available for general expenditure, that is, without donor or other restrictions limiting their use, within one year of the statement of the statement of financial position date, comprise the following:

Cash and cash equivalents	\$ 771,178
Certificates of deposit	475,000
Accounts receivable	4,159
Grants receivable	35,152
Total	<u>\$ 1,285,489</u>

The Organization has \$1,285,489 of financial assets available within one year of the statement of financial position date. None of these assets are subject to donor or other contractual restrictions that make them unavailable for general expenditure within one year of the statement of financial position date. The Department of Commerce allows the Organization to request cash draws approximate to amounts necessary for pending disbursements for two weeks of cash needs.

(10) **Contingencies:**

Amounts received or receivable from grantor agencies are subject to audit and adjustment by grantor agencies, principally the Federal government and the State of Florida. Any disallowed claims, including amounts already collected, may constitute a liability of the applicable funds. The amount, if any, of expenditures which may be disallowed by the grantor cannot be determined at this time although the Organization expects such amounts, if any, to be immaterial.

**SUNCOAST WORKFORCE BOARD, INC.**  
**D/B/A CAREERSOURCE SUNCOAST**  
**SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**  
**FOR THE YEAR ENDED JUNE 30, 2023**

Federal Grantor/Pass-Through Entity/ Federal Program or Cluster Title	Federal Assistance Listing Number	Pass-Through Entity Identification Number	Federal Expenditures	Amount to Subrecipients
<b>United States Department of Labor:</b>				
Passed through the State of Florida, Department of Commerce:				
Employment Service Cluster:				
Wagner Peyser	17.207	WPB23	\$ 62,461	\$ -
Wagner Peyser	17.207	WPA23	538,512	-
Disabled Veterans Outreach Program	17.207	WPA22	158,044	-
Disabled Veterans Outreach Program	17.801	DVP22	37,573	-
Local Veterans Employment Representative	17.801	DVP23	12,928	-
Local Veterans Employment Representative	17.801	LVR22	47,900	-
Total Employment Service Cluster			<u>899,480</u>	<u>-</u>
Trade Adjustment Assistance	17.245	TAC20	36	-
Trade Adjustment Assistance	17.245	TAC21	237	-
Total Trade Adjustment Assistance			<u>273</u>	<u>-</u>
Unemployment Insurance	17.225	UCR21	94,882	-
Unemployment Insurance	17.225	UCR22	48,069	-
Total Unemployment Insurance			<u>142,951</u>	<u>-</u>
COVID-19 National Emergency Grants	17.277	WNC20	255,482	-
National Emergency Grants	17.277	WNO20	225,283	-
National Emergency Grants	17.277	WNI23	371,417	-
Total National Emergency Grants			<u>852,182</u>	<u>-</u>
Workforce Innovation and Opportunity Act Cluster:				
WIOA Adult Program	17.258	WIA23	929,003	-
WIOA Adult Program	17.258	WIS22	63,854	5,058
WIOA Youth Activities	17.259	WIY23	354,189	-
WIOA Youth Activities	17.259	WIY22	604,445	2,007
WIOA Youth Activities	17.259	WIS22	63,854	-
WIOA Dislocated Worker Formulas Grants	17.278	WID23	728,326	-
WIOA Dislocated Worker Formulas Grants	17.278	WID22	111,717	3,551
WIOA Dislocated Worker Formulas Grants	17.278	WRS22	36,467	-
WIOA Dislocated Worker Formulas Grants	17.278	WIR23	73,717	-
WIOA Dislocated Worker Formulas Grants	17.278	WIR22	12,461	-
WIOA Dislocated Worker Formulas Grants	17.278	WIS22	71,836	-
Total Workforce Innovation and Opportunity Act Cluster			<u>3,049,869</u>	<u>10,616</u>
<b>Total United States Department of Labor</b>			<u>4,944,755</u>	<u>10,616</u>
<b>U.S. Department of Agriculture</b>				
Passed through the State of Florida, Department of Commerce:				
Supplemental Nutrition Assistance Program Cluster:				
Supplemental Nutrition Assistance Program	10.561	FSH23	84,811	-
Supplemental Nutrition Assistance Program	10.561	FSH22	22,054	5,084
Total Supplemental Nutrition Assistance Program Cluster			<u>106,865</u>	<u>5,084</u>
<b>U.S. Department of Health and Human Services:</b>				
Passed through the State of Florida, Department of Commerce:				
Temporary Assistance for Needy Families	93.558	WTS22	633,865	19,299
Temporary Assistance for Needy Families	93.558	WTS23	897,299	-
Total Temporary Assistance for Needy Families			<u>1,531,164</u>	<u>19,299</u>
<b>TOTAL EXPENDITURES OF FEDERAL AWARDS</b>			<u><u>\$ 6,582,784</u></u>	<u><u>\$ 34,999</u></u>

The accompanying notes to schedule of expenditures of federal awards are an integral part of this schedule.

**SUNCOAST WORKFORCE BOARD, INC.**  
**D/B/A: CAREERSOURCE SUNCOAST**  
**NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**  
**YEAR ENDED JUNE 30, 2023**

(1) **Basis of Presentation:**

The accompanying Schedule of Expenditures of Federal Awards includes the Federal award activity of Suncoast Workforce Board, Inc. (the Organization) and is presented on the accrual basis of accounting. The information in this schedule is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Therefore, some amounts presented in this schedule may differ from amounts presented in, or used in the preparation of, the financial statements.

(2) **Summary of Significant Accounting Policies:**

Expenditures reported on the schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowed or are limited as to reimbursement.

(3) **De Minimis Indirect Cost Rate Election:**

The Organization has elected not to use the 10 percent de minimis indirect cost rate as allowed under Uniform Guidance.

**INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL OVER  
FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS  
BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE  
WITH GOVERNMENT AUDITING STANDARDS**

To the Board of Directors,  
Suncoast Workforce Board, Inc.  
d/b/a CareerSource Suncoast

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to the financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the Suncoast Workforce Board, Inc., (the Organization) which comprise the statement of financial position as of June 30, 2023, and the related statements of activities, functional expenses, and cash flows for the year then ended, and the related notes to the financial statements, and have issued our report thereon dated \_\_\_/\_\_\_/\_\_\_.

**Report on Internal Control over Financial Reporting**

In planning and performing our audit, we considered the Organization's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Organization's internal control. Accordingly, we do not express an opinion on the effectiveness of the Organization's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over financial reporting was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

## Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Organization's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

## Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

James Moore & Co., P.L.

Tallahassee, Florida  
January 31, 2035

**INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM AND REPORT ON INTERNAL CONTROL OVER COMPLIANCE IN ACCORDANCE WITH THE UNIFORM GUIDANCE**

To the Board of Directors,  
Suncoast Workforce Board, Inc.  
d/b/a CareerSource Suncoast

**Report on Compliance for Each Major Federal Program**

***Opinion on Each Major Federal Program***

We have audited Suncoast Workforce Board, Inc. d/b/a CareerSource Suncoast (“the Organization”)’s compliance with the types of compliance requirements described in the OMB *Compliance Supplement* that could have a direct and material effect on each of the Organization’s major federal programs for the year ended June 30, 2023. The Organization’s major federal programs are identified in the summary of auditors’ results section of the accompanying schedule of findings and questioned costs.

In our opinion, the Organization complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2023.

***Basis for Opinion on Each Major Federal Program***

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America (GAAS); the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States (*Government Auditing Standards*); the special audit guidance provided by the State of Florida Department of Commerce and the audit requirements of Title 2 U.S. *Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditors’ Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of the Organization and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for each major federal program. Our audit does not provide a legal determination of the Organization’s compliance with the compliance requirements referred to above.

***Responsibilities of Management for Compliance***

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules and provisions of contracts or grant agreements applicable to the Organization’s federal programs.



## ***Auditors' Responsibility***

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the Organization's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material, if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about the Organization's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with GAAS, *Government Auditing Standards* and Uniform Guidance, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the Organization's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of the Organization's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of the Organization's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

### **Report on Internal Control Over Compliance**

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the Auditors' Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given these limitations, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weaknesses or significant deficiencies in internal control over compliance may exist that were not identified.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

*James Moore & Co., P.L.*

Tallahassee, Florida  
January 31, 2035

DRAFT

**SUNCOAST WORKFORCE BOARD, INC.  
D/B/A CAREERSOURCE SUNCOAST  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
FOR THE YEAR ENDED JUNE 30, 2023**

**I. Summary of Auditors' Results:**

***Financial Statements:***

Type of audit report issued on the financial statements: *Unmodified*

Internal control over financial reporting:

Material weakness(es) identified?  yes  no

Significant deficiency(ies) identified?  yes  none reported

Noncompliance material to financial statements noted?  yes  no

***Federal Awards:***

Internal control over major Federal programs:

Material weakness(es) identified?  yes  no

Significant deficiency(ies) identified?  yes  none reported

Type of auditors' report issued on compliance for major Federal programs: *Unmodified*

Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)?  yes  no

Identification of major Federal programs:

<u>Assistance Listing Number(s)</u>	<u>Program Name/Cluster</u>
17.207, 17.801	Employment Service Cluster
93.558	Temporary Assistance for Needy Families
Dollar threshold used to distinguish between type A and type B Federal programs:	\$750,000
Auditee qualified as low-risk auditee?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> No

**II. Financial Statement Findings:** None.

**III. Federal Awards Findings and Questioned Costs:** None.

**IV. State of Florida, Department of Commerce (DOC) Reporting Requirements:** The Organization performed timely reconciliations between the general ledger accounting system and the Subrecipient Enterprise Resource Application maintained by DOC. Also, based on the DOC reporting requirements, there were no additional findings required to be reported in FY2023.

**V. Federal Award Summary Schedule of Prior Year Findings:** There were no audit findings for the year ended June 30, 2022.



# ACTION ITEMS

**CareerSource Suncoast  
Executive Committee  
Meeting Minutes**  
Teams Virtual Meeting  
Thursday, December 14, 2023  
8:00 a.m.

<b>Absent Present</b>	<b><u>Committee Members</u></b>
P*	Eric Troyer, CPA, Kerkering, Barberio & Company
A	Christy Cardillo, Partner, Carr, Riggs & Ingram, LLC
P*	David Kraft, Vision Consulting Group
P*	Sharon Hillstrom, Bradenton Area Economic Development Corporation
P*	Lisa Eding, Teakdecking Systems
A	Peter Hayes, Tandem Construction
*	Virtual
	Staff Present: Joshua Matlock*, Anthony Gagliano*, Kathy Bouchard*, James Disbro*, Linda Benedict*

**I. Call to Order**

Eric Troyer, Chair, called the meeting to order at 8:00 a.m. Attendance was recorded, and quorum established.

**II. Action Items**

**Approval of November 9, 2023, Executive Committee Meeting Minutes**

Eric Troyer asked for a motion to approve the November 9, 2023 Executive Committee meeting minutes.

Motion: Sharon Hillstrom      Second: Lisa Eding

The motion passed unanimously.

**III. CEO Report**

Joshua Matlock gave updates on the CareerSource Florida (CSF) Board [meeting](#) held on December 12, 2023. The CSF meeting provided a comprehensive overview of Sunshine Law, and the Executive Committee agreed to have a separate training course on Sunshine Law, in addition to the annual Board refresher. CSF also passed several policies to include Apprenticeship Strategic Policy, Regional Planning Areas Identification and Requirements and a Standardization of Tools and Services Policy.

**IV. Other Board Business**

The Executive Committee reviewed the proposed changes from the strategic planning meeting to update the CareerSource Suncoast (CSS) mission, vision, values and two-year goals. The following changes were developed, and a motion was made to present to the full Board of Directors for approval.

## Proposed Changes:

### Mission

- Identify and invest in workforce development solutions to meet the needs of Manatee and Sarasota Counties.

### Vision

- A highly skilled and responsive workforce that fuels a thriving economy.

### Values

- Employer Centric
- Integrity
- Culture of Excellence
- Collaboration
- Innovation

### 2-Year Goals

- Enhance offerings to focus on increasing access by employers
  - Enhance customized employer-focused solutions
  - Provide programs to help job seekers and employees address benefits cliff and financial gaps
- Develop a plan to invest unrestricted funds in growing best practice employer programs
  - Identify programs needing unrestricted funds to grow, expand and deepen.
- Strengthen board engagement by developing opportunities for members to increase awareness of CSS among employers.
  - Build a menu of board engagement opportunities and match board members according to highest and best use.

Motion: Lisa Eding    Second: David Kraft

The motion passed unanimously.

## **V. Staff Reports**

### Kathy Bouchard

Friday, December 15, 2023 will be the CSS staff retreat. David Kraft will be presenting the Connective Workplace blueprint to the staff. The three main topics that will be reviewed are: training, turnover and evaluations.

FloridaCommerce is applying for a new \$5 million statewide Opioid grant. CSS was one of nine (9) local boards that submitted to participate in the grant.

The Ticket-to-Work (TTW) program generated \$57,000 dollars in the prior quarter that was received in late November and early December. These generated funds are unrestricted.

### Anthony Gagliano

A video, [Discover Mfg Sarasota Manatee.mp4](#), was shared with the committee from a CSS event held in partnership with FloridaMakes and the Sarasota-Manatee Area Manufacturing Association (SAMA). There were thirteen (13) attendees at the two-day event, highlighting manufacturing careers in the region.

There were two different apprenticeship events held, including one to highlight National Apprenticeship Week (NAW). There were multiple employers at the event, including New Dawn Electric and the Early Learning Coalition, speaking about their apprenticeships and pre-apprenticeship programs. James Disbro was in Chicago, participating in some Department of Labor (DOL) talks around apprenticeship with hopes to yield some nationwide exposure for CSS on apprenticeships. An upcoming webinar and a possible speaking engagement at the National Association of Workforce Boards (NAWB) Forum in March will provide more exposure to CSS. James shared with the committee that there will be a site visit to the Sarasota office from the DOL Office of Apprenticeship (OA) next week.

Michael Meerman and his team held the third annual [eRising Conference](#) on Wednesday, November 15, 2023 at the Sarasota Career Center, focusing on entrepreneurship. Three of the speakers have gone through the [CEO Platform for Success](#) courses. Both the eRising conference and second apprenticeship event were live streamed for virtual attendees.

Linda Benedict and her team are working on the Non-Custodial Parent Employment Program (NCPEP). CSS hosted interviews for the Department of Revenue with our clients.

Clients in the NCPEP and VIPER, Sarasota County's residential recovery program, were referred to New Dawn Electric for job opportunities.

The Manatee School district reached out to CSS to assist high school seniors in connecting to careers. The Business Services team secured 3-5 employers for each high school to sit on a panel and talk about careers in their industry.

**VI. Public Comment/Closing Remarks – Eric Troyer, Chair**  
None

**VII. Adjournment – Eric Troyer, Chair**

Next Executive Committee meeting is on scheduled for January 11, 2024.

There being no further business, Eric Troyer adjourned the meeting at 9:00 a.m.

**Respectfully submitted,**



[Joshua Matlock \(Dec 23, 2023 12:48 CST\)](#)

Joshua Matlock  
President/CEO



Consent  
Agenda



**CAREERSOURCE SUNCOAST**  
**Combined Executive Committee and Board Meeting Minutes**  
Virtual TEAMS Meeting and In-person  
3660 N. Washington Blvd., Sarasota, FL 34234  
Thursday, November 9, 2023  
8:00 A.M.

**Call to Order**

Eric Troyer, Chair, called the meeting to order at 8:03 a.m. Roll call was performed, and a quorum was established.

**Action Items – Eric Troyer, Chair**

- **Approval of September 28, 2023 Board Meeting Minutes - Eric Troyer**

Eric Troyer requested a motion to approve the September 28, 2023 Board Meeting Minutes.

**Motion: David Kraft                      Second: Ron DiPillo**

**Motion passed unanimously**

- **Approval of Revised Schedule of Operations – Kathy Bouchard**

The Schedule of Operations was revised to include the additional Holiday Closures approved by Governor Ron DeSantis. Kathy Bouchard requested a motion to approve the revised Schedule of Operations.

**Motion: Lisa Eding                      Second: David Kraft**

**Motion passed unanimously**

- **Approval of Policy #21-23, Performance Incentives to Staff – Christina Witt**

Christina Witt presented the policy to the Board and requested a motion to approve Policy #21-23, Performance Incentives to Staff.

**Motion: Jim Bos                      Second: Lisa Eding**

**Motion passed unanimously**

- **Approval of CSS Employee Handbook**

Kathy Bouchard reviewed the updates with the Board and requested a motion to approve the revised CSS Employee Handbook.

**Motion: William Z. Holland      Second: David Kraft**

**Motion passed unanimously**

- **Approval of Budget Modification #2 PY 2023/24 – Lisa Eding**

Lisa Eding introduced the budget modification approved by the Finance and Performance Committee on November 7, 2023. Robin Dawson reviewed and requested a motion to approve budget modification #2 for PY 2023/24.

Summary of Modification #2:

○ Budget Modification #1 Funding Available:	\$8,012,531
○ Increase in Funding:	\$1,011,426
○ Adjusted Funding Available:	\$9,023,957
○ Less Reserve for PY 24-25:	\$689,391
○ Modification #2 Funding Budgeted:	\$8,334,566

Funding Budgeted for PY 2023/24 Mod #1. Line items requested for an increase for PY 2023/24 Budget total \$\$799,268:

- Add \$251,798 Salary and Fringe Benefits
- Add \$10,000 Staff Training & Education
- Add \$38,695 Facilities
- Add \$15,000 Office Furniture & Equipment
- Add \$8,000 Accounting & Audit
- Add \$7,000 Office Supplies & Expense
- Add \$13,375 Travel and Meetings
- Add \$430,400 Client Training and Support
- Add \$15,000 Employer & Client Services
- Add \$10,000 Outreach

**Motion: David Kraft                      Second: Jim Bos**  
**Motion passed unanimously**

**CEO Report:**

Joshua Matlock reviewed the strategic planning meeting report provided by Carter. The report was provided in the meeting agenda packet. The strategic plan will be updated every two years to keep in alignment with labor market changes. Next steps will be working with the Executive Committee to review the mission, vision, values and finalize the strategic plan to present to the Board.

**Other Board Business:**

• **Finance and Performance Committee Report**

Lisa Eding provided an overview of the Finance & Performance Committee meeting from November 7, 2023. Robin Dawson, VP/CFAO, reviewed the following reports.

- Review of Budget to Expenditure Report as of September 30, 2023
  - Overall burn rate of 24%
  - YTD Federal and State requirements:
    - Admin: 9.07%; max allowed 10%
    - ITAs: 35.81%; min requirement 35%
    - Youth paid internships PY22 – 10.3%; min requirement 20%
    - Youth Out of School PY22 96.27% ; min requirement 50%
- Budget to Expenditure Report by Fundsource as of September 30, 2023
- Summary of Non-Federal Funds Revenue & Expenditures as of September 30, 2023

**Performance Update:**

Anthony Gagliano reviewed the CSS WIOA performance indicators for PY2022/2023. A copy of the performance results was provided in the agenda packet.

CSS final letter grade for PY2022/2023 was an "A-" with a score of 92.5%. A copy of the current letter grade was provided in the agenda packet. CareerSource Florida Letter Grades are updated on a quarterly basis, being available approximately 45 days from the end of the quarter.

Anthony Gagliano shared success stories from the CSS Veteran Services team.

**Staff Reports:**

**Kathy Bouchard - CTO**

Kathy Bouchard reported that all vacant positions have been filled and there are currently no openings with CSS. Kathy recognized all of the Veterans working at CSS, the eleven (11) Veterans have one-hundred fifty (150) years of combined service between them.

Last week, David Kraft met with the CSS leadership team and reviewed the blueprint for the Connective Workplace survey done with the entire CSS team. The information will be presented at the upcoming staff retreat.

**Anthony Gagliano – COO**

CSS continues to work with the Sarasota County Sheriff's department providing job fairs within the jail. Four (4) members of the CSS team facilitated the job fair, connecting thirty (30) soon-to-be released individuals with local employers.

The Veterans team worked at the Manatee County Veterans Stand Down event on Saturday. The next Veteran event is the Paychecks for Patriots job fair, being held at the Rober L. Taylor Center on Tuesday, November 14<sup>th</sup> from 2 p.m. - 6 p.m.

This week, CSS wrapped up an initiative with FloridaMakes and Sarasota-Manatee Area Manufacturers Association called Discover Manufacturing. There were thirteen (13) unemployed individuals attending. The diverse group was exposed to virtual reality headsets and employers such as Sun Hydraulics, Chris Craft and Flowers Bakery.

On Wednesday, November 15, 2023, Michael Meerman and his team will be holding the third annual [eRising Conference](#) here at the Sarasota Career Center, focusing on entrepreneurship. Three of the speakers have gone through the [CEO Platform for Success](#) courses.

In recognition of National Apprenticeship week, on Wednesday, November 15, 2023 right after the eRising conference, CSS will host an event to discuss apprenticeships from 1 p.m. - 2 p.m. Both of the local apprentices who were recognized statewide by FloridaMakes will be at the event, speaking about their experiences as apprentices at Sun Hydraulics and PGT, respectively.

**Public Comments:** Jim Bos recommended more Board members attend in person.

**Next Meeting:**


Next Board of Directors Meeting is January 25, 2024

Location: 3660 N. Washington Blvd, Sarasota, FL

**Full Board Meeting Adjournment:**

The meeting was adjourned at 9:13 a.m.

Respectfully submitted,

  
[Joshua Matlock \(Nov 27, 2023 07:53 EST\)](#)

Josh Matlock  
President, CEO

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**CAREERSOURCE SUNCOAST - BOARD MEETING ATTENDANCE**

Absent Present	Board Member
P	Jim Bos, MBJ Group
P*	Ashley Brown, Women’s Resource Center
P*	Christy Cardillo, Carr Riggs, & Ingram, LLC.
P*	Jackie Dezelski, Manatee Chamber of Commerce
P	Dr. Ron DiPillo, Sarasota County Schools
P	Lisa Eding, Teak Decking Systems
A	Luis Font, LIUNA, Laborers International Union
P*	Brian Gurucharri, Manatee Memorial Hospital
A	Roscelyn Guenther, Boys & Girls Club of Sarasota County
P*	Dr. Deborah Hawkes, CAN Community Health
P*	Peter Hayes, Tandem Construction
P*	Sharon Hillstrom, Bradenton Area Economic Development Corporation
P	William Zack Holland, Local 123 Plumbers and Pipefitters Union
A	Allison Imre, Grapevine Communications
P*	Heather Kasten, Sarasota Chamber of Commerce
P	David Kraft, Vision Consulting Group
P*	Jennifer Green, Galen College of Nursing
P*	Shaun Polasky, Helios Technologies
A	Ericka Randall, Vocational Rehabilitation
P	Vaughn Alexander Hendriex, State College of Florida
A	Walter Spikes, Coldwell Banker Realty
P	Eric Troyer, Kerkering Barberio & Company
P*	Doug Wagner, Manatee County School Board
A	Craig Warzecha, Bradenton Marauders/Pittsburgh Pirates
P*	Ken Waters, Sarasota Housing Authority
A	Anne LeBaron, Take Stock in Children Manatee
	Staff Present: Josh Matlock, Robin Dawson, Kathy Bouchard, Anthony Gagliano, Karima Habity*, Linda Benedict*, Christina Witt, Michelle Snyder, James Disbro, Chet Filanowski*
P*	Commissioner George Kruse - Manatee County
P*	Commissioner Joe Neunder – Sarasota County

26 Board Members – 19 present, 7 absent

**CAREERSOURCE SUNCOAST**  
**Policy Approval**  
**Board of Directors Summary Report**  
**January 25, 2024**

**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 FloridaCommerce (formerly 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 local boards to present all local policies to the Board of Directors for review and approval. Outlined below is the CSS Board Policy for your review and approval.

**Policy:**

Revised Policy #09-21 Client Grievance and Reporting Policy and Procedure

On November 3, 2023 the Department of Labor released TEGL 05-23 Complying with Non-Discrimination Requirements. The release of the TEGL required updates to the non-discriminatory language outlined in the CSS Policy. The new language outlined in the policy is highlighted in yellow and in red font for clear identification. The new language added discrimination based on the following additional criteria is prohibited by law:

- Actual or Perceived Religion
- Shared Ancestry
- Ethnic Characteristics

Additional revisions were made to reflect the FloridaCommerce name change.

Revised Policy #13-21 Disaster Recovery Dislocated Worker Grants

On August 8, 2023 CareerSource Florida released a revised version of Administrative Policy #113- Disaster Recovery Dislocated Worker Grants Program. The revised version removed some of the stipulation regarding recovery work on private property and provided clarification on coordination requirements with local government and FEMA.

Additional revisions were made to reflect the FloridaCommerce name change.

**Requested Action:**

**A motion the Board of Directors approve the revised Policy # 09-21 Client Grievance and Reporting Policy and Procedure and the revised Policy #13-21 Disaster Recovery Dislocated Worker Grants.**

Respectfully submitted,

Christina Witt  
Organizational Support Director



## POLICY# 09- 21

<b>Policy:</b> Client Grievance and Reporting Policy and Procedure	<b>Page</b> 1 of 17
<b>Program:</b> Wagner Peyser (WP), Workforce Innovation and Opportunity Act (WIOA), Welfare Transition (WT), Trade Adjustment Assistance (TAA) and Supplemental Nutrition Assistance Program (SNAP)	
<b>Section:</b> Program Operations	
<b>Date of Issuance:</b> 1/27/2022	<b>Revision Date:</b> 1/25/2024
<b>Distribution:</b> CareerSource Suncoast Team Members	

### **Background**

In accordance with WIOA Section 184(f),188, the 20 CFR 683.600 mandates each state and direct recipient of funds under Title I of WIOA must establish and maintain a procedure for participants and other interested parties to file grievances and complaints alleging violations of the requirements of the Workforce Innovation and Opportunity Act. Florida Commerce (formerly Department of Economic Opportunity) is responsible for implementing policy in the areas of workforce development, welfare transition, unemployment compensation, labor market information, early learning, and school readiness. The Florida Administrative Code, Chapter 60BB-1, mandates that grievance and hearing procedures be in place for grievances under the Welfare Transition (WT), Workforce Innovation and Opportunity Act (WIOA), the Trade Adjustment Assistance (TAA) Program, Supplemental Nutrition Assistance Program (SNAP) Program and/or Wagner-Peyser (WP), which allege a violation of participants' rights.

### **Purpose**

To provide basic grievance/complaint, hearing/appeal, and incident reporting procedures for the various workforce programs provided at CareerSource Suncoast Centers to include, but not limited to: WP, WIOA, TAA, WT, and SNAP.

### **Policy**

CareerSource Suncoast (CSS) is committed to operating all programs and activities in accordance with Federal, State, and local laws, rules, and policies. Clients and/or interested parties (e.g., contractors, One-Stop partners, One-Stop operators, and employers) affected by a decision or actions of the local workforce board have a right to file grievances/complaints with the local area Workforce Board. The grievance/complaint should be filed with CareerSource Suncoast, in accordance with the procedures outlined in this Policy.

### **Definitions:**

- *Grievant/Complainant* – any client or other interested or personally affected party alleging a noncriminal or non-discriminatory violation of WIOA Title I requirements.
- *Interested Party*– includes applicants, clients, subgrantees, subcontractors, service providers, One-Stop partners, training providers and other relevant parties.
- *Informal Resolution* – an opportunity to resolve complaints informally before they become grievances.
- *Complaint file* – a file that is maintained in a central location within each office, which includes a copy of each complaint filed along with pertinent documentation.

- *Compliance Review Office* – the organization within the EDD that oversees the administrative resolution of WIOA programmatic complaints.
- *Days* – consecutive calendar days, including weekends and holidays.
- *Grievance or complaint* – a written expression by a party alleging a violation of WIOA Title I, regulations promulgated under WIOA, recipient grants, subgrants, or other specific agreements under WIOA.
- *Hearing Officer* – an impartial person or group of persons that shall preside at a hearing on a grievance or complaint.
- *Local Area* – the Local Area administrative entity and its subrecipients to whom the administrative entity has delegated the grievance and complaint resolution process. CareerSource Suncoast is Manatee and Sarasota Counties local area board.
- *Client* – an individual who has been determined to be eligible to participate in and who is receiving services under a program authorized under WIOA.
- *Applicant* – an individual who has applied to a program but has not been deemed eligible to participate in and who is not currently receiving services under a program authorized under WIOA that requires eligibility determination.
- *Service Provider* – a public agency, private nonprofit organization, or private-for-profit entity that delivers educational, training, employment, or supportive services to WIOA clients.
- *Subrecipient* – an entity to which a recipient awards funds and is accountable to the recipient (or higher tier subrecipient) for the use of the funds provided.

#### **Grievance/Complaint and Hearing/Appeal General Rules:**

1. CSS serves as the administrative and fiscal entity for the WIOA, TAA, SNAP, and WT programs. If an individual has a grievance arising out of a program provided by CSS, CSS will try to resolve the matter informally. If the matter cannot be resolved, the process outlined in this policy has been adopted to provide a clear process to address an individual's grievance.
2. Any client or other interested party adversely affected by a decision or action by the local workforce system, including decisions by CSS staff, center partners and/or service providers, has the right to file a **local** grievance/complaint with CSS, with the exception of complaints alleging unlawful discrimination.
3. All local workforce grievances/complaints shall be filed with CSS **within 6 months of the occurrence of the incident** using the established procedures.
4. CSS provides clients enrolled in WIOA, WT, SNAP, TAA or receiving RESEA (WP) services with a form summarizing the client's Grievance/Conflict Hearing and Appeals Process. Informal and formal grievances are explained, and the form is signed by both the client and CSS staff.
5. In the event an individual submits a grievance/complaint **not** under the authority of CSS, CSS will notify the individual within five (5) working days from the receipt of the grievance/complaint. The grievance/complaint will be forwarded to the proper entity/agency for action. The entity's/agency's **sixty (60) day** timeframe to handle the grievance will start upon receipt of grievance/complaint.
6. Job Corps grievances/complaints should be processed according to requirements of [20 CFR 686.960](#) and [20 CFR 686.965](#) and may differ from the processes outlined in this Policy /Procedure.



### Grievances Covered by This Policy

Clients applying for or receiving services at CSS, or through any other program paid for by CSS, have the right to be treated fairly and in compliance with the laws under which we operate. If a client feels they have been unfairly treated, they can file a grievance or complaint by following the process outlined in this policy. Examples of these grievances are outlined below. These examples are applicable to WIOA, TAA, SNAP and WT/TANF grievances/complaints for reasons other than unlawful discrimination.

### Grievances May Include, but Are Not Limited To:

- Program Applicants/Clients
  - Applicants who have been denied intensive or training services for reasons other than unlawful discrimination (WIOA/TAA)
  - Clients registered or enrolled in a program under the WIOA or WT and have asked for a program service or benefit and have been denied the service or benefit in whole or in part, whether by written denial notice or not, for reasons other than unlawful discrimination.
    - Sanctioned for non-compliance with required work activities for reasons other than unlawful discrimination (WT/SNAP)
    - Denied support services for reasons other than unlawful discrimination
    - Denied education, training, or support services for reasons other than unlawful discrimination (WT)
    - Denial of for an approval or extension of a hardship or medical exemption for reasons other than unlawful discrimination (WT)
    - SNAP support service recipients who have been denied reimbursement for support services for reasons other than unlawful discrimination.
    - Client's (pursuant to WIOA Title I or the TAA) who have been sanctioned for use of a controlled substance for reasons other than unlawful discrimination. ([20 CFR 667.270](#))
- Employers/Training Providers/Interested Parties
  - Denial or termination of eligibility as a training provider for reasons other than unlawful discrimination (WIOA/TAA)
  - Denial of eligibility as an on-the-job or customized training provider/employer for reasons other than unlawful discrimination (WIOA)
- Employees
  - An individual who is a regular employee or a WIOA, TAA, WT or SNAP program client who has been displaced by a WIOA, TAA, WT or SNAP program client for reasons other than unlawful discrimination
- Any interested party, center partner or service partner under WIOA, TAA and/or WT who has been adversely affected by a decision or action by the CSS system, for reasons other than unlawful discrimination.

### Grievances Not Covered Under This Policy:

The WIOA, TAA, SNAP and WT programs are not entitlement programs. This means that even if an individual meets the eligibility requirements to receive services under those programs, they still may be denied access to the program or denied a specific service allowable under the program rules. This is not considered a violation of the law. This may happen because:

1. The Region may not have sufficient funds to enroll the individual or any other client into a program or provide the individual/other client with a service at the time of application or need for the service. If a freeze in funding for the program or service at issue is imposed by the Regional Board, the State of Florida or the Federal government, there would be no grounds upon which to file a formal grievance. An individual may obtain a copy of the applicable local, state, or federal action freezing such funds upon request.
2. Local areas have the flexibility to decide the provision of services to offer in their local areas. These decisions are made locally by the governing board for CSS. The governing board for CSS may have decided not to offer a particular benefit or service. In such instances there would be no grounds upon which to file a formal grievance. An individual may obtain a copy of the applicable policy upon request.
3. Under WIOA rules there are eligibility requirements and prioritization criteria. Individuals who are seeking services, but who do not meet the eligibility or prioritization criteria, cannot be served with these funds. If one does not dispute the fact that they do not meet the eligibility or prioritization criteria, they do not have grounds for a formal grievance. If they wish to show that they do meet the applicable criteria, they may file a formal grievance.
4. Local Workforce Boards have the flexibility to impose requirements and specific standards applicable to programs and services. A policy that has been adopted may restrict access to a program or service or may limit the availability of the program or service. In such instances, there would be no grounds upon which to file a formal grievance. An individual may obtain a copy of the applicable policy upon request.

*Note: If an individual is denied services for one of these enumerated reasons #1-4, they may still follow the informal grievance procedures prescribed, but may not be entitled to a hearing before a Hearing Officer.*

5. If an individual is a Welfare Transition client and their TANF cash assistance eligibility or cash benefit of food stamps or Medicaid has been reduced or terminated, they have followed the local process, and disagree with the action taken against them, but do not believe the action was taken for reasons of unlawful discrimination, they must file a grievance with the local Department of Children and Families Office.
6. DCF is responsible for providing a grievance process for complaints, except complaints of alleged discrimination, related to WT program service delivery, such as work activities, support services, diversion programs, and other workforce functions under WIOA. If the individual is under sanction for noncompliance with TANF work requirements and requests a fair hearing, CSS must attend the fair hearing, bring relevant documentation, and participate in the fair hearing process.
7. If an individual is a SNAP client and their food stamp eligibility or benefit entitlement has been reduced or terminated, they have followed the local process, and disagree with the action taken against them, but do not believe the action was taken for reasons of unlawful discrimination, they may file a grievance with the local Department of Children and Family Services. If the individual is under sanction for noncompliance with SNAP work requirements and requests a fair hearing, CSS must attend the fair hearing, bring relevant documentation, and participate in the fair hearing process.

## **CSS Grievance/Complaint Procedures:**

This section provides standard procedures for the filing and processing of grievances against an employee, policy, WT, SNAP, TAA or the WIOA Title I program decision administered by the CSS. It is the responsibility of CSS to establish a climate in which employees, job seekers, clients, program applicants or interested parties' problem may be promptly presented, discussed, and given fair and timely consideration. These procedures provide for prompt and equitable resolution of such grievances. The confidentiality of the grievance and any actions resulting from it are to be safeguarded.

### Local WIOA, TAA, WT(TANF), SNAP E&T Programs Process:

Clients first must attempt to resolve their complaints locally with CSS through an informal complaint process.

### Informal Step Process:

1. If an individual has a complaint about a program in which they participate, they must first discuss the matter with their CSS representative (i.e., Career Coach, Talent Consultant, etc.).
2. If they are not satisfied with the CSS representatives' resolution, they may discuss the matter with their manager and attempt to resolve the complaint informally.
3. If an individual is unable to resolve their complaint through the manager, they must contact their director and allow them the opportunity to resolve the complaint. The director has thirty (30) days to resolve the complaint through the informal portion of the process.

### Formal Step Process:

1. If the problem is not satisfactorily resolved, an individual can send a formal, written grievance/complaint and request for hearing by certified mail, return receipt, to:

President/CEO
CareerSource Suncoast
3660 N. Washington Blvd
Sarasota, Florida 34234

2. An individual **must** file this grievance/complaint request for a hearing in writing within six (6) months of the alleged occurrence or violation they are reporting.
3. All formal submissions must meet the following guidelines
  - a. Submissions should be concise and clearly written or typed
  - b. State the facts of the situation
  - c. State the laws or procedures of alleged violation
  - d. Any additional information believed to be relevant for review
  - e. The grievance must be signed and dated
  - f. Must include a legible address where official notices may be mailed to the grievant/complainant
  - g. Include the words **REQUEST FOR HEARING** at the top of the first page in capital letters of the formal complaint letter
  - h. Specifically state the type of violation nature of the action that is the subject of the grievance.
  - i. The grievance can be no longer than five (5) pages. Exhibits and attachments are not included in the five-page limit (i.e., emails, procedures, etc.) and submitted to the address noted in step #1 of this *Formal Process* section.

- j. CSS will receive, review, and attempt to resolve the grievance/complaint informally, proceeding with the formal process. The President/CEO has fifteen (15) calendar days after receipt of the complaint to satisfactorily resolve the complaint.
- k. If the grievance/complaint cannot be resolved informally within fifteen days, then a hearing shall be set.
- l. The individual will be sent notice of hearing by certified mail w/ return receipt with at least fifteen (15) days in advance notice of the hearing date. The notice will advise them of the following:
  - i. The date, time, and location of the hearing
  - ii. The applicable sections of the law and any federal regulations involved
  - iii. That the individual may present witnesses and documentary evidence at the hearing
  - iv. That the individual may be represented by an attorney or other representative at the hearing
  - v. Notice that the individual will receive the Board's decision within sixty (60) calendar days after the official filing of the grievance/complaint.
4. CSS will record or transcribe the hearing to maintain an accurate and complete record of the hearing and documentation in the event the decision is appealed.
5. CSS will review the information presented at the hearing and notify the complainant of the board's official decision via certified return receipt mail.
6. Complainants who allege a labor standard violation will submit the complaint for binding arbitration if the collective bargaining agreement covers the parties involved.
7. Individuals with a disability needing special accommodations, or if an individual is a non-English speaker and require an interpreter, please call CSS at 941-358-4200 ext. 3112 or fax at (941) 315-2675 at least five working days prior to the hearing and state what special accommodation requirements are needed in order to participate in the hearing.

**Note: Do NOT phone in the request. All Formal Grievances must be submitted in writing.**

**Filing an Appeal of CSS Decision or Lack of Action to the State (DEO):**

An individual has the right to file an appeal to the Department of Economic Opportunity (DEO) if/when the following occur:

- The grievance/complaint is not for reasons of unlawful discriminations.
- After CSS has conducted a hearing but the grievant/complainant, are dissatisfied with or have been adversely affected by the Hearing Officer's decision
- CSS has not conducted a hearing within the required 60-day timeframe
- CSS conducted the hearing but has not issued a decision within the mandated sixty (60) calendar day timeframe
- CSS has been nonresponsive to the complaint; the required 60-day timeframe for CSS to act has elapsed

If one of the above applies, an individual may appeal the decision with the Department of Economic Opportunity (DEO). To file an appeal:

1. An individual must make a written request for a formal hearing/appeal within 30 days of the CSS Hearing Officer's decision, or within thirty (30) days after the required sixty (60) day timeframe for CSS to act has elapsed. This request must be sent by certified mail, return receipt, to:

Department of Economic Opportunity
Office of General Counsel
Caldwell Building - Suite 150
107 East Madison Street
Tallahassee, Florida 32399.

2. The request for a hearing/appeal must be clearly titled "Request for Hearing/Appeal."
3. The grievance can be no longer than five (5) pages. Exhibits and attachments are not included in the five-page limit (i.e., emails, procedures, etc.)
  - a. Include the written decision made by CSS from the local hearing
  - b. Submissions should be concise and clearly written or typed
  - c. State the facts of the situation
  - d. State the laws or procedures of alleged violation
  - e. Any additional information believed to be relevant for review
  - f. The grievance should be signed and dated
  - g. Must include a legible address where official notices may be mailed to the grievant/complainant
4. The State can return the grievance/complaint to the CSS to hold a hearing or impose other remedies to resolve the grievance/complaint.

Review and Hearing Process at State Level:

The state administrative entity will hear initial complaints or grievances regarding actions taken or decisions made by the state administrative agency for reasons other than alleged unlawful discrimination. Upon receipt, the state shall review and attempt to informally resolve the WIOA, TAA, TANF/WT, and SNAP grievance/complaint.

At the state administrative entity level, the Agency Head or his/her designee is the presiding officer and shall conduct all hearings of original state level complaints.

- 1) Within five (5) working days of receipt of appeal notice, the DEO agency heads, or their designee will notify the complainant and CSS that an appeal has been filed.
- 2) The state will review the submission and attempt to find an informal solution for the complaint.
- 3) If an informal resolution cannot be made, then the Agency Head or designee will act as Presiding Officer and begin the formal grievant process and a hearing will be scheduled.
- 4) Each party shall be given a hearing notice to formally attempt to resolve the complaint.
- 5) The hearing notice shall advise the following:
  - a. The date, time, and place of the hearing
  - b. The pertinent sections of WIOA, TAA, WT/TANF, and SNAP, or any other federal regulations involved
  - c. Affected parties may present witnesses or documentary evidence at the hearing

- d. Affected parties may be represented at the hearing by an attorney or other representative
- 6) The DEO agency heads, or their designee shall issue a decision within sixty (60) calendar days of receipt of the appeal request.

The hearing shall be conducted in compliance with rules of procedure as contained in Chapter 28-106, Parts I, II, and III, Florida Administrative Code, incorporated herein by reference. The Presiding Officer will schedule a hearing, complete the hearing, and issue a decision within the required 60 calendar days of receipt of complaint/grievance.

Individuals with a disability needing reasonable accommodations shall call the State Administrative Entity Process Manager at (850) 245-7105 at a minimum of five working days prior to the hearing and indicate what special accommodations are needed in order to participate in the hearing.

Remedies

The remedies that may be imposed under WIOA grievances/complaints (other than those alleging unlawful discrimination) shall be limited to:

- Suspension or termination of payments under WIOA Title I
- Prohibition of placement of a client with an employer that has violated any requirement under WIOA Title I
- Reinstatement of an employee, payment of lost wages and benefits, and re-establishment of other relevant terms, conditions, and privileges of employment, where applicable.
- Other equitable relief, where appropriate

State (DEO) Appeal Review of Local Hearing officers Decision:

A grievant/complainant may file an appeal of CSS's decision/final order if they are dissatisfied with or have been adversely affected by CSS's Hearing Officer's decision for reasons other than unlawful discrimination. The grievant/complainant must make a written request for an appeal within 30 days of the CSS Hearing Officer's decision. This request must be sent by certified mail, return receipt, to:

Department of Economic Opportunity
Office of General Counsel
Caldwell Building - Suite 150
107 East Madison Street
Tallahassee, Florida 32399

Within (5) five working days of receipt of appeal notice, the States Agency Head or their designee will notify each party that an appeal has been filed. Each party will be given 15 calendar days from the date of the notice to submit written argument and provide supporting documentation. Only unaltered, verbatim transcripts of the original hearing evidence and other proof introduced at the initial hearing will be considered for purposes of the appeal.

The party submitting the transcript must bear all expenses of the transcription and deliver a copy of the transcript to the Agency Head and the opposing party. If a stenographer authorized to administer oaths has not recorded the proceedings and prepared the transcript, an exact copy of the tape recording, video, or other recording must also be delivered to the Agency Head and the parties, along with the transcript. The party submitting the transcript and the recording must include a certification that the transcript is verbatim, and the recording is of the entire proceeding and has not been altered. The Agency Head will not consider a transcript when the foregoing procedure has not been followed.

The Agency Head or his/her designee shall issue a decision within 60 calendar days of receipt of the appeal request.

Judicial Review Period of Final Order:

The DEO designee will issue a final order, which will be subject to a judicial review period and the Florida Rules of Appellate Procedure, Rules 9.110 and 9.190. An individual can file an appeal of the State (DEO) decision if they are dissatisfied with or have been adversely affected by the DEO Hearing Officer's decision; or the State has not conducted a hearing; or has conducted the hearing but has not issued a decision within the mandated sixty (60) calendar day timeframe.

The appeal must be filed within thirty (30) calendar days of receipt of the State's decision; or after the mandated sixty (60) calendar days have elapsed for the State to have issued a decision. The Request for Review/Appeal shall be filed with the following agency/entity:

1. WIOA and TAA appeals of state decisions may be filed with the USDOL using the Federal Level Appeal Procedures noted in the *Federal Level Appeal Process* section below.
2. TANF work activity and support services appeals may be filed according to the Rules of Appellate Procedure, Rules 9.110 and 9.190(b).

Federal Level Appeal Process:

Under WIOA regulations, 20 CFR Section 683.600, if the State has not issued a decision on a case that does not deal with allegations of unlawful discrimination within the required sixty (60) calendar-day timeframe, the grievant can file an appeal to the USDOL. The appeal must be filed with the USDOL no later than one hundred and twenty (120) calendar days of the filing of the grievance with the State, or the filing of the appeal of a local grievance with the State.

An appeal must be filed within sixty (60) days of the receipt of the decision being appealed in cases where a decision has been reached and the party to which such a decision has been adversely impacted wishes to appeal to the Secretary.

All appeals must be submitted by certified mail, return receipt requested to:

Secretary, U.S. Department of Labor
200 Constitution Avenue NW
Washington, D.C. 20210
Attention: Assistant Secretary of ETA

A copy of the appeal must be simultaneously provided to the appropriate ETA Regional Administrator and the opposing party.

Atlanta Regional Office
61 Forsyth St, SW, Ste 7B54
Atlanta, GA 30303
Attn: Florida ETA Regional Administrator

The secretary must make a final decision on an appeal no later than one hundred and twenty (120) days after receiving the appeal request. Grievances or complaints filed directly with the Secretary that were not previously filed with the Local Area and/or state will be remanded to the Local Area or state, as appropriate.

### Wagner-Peyser Employment Service Complaints:

Federal regulations [20 CFR Part 658.410](#) provide that each state shall establish and maintain an employment service complaint system that includes procedures at the local, State and Federal level for processing complaints related to Wagner-Peyser Employment Service (ES) that do not allege unlawful discrimination. Employment Services (ES) Complaints may be accepted in any CSS one-stop center, or elsewhere by outreach staff.

These complaints are handled by the Career Services manager or assigned Complaint Specialist. The Manager/Specialist will maintain a separate file for each complaint and enter the complaint on the Complaint Log. The complaint log includes the following information:

- The name of the complainant
- The name of the respondent (employer or State agency)
- The date the complaint was filed
- If the complaint is by or on behalf of a migrant seasonal farmworker (MSFW)
- Type of Complaint (employments-related law or the ES regulations)
- The action taken, formal or informal, to include the resulting resolution When a client presents with an ES complaint the following will occur:
  - CSS staff will request all the information perceived to be necessary to investigate the complaint
  - Request that the complainant indicate all the physical addresses, email, and telephone numbers through which they might be contacted during the investigation of the complaint
  - Request that the complainant contact the Complaint System Representative before leaving the area if possible and explain the need to maintain contact during the investigation

CareerSource Suncoast will try to resolve the complaint within 15 days through an informal process. The complaint is considered to be resolved when the complainant is satisfied with the outcome; the complainant chooses not to elevate to the next level; or when the complainant has not responded within twenty (20) working days after correspondence has been mailed for ES complaints and within forty (40) working days for MSFW complaints.

If the ES complaint is not resolved within fifteen (15) working days, then the complaint and associated file documents are forwarded to the:

Department of Economic Opportunity
Office of Career Center and Program Support
Caldwell Building–Suite 150
107 East Madison Street
Tallahassee, Florida 32399-4133
Attention: ES Complaint Coordinator

The complaint logs must be submitted within five days after the end of the quarter, the local Career Services managers will mail the Complaint Logs to the Senior Monitor Advocate at the address listed below:

Department of Economic Opportunity
State Monitor Advocate Office
Attention: Senior Monitor Advocate
Caldwell Building – Suite 150
107 East Madison Street
Tallahassee, Florida, 32399-4133



The staff must ensure the complainant (or their representative) submits the complaint on the Complaint/Referral Form or another complaint form prescribed or approved by DEO or submits complaint information which satisfies the parameters outlined in [20 CFR Part 658.410](#).

The complaint and associated file documents will be forwarded the address below for resolution at the state level:

Department of Economic Opportunity
Office of Career Center and Program Support
Caldwell Building - Suite 150
107 East Madison Street
Tallahassee, Florida 32399
Attention: ES Complaint Coordinator

Special handling procedures are required for complaints filed by Migrant Seasonal Farm Workers (MSFW) that do not allege unlawful discrimination. The State Monitor Advocate are designated to handle MSFW complaints. (20CFR 658.40 (6)(h)) CSS will forward the complaint form and copies of all documents to the Senior Monitor Advocate. MSFW complaints involving an allegation of noncompliance with assurances regarding wage and hour law, or other employment conditions are to be forwarded to the nearest USDOL Wage and Hour office.

U.S. Department of Labor
Wage and Hour Division
4200 W Cypress Street, Suite 444.
Tampa, FL 33607

Alternately check the USDOL web site [Local Offices | U.S. Department of Labor \(dol.gov\)](#) to find the nearest office.

MSFW violations of Occupational Safety and Health Administration (OSHA) Directive's complaints should be forwarded to USDOL, Occupational Safety and Health Administration to the address listed below:

U.S. Department of Labor
Occupational Safety and Health Administration
200 Constitution Avenue, N.W.
Washington, D.C. 20210

**Employment Related Law Complaints:**

When a complaint is filed regarding an employment-related law concern, CSS must determine if the complainant is an MSFW. If the complainant is a non-MSFW, the office must immediately refer the complainant to the appropriate enforcement agency, another public agency, a legal aid organization, and/or a consumer advocate organization, as appropriate, for assistance. Upon completing the referral, the local or State representative is not required to follow up with the complainant.

**Discontinuation of Services to Employers:**

The following conditions are identified in [20 CFR 658.501\(a\)](#) as the basis for discontinuation of services to employers:

1. Employer Submit and refuse to alter or withdraw job orders containing specifications which are contrary to employment-related laws

2. Employer Submit job orders and refuse to provide assurances, in accordance with the Agricultural Recruitment System for U.S. Workers at part 653, subpart F, of this chapter, that the jobs offered are in compliance with employment-related laws, or to withdraw such job orders
3. Are found through field checks or otherwise to have either misrepresented the terms or conditions of employment specified on job orders or failed to comply fully with assurances made on job orders
4. Are found by a final determination by an appropriate enforcement agency to have violated any employment-related laws and notification of this final determination has been provided to the Department or the SWA by that enforcement agency
5. Are found to have violated ES regulations pursuant to [20 CFR 658.411](#)
6. Refuse to accept qualified workers referred through the clearance system
7. Refuse to cooperate in the conduct of field checks conducted pursuant to [CFR 20 653.503](#)
8. Repeatedly cause the initiation of the procedures for discontinuation of services pursuant to [20 CFR 658.501\(a\)\(1-7\)](#)

CSS may discontinue services immediately if, in the judgment of the State Administrator, exhaustion of the administrative procedures outlined above would cause substantial harm to a significant number of workers. In such instances, procedures at [§§ 658.503](#) and [658.504](#) must be followed.

More detail on the ES Complaint System (20 CFR sections 658.411-418) can be found in the [Complaint Resolution Handbook](#), e.g., the completion of the complaint filing, assigning, and handling ES related complaints, complaint resolution, referrals, hearings, etc. Also, a list of referral agencies is available in the Complaint Resolution System Handbook that has been provided to each Regional Workforce Board, local Representative, and Career Center.

*Note: Nothing included in this policy precludes a grievant or complainant from pursuing a remedy authorized under another Federal, State, or local law.*

**Criminal Fraud and Abuse:**

In Accordance with 20 CFR 683.620 the process for reporting criminal fraud and abuse. Information and grievances involving criminal fraud, waste, abuse, or other criminal activity must be reported immediately through the U.S. Department of Labor’s (USDOL) Incident Reporting System. The complaint should be mailed or phoned:

USDOL Office of Inspector General
Office of Investigations
Room S-5514
200 Constitution Avenue NW
Washington, D.C. 20210
<i>Or</i>
USDOL Hotline: 1-800-347-3756

The complaint can also be made to the corresponding Regional Inspector General for Investigations, with a copy simultaneously provided to the Employment and Training Administration. Procedures for reporting such incidents and instructions for completing the incident reporting form can be found at the following web site: [General Complaint Form - FloridaJobs.org](#).

USDOL Southeast Regional Inspector General for Investigations
Office of Investigations
Sam Nunn Atlanta Federal Center

61 Forsyth Street SW, Suite 6T1
Atlanta, Georgia 30303.

These complaints should also be reported at the local level to the CareerSource Suncoast Board Chair. Any such concern can be reported to the: **Integrity Hotline at 941-479-6321** to the attention of the Board Chair.

In addition to the Integrity Hotline, to facilitate reporting of suspected violation where the reporter wishes to remain anonymous, a written statement may be submitted to the Chief Executive Officer (CEO) by mailing to:

ATTN: President/CEO
CareerSource Suncoast
3660 N. Washington Blvd.
Sarasota, FL 34234

**Discrimination Grievances:**

The complaint procedures for charges of discrimination are separate and distinct from the grievance procedures outlined elsewhere in this document.

Discrimination on the basis of race, color, ethnic characteristics, disability, actual or perceived religion, sex, national origin, shared ancestry, age, marital status, political affiliation or belief, participation in any WIOA Title I financially assisted program or activity, or on the basis of citizenship or status as a lawfully admitted immigrant authorized to work in the United States is prohibited under federal and/or state laws.

A complaint of alleged discrimination may be filed by any person, including (but not limited to) any employee, applicant for employment, or customer of a Center, Center operator, training provider, or other program or activity that is offered through the Center system, who feels he or she, or any specific “class of individuals” (group of people), has been subjected to unlawful discrimination by a program or activity offered through the Center system, or by the DEO or CSS.

If an individual believes they or someone they know has been subjected to unlawful discrimination, complaints may be filed with the CSS Equal Opportunity Officer (EEO). The contact information for the current CSS Equal Opportunity Officer can be found on the CSS website at [Policies – CareerSource Suncoast](#) under the Equal Opportunity and Non-Discrimination Notice section. Instructions for filing a complaint are posted on the website. CSS will attempt to resolve the complaint within five (5) days of receipt of the complaint.

To file complaints directly with the state, the complaint must be filed in accordance with the Department of Economic Opportunity (DEO) Discrimination-Complaints Procedures. The discrimination complaint procedures are available on DEO’S Website [Home - FloridaJobs.org](#) at [Time Limits for Filing a Discrimination Complaint - FloridaJobs.org](#).

For reporting to the federal level, the appropriate program contacts are outlined below.

WIOA and Wagner Peyser Programs:

In accordance with [20 CFR 658.411](#), Under Wagner-Peyser, discrimination complaints may be filed directly with a local-office equal opportunity officer (EEO), when such has been designated and trained, with the state agency having administrative responsibility for Wagner-Peyser programs, or with the Civil Rights Center, U.S. Department of Labor.

The CSS office Equal Opportunity Officer contact information is noted on page #13 of this policy Questions about or complaints alleging a violation of the non-discrimination provisions of WIOA sec.188 may be directed or mailed, faxed, or emailed to the Civil Rights Center (CRC):

Director, Civil Rights Center
ATTENTION: Office of External Enforcement
U.S. Department of Labor
Room N4123
200 Constitution Avenue NW.
Washington, DC 20210

<b>Fax:</b> (202)693-6505
ATTENTION: Office of External Enforcement
<b>Email:</b> <a href="mailto:CRCEXternalComplaints@dol.gov">CRCEXternalComplaints@dol.gov</a>

If an individual is a person with a disability and require auxiliary aids and services in order to file a complaint, to access the CRC complaint form, or during the CRC complaint process, please contact the office of Civil Rights at [CRCEXternalComplaints@dol.gov](mailto:CRCEXternalComplaints@dol.gov) or by phone at (202)-693-6500 or TTY/TRS 1-800-877-8339.

#### SNAP- Discrimination Complaints

Any person who believes he or she, or any specific class of individuals (including employees of and applicants for employment with an agency administering the SNAP program), has been subjected to unlawful discrimination under SNAP program may file a complaint in accordance with the Department of Economic Opportunity Discrimination-Complaint Procedures. Under the SNAP program, in accordance with [7 CFR part 15](#) individuals who believe that they have been subject to discrimination may file a written complaint to:

United States Department of Agriculture
Office of the Hearing Clerk
Room 112
Administration Building
Washington, D.C. 20250

Under Florida law, employees or applicants may also choose to file employment complaints with the Florida Commission on Human Relations. (Reference: Section 760.06, F.S.)

#### **Health and Safety Grievances:**

Health and safety standards which have been established under both Federal and/or State law which apply to the working conditions of employees are also applicable to clients of programs and activities under WIOA Title I and clients in employment activities. **CSS does not hear complaints related to health and safety.** If an individual has a complaint related to a health or safety matter, they may file the complaint with:

Department of Economic Opportunity
Office of General Counsel
Caldwell Building, MSC 110
107 East Madison Street
Tallahassee, Florida 32399-4128
(850) 245-7150

They may also file a health and safety complaint with:

U.S. Department of Labor
Occupational Safety and Health Administration
200 Constitution Avenue, N.W.
Washington, D.C. 20210

The OSHA website [File a Complaint | Occupational Safety and Health Administration \(osha.gov\)](http://www.osha.gov) provides additional information on the various methods in which an individual can file a complaint. (i.e., mail, fax, phone, in person, etc.). For more information regarding health and safety issues, visit the Occupational Safety and Health Administration's Website at <http://www.osha.gov> or the Florida Department of Health Website at <http://www.doh.state.fl.us>. **Local, State, and Federal Agency**

**Contacts:**

Contact the following entities for discrimination, employment, health and safety, or Florida law violations/complaints:

<p><b>Florida Commission on Human Relations Florida Law Violations</b> 4075 Esplanade Way, Room 110 Tallahassee, Florida 32399 Phone:(850) 488-7082 Toll free:1-800-342-8170 Florida Relay Service Voice (statewide) 711 <a href="http://myflorida.com">Contact Us — Florida Commission on Human Relations (myflorida.com)</a></p>	<p><b>U. S. Department of Labor, Civil Rights Center Discrimination Complaints</b> 200 Constitution Avenue NW Room N-4123 Washington, D. C. 20210 <a href="http://dol.gov">How to File a Complaint with External Enforcement   U.S. Department of Labor (dol.gov)</a></p>
<p><b>U. S. Equal Employment Opportunity Commission (EEOC) Employment Complaints Miami District Office</b> Miami Tower 100 SE 2nd Street, Suite 1500 Miami, FL 33131 Phone: (305) 808-1763 Toll Free: 1-800-669-4000 TTY: 1-800-669-6820 <a href="http://eoc.gov">Miami District Office   U.S. Equal Employment Opportunity Commission (eoc.gov)</a></p>	<p><b>USDOL Occupational Safety and Health Administration (OSHA) Safety and Health Violations</b> 200 Constitution Avenue NW Washington, D.C. 20210 Phone:1-800-321-6742 TTY 1-877-889-5627 <a href="http://osha.gov">File a Complaint   Occupational Safety and Health Administration (osha.gov)</a></p> <p><b>Regional Office</b> Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Room 6T50 Atlanta, GA 30303 Phone: (678) 237-0400</p> <p><b>Local Office:</b> Tampa Area Office 5807 Breckenridge Parkway, Suite A Tampa, FL 33610-4249 Phone: (813) 626-1177</p>

<p><b>U. S. Equal Employment Opportunity Commission (EEOC) Employment Complaints Tampa Area Office</b> 501 East Polk Street, Suite 1000 Tampa, Florida 33602 Phone:(813) 228-2310 Toll Free: 1-800-669-4000 Toll Free: 1-800-669-4000 TTY: (813) 228-2003 <a href="http://www.eeoc.gov">Tampa Field Office   U.S. Equal Employment Opportunity Commission (eeoc.gov)</a></p>	<p><b>USDOL Office of Inspector General, Office of Investigations</b> 200 Constitution Avenue NW Room S-5014 Washington, D.C. 20210 <a href="http://www.dol.gov">Office of Inspector General U.S. Department of Labor - Contact OIG (dol.gov)</a></p>
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**Attachments(s):**

None: All forms associated with this Policy are stored on CSS SharePoint folders.

**AUTHORITY:**

- Office of Inspector General [Office of Inspector General U.S. Department of Labor - Contact OIG \(dol.gov\)](http://www.dol.gov)
- [20Code of Final Rule- What local are, State , and Direct recipient grievance procedures must establish](#)
- [eCFR: 20 CFR Chapter V -- Employment and Training Administration, Department of Labor](#)
- [DEO Final Guidance Grievance/Complaint and Hearing/Appeal Procedures](#)
- TANF State Plan [TANF-Plan.pdf \(myflfamilies.com\)](http://myflfamilies.com)
- Florida Administrative Code [60BB-1: WORKFORCE PROGRAMS' GRIEVANCE, COMPLAINT, HEARING AND APPEAL PROCEDURES - Florida Administrative Rules, Law, Code, Register - FAC, FAR, eRulemaking \(flrules.org\)](http://flrules.org)

**Supersession:**

This policy supersedes and replaces Policy# 1-06R5 Customer Grievance/Complaint, Hearing/Appeal, and Criminal Fraud/Abuse Incident Reporting Procedures dated 02/10/2014.

**Inquiries:**

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



**POLICY# 13- 21**

<b>Policy:</b> Disaster Recovery Dislocated Worker Grants	<b>Page</b> 1 of 11
<b>Program:</b> Workforce Innovation and Opportunity Act (WIOA)	
<b>Section:</b> Program Operations	
<b>Date of Issuance:</b> 3/24/2022	<b>Revision Date:</b> 1/25/2024
<b>Distribution:</b> CareerSource Suncoast Team Members	

**Background**

Dislocated Worker Grants (DWGs) are discretionary grants awarded by the Secretary of Labor under Section 170 of WIOA to provide employment-related services for dislocated workers. The Department of Labor funds two types of DWGs: Disaster Recovery and Employment Recovery. Disaster Recovery DWGs provide funding to create temporary employment opportunities to assist with clean-up and recovery efforts when an area impacted by an emergency or major disaster is declared eligible for public assistance by the Federal Emergency Management Agency (FEMA), or is declared, or otherwise recognized, as an emergency or disaster of national significance by a federal agency with authority or jurisdiction over federal response to the disaster or emergency. Employment Recovery DWGs temporarily expand capacity to serve dislocated workers and to meet the increased demand for employment and training services following a qualifying event. Qualifying events include major economic dislocations, such as plant closures, mass layoffs, or higher-than-average demand for employment and training activities for dislocated members of the Armed Forces and their spouses. Under 20 CFR 687.110(a)(5), the Secretary of Labor may determine other major dislocations eligible for Employment Recovery DWGs.

DWGs are meant to address situations beyond those that are the focus of WIOA formula funds. Disaster Recovery DWGs enable areas impacted by a disaster to employ workers in jobs assisting in recovery and humanitarian efforts, as well as to provide training opportunities that support customers in accessing employment.

**Purpose**

To provide Career Source Suncoast (CSS) Team members guidance on the eligibility and provision services allowable to be provided under the requirements of the Workforce Innovation and Opportunity Act (WIOA) Disaster Recovery Dislocated Worker Grant funded program.

**Policy**

Disaster Recovery Dislocated Worker Grants are made available when a qualifying event occurs and impacts a local areas economy. Qualifying events for receipt of a DWG include the following:

- Emergencies and major disasters, as defined by the Staffor Act, 42 U.S.C. 5122(6), which have been declared by the Federal Emergency Management Agency (FEMA) as eligible for public assistance;
- Emergencies or disaster situations of national significance, natural or man-made, that could result in a potentially large loss of employment, as declared or otherwise recognized and issued in writing by the chief official of a federal agency with jurisdiction over the federal response to the disaster or emergency; and
- Relocation of a substantial number of individuals from a state, tribal area, or outlying area in which a disaster or emergency has occurred, to other states, tribal areas, or outlying areas.

When an emergency or disaster has met the criteria for disaster grant funding, the Florida Department of Commerce (FloridaCommerce) will coordinate with the impacted local area(s) to assess the need for clean-up and humanitarian efforts, ascertain the availability of eligible individuals to perform the disaster relief work, and provide technical assistance on the application process and operational considerations.

If the CSS region has been impacted by an emergency or disaster, they will work with FloridaCommerce in accordance with Administrative Policy #113, *Disaster Recovery Dislocated Worker Grants*, following the emergency applications process to receive DWG funding to serve the impacted community.

If the application is approved, FloridaCommerce will notify CSS of their sub-grant award amounts. Funds are released to CSS through Notices of Grant Award/Fund Availability (NFAs) which describe special grant conditions. A NFA may include grant conditions that restrict the application of some of the provisions of services provided to clients outlined in this Policy.

**Community Needs Assessment:**

Local Workforce Development Boards, (LWDBs) affected by a declared disaster must conduct a Community Needs Assessment, in coordination with county and city emergency management offices and other agencies involved in disaster recovery in the affected areas. Agencies included in the community needs assessment include FEMA, Small Business Administration, voluntary organizations active in disaster recovery in the affected areas (i.e. United Way), and others as applicable.

The Community Needs Assessment includes the following components:

- The impacts of the declared emergency or disaster event, including how the proposed grant will prioritize communities and individuals most in need due to the effects of the declared disaster or emergency situation, or due to economic or other disadvantage;
- The cleanup or humanitarian needs that stem from the impacts of the declared emergency or disaster; and
- How proposed disaster-relief employment will address the needs and help mitigate the effects of the declared emergency or disaster event, and promote community recovery, including through creating high-quality employment opportunities.

For emergencies or disasters of national significance, the Community Needs Assessment should also demonstrate that the declared emergency or disaster could result in the loss of at least 50 jobs in the area covered by the declaration.

For Disaster Recovery DWGs that include employment and training activities in addition to disaster-relief employment, the Community Needs Assessment:

- Provides an overview of the economic situation or layoff impacts on the communities to be included in the project;
- Addresses the workforce or employment-related needs in the communities impacted;
- Identifies populations to be targeted for services including those who have been historically marginalized; and
- Describes how Disaster Recovery DWG funds will support the goal of enabling individuals to return to high-quality employment that includes a living wage and benefits, promotion potential, and other factors, as a result of grant activities.



**Priority of Service:**

Covered persons (veterans and eligible spouses) determined eligible for services under a Disaster Recovery DWG must receive priority over non-covered persons in accordance with *FloridaCommerce Administrative Policy #111: Priority of Service for Veterans and Eligible Spouses*.

**DWG Allowable Activities:**

Clients may be enrolled into temporary disaster relief employment, career, and training services, concurrently, sequentially, or as stand-alone services. The NFA issued for the DWGs will outline the activities allowable within that specific DWG.

**Temporary Disaster Relief Jobs:**

Disaster-relief employment is temporary employment of eligible individuals for the purposes described in WIOA Section 170(b)(1)(B) and (d), 20 CFR 687.180(b) and (c), and TEGL 12-19. CSS will ensure that disaster-relief employment created under a DWG aligns with one of the following categories:

- Cleanup and recovery efforts; or
- Delivery of appropriate humanitarian assistance in the aftermath of the emergency or disaster.

Post-disaster response and recovery activities address needs associated with mass care/sheltering, public health, and health care, (re)housing, debris/infrastructure removal and repair, support to business owners, emotional/psychological support, public health and health care, and mitigation activities. Allowable mitigation activities are those that are directed at correcting existing damage. Activities that are in preparation for future disasters are not allowed.

Humanitarian assistance provided by temporary disaster-relief workers generally includes actions designed to alleviate suffering and maintain human dignity in the immediate aftermath of disasters. The humanitarian assistance provided by disaster-relief workers must relate directly to needs created by the disaster or emergency, and physical, emotional, and economic consequences of the disaster or emergency. Disaster-relief positions that deliver humanitarian assistance to address humanitarian needs cannot be used to fund the actual humanitarian aid. For example, funding could be used to support food delivery workers at food shelters but not the food itself.

With declared natural disasters, there will be physical damage which results in the dislocation of individuals, families, and businesses, as well as economic and emotional damage. Temporary disaster-relief workers may be provided to help deal with these crises since they are the immediate consequence of the disaster for the time necessary to help affected individuals recover. The humanitarian assistance provided by disaster-relief workers must relate directly to needs created by the disaster and economic consequences due to the disaster.

**Duration of Temporary Disaster Relief Jobs:**

Eligible Clients may be enrolled into temporary disaster-relief jobs under a DWG for a maximum of up to 12 months or 2,080 hours, whichever comes sooner. Duration of temporary jobs will be based on the specific NFA and the availability of funding to maximize the amount of clients CSS serves. The only time a temporary job may exceed these limits is if the Department of Labor (DOL) approves an extension for up to an additional 12 months through a grant modification requested by FloridaCommerce.

### Pay Rates and Benefits of Disaster Relief Jobs:

Clients must be paid the higher of the comparable rate of pay for individuals employed in similar occupations by the same employer, and no less than the federal or state minimum wage, or \$15 per hour. In accordance with WIOA Section 181(a)(1)(A), generally, clients must be compensated at the same rates, including periodic increases, as employees who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills. However, in cases where the worksite does not have employees doing the same or similar work and with similar training, experience, and skills, CSS must ensure the wages paid to clients are in line with the industry standard for that type of work in the area where the work is to be performed.

Where applicable, fringe benefits should be paid in accordance with the policies of the worksite employer. If other employees of the worksite employer are doing similar work and receiving hazard pay, disaster-relief temporary workers can also be paid hazard pay rates for their work. In addition, overtime is allowable if employees of the worksite employer are receiving equivalent overtime opportunities.

### **Training and Pre-Vocational Activities**

Training and career services may be offered to clients who meet WIOA eligibility and pre-requisite requirements to help them obtain (re)employment that leads to self-sufficiency when they are unlikely to return to their prior employment. These services may include:

- Individualized Career Services
- Literacy instruction including English as a second language
- Occupational skills training
- Work-based training such as: On-the-Job Training or Customized Training

Clients who meet the eligibility criteria and receive these services must have an Individual Employment Plan detailing the need for training services as well as certain individualized career services, such as work experiences, literacy/GED prep/ESOL, short-term prevocational services, out-of-area job searches/relocation.

Additionally, to meet the disaster-recovery needs of affected areas, CSS may provide short-term training and pre-vocational activities that allow a disaster-relief worker to obtain the skills needed to conduct the disaster-relief work. For example, this may include training in the use of heavy equipment. Such training is not required to be included in state or local eligible training provider/program list, nor is the occupation required to be on the local targeted occupation list. During these activities, for a client who has been hired in a disaster-relief position that requires specific skills, the client may receive wages under the Disaster Recovery DWG.

### **Disallowed Activities**

The following activities are not allowable uses of Disaster Recovery DWG funds:

- Activities that are in preparation for future disasters.
- Disaster-relief employment positions that deliver humanitarian assistance to address humanitarian needs cannot be used to fund the actual humanitarian aid. For example, funding could be used to support food delivery workers at food shelters but not to purchase the food itself.
- Cost of materials to do repairs.
- May not be used to match FEMA funds.

## **Supportive Services**

Supportive services are allowable to enable a client involvement in DWG activities. Supportive services for a Disaster Recovery DWG are based on grant funding availability and must align with CSS Policy #01-21 *Provision of Supportive Services*, “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.”

When funding availability permits, Needs-Related Payments (NRP) may be made to those individuals enrolled in training services who do not qualify for or have exhausted benefits under Re-employment Assistance or Disaster Unemployment Assistance (DUA). Individuals who receive wages from disaster-relief temporary jobs are **not** eligible for NRPs.

## **Disaster-Relief Worksites:**

Disaster-relief worksites must be in the geographic area covered by the qualifying event in Manatee and/or Sarasota Counties. WIOA requires that cleanup activities respond to the impacts of natural disasters. CSS will give the highest priority to clean-up of the disaster area’s most severely damaged public facilities and to the cleanup and the provision of humanitarian assistance to economically disadvantaged portions of the disaster area. The administration of grant funds must be in coordination with projects administered by emergency management and disaster recovery agencies.

**Note:** The provision of disaster-relief activities that focus on prevention and planning for future disasters is **not** an allowable activity for a temporary disaster-relief worker.

## **Worksite Employers:**

There is no limitation on what type of entity may be a worksite employer. Disaster-recovery worksites may be governmental agencies, community/faith-based organizations (CBO), private, or for-profit employers. Any of these types of employers may be approved to host eligible temporary disaster-relief workers under the following conditions:

- Priority of disaster-relief activities are in coordination with the Manatee or Sarasota county’s disaster-recovery team that identifies the need for and use of private for-profit worksites, as applicable
- The delivery of temporary disaster-relief activities through a private for-profit worksite is coordinated through a governmental entity or CBO
- The funding of temporary disaster-relief positions shall not duplicate or supplant other funding

## **Private Property Worksites:**

The use of private properties for DWG temporary employment may be authorized under the following circumstances:

- The work is necessary to remove health and safety hazards to the larger community located on private lands or around homes or other structures and only to return them to a safe and habitable level and not to improve them:
  - For example, fallen trees on private properties that become a hazard to the community or debris fields from storm adjacent to a navigable waterway and at risk of clogging the waterway water could be removed.
- The work is necessary to remove health and safety hazards on private lands or around homes or other structures and may only return the land or structure(s) to a safe and habitable level, or operational status, and will not improve the original land or structure(s); and

- Priority is to be given to older individuals and individuals with disabilities
- Funds may not be used to cover the cost of materials to do repairs

Private property worksites will be prioritized in the following manner:

- Private homes of Veterans or Eligible spouses who are older individuals, or individuals with disabilities
- Private homes of non-veterans who are older individuals, or individuals with disabilities
- Private homes of Veterans or Eligible spouses who are low-income individuals
- Private homes of non-veterans who are low-income individuals

### **Prioritizing Disaster-Relief Worksites**

CSS will coordinate with local government, community and faith-based organizations, economic development, and industry stakeholders, to prioritize the types of disaster-relief jobs and worksites. Prioritization will be assessed on the following factors:

- Physical impact on public properties
- Human impact on the elderly, people with disabilities, low-income and other special needs populations
- Impact on organizations that are needed to respond to the disaster or emergency (governmental, community and faith-based)
- Impact on local businesses, industry sectors, and the overall economic health of the area

### **Approval and Tracking of Worksites:**

CSS will assess and approve temporary disaster-recovery worksites and job duties for temporary disaster-relief workers. Worksite and job description information will be obtained and reported to FloridaCommerce according to a schedule and in a format provided by FloridaCommerce for each Disaster Recovery DWG. Worksite files must include:

- The worksite agreement between CSS, the employer and staffing agency (if applicable)
  - The agreement should include non-duplication requirements
- Approved job descriptions
- Evidence of appropriate OSHA/safety training (if applicable)
- Evidence that supervisor orientation has taken place
  - To include but not limited to, allowable job duties, timekeeping and submission, disciplinary rules and actions, communication, etc.
- Description of supplies and equipment needed and responsibility for providing such
- Copies of attendance/payroll records.

### **Coordination with FEMA and non-duplication of funds:**

Disaster-relief activities must be coordinated with the appropriate Manatee and Sarasota local emergency management agencies to avoid duplication of benefits and ensure that grant activities appropriately respond to the affected community's needs after a disaster. For purpose of this policy, duplication occurs when a beneficiary receives assistance from multiple sources for a total that exceeds the need. CSS will coordinate with federal agencies responding to the natural disaster either through direct contact or through state or local agencies working with the federal agencies.

CSS will coordinate with Manatee and Sarasota County government, to determine what services and/or funding FEMA is or will be supplying to local employers and what disaster-recovery services will be provided by disaster-relief temporary workers. CSS will request a statement from the counties that include a brief description of what staff, equipment, supplies, etc., are being paid for through FEMA. In the event a Disaster Recovery DWG funded disaster-relief temporary job client works at a site which is later approved for FEMA reimbursement, and it is time for FEMA to reimburse the costs of the project, the wages of the temporary job clients must be deducted from the cost of the project before FEMA reimburses 75% of the cost of the project to the local government.

CSS will require worksite partners to complete an evaluation on the resources they have received in the past, are currently receiving, scheduled to receive, have applied for, or have been denied funding for. Worksites are required to report any funding and purpose of the funding received for disaster recovery to CSS. CSS will require worksites to repay any grant funds expended for activities or services which other funds become available from FEMA, public or private insurance, or other available resources. Note: Disaster Recovery DWG funds may NOT be used to match FEMA funds.

**Use of Equipment for Temporary Disaster-relief Workers:**

Generally, Disaster Recovery DWG funds may not be used to purchase equipment. [Administrative Policy 87 Prior Approval Administrative Policy for Local Workforce Development Boards](#) requires prior approval by FloridaCommerce before funds awarded to CSS may be used to purchase equipment for such cases which may be subject to exception.

If the equipment needed for the temporary disaster-relief worker to complete their assigned task is not available from the worksite employer, such equipment may be rented as long as it does not cause the cost per client to exceed the maximum allotted amount. Equipment rental expenses will be detailed as a separate line item in the budget(s) submitted to FloridaCommerce. Modifications will be sent for approval as needed.

**Employer of Record:**

Each temporary disaster-relief worker must have an employer of record. The employer of record is responsible for maintaining all personnel and payroll records related to the employment of temporary disaster-relief workers, including employer and employee withholdings, and other benefits, if applicable. The employer of record will be responsible for unemployment claims filed by temporary disaster-relief workers when their assignment ends. In addition, the employer of record is required to secure workers' compensation for temporary disaster-relief workers and ensure that the workers receive adequate OSHA/security training. In any event, CSS is responsible for ensuring and maintaining documentation that worker orientation and OSHA/safety training has occurred when required.

CSS may opt to use the FloridaCommerce procured contract with a staffing agency to be the employer of record for temporary disaster-relief workers. This contract is available to CSS to utilize without having to individually procure a staffing agency for each DWG received. CSS may opt to use the FloridaCommerce-procured staffing agency for the placement of temporary workers in a Disaster Recovery DWG project pursuant to FloridaCommerce's contract with the staffing agency. The FloridaCommerce procured staffing agency will invoice CSS directly for all Temporary disaster-relief worker's wages and provide required supporting documentation.

CSS may opt to independently procure a staffing agency to be the employer of record for temporary disaster-relief workers. CSS will follow the process outlined in the *CSS Policy 02-21 Purchasing and Procurement* to procure a staffing agency to act as the employer of record.

### **Client DWG Eligibility:**

Clients receiving services must first meet basic WIOA eligibility requirements. Eligibility must be documented in the client's Employ Florida (EF) program application, including, but not limited to:

- a) Citizenship or right to work
  - A copy of the completed I-9 must be maintained in the file of a client placed into a temporary disaster-relief position.
- b) Compliance with Selective Service Act Registration (males only)
- c) One of the four Dislocated Worker (DW) grant-specific eligibility requirements listed below.

Clients receiving services funded by a Disaster Recovery DWG meet at least one of the following WIOA DW eligibility requirements:

- a) Temporarily or permanently laid off because of the disaster
  - The term laid off, as used in this subsection, may include individuals who were forced to leave their employment following the disaster due to reductions in time or wages, as well as external circumstances caused by the disaster that prevents them from remaining at their pre-disaster job. For example, a worker may have to leave a job to take care of problems caused by the emergency or disaster, to take care of themselves or a relative during the emergency or disaster, or dealing with temporary or permanent homelessness due to the emergency or disaster.
- b) A dislocated worker as defined in WIOA section 3(15), including displaced homemakers as defined in WIOA Section 3(16);
- c) A long-term unemployed individual
  - A long-term unemployed individual for Disaster Recovery DWGs is defined as an individual who has been unemployed for six (6) out of the last 13 weeks
  - An individual is considered unemployed if they were not employed during the weeks in question and were available for work
- d) A self-employed individual who became unemployed or significantly underemployed as a result of the covered disaster.

Examples of documentation demonstrating dislocated worker status include:

- Letter of separation from previous employer
- Verification of Reemployment Assistance (RA) or other forms of unemployment assistance
- Federal Income Tax returns
- Business ledgers or client information for self-employed individuals (i.e., bank statements, etc.)
- Self-Attestation may be accepted as an exception and must not be used as a regular method of determining eligibility. When self-attestation is accepted due to its being the only verification method, CSS must describe efforts made to obtain other, independent documentation.

Circumstances surrounding the disaster may make documentation of eligibility difficult to obtain during the initial stages of disaster recovery. In these circumstances, CSS may determine an individual initially eligible based on self-attestation when a client has experienced physical loss of eligibility verification documentation, due to the physical damage and loss as a result of a natural disaster. However, eligibility verification/documentation must be obtained within six (6) months of the client's enrollment or the grant closeout date, whichever occurs first.

If, during the eligibility reverification review of clients enrolled through self-attestation, CSS discovers the client is in fact ineligible, grant services will immediately be closed. This situation will not result in a disallowed cost.

Self-employed individuals must submit documentation to establish their self-employment prior to the disaster and unemployment/underemployment due to the declared disaster through the following:

- Self-Attestation describing the impact of the disaster, supported by one of more of the following:
  - Federal tax return and/or evidence of payment of estimated taxes to the Internal Revenue Service (IRS)
  - Evidence of business closure
  - Business ledger
  - Business license
  - Customer/client verification (bank records)
  - Self-attestation may be initially accepted as an exception if other documents are not available (and are subject to re-verification)

To verify that an individual was unemployed six (6) out of the last 13 weeks, the following documentation may be used:

- Self-attestation supported by wage records and case note documentation for the previous quarter in which the WIOA application is taken.
  - Probative wage records will not be available at the time of application and must be verified the previous quarter(s).

### **DWG Program Goals, Performance, and Reporting Outcomes:**

#### Goals:

CSS will provide information to FloridaCommerce to describe their planned levels of service and planned expenditures. In addition, FloridaCommerce will be provided measurable goals with milestones and timelines in the following areas:

- Planned number of clients to be served in temporary disaster-relief employment
- Planned worksite employers with description of worksites, tasks, length of time needed, and number of workers needed (and, for modifications, percentage of work completed)
- Planned number of clients to be enrolled in training, including on-the-job training, targeted industries and occupations, anticipated length of training
- Planned number of clients to be enrolled in work experiences, types of work experience sites, anticipated length of activity
- Planned number of clients to receive supportive services, types of supportive services
- Planned number of clients to be placed in employment upon completion of grant activities
- Planned other outcomes, such as continuation in training/other WIOA services after the grant ends, and/or credential attainment

### Performance:

The negotiated performance measures for the WIOA Dislocated Worker program serve as the performance measures for the Disaster Recovery DWG program. FloridaCommerce may propose additional performance measures regarding levels and types of services in its application to USDOL. For clients who only receive disaster-relief employment, the same performance data collection requirements apply as for other DWG participants. However, participants who receive only disaster-relief employment are not included in the WIOA primary indicators of performance unless they receive other allowable career and training services provided through the grant or through co-enrollment in another WIOA core or partner program that shares a common exit. Performance outcomes are measured for individuals enrolled in employment and training activities through the Disaster Recovery DWG or through co-enrollment in another WIOA or partner program that shares a common exit.

### Reporting:

Progress is tracked monthly through a review of client data in Employ Florida and financial information entered in FloridaCommerce's financial management systems. CSS will provide worksite information and submit monthly updates to FloridaCommerce. Such information is to be submitted via the [DWG@FloridaCommerce.myflorida.com](mailto:DWG@FloridaCommerce.myflorida.com) mailbox.

## **Monitoring**

### Worksite Monitoring:

Each worksite must be monitored by CSS as part of its formal programmatic & fiscal monitoring plan. The formal monitoring must be conducted by an independent person or entity not engaged in worksite development/management or case management. The worksite monitor must engage with worksite supervisors and temporary disaster-relief workers on-site at a minimum of once for each program participant. Monitoring visits must be documented in a written report and address corrective actions, as needed.

If at any time CSS becomes aware of temporary disaster-relief workers being employed in activities that are not disaster-relief activities, immediate action will be taken to remedy the finding and/or terminate the agreement.

### Programmatic Monitoring:

Programmatic monitoring will be conducted throughout the program year by CSS's quality assurance team member. This includes the specific review of client records (local & state MIS) while using the current applicable state program monitoring tools. In addition, federal and state guidance and CSS policies and operating procedures will be utilized.

## **Attachments:**

- None

## **Authority:**

- [Workforce Innovation and Opportunity Act \(WIOA\) Sections 3\(15\); 170\(a\) and \(d\); 134; ;181; 184; 185; 188; 189.](#)
- [TEGL 12-19 Attachment-1](#)
- [eCFR :: 20 CFR Part 687 -- National Dislocated Worker Grants](#)
- [TRAINING AND EMPLOYMENT GUIDANCE LETTER No. 12-19, Change 1, Employment & Training Administration \(ETA\) - U.S. Department of Labor \(doleta.gov\)](#)



- [TRAINING AND EMPLOYMENT GUIDANCE LETTER No. 19-16, Employment & Training Administration \(ETA\) - U.S. Department of Labor \(doleta.gov\)](#)
- [CareerSource Florida Administrative Policy #113 Disaster Recovery Dislocated Worker Grants](#)
- [National Dislocated Worker Grant Program Guidance \(doleta.gov\)](#)
- [TRAINING AND EMPLOYMENT GUIDANCE LETTER No. 16-21 | U.S. Department of Labor \(dol.gov\)](#)

**Supersession:**

- **None**

**Inquiries:**

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

DRAFT



ACTION  
ITEMS  
Cont.



Prior Approval Transfer Request Form - WIOA Adult and Dislocated Worker (DW) Programs

From 7/1/2023 through 6/30/24

LWDB Number and Name (Requestor): CareerSource Suncoast LWDB #18

Name / Title of Requestor Representative: Robin Dawson, CFAO

**Adult and Dislocated Worker Transfer Request**

Program Year	Program	Total Award Amount	Amount of Adult Requested to be Spent on DW	Percentage of Adult Requested to be Spent on DW	Amount of DW Requested to be Spent on Adult	Percentage of DW Requested to be Spent on Adult
PY23	Dislocated Wkr	858,560.00	0.00	0	576,000.00	67%

**COMPLETE THE BELOW SECTIONS FOR REQUESTS THAT EXCEED 25% OF THE PROGRAM'S ANNUAL ALLOCATION**

**Reason for requesting the use of one program's funding for the other (e.g. anticipated depletion of current funds, changes in labor market conditions, etc.):**

PY22 Adult Funds are fully expended this program year. Our PY 23 Adult funds will require an estimated \$576,000 from DW

**A description of outreach/marketing activities conducted to ensure underserved populations were aware of available services:**

We have satellite offices at our technical colleges and community college manned by CareerSource employees on a regular basis. We do weekly emails to clients registered at www.employflorida.com about training services available. CareerSource hosts a biweekly partners meeting to share information with a variety of nonprofits, educational providers and economic development organizations in the region. We attend meetings from our veterans commission, homelessness partnership and Veterans stand downs to meet potential new clients. We work with Ticket to Work clients on a regular basis. Post on social media services we offer. Attend local chamber and economic development

**Labor market conditions contributing to the need for the transfer:**

Unemployment is at very low levels, registering at 3.2 percent for November 2023. While 12,622 individuals were unemployed for the month in the MSA, nearly 383,000 people were employed. Furthermore, inflation increased 3.4 percent for the year 2023 according to the Consumer Price Index.

**The number of participants originally planned to be served by the base allocation compared to the estimated number of participants expected to be served after funds are transferred.**

Originally projections had 57 Adult clients for ITAs but we have already put 63 into ITAs, including apprenticeship, this program year. With National Emergency Grants for Hurricane Ian and Fostering Opioid Recovery, we have had multiple other avenues to serve dislocated workers. This should allow us to serve another 50 adult clients on top of our current caseload.

**COMPLETE THE BELOW CERTIFICATION FOR REQUESTS THAT EXCEED 25% OF THE PROGRAM'S ANNUAL ALLOCATION**

I certify the following:

1. When transferring from Adult to Dislocated Worker - The LWDB has sufficient funds to serve the WIOA Adult priority populations.
2. When transferring from Dislocated Worker to Adult - The LWDB has sufficient Dislocated Worker funds to serve dislocated workers in the local area; there are no pending layoffs that may impact the need for dislocated workers in the local area.
3. The full board voted to approve this request to transfer funds and a copy of the LWDB's meeting minutes are included with this request.

I certify the above information is true and correct.

\_\_\_\_\_  
Signature of Board Chair

Eric Troyer  
Print Name Date

**CAREERSOURCE SUNCOAST**  
**Strategic Plan Modifications**  
**Board of Directors Summary Report**  
**January 25, 2024**

**Background Information:**

On October 11, 2023 Carter Consulting Group held a strategic planning session with the CSS leadership team and Board of Directors. This session was conducted to assist CSS in moving to a two-year strategic planning cycle vs a five-year cycle in an effort to adjust to the rapidly changing workforce landscape more fluidly. Carter Consulting developed and presented a summary report of the planning sessions to CSS, providing recommendations for strategic plan updates to reflect the current vision of the Board of Directors.

On December 14, 2023, the Executive Committee met to review the recommendations and approved the following changes to the Strategic plan.

Mission

- Identify and invest in workforce development solutions to meet the needs of Manatee and Sarasota Counties.

Vision

- A highly skilled and responsive workforce that fuels a thriving economy.

Values

- Employer Centric
- Integrity
- Culture of Excellence
- Collaboration
- Innovation

2-Year Goals

- Enhance offerings to focus on increasing access by employers
  - Enhance customized employer-focused solutions
  - Identify programs to help job seekers and employees address benefits cliff and financial gaps

**Key Result: Expand work-based training/learning opportunities to twenty new employers.**

**Key Result: Offer retention base workshop series to local employers.**

- Develop a plan to invest unrestricted funds in growing best practice employer programs
  - Identify programs needing unrestricted funds to grow, expand and deepen.

**Key Result: Invest 10% of the prior years unrestricted available balance in youth program development.**

**CAREERSOURCE SUNCOAST**  
**Strategic Plan Modifications**  
**Board of Directors Summary Report**  
**January 25, 2024**

- Strengthen board engagement by developing opportunities for members to increase awareness of CSS among employers.
  - Build a menu of board engagement opportunities and match board members according to highest and best use.

**Key Result: Offer opportunities for Board Members to engage and represent CareerSource Suncoast in the Community. At least one Board Member represents CSS at participating events.**

Respectfully submitted,

Joshua Matlock  
President, CEO

**CAREERSOURCE SUNCOAST**  
**Related Party Agreements**  
**Board of Directors Summary Report**  
**January 25, 2024**

**Background Information:**

CareerSource Suncoast and the FloridaCommerce (formerly Department of Economic Opportunity) 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 approvals are for work-based learning (i.e., paid-work experience) and/or work-based training (i.e., incumbent worker training, customized training, on-the-job training) agreements.

- Teakdecking Systems, \$9,000 maximum expenditures for PY2023-2024.

**Requested Action:**

A motion for the Board of Directors to approve the Related Party agreement(s) for PY2023/2024 at a maximum of \$9,000.

Respectfully submitted,

Christina Witt  
Organizational Support Director



# CEO Report



OTHER BOARD BUSINESS





# One-Stop Operator Semi-Annual Report

Dr. Ron Natale  
Educational Management and  
Services Fl., LLC.

**Educational Management & Services FL, LLC Report to  
the Suncoast Workforce Board, INC dba CareerSource Suncoast  
January 25, 2024**

In March 2023, **Educational Management & Services FL, LLC (EMSFL)**, was renewed as the **One-Stop Operator (OSO)** for **CareerSource Suncoast (CSS)** for the Program Year beginning July 2023 through June 2024. This report is the first of two required reports to the Board and addresses the scope of work for the program year.

To fully understand the mission, vision, and service delivery requirements of the required one-stop partners and to align with CSS priorities and services better strategically, Dr. Natale convenes quarterly partner meetings. While he is usually present for these meetings at the Sarasota Career Center or another local agency, most partners attend virtually via TEAMS. The 2023-2024 meeting schedule is October 18, 2023, at Suncoast Technical College, January 17, 2024, April 17, 2024, and July 17, 2024. All meetings are from 2:00-3:30 PM. A standard agenda includes:

- 1) Welcome
- 2) CareerSource Suncoast Update
- 3) Crosswalk Referral System
- 4) Infrastructure Funding Agreement Reports
- 5) Agency Highlights
- 6) Partner Agency Updates
- 7) Next meeting
- 8) Survey

Templates for Infrastructure Funding Agreement (IFA) quarterly reports are no longer being used. The template has been replaced with a link,

[https://careersourcesc.na4.adobesign.com/public/esignWidget?wid=CBFCIBAA3AAABLlqZhCkvetfp3N6VHCKbwjeISEivcss\\_YaZTbh74-J6j2Z-AIRZrvNttYFXHvrYjQ1fsVE\\*](https://careersourcesc.na4.adobesign.com/public/esignWidget?wid=CBFCIBAA3AAABLlqZhCkvetfp3N6VHCKbwjeISEivcss_YaZTbh74-J6j2Z-AIRZrvNttYFXHvrYjQ1fsVE*)

This link with funding amounts is sent to partner agencies two weeks prior to the partner meeting so any questions can be addressed during the meeting. An EMSFL meeting satisfaction

survey (attached) is included in the meeting packet for attendees to provide feedback on meeting length, appropriateness, and facilitation.

By promoting and training partners in the Crosswalk Referral System (CRS), EMSFL is working toward the development and implementation of braided services across one stop mandated partner programs to enhance client outcomes. Dr. Natale received initial training and access to the Crosswalk Referral System (CRS) in August 2021. Additional access to CRS was provided in January 2022. Crosswalk has previously been introduced to other regions and expanded to agencies in those regions to facilitate conversations supporting and maintaining the use of the CRS with other CareerSource regions, One Stop Center mandated partners and other community organizations. EMSFL has provided support and training to other regions and agencies as requested. The CRS is part of each partner meeting agenda in the other regions as well as CSS. A Crosswalk Referral System monthly report is provided to the liaison and CSS staff monthly and to the partners at each quarterly meeting as a year-to-year comparison. This report tracks new agencies added to the system, agency referrals sent, received, and closed. A current report is attached.

While workforce regions have shared common practices, each region also has nuances and EMSFL has become more familiar with the processes utilized by CSS. In addition to meeting regularly with partner organizations and the OSO liaison, Dr. Natale meets with individual staff as well as a small group consisting of the Career Center Managers, and the Director of Continuous Improvement. From these discussions a best practice, *Analysis of Teleworking*, was developed and submitted on December 7, 2023. A previous best practice, *Streamlining Infrastructure Funding Reports*, was implemented as described in a previous paragraph. The feedback from partner agency representatives has been positive.

CareerSource Florida Administrative Policy Number 93 adopted February 2, 2017, Section C. Effectiveness, Physical and Programmatic Accessibility, and Continuous Improvement, subsection 1. Effectiveness, item e. asks, “has the CareerSource Board established policies and procedures that provide one-stop career center customers the opportunity to provide feedback

on services provided and customer satisfaction?” On February 15, 2022, EMSFL provided a recommendation for making a customer satisfaction survey available to CSS clients. The recommendation was modified by leadership and implemented in a different fashion. Michael Meerman has reported that in the last program year CSS surveyed clients who received staff assisted services directly through an email campaign. They were sent emails requesting their participation in our customer satisfaction survey. Late in that year, per an EMSFL request, the survey instead has been published to the CSS Resource Area’s home page. That was completed/created on August 18, 2023. Participation has been very low. At that time CSS had already been preparing for the new direct mail campaign. CSS followed through and sent out 711 (client assisted services Feb '23 - June '23) emails on August 11, 2023. Consideration is being given to returning to the initial process of sending emails to any customer (virtual or in-person) who has directly received services from our staff. That will provide a larger pool and include those that were in our centers. EMSFL supports a process that increases the pool and provides more timely feedback so a baseline can be established and Center staff can be provided with feedback for process improvement.

If the Board desires additional reports or has questions for the OSO to address, please provide requests through the Executive Director’s office. Dr. Natale can be available for Board or committee meetings if necessary to facilitate the best outcomes possible under the OSO contract of services.



### MEETING SATISFACTION SURVEY

Thank you for your participation in an EMSFL program. Please assist us in providing quality meetings by completing this survey of your experiences. Please feel free to write comments on the back of this form and attach extra sheets as necessary. The following rating scale is provided for your convenience.

SA = Strongly Agree	A = Agree	DA = Disagree	SD = Strongly Disagree	NA = Not Applicable
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- |   |                          |                          |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. The session leader was responsive to my requests for information and assistance. | SA                       | A                        | DA                       | SD                       | NA                       |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. The length of the meeting was appropriate.                                       | SA                       | A                        | DA                       | SD                       | NA                       |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. The content was relevant to my needs.  | SA                       | A                        | DA                       | SD                       | NA                       |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. The agenda seemed well organized.  | SA                       | A                        | DA                       | SD                       | NA                       |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. The facilitator was knowledgeable of the material.                               | SA                       | A                        | DA                       | SD                       | NA                       |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. The facilitator followed the agenda.   | SA                       | A                        | DA                       | SD                       | NA                       |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. The support materials were appropriate to the meeting .                          | SA                       | A                        | DA                       | SD                       | NA                       |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. I would recommend EMSFL to others for facilitation.                              | SA                       | A                        | DA                       | SD                       | NA                       |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Comments:  |                          |                          |                          |                          |                          |

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Attachment: CRS Monthly Reports

**Crosswalk Referral System Monthly Report PY 2022-2023**

Month	New Agencies	Agency referrals sent	Agency referrals received	Total Referrals	Closed Referrals
July	6	0	12	12	5
August	5	9	27	35	11
September	3	2	9	11	3
October	6	2	6	8	7
November	0	2	1	3	1
December	0	2	2	4	1
January	0	0	6	6	3
February	0	2	6	7	4
March	0	5	3	8	3
April	0	7	17	23	8
May	0	7	25	31	19
June	0	19	70	87	58
<b>Total</b>	<b>20</b>	<b>57</b>	<b>184</b>	<b>235</b>	<b>123</b>

**PY 2023-2024**

Month	New Agencies	Agency referrals sent	Agency referrals received	Total Referrals	Closed Referrals
July	0	2	24	26	17
August	0	5	16	21	14
September	5	8	27	31	31
October	3	4	25	28	16
November	5	3	15	18	10
December	3	10	29	39	14
January	0	0	0	0	0
February	0	0	0	0	0
March	0	0	0	0	0
0	0	0	0	0	0
May	0	0	0	0	0
June	0	0	0	0	0
<b>Total</b>	<b>16</b>	<b>32</b>	<b>136</b>	<b>163</b>	<b>102</b>

\*Total Referrals may include a duplication of referrals



## Analysis of Teleworking

The coronavirus (COVID-19) pandemic resulted in changes to the working arrangements of millions of employees who are now based at home and may continue to work at home, in some capacity, for the foreseeable future. Whether it's called Work at Home (WAH), Teleworking or Telecommuting, it entails working from home or in a location other than a company office. This system allows employees to turn their homes into their office spaces and also allows employees to save time by eliminating a commute to work. Teleworking typically requires a computer, internet connection and communication system, whether email, a messaging service or a phone, to succeed. Some companies implement periodic telecommuting workdays, while others allow their work teams to be fully remote.

Over the past year, Dr. Natale has heard concerns about teleworking that prompted a meta study of the advantages and disadvantages of Teleworking. This paper identifies benefits and drawbacks to Teleworking and offers suggestions to CareerSource Suncoast for maintaining high levels of effectiveness and efficiency.

There are several advantages to telecommuting, including: saving time, saving money, improving efficiency, and encouraging productivity. Teleworking allows an employee to save potentially large amounts of time each day by working from home and avoiding a commute. Not having to drive or take public transportation also enables an employee to eliminate the possibility of unforeseen circumstances that might make you late or cause you to miss work altogether. Teleworking saves an employee money on travel expenses, like gas, transportation passes and tolls. This financial benefit can boost job satisfaction. Obviously, an employee can also save money on a professional wardrobe, office lunches and other costs directly associated with working within an office environment. Working from home allows everyone to enjoy maximum efficiency with their time. For example, some employees work most efficiently during the early morning hours, while others prefer to work later in the day. Teleworking allows you to structure your day in a way that takes advantage of your natural energy levels, working during the hours when you are most productive and focused, even if they are outside of normal business hours. Many studies demonstrate that teleworking encourages productivity among work teams by reducing or even eliminating many of the common distractions experienced within an office setting. When working from home in a dedicated workspace, an individual can focus solely on tasks and deadlines. This allows an employee to stay more engaged with work and ultimately helps boost work performance and productivity. Also, establishing a comfortable workspace can improve one's mood during work, making the individual more productive and focused.

Although there are many benefits to teleworking, there are also some disadvantages. A balanced understanding of the benefits and disadvantages of teleworking makes it easier for companies to decide when to implement this feature for their teams. Some disadvantages are the impact on work culture, changes to communication dynamics, challenges to collaboration and creativity, and increased security risks. Teleworking makes it challenging for coworkers to

work closely with one another and for a company's management teams to communicate their long-term vision for an organization. Both are vital to creating a positive work culture within an organization. Building a team of employees that enjoy each other's company and thrives in the same space is challenging if everyone is in a different location. However, the company may organize remote events, one-on-one meetings, or other events to encourage coworkers to get to know each other and emphasize company culture. Communication dynamics include clear communication and directions that are easy to follow and understand to support efficient business operations. If a company doesn't have a communication system that allows them to communicate easily with their managers or their teams, communication discrepancies may make completing work efficiently or accurately challenging. Also, telecommuting requires team members to adjust to using video conferencing, instant messaging, or phone calls instead of in-person meetings. Establishing specific communication channels and organizing resources well may help companies prevent miscommunication and related challenges. Collaboration often leads to creativity, especially when people can share and refine ideas. With the right technology, it's possible to hold team meetings and brainstorming sessions. However, this process can be somewhat limited when a team isn't within the same space because it can make it hard for teams to collaborate and share spontaneous and creative ideas. Ensuring everyone understands the project's goals and feels comfortable together may help ensure virtual meetings are effective for collaboration. When a company telecommutes, there's an increased risk of data breaches that can cause a loss of sensitive company information. Most companies have dedicated information technology (IT) teams and system administrators that help them set up secure networks for everyone to work on. When employees are telecommuting, each person works independently on their own home network and sometimes this causes mismanagement of company data and information. Using measures like virtual private networks (VPNs) and establishing security expectations and guidelines may help keep important information secure.

In addition to these business aspects of teleworking, the company needs to be aware of employee health concerns. Decisions on how to promote employees' health while teleworking need to be based on the best available evidence to optimize worker outcomes. A digest of available studies allowed Dr. Natale to review the impact of Teleworking on individual workers' mental and physical health, and determine any gender difference, to develop recommendations for employers and employees to optimize workers' health.

While some workers may have had flexibility to work remotely before the pandemic, this unprecedented shift to remote work looks like it could be here to stay in some form. A team of researchers at Microsoft analyzed how workers were experiencing remote work, they found that even employees who had previously developed strong work-life boundaries found them blurring during the pandemic transition. "The research has generally shown that for most outcomes, remote work leads to small but tangible benefits," says I/O psychologist Bradford Bell, PhD, professor, and director of the Center for Advanced Human Resource Studies (CAHRS) at Cornell University. "Employees who telecommute tend to be slightly more satisfied, and their performance tends to be the same or a little higher." But researchers also caution that teleworking is rarely an all-or-nothing arrangement. Some employees work from home a few days a month, some a few days a week and some full time—and the extent of a worker's telecommuting can dictate his or her experience. For instance, a meta-analysis by Gajendran



and a co-author found that telecommuters' relationships with colleagues generally only suffered if they worked remotely three or more days each week ([\*Journal of Applied Psychology\*](#), Vol. 92, No. 6, 2007).

Despite the largely positive findings on the benefits of telecommuting, just 7% of American companies offer the option to most or all of their employees, according to recent BLS data. Some early adopters—including Best Buy, IBM and Yahoo—are even reversing policies that once allowed employees to telecommute, citing leadership changes and a growing need for creative collaboration. Coworking spaces may alleviate social isolation, “but it’s unclear whether they address the professional isolation that out-of-office employees tend to experience.

Working at home could have negative or positive impacts, depending on various systemic moderators such as: the demands of the home environment, level of organizational support, and social connections external to work. When the effects of organizational support (via job resources and demands) are examined, researchers found associations between Work At Home and less time pressure, less role conflict, and greater autonomy, resulting in less exhaustion. However, they also found Work At Home was associated with lower social support, lower feedback and greater role ambiguity which increased exhaustion; overall these negative effects did not outweigh the overall positive impact of Work at Home.

#### **Recommendations:**

Discuss with your team: How has the pandemic changed how you think about work-from-home opportunities? Have your work-life boundaries shifted in ways that you are happy (or unhappy) with? Does “always on” mean that you are more productive? What team standards or norms can you use to bridge the gap between workers’ experiences and managers’ perceptions?

If CareerSource Suncoast determines that employees should return to the office:

1. Communicate openly and transparently. Don't bury the plans to move everyone back to the office at the bottom of the weekly company memo. Businesses need to tell employees as soon as they've decided to return to the office. Be sure employees are aware of the anticipated timeframe and kept informed as milestones are reached.
2. Explain why the move is necessary. Employees don't need to know every detail about the transition plan, but they will appreciate honesty about why their employer wants them to go back into the office. They will also be more inclined to see the business's perspective if they see hard data to support this decision.
3. Make employees aware of in-office changes. Organizations should be sure employees understand what is expected of them before returning to the office. This includes things such as continued enforcement of social distancing or allowing people to continue to work from home one or more days a week.
4. Allow employees to offer input. Many organizations took employees' advice into account when entering lockdown. Workers told employers what tools would help them

do their jobs more efficiently from a remote location. Likewise, businesses should hear employees out on what would help ease the transition back to the office.

5. Have patience. Businesses should give employees time to adjust to working in the office again. This can be done by easing them back into regular office work while still working from home part time. Also, ask for employee feedback on easing any anxieties or uncertainties during the transition.

The following items delineate the disadvantages of teleworking:

### **1. Distractions at home**

There are many distractions at home that can detract from an employee's focus on their work. Some of these factors include screaming children, noise from passing traffic, ringing doorbells, dogs barking and household chores. If employees work from home, it's important that they have a dedicated workspace, access to childcare and a schedule.

### **2. Isolation**

Remote work, especially for those who live alone, can lead to feelings of loneliness and isolation. Even if an employee has their own office in a physical office building, they see others in the hallway, elevator and parking lot throughout the day. They also interact with people at gas stations, coffee shops and restaurants during their commute to work and their lunch. Workers may only exchange pleasantries, but it is in-person social interaction. Employees who work from home miss out on these conversations.

### **3. Loss of work-life balance**

Though a better work-life balance is sometimes an advantage, many teleworkers find the opposite to be true. Some employees find that work bleeds over into their home life more and more. It can start as something simple, such as responding to an email after clocking out for the day. But if workers aren't careful, that can turn into multiple emails or putting in extra work after hours. For some, this turns an eight-hour day into a 10-hour day or more. The line between work life and home life becomes blurred when the workplace is inside the home, which can lead to burnout and lower morale.

### **4. Increased need for meetings**

Once a company's employees are spread far and wide, leadership will want to keep tabs on them to some extent. In a remote work world, this means managers can no longer walk across the office to check in on their employees. Instead, they need to schedule virtual meetings to discuss routine project management tasks. While digital meetings can be less disruptive than in-person meetings, they are rarely the highlight of the workday. And having too many meetings often causes frustration among employees.

### **5. Cybersecurity concerns**

Security is always at the top of a business's list of priorities. But it becomes critical when an organization must accommodate remote working arrangements. A company's potential security loopholes increase when factoring in antivirus software, firewalls and VPN configurations for employees' home internet connections. Further complicating matters is

when employees decide to work from a coffee shop or other location with public Wi-Fi, and when they bring personal devices onto a business network. Before the idea of remote work is even mentioned, businesses must be sure they can meet or exceed security expectations to minimize a cybersecurity disaster.

#### **6. Difficulty maintaining confidentiality**

Organizations also must contend with the possibility of confidentiality breaches. This could include someone overhearing a confidential discussion or seeing sensitive documents on an employee's computer. Businesses must stress the importance of maintaining confidentiality and consider limiting work in public spaces.

#### **7. Unstable/inconsistent internet access**

No one's internet connection is completely stable at every possible second. Electricity and internet outages aside, connections can vary in speed and reliability over the course of a day. For people in crowded areas where many others also work from home -- such as apartment complexes and densely packed cities -- slow speeds, buffering, and poor audio and video connections are common.

#### **8. Inconvenient for new hires**

Starting a new job is stressful for most people, even under the best of circumstances. But new hires to an organization might feel overwhelmed if they are going from a traditional office to one primary based at home. Not only do they have to learn how to perform in their new role, but they must also learn to navigate new technology. As a result, managers may spend more time coaching a new remote employee.

### **Resources**

Amico, L. (2021, October). What can be done? *Harvard Business Review*.

Abrams, Z. (2019, October). The future of remote work: When it's done right, telework can improve employee productivity, creativity and morale. *American Psychological Association, Vol. 50, No. 9. Print version: page 54.*

Gajendran, R. & Golden, T. (2019) Unpacking the Role of a Telecommuter's Job in Their Performance. *Journal of Business and Psychology, Vol. 34, No. 1, 2019.*

Other resources were used in a composite form.



FINANCE  
AND  
PERFORMANCE  
COMMITTEE  
REPORT

**CAREERSOURCE SUNCOAST**  
**Finance & Performance Committee**  
**Board of Directors Summary**  
**January 25, 2024**

The Finance & Performance Committee met on January 23, 2024.

**Acceptance of the Financial Audit Report for Program Year Ending June 30, 2023:**

Ben Clark, James Moore & Co. presented the Finance and Performance Committee the completed audit report for Program Year ending June 30, 2023. The report reflected no findings and no questioned costs were found. A copy of the audit report was provided in the agenda packet. The audit report was accepted by the F&P Committee.

**Budget to Expenditure Reports Review:**

Robin Dawson, VP/CFAO, reviewed the following reports provided in the agenda.

1. Review of Budget to Expenditure Report as of December 31, 2023.
  - a) Overall burn rate of 42%
  - b) YTD Federal and State requirements:
    - Admin: 9.33%; max allowed 10%
    - ITAs: 44.45%; minimum requirement 35%
    - Youth Paid Internships/Work Experience: PY22 is 14.24%; minimum requirement 20%,
    - Youth Out of School: PY22 is 97.30%; minimum requirement 50%
2. Summary of Non-Federal Funds Revenue & Expenditures as of December 31, 2023.

**FloridaCommerce PY2022-23 Programmatic and Financial Compliance Monitoring Review:**

A copy of the FloridaCommerce monitoring report was received on December 1, 2023. The review period was January 1, 2022 – June 30, 2022. A copy of the report was provided in the agenda packet. Anthony Gagliano reviewed the monitoring report. There was a total of ten (10) programmatic findings and nine (9) observations of non-compliance issues. There were no findings and no observations on the financial monitoring report.

**Performance Update:**

Anthony Gagliano reviewed the CSS WIOA Performance Indicators for the first quarter of program year 2023-24 as of 09/30/2023. A copy of the performance results was provided in the agenda packet.

**General Comments & Updates:**

Next meeting(s) of the Finance & Performance Committee is scheduled for February 27, 2024 at 8:00 a.m. and April 25, 2024 at 8:00 a.m.

Respectfully Submitted,

Lisa Eding  
CSS Treasurer

CareerSource Suncoast  
 Expenditure To Budget Report - Summary  
 Program Year July 1, 2023 thru June 30, 2024  
 As Of 12/31/2023 (with accruals)

MOD 2

	PY TOTAL BUDGET	RESTRICTED EXPENSES YTD	BUDGET BALANCE	% OF BUDGET EXPENDED	NOTES
<b>PERSONNEL COSTS</b>					
SALARIESFRINGE BENEFITS	\$4,282,731	\$1,980,907	\$2,301,824	46%	
STAFF TRAINING & EDU	\$45,000	\$36,984	\$8,016	82%	Obligations \$3,175
<b>TOTAL PERSONNEL COSTS</b>	<b>\$4,327,731</b>	<b>\$2,017,892</b>	<b>\$2,309,839</b>	<b>47%</b>	
<b>FACILITY COSTS</b>	<b>\$556,669</b>	<b>\$265,886</b>	<b>\$290,783</b>	<b>48%</b>	
<b>OFFICE FURNITURE &amp; EQUIP</b>	<b>\$26,502</b>	<b>\$3,149</b>	<b>\$23,353</b>	<b>12%</b>	Obligations \$9,703
<b>OPERATING COSTS:</b>					
ACCOUNTING/AUDIT	\$73,657	\$37,221	\$36,436	51%	Obligations Audit/990 \$3,900
CONSULTANTS/LEGAL	\$60,000	\$24,159	\$35,841	40%	Obligations \$22,030 (OSO & Legal)
GENERAL INSURANCE	\$61,550	\$46,158	\$15,392	75%	Policies begin July 1 - decrease in coverage from downsizing
OFFICE EXP & SUPP	\$45,759	\$13,603	\$32,156	30%	
TRAVEL & MEETINGS	\$83,557	\$29,395	\$54,162	35%	
<b>TOTAL OPERATING COSTS</b>	<b>\$324,523</b>	<b>\$150,535</b>	<b>\$173,988</b>	<b>46%</b>	
<b>PROGRAM SERVICES:</b>					
CLIENT TRAINING/SUPPORT	\$2,875,944	\$940,746	\$1,935,198	33%	Obligations \$1,001,452. Exp & Obs @ 67.5%
CLIENT & EMPLOYER SERVICES	\$95,329	\$64,326	\$31,003	67%	
OUTREACH	\$127,868	\$35,158	\$92,710	27%	Obligations for EDCs & LCANs \$55,000
<b>TOTAL PROGRAM SERVICES</b>	<b>\$3,099,141</b>	<b>\$1,040,230</b>	<b>\$2,058,911</b>	<b>34%</b>	
<b>TOTALS</b>	<b>\$8,334,566</b>	<b>\$3,477,692</b>	<b>\$4,856,874</b>	<b>42%</b>	<b>Rates below as of 12/2023:</b> Admin 9.33% Max 10% ITA 44.45%. Min Req 35% Paid Internships Exp: PY22 14.24%, Min Req 20% Yth Out of Sch Exp: PY22 97.30%, Min Req 50%.

Expected burn rate as of 12/31/23 50%

**CareerSource Suncoast**  
**Summary of Non-Federal Funds Revenue & Expenditures**  
**as of 12/31/2023 (with accruals)**

	Unrestricted Business Support - 707	Unrestricted Tobacco Free - 719	Restricted Consolidated Workforce Educ - 720	Unrestricted Ticket to Work - 724	Restricted Misc Client Supp - 730	Totals
<b>Wells Fargo Operating Account #10001</b>						
Fund Balance as of 7/1/2023	\$48,324	\$380	\$85,038	\$331,344	\$344	\$465,429.25
Revenue						
Current Year	\$0	\$975	\$34,750	\$97,251	\$3,000	
Bank Interest Income	\$0	\$0	\$0	\$1,273		
Inter Transfer	\$0	\$0	\$43,347	\$0	\$0	
Revenue Total	\$0	\$975	\$78,097	\$98,524	\$3,000	\$180,595
Expenditures - Current Year	\$0	\$0	\$46,807	\$26,834		\$73,641
Increase/(Decrease) in Cash - Current Year	\$0	\$975	\$31,290	\$71,689	\$3,000	\$63,607
Transfer Excess Cash to CD				(\$200,000)		
<b>Wells Fargo Cash Balance as of 12/31/2023</b>	<b>\$48,324</b>	<b>\$1,355</b>	<b>\$116,327</b>	<b>\$203,033</b>	<b>\$3,344</b>	<b>\$372,383</b>

cash bal per wk sheet

	Unrestricted SWB Misc - 901
<b>Truist Bank - Unrestricted #10002 MM &amp; #10006 CD</b>	
Money Market Fund Balance	\$63,934
Certificate of Deposit - matures 01/16/2024	\$100,000
<b>Truist Balance as of 12/31/2023</b>	<b>\$163,934</b>

	Unrestricted SWB Misc - 901
<b>Edward Jones - Unrestricted #10003 Savings &amp; #10006 CD</b>	
<b>Certificates of Deposits (CD) -</b>	
CD - Baroda Bank matures 03/28/2024	\$175,000
CD - Comerica Bank (Ticket 2 Work) matures 05/03/2024	\$200,000
<b>10006 - CD Account Balance</b>	<b>\$375,000</b>
<b>Savings:</b>	
10003 - BMO Harris Bank (savings account) balance	\$1,387
<b>Edward Jones Balance as of 12/31/2023</b>	<b>\$376,387</b>

Summary Non-Federal Funds Restricted and Unrestricted by Account Type	Total CDs & Bank Accts	Total CDs CDs	Total Bank Accts	1 Mth Oper Exp Req Reserve 23-24	Available Unrest 23-24
<b>Total Non-Federal Funds Restricted</b>	\$119,671	\$0	\$119,671		
<b>Total Non-Feder Funds Unrestricted</b>	\$793,033	\$475,000	\$318,033	\$377,000	\$416,033
<b>Total Non-Federal Funds</b>	<b>\$912,704</b>	<b>\$475,000</b>	<b>\$437,704</b>		

\$912,704

ck fig

# Quality Assurance Report

Program Year 2022-2023

November 29, 2023

*Programmatic and Financial  
Compliance Monitoring Review*

**FOR**

**Local Workforce Development Board - 18**



**Prepared by the  
Florida Department of Commerce  
Division of Workforce Services and Division of Finance and Administration**



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## Executive Summary

During the period of March 6–10, 2023, the Florida Department of Commerce (FloridaCommerce) conducted a joint programmatic and financial monitoring review of CareerSource Suncoast’s (CSS) workforce programs. CSS’s service area includes Manatee and Sarasota counties.

Programmatic monitoring was conducted by FloridaCommerce’s Bureau of One-Stop and Program Support (OSPS) and financial monitoring was conducted by FloridaCommerce’s Bureau of Financial Monitoring and Accountability (FMA) staff through a remote desktop review analysis. This allowed for collaboration in the evaluation of both programmatic and financial data by a comprehensive monitoring review team.

Monitoring activities included assessing CSS’s program operations, management practices, system protocols, internal controls, financial record keeping and reporting to determine if CSS operated in compliance with each of the programs’ laws, regulations, state and local plans, policies and guidance, and any contract or agreement terms. Monitoring also included sample testing of randomly selected participant case file records from each of the workforce programs reviewed.

Programmatic and financial management issues identified in the report are generally categorized as Findings, Other Noncompliance Issues (ONIs), Observations, and Technical Assistance based on a scale of high, medium, and low risk factors. High, medium, and low risk factors are used to separate issues that present more of a threat to program operations including issues that may potentially impact the fiscal integrity or delivery of services within program operations.

The review revealed that CSS has the systems in place to perform the broad management, operational, and financial functions required to operate the workforce programs; however, deficiencies in case file documentation requirements and operational and management practices in several program review areas were identified. The programmatic monitoring review resulted in 10 findings, nine ONIs, and several observations. The financial monitoring review did not result in any findings, ONIs, observations, or technical assistance. While no material issues or weaknesses came to the reviewers’ attention other than those contained in the report, there is no assurance that other issues do not exist.

As a subrecipient of authorized funds administered by FloridaCommerce, CSS is accountable for failing to correct performance, programmatic, and financial deficiencies found during compliance monitoring reviews. To reduce programmatic or financial deficiencies observed and to increase program integrity at the local level, corrective action by CSS is required to be taken.

The results of each of CSS’s workforce programs are summarized in the following charts by program and category.

## ACRONYM TABLE

---

ABAWD – Abled Bodied Adult without Dependents  
AP – Administrative Policy  
CAP – Corrective Action Plan  
CFR – Code of Federal Regulations  
CSS – CareerSource Suncoast  
DCF – Department of Children and Families  
DVOP – Disabled Veterans Outreach Program  
DWG – Disaster Recovery Dislocated Worker Grant  
DW – Dislocated Worker  
EDP – Employability Development Plan  
EEO – Equal Employment Opportunity  
ES – Employment Service  
ETA – Employment and Training Administration  
F.A.C.–Florida Administrative Code  
FCOP – Farmworker Career Development Program  
FG – Final Guidance  
FLC – Foreign Labor Certification  
FloridaCommerce – Florida Department of Commerce  
FLSA – Fair Labor Standards Act  
FMA – Bureau of Financial Monitoring and Accountability  
F.S. – Florida Statutes  
FY – Fiscal Year  
IEP – Individual Employment Plan  
IRP – Individual Responsibility Plan  
IT – Information Technology  
ITA – Individual Training Account  
IWT – Incumbent Worker Training  
JPR – Job Participation Rate  
JVA – Jobs for Veterans Act  
JVSG – Jobs for Veterans State Grant  
LLC – Limited Liability Corporation  
LMI – Labor Market Information  
LVER – Local Veterans Employment Representative  
LWDB – Local Workforce Development Board  
MIS – Management Information System  
MOU/IFA – Memorandum of Understanding & Infrastructure Funding Agreement  
MSFW – Migrant and Seasonal Farmworker  
MSG – Measurable Skills Gains  
ONI – Other Noncompliance Issue  
OSPS – Bureau of One-Stop and Program Support  
OSST – One-Stop Service Tracking  
OST – Occupational Skills Training  
POS – Priority of Service  
PY – Program Year  
RESEA – Reemployment Services and Eligibility Assessment Program  
SBE – Significant Barrier to Employment  
SMA – State Monitor Advocate

S.M.A.R.T – Specific, Measurable, Attainable, Realistic, and Time-Bound  
SNAP E&T – Supplemental Nutrition Assistance Program Employment and Training  
SYEP – Summer Youth Employment Program  
TAA – Trade Adjustment Assistance  
TANF – Temporary Assistance for Needy Families  
TCA – Temporary Cash Assistance  
TEGL – Training and Employment Guidance Letter  
U.S.C. – United States Code  
WE – Work Experience  
WFS – Workforce Services  
WIOA – Workforce Innovation and Opportunity Act  
WP – Wagner-Peyser  
WSA – Work Search Activity  
WT – Welfare Transition

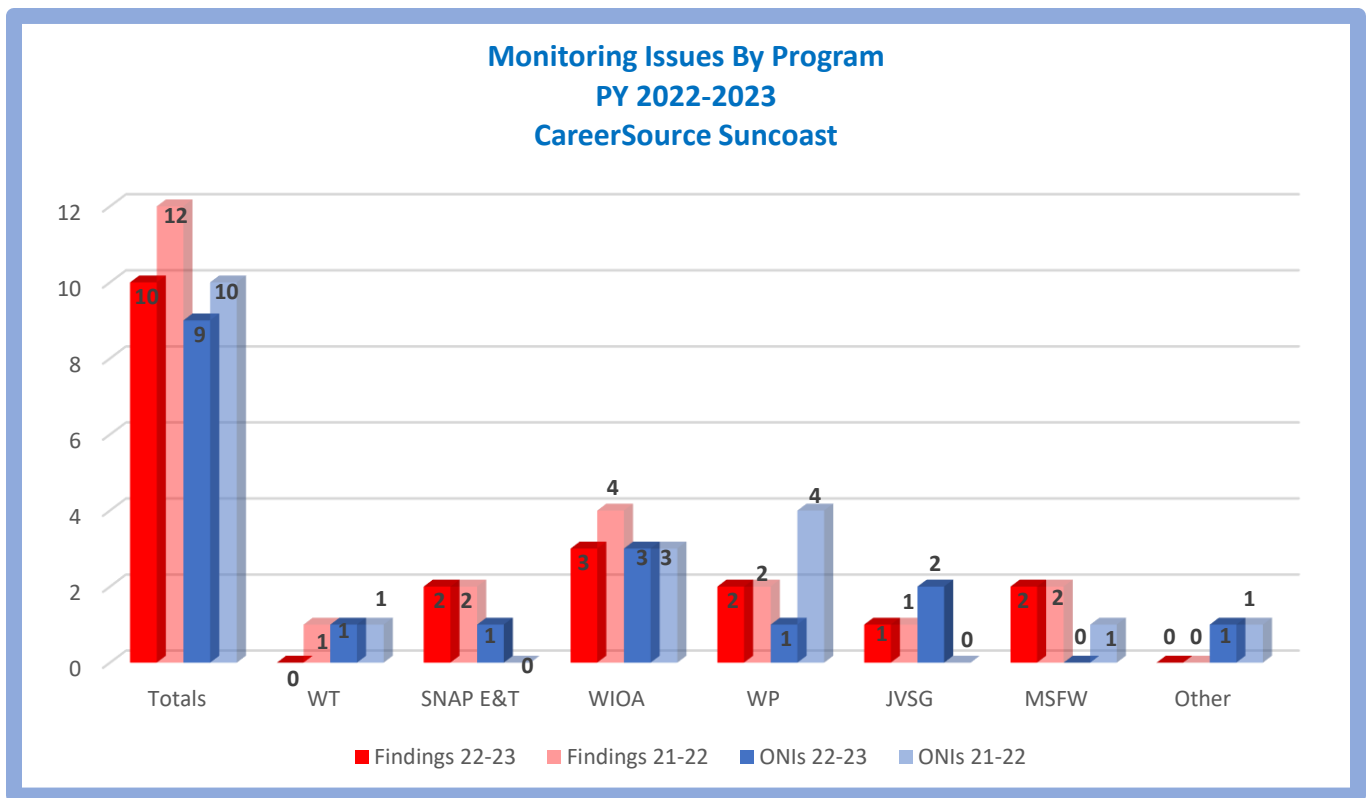
**\*This acronym table reflects all acronyms that have been used in the PY 2022-2023 monitoring cycle. All acronyms may not be used in this report.**

## SUMMARY TABLE OF PROGRAMMATIC MONITORING RESULTS

N=No. Y=Yes. N/A=Not Applicable.

PY 2022-23 Programmatic Monitoring Results					
Workforce Program	Issue	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue
WT	One participant's IRP did not include one of the three required elements (provision of services).			N	Y
<b>WT TOTALS</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>
SNAP E&T	One participant case file was missing documentation to support all JPR hours entered in OSST.	N	Y		
	CSS assigned one participant to an activity and later initiated a sanction for noncompliance; however, the participant had been exempted from SNAP E&T participation by DCF.	N	Y		
	Three participants did not have their 590 - initial appointment status code ended within two business days.			Y	Y
<b>SNAP E&amp;T Totals</b>		<b>0</b>	<b>2</b>	<b>1</b>	<b>1</b>
WIOA Adult/DW	Documentation to support the veteran status recorded in Employ Florida was missing in one participant's case file.			N	Y
	One participant case file was missing documentation to support the expenditure of funds for a classroom training activity, and another participant's training activity was not recorded in Employ Florida.	N	Y		
	One participant case file was missing documentation to support the credential attainment recorded in Employ Florida. Additionally, one credential attainment did not meet the definition of a nationally recognized credential.	Y	Y		
	There was no documentation to support the offering or provision of follow-up services in one participant case file.	Y	Y		
	Employment information recorded in Employ Florida at exit and during quarterly follow-ups did not match documentation maintained in four participant case files.			Y	Y
WIOA Youth	The ISS in one participant case file was not updated as activities and goals were completed.			N	Y
<b>WIOA Totals</b>		<b>2</b>	<b>3</b>	<b>1</b>	<b>3</b>
WP	Ten job seeker assessments were missing documentation to support that the assessments were conducted or the assessments were missing.	Y	Y		
	Documentation of compliance reviews for 10 employer-entered job orders were missing the steps required to verify compliance.	N	Y		
	A job order with multiple job seeker placements did not have case notes recorded on the job order identifying the job seekers and the wage rate at which each job seeker was hired.			N	Y
<b>WP Totals</b>		<b>1</b>	<b>2</b>	<b>1</b>	<b>1</b>
JVSG	One veteran did not have a corresponding priority of service code (089 automated or 189 manual) recorded in Employ Florida when participation began.	N	Y		
	A participant did not have a 159 Veterans intake code recorded in Employ Florida.			N	Y
	One participant was referred to a DVOP for Individualized Career Services; however, there was no record of a DVOP ever contacting the veteran.			N	Y
<b>JVSG Totals</b>		<b>0</b>	<b>1</b>	<b>0</b>	<b>2</b>

Workforce Program	Issue	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue
MSFW	The Bradenton significant office did not meet all required Equity Ratio Indicators and Minimum Service Level Indicators during the review period.		Y	Y	
	A complaint log did not contain all required elements.	Y	Y		
<b>MSFW Totals</b>		<b>1</b>	<b>2</b>	<b>1</b>	<b>0</b>
<b>Board Governance</b>	Local Board members did not complete their annual refresher training.			N	Y
<b>Other Totals</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>Results – All Programs</b>		<b>4</b>	<b>10</b>	<b>4</b>	<b>9</b>



Note: The above chart reflects a two-year comparison of the number of monitoring issues (PY 2021-22 and PY 2022-23).

### **DEFINITIONS APPLICABLE TO PROGRAMMATIC MONITORING**

1. **Finding** – A high risk issue that directly impacts the integrity or effectiveness of program operations or could potentially result in major program deficiencies (e.g., participant ineligibility, missing files, lack of fully executed contracts, issues indicative of systemic problems in program operations, has the appearance of fraud or abuse, possibility of non-conforming services provided to participants, potential questioned costs, etc.). Findings are expected to be responded to in the CAP.
2. **Other Noncompliance Issue** – A medium risk finding that results in deviation from process or practice not likely to result in failure of the management system or process but has a direct impact on program operations (data validity, timeliness of entering system information, missing program elements and employment plan information, failure to timely conduct follow-ups, etc.). ONIs could potentially be upgraded to a finding over

time based on the nature of the deficiency (e.g., repeat violations, issues indicative of systemic problems in program operations, questioned costs, etc.). ONIs are expected to be responded to in the CAP.

3. Observation – A low risk issue that is intended to offer constructive comments and an opportunity to improve current local practices, processes and procedures that result in positive program outcomes. Observations are not expected to be responded to in the CAP except when requested.

### SUMMARY TABLE OF FINANCIAL MONITORING RESULTS

FY 2022-2023 Financial Monitoring Results						
Category	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue	Observation	Technical Assistance Provided
Results- All Categories	0	0	0	0	0	0

**Note:** For prior year findings and other noncompliance issues, please see the section on Prior Year Corrective Action Follow-Up.

### DEFINITIONS APPLICABLE TO FINANCIAL MONITORING

1. Finding – A high risk issue that directly impacts the integrity or effectiveness of financial operations or could potentially result in major financial deficiencies (e.g., lack of accounting records or no system of accounting, no documentation to support expenditures, lack of internal controls, lack of fully executed contracts, issues indicative of systemic problems in financial operations, has the appearance of fraud or abuse, potential questioned costs, etc.). Findings are expected to be responded to in the CAP.
2. Other Noncompliance Issue – A medium risk finding that results in deviation from process or practice not likely to result in failure of the management system or process but has a direct impact on financial operations (e.g., missing financial elements, failure to timely conduct follow-ups, etc.). ONIs could potentially be upgraded to a finding over time based on the nature of the deficiency (e.g., repeat violations, issues indicative of systemic problems in financial operations, questioned costs, etc.). ONIs are expected to be responded to in the CAP.
3. Observation – A low risk issue that is intended to offer constructive comments and an opportunity to improve current local practices, processes, and procedures that result in positive financial outcomes. Observations are not expected to be responded to in the CAP except when requested.
4. Technical Assistance – Any assistance provided by the financial monitoring team to LWDB staff.

**QUALITY ASSURANCE REPORT  
CAREERSOURCE SUNCOAST  
LOCAL WORKFORCE DEVELOPMENT BOARD - 18**

**I. DESCRIPTION OF MONITORING APPROACH**

**Review Purpose and Scope**

The monitoring review consisted of a joint programmatic and financial review of CSS's workforce programs. The purpose of the monitoring review was to assess CSS's compliance with applicable federal and state program statutes, regulations, and programmatic and fiscal administrative requirements. The scope primarily involved a review of participant case file data entered in the State's MIS, a review of participant case file documentation provided by CSS from the selected file samples, and a review of local plans, procedures, reports, records, and other abstract information. In some instances, interviews were conducted with CSS staff, employers, and participants to gather information about program processes and service delivery strategies.

The review scope also included an examination of CSS's accounting records, internal controls, and supporting documentation including, but not limited to, a review of cash management, general ledger, cost allocations, payroll, personnel activity report testing, disbursement testing, and reporting of program data in the MIS to determine if appropriate processes, procedures, and controls were in place and properly implemented.

**Type of Review**

A remote desktop review was performed for both programmatic and financial monitoring, with the selected sampled items provided through upload to Florida Commerce's SharePoint monitoring system or access to CSS's local document storage system.

**Compliance Review Abstract Information**

- Programmatic and Financial Monitoring Review Dates: March 6, 2023 to March 10, 2023
- Programmatic Monitoring Sample Review Period Dates: January 1, 2022 to December 31, 2022
- Financial Monitoring Sample Review Period Dates: January 1, 2022 to June 30, 2022

Note: Entrance conference and exit conference attendees are listed in Section IX of this report.

**Programs Reviewed:**

- Welfare Transition
- Supplemental Nutrition Assistance Program – Employment and Training
- Workforce Innovation and Opportunity Act
- Trade Adjustment Assistance
- Wagner-Peyser
- Jobs for Veterans State Grant
- Migrant and Seasonal Farmworker
- Any identified special projects operational during the review period
- Financial management practices, record keeping, safeguards, and reporting

## **Monitoring Review Tools**

Florida Commerce’s PY 2022-2023 programmatic and financial monitoring review tools were used to conduct the review. The tools were developed to provide a framework for monitoring activities performed by OSPS and FMA staff as well as the criteria used to monitor.

## **II. FINANCIAL MONITORING REVIEW**

FMA performed financial monitoring based on the elements described in the FY 2022-2023 Financial Monitoring Tool. The results of the financial monitoring testing are described below:

### **Financial Monitoring Results**

#### **Prior Year Corrective Action Follow-Up**

There were no findings or ONIs identified in the prior year.

#### **FY 2022-2023 Financial Monitoring Results**

##### **Findings**

There were no findings identified during the financial monitoring review period of January 1, 2022 – June 30, 2022.

##### **Other Noncompliance Issues**

There were no ONIs identified during the financial monitoring review period of January 1, 2022 – June 30, 2022.

##### **Observations/Technical Assistance**

There were no observations identified or technical assistance provided during the financial monitoring review period of January 1, 2022 – June 30, 2022.

## **III. PROGRAMMATIC MONITORING REVIEW**

The outcome of the programmatic monitoring review is detailed in the following sections of the report. The information presented describes the issues noted and, where appropriate, required corrective actions for improvement.

**NOTE:** The following general CAP requirements must be submitted for each finding, ONI, and any additional program specific issues identified in the report.

### **General Program CAP Requirements**

- A copy of updated local operating procedures/policies that address the requirement, if applicable.
- A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.



- Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topics.
- Documentation of written communication to staff informing them of the requirements.

**Programmatic Monitoring Results**

**WELFARE TRANSITION**

*The sample size consisted of 18 participant case files. The following issues were identified:*

**ONI Number WT 18.23.01**

**Individual Responsibility Plans**

Applicable Reference(s): 45 CFR 261.11-12, and 14; TANF State Plan; FloridaCommerce Memorandum entitled “Individual Responsibility Plan, Alternative Responsibility Plan, and Initial Assessment in OSST” Dated October 22, 2014.

Of the seven case files reviewed that were required to have an IRP completed including all required elements, one (14.3 percent) participant’s IRP did not describe the services CSS will provide to the individual to enable them to obtain and keep private sector employment.

**Recurring Issue from Previous Year: No.**

**Risk Impact:** Absence of an IRP or not identifying all required elements, signatures, and dates on the IRP could eventually lead to a participant being placed in activities not conducive to overcoming barriers leading to employment and self-sufficiency.

**Required Action:** In addition to the general program CAP requirements, CSS must provide documentation showing the required element has been included on the IRP if the case is still open. CSS must also provide an assurance with the CAP that all required elements will be incorporated into the IRPs in the future and include an employment goal and/or plan for moving the participant into employment, a description of the responsibilities of the participant, and a description of the services CSS will provide to the participant.

**OBSERVATION**

During the case file review, the penalty process was initiated for a refugee who was referred to the WT program for assistance but was not work eligible to participate. Instead of referring the refugee to DCF for an exemption or deferring the refugee from participation because the case was received in error, CSS assigned an activity and because of noncompliance, staff requested a sanction which was later lifted when determined the participant was referred in error. Although a case note was later entered in OSST stating the participant was referred in error and the sanction was removed, CSS should make staff aware that when a participant is exempted and/or referred in error, CSS should refer the case back to DCF in a timely manner.

**TEMPORARY ASSISTANCE FOR NEEDY FAMILIES SUMMER YOUTH EMPLOYMENT PROGRAM**

*The sample size consisted of five participant case files. The review did not reveal any findings or ONIs; however, the following observation was noted:*

## OBSERVATION

The SYEP review revealed that five SYEP participant files had a TANF Benchmark 8 recorded in OSST which is not identified in the guide as a benchmark approved for recording activities. Upon review and discussion with CSS staff, it was determined that CSS was using TANF Benchmark 8 as a placeholder for recording TANF funded incentive/support service payments made to eligible individuals. CSS staff stated that Benchmark 8 is identified in their local TANF SYEP operating procedures as a way to individually track support service payments. Although the guide does not preclude establishing a benchmark for activities not covered under benchmarks 1 through 4, CSS should consider placing incentive or bonus payments under benchmark 3 or 4 which were added to the guidance to capture and record activities that were not already listed as activities in OSST.

## SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM – EMPLOYMENT AND TRAINING

*The sample size consisted of 17 participant case files. The following issues were identified:*

### Finding Number SNAP 18.23.01

#### Documentation of Activity Hours

*Applicable reference(s): 7 CFR 273.7 (d)(4)(ii), (1), (m)(3)(v)(A); and the SNAP E&T State Plan.*

Of the four participants engaged in activities with participation hours entered on the JPR screen, one (25.0 percent) did not have sufficient documentation in the file to support all hours recorded in OSST.

**Recurring Issue from Previous Year:** No.

**Risk Impact:** Lack of documentation to support JPR hours could result in overpayment of food assistance benefits and negatively impact performance.

**Required Action:** In addition to the general program CAP requirements, CSS must provide documentation with the CAP that the case file has been updated with the correct number of assigned hours or timesheets have been provided to support all hours if the case is still active.

### Finding Number SNAP 18.23.02

#### Sanction

*Applicable reference(s): 7 CFR 273.7(f); and SNAP E&T State Plan.*

Of the 11 case files reviewed where a sanction was initiated or imposed, one (9.1 percent) participant was exempted from SNAP E&T participation by DCF for good cause after the first failure; however, CSS assigned an activity and later initiated a sanction for not meeting participation requirements. It appears that CSS staff inadvertently missed or overlooked the exemption recorded in the system from DCF when initiating the sanction request.

**Recurring Issue from Previous Year:** No.

**Risk Impact:** Entering a sanction when a participant is exempted from participation for good cause may prohibit a participant from receiving benefits for a sanction that should not have occurred. It could also result in a participant filing a complaint and/or grievance.

**Required Action:** In addition to the general program CAP requirements, CSS must provide an assurance that staff will be reminded that when a participant meets good cause requirements for non-participation, that an activity is

not assigned until conciliation has been cleared through DCF. Documentation of written notification to staff informing them of the requirements must also be provided with the CAP.

**ONI Number SNAP 18.23.02**

**Initial Engagement Process**

*Applicable reference(s):* FloridaCommerce Memorandum entitled “Supplemental Nutrition Assistance Program Employment and Training Able-Bodied Adults Without Dependents Initial Engagement Process Changes” Dated January 5, 2017.

Of the 11 case files reviewed where a 590 appointment setting code was entered in OSST, three (27.3 percent) did not have their initial appointment status selected within two business days of completion of the appointment or have “No show” indicated as required.

**Recurring Issue from Previous Year:** Yes. (Prior year CAP verified; however, noncompliance continues to occur).  
**Risk Impact:** Failure to expedite the assignment of and participation in qualifying SNAP activities affects performance reporting and could potentially result in overpayment of food assistance benefits to an ineligible individual.

**Required Action:** In addition to the general program CAP requirements, CSS must provide an assurance that all future initial appointment status codes will be entered in OSST timely. CSS must also take necessary steps to ensure staff select the initial appointment status within two business days of completion of the appointment or have “No Show” indicated as required. Because this is a repeat issue, CSS must reevaluate the cause and provide a plan of action or process with the CAP for preventing a recurrence of this issue in the future including documentation of staff training and written notification to staff informing them of the requirements.

**WORKFORCE INNOVATION AND OPPORTUNITY ACT**

**WIOA ADULT AND DISLOCATED WORKER PROGRAM**

*The sample size consisted of 22 Adult and Dislocated Worker participant case files (12 Adults and 10 Dislocated Workers). The following issues were identified:*

**ONI Number WIOA 18.23.03**

**Veteran/Eligible Spouse Eligibility**

*Applicable reference(s):* WIOA Section 3(63)(A) and (B); JVA 38 U.S.C., Section 4215 and 101; and 20 CFR 1010.110.

The registration for the one WIOA Adult veteran participant case file reviewed identified the participant as both a veteran and an eligible spouse of a veteran. Documentation in the case file only supported the individual’s status as a spouse of an eligible veteran and not a veteran.

**Recurring Issue from Previous Year:** No.  
**Risk Impact:** Incorrectly completing the veteran sections on the WIOA application and/or failure to accurately record and document veteran status negatively impacts the priority of service guaranteed to eligible veterans as well as veteran service delivery. Performance accountability and reporting are also impacted.

**Required Action:** In addition to the general program CAP requirements, CSS must provide an assurance with the CAP that a participant’s veteran status will be correctly recorded in Employ Florida and documentation will be

maintained in all eligible veteran participant case files to support veteran status in the future. If an applicant is registering as a spouse of an eligible veteran, there is no need to check “yes” to the question “are you currently in the U.S. Military or a Veteran”. Having multiple selections identifying veteran status can lead to confusion. CSS must provide documentation of staff training on how to correctly complete the veteran information page in Employ Florida.

**Finding Number WIOA 18.23.03**

**Individual Training Accounts/Contracts for Classroom Training**

*Applicable reference(s):* 20 CFR 680.410-420; WIOA Sections 122 (b)(1)(D), (b)(4)(A), & (a)(3); and CareerSource Florida AP 90.

The one WIOA Adult case file reviewed of a participant enrolled in a Registered Apprenticeship Program training activity did not have documentation to support the issuance of an ITA or a contract detailing the method of payment for classroom training services provided to the participant. Additionally, documentation to support the training activity of another participant was not recorded in Employ Florida.

**Recurring Issue from Previous Year:** No.

**Risk Impact:** Failure to have an executed agreement or issuance of an ITA between CSS and the training institution could result in improper payments and questioned costs.

**Required Action:** In addition to the general program CAP requirements, CSS must review the accounts of all participants enrolled in a Registered Apprenticeship Program classroom training activity with the particular training provider/institution and submit documentation with the CAP to support whether the training was provided via a contract or an ITA. If no ITA or contract was in place, then documentation must be provided to support the arrangement/authority under which the training was authorized.

CSS must also strengthen its processes by developing a policy or procedure that aligns with WIOA and AP 90 guidance in instances when an ITA is not used. The policy/procedure must describe the process regarding the use of a contract instead of an ITA when there is an insufficient number of eligible providers in the local area. The policy/procedure must also instruct career managers to identify the training provider, training course, and source of funding used to pay for training not covered under an ITA. This information can be entered as a case note in Employ Florida or on a form developed for such purpose.

**Finding Number WIOA 18.23.04**

**Recording of Nationally Recognized Credentials**

*Applicable reference(s):* Federal Data Validation Requirements; TEGL 10-16, Change 2; and WIOA Section 3(52) and 129(c)(1)(C)(i).

Of the 12 WIOA Adult/Dislocated Worker participants who attained a recognized credential, two (16.7 percent) participant case files were missing documentation to support the credential attainment entered in Employ Florida. Additionally, one (8.3 percent) participant case file did not have documentation to support the credential was a recognized occupational credential for WIOA purposes.

Note: The CareerStep website stated the following: “CareerStep has intentionally moved down the certification process route instead of accreditation”.

**Recurring Issue from Previous Year:** Yes (Prior year CAP verified; however, noncompliance continues to occur).

**Risk Impact:** Failure to enter and accurately record credential attainment information in Employ Florida negatively impacts performance results.

**Required Action:** In addition to the general program CAP requirements, CSS must provide documentation to support the credential attainments entered in Employ Florida if the case files are still active. CSS must also ensure that credentials recorded in Employ Florida meet the definition of a nationally recognized credential. Additionally, documentation to support the credential attainment must be retained in the participant's case file or made available upon request. CSS must also provide documentation with the CAP showing that staff have or will review and monitor all files that opened subsequent to the review period to ensure credential attainments meet the requirement of a recognized credential and are recorded correctly in Employ Florida. Because this is a repeat issue, CSS must reevaluate the cause and provide a plan or process with the CAP for preventing a recurrence of this issue in the future including more in-depth monitoring, documentation of staff training, and written notification to staff informing them of the requirements.

#### Finding Number WIOA 18.23.05

##### **Follow-Up Services**

*Applicable reference(s):* WIOA Section 134(c)(2)(A)(xiii); 20 CFR 680.150; TEGL 19-16; and CSS's Local Follow-up Policy.

Of the eight WIOA Adult/Dislocated Worker participants who exited with employment, one (12.5 percent) did not have case file documentation to support that follow-up services were offered and/or provided.

**Recurring Issue from Previous Year:** Yes (Prior year CAP was verified; however, noncompliance continues to occur).

**Risk Impact:** Failure to provide follow-up services can negatively impact performance and resources available to the participant.

**Required Action:** In addition to the general program CAP requirements, CSS must provide documentation that follow-up services have been offered to the individuals identified if the cases are still active. It is imperative to ensure that staff understand the requirements and intent of follow-up services and that an appropriate system is in place for offering and/or providing these services. Because this is a repeat issue, CSS must reevaluate the cause and provide a plan or process with the CAP for preventing a recurrence of this issue in the future including more in-depth monitoring, documentation of staff training, and written notification to staff informing them of the requirements.

#### ONI Number WIOA 18.23.04

##### **Employment Verification**

*Applicable reference(s):* WIOA Section 116; 20 CFR 677.175; and Federal Data Validation Requirements.

Of the eight WIOA Adult/Dislocated Worker participants who exited the program with unsubsidized employment, two (25.0 percent) participant case files did not contain documentation that matched the employment information recorded in Employ Florida at exit. Additionally, two (25.0 percent) other case files did not contain documentation that matched the employment recorded during quarterly follow-ups.

**Recurring Issue from Previous Year:** Yes (Prior year CAP action was verified; however, noncompliance continues to occur).

**Risk Impact:** Failure to enter and accurately record employment information in Employ Florida may negatively impact performance results and could result in claiming false placements.

**Required Action:** In addition to the general program CAP requirements, CSS must provide documentation showing that CSS staff have reviewed and verified the participants' employment and wage information at exit and during quarterly follow-ups if the cases are still active. Additionally, CSS must provide an assurance that measures will be taken to ensure employment documentation is maintained in the files and cross-referenced with data entered in the system for accuracy. Because this is a repeat issue, CSS must reevaluate the cause and provide a plan or process with the CAP for preventing a recurrence of this issue in the future including more in-depth monitoring, documentation of staff training, and written notification to staff informing them of the requirements.

**WIOA YOUTH PROGRAM**

*The sample size consisted of 13 WIOA Out-of-School Youth participant case Files. The following issues were identified:*

**ONI Number WIOA 18.23.05**

**Individual Service Strategy**

*Applicable reference(s):* WIOA Section 129(c)(1)(B); and 20 CFR 681.420(a)(2).

Of the 13 youth case files reviewed, the ISS for one (7.7 percent) participant case file was not updated as activities were completed, benchmarks reached, goals achieved, and/or needs changed.

**Recurring Issue from Previous Year: No.**

**Risk Impact:** Failure to update the ISS as activities and/or the youth's needs change may reduce staff's ability to work effectively and efficiently with participants in delivering services, tracking employability goals, and determining what the participant is required to do to attain his/her short-term and long-term occupational goals.

**Required Action:** In addition to the general program CAP requirements, CSS must provide documentation showing that the one ISS file has been updated with appropriate changes as activities and goals were achieved if the case file is still open and active. Additionally, CSS must provide an assurance with the CAP that staff will review and monitor all future case files to ensure benchmarks are updated as activities are completed, benchmarks reached, goals achieved, and/or needs change.

**OBSERVATION**

The WIOA youth review also revealed that the source of verification used to determine a participant's barrier to employment was not recorded in Employ Florida; however, the document was maintained in the participant's case file. Although the participant was determined eligible, it is strongly recommended that case managers pay close attention to the verification items selected in Employ Florida to ensure that the selected verification source matches the documentation maintained in participant case files for data validation and reporting purposes.

## COMMON OBSERVATIONS

*The following common observations were identified in the WIOA Adult/Dislocated Worker and Youth programs.*

### **Recording of Measurable Skill Gains**

*Applicable reference(s): WIOA Section 116; 20 CFR Part 677.155(a)(v); and TEGL 10-16, Change 2.*

- Of the 22 WIOA Adult/DW case files reviewed of participants enrolled in an education or training program, six (27.3 percent) did not have documentation to support the MSG recorded within the applicable program year in Employ Florida. Additionally, documentation to support the MSG recorded in Employ Florida was not retained in three (13.6 percent) participant case files.
- Of the 13 WIOA Youth case files reviewed of participants enrolled in an education or training program, two (15.4 percent) did not have documentation to support the MSG recorded within the applicable program year in Employ Florida.

For future reference, it is recommended that CSS provides training to staff to ensure they understand the requirements and intent of MSGs including how to review, document, and timely record results. If technical assistance or training is needed, CSS should contact the Workforce Training & Coordination unit at [WFSTraining@commerce.fl.gov](mailto:WFSTraining@commerce.fl.gov)

## WIOA SPECIAL PROJECTS

*The sample size consisted of 20 participant case files (seven Adults, 12 Dislocated Workers, and one out-of-school Youth) for the following special projects:*

- *WIOA-Incumbent Worker – 20% Non-Waiver Local Only*
- *Fostering Opioid Recovery DWG*
- *Opioid Health Emergency DWG*
- *COVID-19 Public Health Emergency*
- *PY21 IWT 15% Governor's Reserve*
- *Commercial Driver's License 2022 – Statewide Adult*
- *Hurricane Ian DWG*

*The review did not reveal any Findings, ONIs, or Observations.*

## TRADE ADJUSTMENT ASSISTANCE

*The sample size consisted of three participant case files.*

*The review did not reveal any Findings, ONIs, or Observations.*

## WAGNER-PEYSER PROGRAM

*The sample size consisted of 45 participant case files (20 job seekers, 15 job orders, and 10 job seeker placements).*

*The following issues were identified:*

### Finding Number WP 18.23.06

#### Assessments

*Applicable reference(s):* 20 CFR 651.10; and Employ Florida Service Code Guide.

Of the 15 job seeker assessments recorded in Employ Florida, one (6.7 percent) did not have documentation of the assessment in the file to support the service recorded in Employ Florida. Additionally, nine (60.0 percent) assessments were missing some of the required components.

**Recurring Issue from Previous Year:** Yes (Prior year CAP verified; however, noncompliance continues to occur).

**Risk Impact:** Absence of an assessment or lack of a complete assessment reduces staff's ability to work effectively and efficiently with participants in delivering services, tracking employability goals, and determining what the participant is required to do to attain the occupational goals.

**Required Action:** In addition to the general program CAP requirements, CSS must provide documentation of attempts to develop or update the missing assessment if the case is still active in Employ Florida. Additionally, CSS must provide an assurance with the CAP that staff will review all future assessment codes recorded in Employ Florida to ensure case notes are recorded timely, elements are individualized to the participant, and documentation has been retained to identify all required elements of the service(s) provided. Because this is a repeat issue and appears to be systemic, a plan or process outlining CSS's efforts to prevent a recurrence of this issue in the future must also be provided with the CAP including documentation of staff training and written notification to staff informing them of the requirements.

### Finding Number WP 18.23.07

#### Employer-Entered Job Order Compliance Review

*Applicable reference(s):* 20 CFR 651.10; and CareerSource Florida AP 099.

Of the 15 employer-entered job orders reviewed in Employ Florida, 10 (66.7 percent) did not have documentation of staff review of the job order's compliance with applicable state and federal laws, rules, and guidance. CSS staff placed non-compliant, employer-entered job orders on hold; however, the job orders were subsequently closed without documentation of any staff efforts to contact the employer to bring the job order into compliance.

**Recurring Issue from Previous Year:** No.

**Risk Impact:** Failure to conduct compliance reviews for employer-entered job orders can lead to companies entering job orders in Employ Florida that can violate the rights of job seekers and perhaps lead companies to defraud job seekers or acquire a job seeker's personal protected information.

**Required Action:** In addition to the general program CAP requirements, CSS must provide an assurance with the CAP that staff have or will conduct and document compliance reviews on all future open job orders in Employ Florida. CSS must also provide an assurance that the need for additional compliance measures will be communicated to the employers prior to job order closure, ample time will be allowed for any changes, and that all steps taken will be documented in case notes on the job order for all future job orders. CSS must also reach out to the employers to conduct and document that a compliance review of the identified job orders has taken place if the job orders are still open and available.



## ONI Number WP 18.23.06

### **Job Order Placement and Wage Rate Verification**

*Applicable reference(s):* Fair Labor Standards Act of 1938 as amended; 29 U.S.C. Section 206; 20 CFR 680.170; 448.01, F.S.; and CareerSource Florida AP 099.

Of the nine job orders reviewed with multiple job seeker hires, one (11.1 percent) did not have documentation of each job seeker's placement wage rate recorded on the job order.

**Recurring Issue from Previous Year:** No.

**Risk Impact:** Allowing an employer to advertise or hire a job seeker at a wage rate that is less than the minimum wage could lead to minimum wage compensation violations.

**Required Action:** In addition to the general program CAP requirements, CSS must provide documentation of CSS's efforts to verify and record the wages paid for each job seeker placement on the job order reviewed if the job order is still open. Documentation must also be provided that CSS staff have or will review all job orders with multiple placements recorded subsequent to the review and ensure case notes on the job orders contain a wage rate for each individual to prevent a recurrence of this issue.

## REEMPLOYMENT SERVICES AND ELIGIBILITY ASSESSMENT PROGRAM

The RESEA program review focused on CSS's compliance with the requirements of the grant to assist Reemployment Assistance claimants in returning to work faster by connecting claimants/participants with in-person assessments, and reemployment services and opportunities to further their reemployment goals and successful employment outcomes.

*The sample size consisted of five participant case files.*

*The review did not reveal any Findings, ONIs, or Observations.*

## CAREER CENTER CREDENTIALING

The career center credentialing review focused on ensuring administrative requirements and records were posted and maintained, that front-line staff had completed all required Florida Certified Workforce Professional Tier I certification and continuing education courses.

*The review did not reveal any Findings, ONIs, or Observations.*

## JOBS FOR VETERANS STATE GRANT PROGRAM

*The sample size consisted of 15 participant case files. The following issues were identified:*

### **Finding Number JVSG 18.23.08**

#### **Veteran Priority of Service (POS)**

*Applicable reference(s):* 20 CFR 1010; CareerSource Florida AP 096, 102, and 111.

Of the 15 veteran case files reviewed, one (6.7 percent) did not have a POS code (089 automated or 189 manual) recorded in Employ Florida when participation began.

**Recurring Issue from Previous Year:** No.

**Risk Impact:** Noncompliance has an impact on veteran service delivery and may result in a negative federal review of the Veterans Program.

**Required Action:** In addition to the general program CAP requirements, CSS must provide documentation that staff have made or initiated contact to verify veteran status and ensure POS was provided if the case is still active. CSS must also ensure that the 189 service code along with a proper case note is recorded on the Wagner-Peyser application if no automated 089 service code is present. Additionally, CSS must ensure that front-line staff are trained to always record the POS service code during the screening process and prior to DVOP referral (if applicable). An assurance must also be provided with the CAP that all requirements for determining POS for veterans will be met in the future.

**ONI Number JVSG 18.23.07**

**Veterans Initial Intake Screening**

*Applicable reference:* CareerSource Florida [AP 102 and 117](#); and [Employ Florida Service Code Guide](#).

Of the 15 veteran cases reviewed, one (6.7 percent) did not have the 159 veteran's intake service code recorded in Employ Florida.

Note: All veterans must be provided with the Veterans Intake form to determine eligibility to work with the DVOP specialist. The information on the form must be recorded in Employ Florida in a case note and recorded in Employ Florida using the 159 veteran's intake service code.

**Recurring Issue from Previous Year:** No.

**Risk Impact:** Failure to screen, identify, and accurately document and record veteran program intake could affect veteran service delivery and limit veterans from receiving qualifying services.

**Required Action:** In addition to the general program CAP requirements, CSS must provide documentation that staff initiated efforts to record the veteran intake information in Employ Florida using the 159 intake service code if the case is still active. CSS must also provide an assurance that all veterans will be provided with the Veterans Intake form and that the results will be recorded in Employ Florida using the 159 veteran's intake service code in the future, regardless of the outcome at intake. CSS must also ensure JVSG staff provide proper training to other CSS staff on intake and eligibility and how to record the veteran information in Employ Florida.

**ONI Number JVSG 11.23.08**

**Veteran Referral to DVOP**

*Applicable reference(s):* [CareerSource AP 102 and 117](#); and [Employ Florida Service Code Guide](#).

Of the 15 veteran case files reviewed, one (6.7 percent) veteran was not contacted within two business days after the DVOP referral (168 service code - Referral for DVOP Follow-Up).

**Recurring Issue from Previous Year:** No.

**Risk Impact:** Failure by the DVOP to contact the veteran within the required two-business days could negatively affect veterans service delivery and limit veterans from receiving qualifying services.

**Required Action:** In addition to the general program CAP requirements, CSS must provide an assurance that veterans will be contacted by DVOP staff within two business days after referral by documenting contact or

contact attempts via a case note in Employ Florida. Documentation of written notification to staff informing them of the requirements must be provided with the CAP.

**MIGRANT AND SEASONAL FARMWORKERS**

**Description of Review Methodology**

The Migrant and Seasonal Farmworker review focused on compliance with MSFW required services and outreach under the Wagner-Peyser Act, as amended, and federal guidelines that mandate service delivery to MSFWs through the public labor exchange system.

**Management Review and Operational Practices of the Significant Career Centers**

CSS’s MSFW significant multilingual career center is located in Bradenton, Florida. The SMA conducted a remote desktop review of the significant career center to ensure the following credentialing requirements had been met: posters, signage, facility accessibility and accommodations, MSFW applications, job orders, MSFW Service Level Indicators Report, MSFW Outreach Services Reports, the Complaint System, as well as other program requirements.

Overall, the MSFW outreach program in the Bradenton significant career center appeared to be managed in accordance with prescribed standards and the required provision of services to MSFWs; however, the following issue was identified during the management and operational review:

**Finding Number MSFW 18.23.09**

**MSFW Service Level Indicators Report**

Applicable references: 20 CFR 653; FloridaCommerce FG 03-040; Migrant Service Level Indicators Report; and CSS’s Local Plan.

Federal and state guidance require specific services be provided to MSFW customers on an equal level as all other customers and that significant career centers meet MSFW Equity Ratio Indicators and Minimum Service Level Indicators.

The Bradenton significant career center did not meet three of the required Equity Ratio Indicators on the MSFW Service Level Indicators Report during the review period (staff-assisted career guidance services, received staff-assisted job search activities, and received unemployment claim assistance). Additionally, two of the three Minimum Service Level Indicators were not met during the review period (median earnings of individuals placed in unsubsidized employment and MSFWs placed long-term in non-agricultural jobs).

**Recurring Issue from Previous Year:** Yes (Prior year CAP verified; however, noncompliance continues to occur).

**Risk Impact:** This data is used for reporting purposes and unmet indicators impact federal performance reporting for the state.

**Required Action:** In addition to the general program CAP requirements, CSS must provide an assurance that staff will refer and place MSFWs in jobs in the future and will monitor the MSFW Service Level Indicators Report located in Employ Florida regularly to identify service gaps and program compliance. Because this is a repeat issue, CSS must reevaluate the cause and provide a plan or process with the CAP including documentation of staff training and written staff notification of the requirements, as well as the internal controls that will be put in place to prevent a recurrence of these issues in the future.

### Finding Number MSFW 18.23.10

#### **Employment Service Complaint System**

*Applicable references:* 20 CFR 658.400.

An employment service complaint log was missing the complaint number, name of the respondent, type of complaint, WP related required information, and complaint status.

Note: All career centers must maintain an ES Complaint System. All employment service and employment-related law complaints filed through the career center must be handled by a trained complaint specialist and any actions taken must be fully documented on the complaint logs.

**Recurring Issue from Previous Year:** Yes. (Prior year CAP action verified; however, noncompliance continues to occur).

**Risk Impact:** Non-adherence to the ES Complaint System requirements can lead to legal issues or further action on part of the individual to file a complaint against CSS and the State.

**Required Action:** In addition to the general program CAP requirements, CSS must provide documentation of staff's efforts to correct and include the required information on the complaint form if the complaint is still open. Because this is a repeat issue, CSS must reevaluate the cause and provide a plan or process with the CAP including documentation of staff training and written communication to staff informing them of the Complaint System requirements along with a signed statement acknowledging they have been made aware.

#### GENERAL COMMENT

The SMA provided technical assistance to outreach staff and the CSS management team on MSFW outreach services, outreach reports, complaint system requirements, MSFW applications, and job orders.

## IV. FINANCIAL DISCLOSURE REVIEW

The Financial Disclosure review focused on determining CSS's compliance with financial disclosure requirements as referenced in Chapters 112.3145 and 445.07, F.S.; and CareerSource FG-075.

*The review did not reveal any Findings, ONIs, or Observations.*

## V. COLLECTION OF DEMOGRAPHIC DATA

The purpose of this section of the review is to determine compliance with the nondiscrimination and equal opportunity provisions of 29 CFR Part 37 and FloridaCommerce's Guidelines for Compliance with Section 188 of WIOA regarding Collection of Demographic Data.

*The review did not reveal any Findings, ONIs, or Observations.*

## VI. MANAGEMENT REVIEW PROCESS

The purpose of this review is to determine whether CSS is implementing requirements associated with local merit staffing responsibilities for FloridaCommerce staff assigned to work under the functional supervision of CSS, local sector strategy implementation, and local board governance activities.

*The following issue was identified:*

### ONI Number 18.23.09

#### **Board Governance**

*Applicable Reference(s):* CareerSource Florida AP 110.

There was no documentation provided to support that all local board members had completed their annual refresher training.

#### **Recurring Issue from Previous Year:** No.

**Risk Impact:** Annual refresher training is required for board members to ensure they are aware of policies, procedures, and requirements of the board and board members. Additionally, absence of board membership training and other member requirements may affect board member decision-making which could lead to violations.

**Required Action:** In addition to the general program CAP requirements, CSS must provide an assurance that all CSS board members will complete annual training by the specified deadlines in the future. Documentation that board member training has been or will be provided for the outstanding board members must be provided with the CAP. Additionally, CSS must develop specific procedures, processes and/or guidelines to make sure that all board members complete training including a system to track and annually update the requirements of board members, and for staff responsible for functioning in a facilitator role or in a process owner monitoring capacity.

## VII. MANAGEMENT INFORMATION SYSTEMS

The MIS security check focused on the effectiveness of CSS's information security controls and whether business processes and policies are in place that protect FloridaCommerce data and information technology resources and complies with FloridaCommerce's IT guidelines and the FloridaCommerce/CSS Grantee - Subgrantee Agreement requirements.

*The review did not reveal any Findings, ONIs, or Observations.*

## VIII. TRAINING AND TECHNICAL ASSISTANCE

For questions and/or technical assistance in any of the program review areas, CSS should contact OSPS at the following email addresses:

- WT – [WTProgram@commerce.fl.gov](mailto:WTProgram@commerce.fl.gov)
- SNAP – [SNAPETProgram@commerce.fl.gov](mailto:SNAPETProgram@commerce.fl.gov)
- WIOA – [WIOA@commerce.fl.gov](mailto:WIOA@commerce.fl.gov)
- TAA – [TAA@commerce.fl.gov](mailto:TAA@commerce.fl.gov)
- WP – [Wagner.Peyser@commerce.fl.gov](mailto:Wagner.Peyser@commerce.fl.gov)
- RESEA – [RESEA@commerce.fl.gov](mailto:RESEA@commerce.fl.gov)
- FLC – [H-2A.JobOrder@commerce.fl.gov](mailto:H-2A.JobOrder@commerce.fl.gov) and [H-2B.JobOrder@commerce.fl.gov](mailto:H-2B.JobOrder@commerce.fl.gov)
- MSFW – [State Monitor Advocate \(via direct email\)](#)
- JVSG – [VETS@commerce.fl.gov](mailto:VETS@commerce.fl.gov)

Additional training can be requested by sending a [Training Request Form](#) to [WFSTraining@commerce.gov.fl](mailto:WFSTraining@commerce.gov.fl).

## CORRECTIVE ACTION PLAN REQUIREMENTS

A CAP is required to address how CSS will correct any programmatic and financial management findings and ONIs identified in the report. For the noted deficiencies, required actions and recommendations have been provided to help respond to the issues identified, help develop and implement processes that result in positive program practices and performance outcomes, and also help to improve the quality and integrity of the data collected.

## IX. ENTRANCE AND EXIT CONFERENCE ATTENDEES:

A joint programmatic and financial monitoring entrance conference with CSS staff was conducted on March 6, 2023. The programmatic exit conference was conducted on March 10, 2023; however, the financial monitoring exit conference was conducted on September 8, 2023. The entrance/exit conference attendees are listed below.

NAME	Agency	Entrance Conference	Exit Conference
Sharon Saulter	FloridaCommerce (Review Lead)	x	x
Yolanda Garcia	FloridaCommerce	x	x
Terry Wester Johnson	FloridaCommerce	x	x
Sanchez Emanuel	FloridaCommerce	x	x
Sharmarie Gray	FloridaCommerce	x	x
Paul Adams	FloridaCommerce	x	x
Minerva Figueroa	FloridaCommerce	x	x
Carol Booth	FloridaCommerce	x	x
Katina Williams	FloridaCommerce	x	x
Awilda Carozza	FloridaCommerce	x	x
Vincent Lynn	FloridaCommerce	x	x
Tameka Austin	FloridaCommerce	x	x
Barbara Walker	FloridaCommerce	x	x
Matthew Yager	FloridaCommerce	x	x
Joshua Matlock,	CSS	x	x
Robin Dawson,	CSS	x	x
Anthony Gagliano	CSS	x	x
James Disbro	CSS	x	x
Deborah Lee	CSS	x	x
Angel Windley	CSS	x	x
Sean Zubyk	CSS	x	x
Kathy Bouchard	CSS	x	x
Michelle Snyder	CSS	x	x
Linda Benedict	CSS	x	x
Alicia Cruz-Otero	CSS	x	x

A joint programmatic and financial entrance conference with CSS staff was conducted on March 6, 2023; however, the financial monitoring exit conference with CSS staff was conducted on September 8, 2023. The entrance/exit conference attendees are listed below:

Sarah Rudnik	FloridaCommerce	x	x
Chadwick Myrick	FloridaCommerce	x	x
Robin Dawson	CSS	x	x

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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 3rd Quarter Performance	PY2022-2023 % of Performance Goal Met For Q3	PY2022-2023 4th Quarter Performance	PY2022-2023 % of Performance Goal Met For Q4	PY2022-2023 Performance Goals	PY2023-2024 1st Quarter Performance	PY2023-2024 % of Performance Goal Met For Q1	PY2023-2024 Performance Goals
<b>Adults:</b>															
Employed 2nd Qtr After Exit	90.00	94.74	95.00	88.00	97.13	84.30	93.05	85.90	94.81	85.30	94.15	90.60	87.30	96.36	90.60
Median Wage 2nd Quarter After Exit	\$12,636	127.64	\$9,900	\$11,996.00	128.29	\$11,066	118.34	\$11,768	125.85	\$9,926	106.15	\$9,351	\$10,452	111.77	\$9,351
Employed 4th Qtr After Exit	90.30	95.05	95.00	91.70	105.40	88.30	101.49	88.00	101.15	86.50	99.43	87.00	87.00	100.00	87.00
Credential Attainment Rate	71.40	85.00	84.00	84.50	108.33	67.30	86.28	66.40	85.13	60.20	77.18	78.00	61.30	78.59	78.00
Measurable Skill Gains	71.10	129.27	55.00	76.00	103.54	78.30	106.68	75.00	102.18	86.00	117.17	73.40	72.70	99.05	73.40
<b>Dislocated Workers:</b>															
Employed 2nd Qtr After Exit	71.60	75.37	95.00	71.70	92.40	71.30	91.88	73.70	94.97	77.10	99.36	77.60	75.00	96.65	77.60
Median Wage 2nd Quarter After Exit	\$9,615	114.46	\$8,400	\$9,692.00	96.17	\$10,025	99.47	\$10,400	103.20	\$10,613	105.31	\$10,078	\$12,811	127.12	\$10,078
Employed 4th Qtr After Exit	85.70	95.22	90.00	100.00	149.25	68.70	102.54	70.70	105.52	71.30	106.42	67.00	72.70	88.66	82.00
Credential Attainment Rate	18.80	26.86	70.00	25.00	42.81	25.90	44.35	36.10	61.82	38.80	66.44	58.40	39.60	67.81	58.40
Measurable Skill Gains	80.60	164.49	49.00	76.90	108.16	56.50	79.47	86.70	121.94	83.30	117.16	71.10	50.00	70.32	71.10
<b>Youth:</b>															
Employed 2nd Qtr After Exit	62.50	69.44	90.00	57.50	69.28	54.10	65.18	62.50	75.30	77.30	93.13	83.00	80.00	94.01	85.10
Median Wage 2nd Quarter After Exit	\$7,625	125.00	\$6,100	\$7,065.00	159.48	\$7,001	158.04	\$6,936	156.57	\$5,727	129.28	\$4,430	\$3,813	86.07	\$4,430
Employed 4th Qtr After Exit	75.00	78.95	95.00	75.00	108.70	70.00	101.45	75.00	108.70	75.70	109.71	69.00	77.50	90.12	86.00
Credential Attainment Rate	77.80	101.70	76.50	87.50	108.43	87.00	107.81	81.80	101.36	80.00	99.13	80.70	78.90	97.77	80.70
Measurable Skill Gains	66.70	121.27	55.00	61.90	91.03	66.70	98.09	72.20	106.18	88.90	130.74	68.00	75.00	110.29	68.00
<b>Wagner Peyser:</b>															
Employed 2nd Qtr After Exit	62.50	83.33	75.00	64.50	99.23	63.60	97.85	69.00	106.15	71.10	109.38	65.00	71.30	109.69	65.00
Median Wage 2nd Quarter After Exit	\$6,930	126.00	\$5,500	\$7,079.00	118.97	\$6,768.00	113.75	\$7,773	130.63	\$7,693	129.29	\$5,950	\$7,952	133.65	\$5,950
Employed 4th Qtr After Exit	62.60	86.94	72.00	64.50	101.57	61.00	96.06	67.30	105.98	67.90	106.93	63.50	68.40	107.72	63.50

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





# STAFF REPORTS

- Kathy Bouchard, CTO
- Anthony Gagliano, COO