



### **Board of Directors Meeting**

Thursday, May 22, 2025 - 8:00 a.m. to 9:30 a.m.

Location: 3660 N. Washington Blvd, Sarasota, FL

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

[Join Microsoft Teams Meeting](#)

Phone 1-786-600-3104

Conference ID: 622 591 430#

### **AGENDA**

**Call to Order / Introductions – David Kraft, Chair – Vision Consulting Group**

**Finance & Performance Committee Member Appointment – David Kraft**

- Doras Divilla – Vice President Commercial Relationship Manager, Regions Bank

**Action Items – David Kraft**

- Consent Agenda – David Kraft
  - Approval of March 24, 2025 Board Meeting Minutes
  - Approval of March 27, 2025 Board Meeting Minutes
  - Approval of Schedule of Operations for PY2025-2026
- Approval of Revisions to the Accounting Procedures Manual – Robin Dawson
- Approval of Related Party Agreements – Christina Witt

**CEO Report – Joshua Matlock**

**Other Business**

- Finance and Performance Committee Report – Jim Bos

**Staff Reports**

- Kathy Bouchard
- Anthony Gagliano

**Public Comments/Closing Remarks – David Kraft**

**Adjournment – David Kraft**

**Next Board of Directors Meeting is June 26, 2025**

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



## ACTION ITEMS:

Consent

Agenda

**CAREERSOURCE SUNCOAST**  
**Board of Directors**  
**Informational Meeting Minutes**  
Virtual TEAMS Meeting  
Monday, March 24, 2025

**Call to Order**

David Kraft, Chair, called the meeting to order at 8:03 a.m. Roll call was performed.

**Information Item:**

**One-Stop Housing Initiative**

Mark Vengroff presented an investment opportunity for CareerSource Suncoast for the One-Stop Housing initiative. Information was provided in the agenda packet.

**Public Comments:** None

**Next Meeting:**

Next Board of Directors Meeting is March 27, 2025

Location: 3660 N. Washington Blvd, Sarasota, FL

**Full Board Meeting Adjournment:**

The meeting was adjourned at 8:28 a.m.

Respectfully submitted,

  
Joshua Matlock (Mar 24, 2025 10:41 EDT)

Josh Matlock  
President, CEO

## CAREERSOURCE SUNCOAST - BOARD MEETING ATTENDANCE

Absent Present	Board Member
A	Jim Bos, MJB Group
A	Ashley Brown, Women's Resource Center
P	Will Cromie, Synovus Bank
P	Jackie Dezelski, Manatee Chamber of Commerce
A	Dr. Ron DiPillo, Sarasota County Schools
A	Kathy Dwyer, Galen College of Nursing
A	Lisa Eding, Teak Decking Systems
A	Luis Font, LIUNA, Laborers International Union
A	Geoffry Gilot, Boys & Girls Clubs
A	Vaughn Alexander Hendriex, State College of Florida
A	Sharon Hillstrom, Bradenton Area Economic Development Corporation
P	Allison Imre, Grapevine Communications
A	Heather Kasten, Sarasota Chamber of Commerce
A	Lori Kidder, Carr Riggs, & Ingram, LLC.
P	David Kraft, Vision Consulting Group
A	Anne LeBaron, Take Stock in Children Manatee
A	Shaun Polasky, Helios Technologies
A	Ericka Randall, Vocational Rehabilitation
P	Jane Roseboro, Centerstone Florida
A	Sarah Tar, Truist
A	Eric Troyer, Kerkering Barberio & Company
A	Mark Viggiano, Local 123 Plumbers, and Pipefitters Union
A	Doug Wagner, Manatee County School Board
P	Craig Warzecha, Bradenton Marauders/Pittsburgh Pirates
A	Ken Waters, Sarasota Housing Authority
P	Sherod Haliburton, Credit Union1
A	Nick Choat, Sport Clips Haircuts
	Staff Present: Josh Matlock, Robin Dawson, Kathy Bouchard, Anthony Gagliano, Christina Witt, Michelle Snyder, James Disbro, Chet Filanowski
A	Commissioner Tal Siddique - Manatee County
P	Commissioner Teresa Mast – Sarasota County

26 Board Members – 7 present, 19 absent

*All Attendance Recorded was Virtual*

**CAREERSOURCE SUNCOAST**  
**Board of Directors Meeting Minutes**  
Virtual TEAMS Meeting and In-person  
3660 N. Washington Blvd., Sarasota, FL 34234  
Thursday, March 27, 2025

**Call to Order**

David Kraft, Chair, called the meeting to order at 8:02 a.m. Roll call was performed, and a quorum was established.

**Welcome New Board Members – David Kraft**

David Kraft introduced the new Board of Directors members.

- Nick Choat – Sport Clips Haircuts
- Sherrod Halliburton – Credit Union1

**Action Items – David Kraft**

• **Approval of January 23, 2025 Board of Directors Meeting Minutes - David Kraft**

David Kraft requested a motion to approve the January 23, 2025 Board of Directors meeting minutes.

**Motion: Ron DiPillo**

**Second: Lisa Eding**

**Motion passed unanimously**

• **Approval of Budget Modification #2 for PY2024/25 – Jim Bos/Robin Dawson**

Jim Bos introduced the Budget Modification action item. Robin Dawson provided an overview of the modification. Materials were provided in the agenda packet.

David Kraft requested a motion to approve Budget Modification #2 for PY2024-25.

**Motion: Jim Bos**

**Second: Will Cromie**

**Motion passed unanimously**

• **Approval of One-Stop Housing Investment – Joshua Matlock**

Joshua Matlock provided an overview of the One-Stop Housing investment of non-federal unrestricted funds.

David Kraft requested a motion to approve the One-Stop Housing investment using non-federal funds up to \$170,000.

**Motion: Jim Bos**

**Second: Will Cromie**

**Motion passed unanimously**

## **Other Business:**

### Mandatory Annual Refresher Training for Board Members

The CSS Leadership Team provided the Annual Board Refresher Training, to include a Sunshine Law & Ethics Training by George Levesque of the firm of GrayRobinson. The training PowerPoint was provided in the meeting materials.

### Finance and Performance Committee Meeting

Jim Bos provided an overview of the Finance and Performance Committee meeting from February 18, 2025. Robin Dawson reviewed the following reports covering the period July 1, 2024 – December 31, 2024 for PY 24-25.

- A Budget to Expenditure Summary and expenditure by fund source reports.
- Non-Federal Funds Revenue & Expenditures as of December 31, 2024.

Copies of the reports were included in the meeting materials.

## **CEO Report:**

The [National Association of Workforce Boards Conference](#) is being held this weekend in Washington, D.C. Attendees include Joshua Matlock, David Kraft, James Disbro, Anthony Gagliano, Diane Seavers and Janet Kahn. James, Diane and Janet will be presenting on apprenticeship. Anthony Gagliano will be participating in a panel discussion on apprenticeship.

## **Staff Reports:**

### Anthony Gagliano

Anthony shared a video from [Bay News 9](#) highlighting apprenticeship opportunities with [New Dawn Electric](#) and [Manatee Technical College](#). CSS is able to assist apprenticeship with support services through the Credit Union1 Financial Access grant.

Anthony is currently in Tallahassee participating in Workforce Day at the Capitol as well as the HR Florida State Council's 14<sup>th</sup> annual Legislative Conference. He also attended Small Business Day at the Capitol yesterday as he's a member of the advisory Board for the Small Business Development Center at the University of South Florida.

CSS has a CEO class graduating on April 2, 2025. A new CEO course is scheduled to start on April 15, 2025.

Anthony highlighted the work CSS is doing in partnership with [Project 180](#) on reentry into the workforce for individuals who have been incarcerated.

James Disbro shared that another PGT apprentice sponsored by CSS will be awarded the apprenticeship of the year award.

**Public Comments:** None

**Next Meeting:**

Next Board of Directors Meeting is May 22, 2025

Location: 3660 N. Washington Blvd, Sarasota, FL

**Full Board Meeting Adjournment:**

The meeting was adjourned at 9:55 a.m.

Respectfully submitted,



[Joshua Matlock \(Apr 1, 2025 08:12 EDT\)](#)

Josh Matlock

President, CEO

## CAREERSOURCE SUNCOAST - BOARD MEETING ATTENDANCE

Absent Present	Board Member
P	Jim Bos, MJB Group
A	Ashley Brown, Women's Resource Center
P	Nick Choat, Sport Clips Haircuts
P	Will Cromie, Synovus Bank
P*	Jackie Dezelski, Manatee Chamber of Commerce
P	Dr. Ron DiPillo, Sarasota County Schools
A	Kathy Dwyer, Galen College of Nursing
P	Lisa Eding, Teak Decking Systems
P*	Luis Font, LIUNA, Laborers International Union
A	Geoffry Gilot, Boys & Girls Clubs
P*	Vaughn Alexander Hendriex, State College of Florida
P*	Sherod Haliburton, Credit Union1
A	Sharon Hillstrom, Bradenton Area Economic Development Corporation
P*	Allison Imre, Grapevine Communications
A	Heather Kasten, Sarasota Chamber of Commerce
P*	Lori Kidder, Carr Riggs, & Ingram, LLC.
P	David Kraft, Vision Consulting Group
P*	Anne LeBaron, Take Stock in Children Manatee
P*	Shaun Polasky, Helios Technologies
P*	Ericka Randall, Vocational Rehabilitation
P*	Jane Roseboro, Centerstone Florida
A	Sarah Tar, Truist
P*	Eric Troyer, Kerkerling Barberio & Company
P	Mark Viggiano, Local 123 Plumbers, and Pipefitters Union
P*	Doug Wagner, Manatee County School Board
P*	Craig Warzecha, Bradenton Marauders/Pittsburgh Pirates
A	Ken Waters, Sarasota Housing Authority
	Staff Present: Josh Matlock, Robin Dawson, Anthony Gagliano*, Karima Habyt*, Christina Witt, Michelle Snyder, James Disbro, Chet Filanowski*, Curt Preisser*, Curt Preisser*, Nicholas Quinn*
P*	Commissioner Tal Siddique - Manatee County
A	Commissioner Teresa Mast – Sarasota County

27 Board Members – 20 present, 7 absent

*\*Virtual*





## PY 2025-2026 Schedule of Operations by Location

### Locations:

#### **Palmetto Career Center**

600 8<sup>th</sup> Ave. West, Suite 100  
Palmetto, FL 34221  
Phone: (941) 358-4200  
Fax: (941) 315-2675

#### **Hours of Operation**

Monday – Thursday  
8:30 a.m. - 5:00 p.m.

#### **Sarasota Career Center**

3660 North Washington Boulevard  
Sarasota, FL 34234  
Phone: (941) 358-4200  
Fax: (941) 315-2675

#### **Hours of Operation**

Monday - Friday  
8:30 a.m. - 5:00 p.m.

### **Career Center Holiday Closure Schedule July 1, 2025 – June 30, 2026**

#### Date

July 4  
September 1  
November 11  
November 27  
November 28  
December 24  
December 25  
January 1  
January 19  
February 16  
May 25  
June 19

#### Day of Week

Friday  
Monday  
Tuesday  
Thursday  
Friday  
Wednesday  
Thursday  
Thursday  
Monday  
Monday  
Monday  
Friday

#### Holiday

Independence Day  
Labor Day  
Veteran's Day  
Thanksgiving Day  
Day After Thanksgiving  
Christmas Eve  
Christmas Day  
New Year's Day  
Martin Luther King, Jr Day  
President's Day  
Memorial Day  
Juneteenth

### **Career Center Closure - Staff Development Training for July 1, 2025 – June 30, 2026:**

August 15, 2025 and December 19, 2025

### **Governors Discretionary Holidays**

All additional holiday and State office closures authorized by the Governor.



**ACTION ITEMS:**

**CAREERSOURCE SUNCOAST**  
**Accounting Procedure Approval**  
**Board of Directors**  
**Summary Report**  
**May 22 , 2025**

**Background Information:**

Accounting Procedures Manual describes and details the fiscal controls and accounting procedures in use by Suncoast Workforce Board, Inc. dba CareerSource Suncoast and herein referred to as CSS. These procedures were developed in accordance with the provisions of the Uniform Guidance, 2 CFR, Part 200-Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; the Workforce Innovation and Opportunity Act effective July 1, 2015; and State of Florida Policies and generally accepted accounting principles.

CSS accounting procedures and controls, as described in the Accounting Procedures Manual provided, assure that disbursements are properly authorized, allocated and charged.

Independent annual audits are conducted in accordance with the Uniform Guidance, 2 CFR, Part 200-Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and the Grantee-Subgrantee Agreement between CSS and FloridaCommerce.

**Summary of Policy Changes:**

The Executive and Finance & Performance Committees met on May 8, 2025. The Policy was approved contingent upon review by the independent auditor James Moore & Co. to ensure there will be no significant deficiencies in the accounting procedure manual. On May 8, 2025 James Moore & Co. confirmed that the policy did not show any significant deficiencies and they had no issues with the revisions, stating "... the revised policy aligns with good internal control practices and should be acceptable from an audit perspective...."

**Accounting Procedures Manual Updates:**

- The procedure 6-4-12R was revised to add internal control updates as summarized below.
  - o Requirement of an approval for cash disbursements prior to the printing of checks.
  - o The threshold for two authorizations for a single cash disbursement has increased from \$10,000 to \$15,000 or more.
  - o Two signatures will no longer be required on the printed checks over the threshold.
- The procedure 11-0-5R was revised to include audit requirements as noted in the Grantee-Subgrantee agreement with FloridaCommerce.
- General housekeeping updates to job titles and organizational names.

**Requested Action:**

**A motion for the Board of Directors to approve the revised Accounting Procedures Manual.**

Respectfully submitted,  
Robin Dawson,  
Chief Financial and Administrative Officer



collaborate. innovate. lead.  
careersourcesuncoast.com

## **ACCOUNTING PROCEDURES MANUAL & FISCAL MANAGEMENT PROCEDURES**

The following Accounting Procedures Manual describes and details the fiscal controls and accounting procedures in use by Suncoast Workforce Board, Inc. dba CareerSource Suncoast and herein referred to as CSS. These procedures were developed in accordance with the provisions of the Uniform Guidance, 2 CFR, Part 200-Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; the Workforce Innovation and Opportunity Act effective July 1, 2015; and State of Florida Policies and generally accepted accounting principles.

Information pertaining to subgrants and contract awards, obligations, unobligated balances, assets, liabilities, expenditures and revenue is maintained in our automated accounting system and subsidiary computer files which are supported by hard copy documentation. All computer files are backed up on a recurring basis.

Our accounting procedures and controls, as described in the following Accounting Procedures Manual, assure that disbursements are properly authorized, allocated and charged.

Independent annual audits are conducted in accordance with the Uniform Guidance, 2 CFR, Part 200-Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and the Grantee-Subgrantee Agreement between CSS and FloridaCommerce.

<b>SUBJECT:</b>  <b>INDEX BY PROCEDURE NUMBER</b>	Page	1 of 1
	Procedure No.	1-0-34R
	Effective	05/22/25
	Supersedes	1-0-33R

PROCEDURE NO.	SUBJECT	EFFECTIVE DATE	SUPERSEDES
1-0-33R	Index by Procedure Number	05/22/2025	1-0-32R
2-0-4R	Statement of Purpose & Use of Accounting Procedures Manual	05/26/2016	2-0-3R
4-0	General Accounting Policies	10/31/1993	n/a
4-1-2R	Accounting Software	05/23/2016	4-1-1R
4-2-8R	Periodic Backup of Network Data Files	07/01/2018	4-2-7R
4-3-1R	General Ledger Account File Maintenance	01/01/2001	4-3
5-0-2R	Grants Management Overview	07/01/2000	5-0-1R
5-1-9R	Grant Management Procedures	02/12/2021	5-1-8R
5-2-1R	Budgetary Processes and Control	05/01/1998	5-2
5-3-7R	State Reports	07/01/2018	5-3-6R
6-0-13R	Small Purchase and Procurement Procedures	02/12/2021	6-0-12R
6-1-8R	Vendor & Service Provider Contract Payment Procedures	04/28/2017	6-1-7R
6-2-8R	Accounts Payable Voucher	05/22/2025	6-2-7R
6-3-3R	Recording Accounts Payable	05/22/2025	6-3-2R
6-4-12R	Check Issuance Procedures	05/22/2025	6-4-11R
6-5-3R	Vendor File Maintenance	07/01/2015	6-5-2R
6-6-1R	Periodic Closing of Accounts Payable	07/01/2004	6-6
6-7-4R	Petty Cash Procedure	05/22/2025	6-7-3R
7-0-10R	Staff Payroll Procedures	04/28/2017	7-0-9R
8-0-7R	Property Management	07/01/2015	8-0-6R
9-0-2R	Financial Reporting	07/01/2004	9-0-1R
10-2-2R	Resolution of State Outstanding Checks	05/20/2016	10-2-1R
10-3-4R	Procedure for Voiding Checks	04/28/2017	10-3-3R
10-4-1R	Bonding	01/28/2002	10-4
11-0-5R	Audit and Audit Resolution	05/22/2025	11-0-4R
12-0-R1	Client Reloadable Debit Cards	05/22/2025	12-0

<b>SUBJECT:</b>  <b>STATEMENT OF PURPOSE AND USE</b>  <b>OF THE ACCOUNTING PROCEDURES</b>  <b>MANUAL</b>	Page	1 of 1
	Procedure No.	2-0-4R
	Effective	05/23/2016
	Supersedes	2-0-3R

CSS will utilize the policies and procedures contained in the manual in its capacity as Administrative Entity and Fiscal Agent for programs under the Workforce Innovation & Opportunity Act (WIOA), Temporary Assistance to Needy Families (TANF), Wagner Peyser, Veteran Programs, Supplemental Nutrition Assistance Program (SNAP), and Unemployment Compensation. The manual will comply with provisions of the acts and State of Florida regulations and policy relating thereto. The manual will be periodically revised to maintain compliance with any superceding legislation, regulations and policies.

It is also the policy of CSS to utilize these procedures for all programs, public or private, administered by the CSS.

#### Issuing Accounting Procedure Statements

Drafts of new or revised procedures will be reviewed by the Chief Financial & Administrative Officer prior to issuance.

#### Distribution

The completed new or revised policy will be kept as an electronic document stored on the Administrative Drive on CSS's Server. New or revised policies will be communicated to employees whose actions may be affected.

#### Index

A numerical and alphabetic title index of all Procedure Statements will be issued as needed.

#### Format

PROCEDURE NO. – A procedure number will be assigned when the policy is approved and issued. This number is located in the upper right hand corner on all pages.

EFFECTIVE - Actual date the policy becomes effective in the form "00/00/0000".

SUBJECT – A short descriptive title of the procedure. The title will be used for indexing.

PROCEDURE – The body of the policy includes a complete description of the procedure, the methods to be used, form names and numbers related thereto, and so forth. Attachments may be included for reference.

<b>SUBJECT:</b>  <b>GENERAL ACCOUNTING POLICIES</b>	Page	1 of 1
	Procedure No.	4-0
	Effective	10/31/1993
	Supersedes	

The CSS shall maintain fiscal controls and fund accounting procedures to insure the proper disbursement and accounting for all funds received. The following general policies shall control the design, implementation, and operation of such controls and procedures.

1. Provide for identifying receipts and expenditures of program funds separately for each award or grant.
2. Provide for accumulating and recording expenditures by award or grant and cost category shown in the budget. Such financial records shall provide for the tracing of funds to a level of expenditure adequate to ensure that the funds have been spent in accordance with controlling law and requirements of grantors.
3. Provide for a documented time schedule for filing financial reports with grantors.

<b>SUBJECT:</b>  <b>ACCOUNTING SOFTWARE</b>	Page	1 of 1
	Procedure No.	4-1-2R
	Effective	05/23/2016
	Supersedes	4-1-1R

The MIP Fund Accounting system is report driven and was designed and structured to capture data for reporting to Granting Agencies, the Board of Directors and Management Staff for internal control.

The system contains the following modules:

Accounts Payable  
 Bank Reconciliation  
 Electronic Funds Transfers  
 Encumbrances  
 General Ledger  
 Grant Administration  
 Import/Export  
 Primary Budget Control  
 Reporting

Transactions are input in the system as a result of A/P checks/ETs, or as journal vouchers for payroll, accruals, adjusting or correcting entries, revenue receipts, and bank transactions.

No formal monthly closing is required in this system. Account Payable checks/EFTs are posted to the general ledger after each check batch session is complete. Monthly reports are generated by selecting a specific time period.



<b>SUBJECT:</b>  <b>PERIODIC BACKUP OF NETWORK DATA FILES</b>	Page	1 of 1
	Procedure No.	4-2-8R
	Effective	07/01/2018
	Supersedes	4-2-7R

The Periodic Backup of Network Data files policy is located on the CSS intranet at  
<https://careersourcesc.sharepoint.com/documents/IT Policy and Procedures>

Policy Number: ITNPP-02-R1

DRAFT

<b>SUBJECT:</b>  <b>GENERAL LEDGER FILE MAINTENANCE</b>	Page	1 of 1
	Procedure No.	4-3-1R
	Effective	01/01/2001
	Supersedes	4-3

General ledger additions, changes and deletions are accomplished by selecting “Maintain” under the MIP accounting module of the accounting software and then selecting “Chart of Accounts Codes”. Under the Chart of Accounts – updates are done by segments of the accounting code.

Other procedures that involve general ledger structural type functions are accomplished via this menu.

DRAFT

<b>SUBJECT:</b>  <b>GRANTS MANAGEMENT OVERVIEW</b>	Page	1 of 1
	Procedure No.	5-0-2R
	Effective	07/01/2000
	Supersedes	5-0-1R

The CSS receives funding primarily from the State of Florida as pass through funds authorized by federal legislation. Funding may also be received as a result of submitting proposals in response to RFPs issued by Federal, State or Local Entities.

The revenue and expenditures for each distinct funding source are accounted for separately within the accounting system.

DRAFT

<b>SUBJECT:</b>  <b>GRANTS MANAGEMENT PROCEDURES</b>	Page	1 of 3
	Procedure No.	5-1-9R
	Effective	02/12/2021
	Supersedes	5-1-8R

## DRAWDOWNS

1. Funds availability and authority to draw funds is evidenced by State issued "Notice of Funds Availability"(NFA). The NFA includes contract period, contract number, Title/Program and level of funding.

2. Drawdown of funds are made on a weekly basis in accordance with a State issued schedule. The basis for the amount of cash requested is the total of cash needs by contract/grant for the following week supported by the following documentation:

- A. Vendor invoices.
- B. CSS generated request for client related payments.
- C. Service provider invoices.
- D. Recurring payroll and payroll related costs.
- E. Recurring payments such as rent, equipment leases, etc.

All invoices expected to be paid in the following week should be reported as cash needed. Items to be paid must be summarized and documented to support the request for funds.

3. In determining the actual amount of funds to be drawn, State cash management policy is followed with respect to minimizing the time elapsing between actual receipt of funds and their subsequent disbursement and use of the SERA screens for cash requests and financial reporting.

4. On a weekly basis, the CFAO reviews an analysis of drawdowns by contract number. SERA screens are used to obtain data for this analysis. The purpose of this analysis is to track the excess and deficiencies of drawdowns to disbursements by contract.

## CASH RECEIPTS

5. Drawdowns are received via EFT remittance advices. Miscellaneous receipts received are logged in by staff on a daily basis in the cash receipts log, submitted to accounting and restrictively endorsed. A deposit slip is prepared. Cash receipts are deposited within a reasonable time of receipt. The cash receipts log will be verified against the deposit slip, by the Finance Department staff by placing a check mark next to each entry. If a deposit cannot be made by close of business the Finance Department will secure the deposit in a locked cabinet.

6. Receipts are coded to the respective accounts by the Finance Department and input to the financial accounting system via a journal entry on a monthly basis.

### ACCOUNTS RECEIVABLE

The following outlines the procedures necessary to record accounts receivable.

Services requiring invoices to vendors are submitted to Accounting by the requestor via an email.

1. An invoice is created using the invoice template under the appropriate program year folder in the Accounts Receivable folder, then recorded on the Invoice Number Tracking Log.
2. Checks received by mail are recorded in the Cash Receipts Log by the Executive Assistant, then provided to Accounting for deposit.
3. Once received, the Invoice log is updated to reflect date received, payment method, amount, and any other information relevant to the payment.
4. Payments received by check are deposited and copies of the check are coded to the respective accounts, then provided to the Accountant for entry into the financial accounting system and reconciliation.
5. Payments received in credit card format must be processed through Paypal.
  - a. Log into Paypal Manager with the Partner Name, Finance User Name, and password
  - b. Select the Virtual Terminal tab, then choose Single Transaction and change the Transaction Type drop down to Sale
  - c. Type in the vendor credit card number and click Submit
  - d. In the following screen, enter the Expiration Date, Security Code, and Amount. Under the comments include the Invoice Number or any relevant information for the payment
  - e. Under Billing Information, enter the Vendor Cardholder's name, Company Name if applicable, address, and email, then submit.
  - f. Once processed successfully, print a copy of the receipt, code, and submit to the Accountant for entry into the financial accounting system and reconciliation.

## PROGRAM REVENUE

7. Revenues earned (in excess of costs) from performing as a subcontractor are retained for providing further employment and training services. For reporting to the State of Florida refer to the Department of Economic Opportunity (DEO) – Subrecipient Enterprise Resource Application (SERA) – Workforce Board Manual.

## CASH DISBURSEMENTS:

8. The Accounting Coordinator records accounts payable, post and mails the checks.

## BANK RECONCILIATIONS:

9. Monthly bank statements will be reconciled each month by the Accounting Manager. The CFAO will review, initial and date each bank reconciliation.

<b>SUBJECT:</b>  <b>BUDGETARY PROCESSES</b>  <b>AND CONTROL</b>	Page	1 of 1
	Procedure No.	5-2-1R
	Effective	05/01/1998
	Supersedes	5-2

A budget is prepared each program year by the Finance Department. This is an organization budget reflecting all programs and funding sources. Factors such as program designs, historical data, and regulator limits on expenditures are considered in preparing the budget. Budget modifications are prepared as required.

The budget is reviewed and approved by the CSS Board of Directors.

Budgetary control of expenditures is discussed in procedure No. 9-0-2R, Financial Reporting.

DRAFT

<b>SUBJECT:</b>  <b>STATE REPORTS</b>	Page	1 of 2
	Procedure No.	5-3-7R
	Effective	07/01/2018
	Supersedes	5-3-6R

The following reports are mandated by the State for use in the management reporting of Workforce Innovation & Opportunity Act (WIOA), Temporary Assistance Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), Unemployment Compensation and DEO Joint Managed Programs (Wagner Peyser, DVOP & LVER) in the Subrecipient Enterprise Application (SERA):

#### CASH MANAGEMENT:

##### Cash Request

Purpose: To provide a specific procedure for LWDB's to request a cash advance of funds by contract.

Due: Noon EST on the Wednesday prior to the week for which the cash is needed.

#### REPORTS:

##### Cash Analysis

Purpose: To determine if each LWDB's cash balance at the end of any given week exceeds the allowable amount as set forth in the Cash Management Policy. CSS uses an excel worksheet to determine if there is excessive cash on-hand in the previous week, thereby necessitating a cash request adjustment in the current week.

##### Partner History - Cash Advance

Purpose: To facilitate a reconciliation of life-to-date cash advances by contract and to provide on-line information regarding balances available to draw.

##### Partner History – Cash Disbursement

Purpose: To facilitate a reconciliation of life-to-date disbursements by contract and to provide on-line information regarding balances available to expend.

##### Cost Category Disbursement

Purpose: To report monthly disbursements for NFA's by cost category.

Due: By the 20<sup>th</sup> of the following month prior to submitting the Financial Report Summary.

##### Financial Report Summary

Purpose: To provide specific procedures for LWDB's to report the disbursing/expending of WIOA, TANF, SNAP, UC, and DEO Joint Managed Programs (Wagner Peyser, DVOP and LVER) funds by contract.

Due: By the 20<sup>th</sup> of the following month. Reports are to be balanced with CSS general ledger, and SERA screens updated.



**Program Income Quarterly Report**

Purpose: To provide specific procedures for LWDB's to report income and disbursement thereof on funds by contract number by quarter on the screen.

Due: Quarterly in connection with the Financial Report Summary.

**Florida Commerce Resource**

Subrecipient Enterprise Resource Application (SERA)

<http://www.floridajobs.org/grants-management/grants-management>

1. Click on SERA Workforce Board Manual or SERA Workforce Board Training

<b>SUBJECT:</b>  <b>SMALL PURCHASE AND PROCUREMENT PROCEDURES</b>	Page	1 of 1
	Procedure No.	6-0-13R
	Effective	02/12/2021
	Supersedes	6-0-12R

In an effort to streamline CSS policies and procedures - the Accounting Policies and Procedures # 6-0-13R Small Purchase and Procurement Procedures has been incorporated into one policy and procedure under – CSS Policies and Procedures titled CSS Purchasing and Procurement # 01-03 R15 as of 2/12/2021.

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<b>SUBJECT:</b>  <b>VENDOR &amp; SERVICE PROVIDER</b>  <b>CONTRACT PAYMENT PROCEDURES</b>	Page	1 of 2
	Procedure No.	6-1-8R
	Effective	04/28/2017
	Supersedes	6-1-7R

The following outlines the procedures necessary to process vendor invoices and service provider contract payments, including maintenance of documentation policy.

### **VENDOR INVOICES**

1. Mailed invoices are received by the CSS Executive Assistant who distributes them to the appropriate responsible staff member for approval or indicates, when appropriate, by notation on the invoice the date of receipt of goods or services. Invoices are also accepted via email and those invoices would be distributed by the receiver to the appropriate staff for approval.
2. Recurring payments, such as telephone, rent, utility, go directly to the Finance Division for processing and payment.
3. Invoices are coded on an accounts payable voucher as described in procedure 6-2 or they are matched with a purchase requisition from the Electronic Purchase Requisition System, Microix. The Finance Division checks all invoices for mathematical accuracy and compliance with policy and procedure.
4. The completed vouchers with attachments are then submitted to an authorized Approver for final approval.
5. Invoices for purchases of fixed assets greater than \$5,000 per unit are copied for fixed asset inventory control.

### **SERVICE PROVIDER CONTRACT PAYMENTS**

The following outlines the procedures necessary to process payments under service provider contracts including maintenance of back-up documentation.

1. Back-up documentation for amounts invoiced by service providers under contractual agreements with CSS must be made available for review/audit by CSS staff. Service Provider timesheets must be included to document salary allocations. This documentation will support monthly invoices submitted to CSS for payment. Finance staff will initial invoice for approval of payment. Performance information is submitted by the Service Provider, performance objectives are verified and initialed by the Career Services Director and processed by the Finance staff.

2. Back-up documentation will be reviewed/audited by Finance staff for each monthly invoice submitted prior to payment of the invoice. This monthly review of back-up documentation will assure that our service providers are appropriately expending funds in accordance with contractual and budgetary provisions and requirements.
3. Maintenance of back-up documentation materials will be either at the Administrative Entity or service provider level in accordance with the following:
  - a) New service providers will submit backup documentation materials to the CSS for review and maintenance.
  - b) After an initial contract period, typically a full program year, the CSS may allow maintenance of back-up documentation at the service provider level for succeeding contract periods under the following conditions:
    - 1) Previous contract periods have been programmatically successful.
    - 2) There have been no material monitoring findings.
    - 3) There have been no disallowed costs for lack of documentation.
    - 4) Copying and assembling back-up documentation materials for submission to the administrative entity would be an administrative burden to the service provider.
  - c) For existing service providers (those who have had contract with the CSS for at least one full program year as of the effective date of this policy) back-up documentation may be maintained at the service provider level under the following conditions:
    - 1) Previous contract periods have been programmatically successful.
    - 2) There have been no material monitoring findings.
    - 3) There have been no disallowed costs for lack of documentation.
    - 4) Same as b4 above.
  - d) Maintenance of back-up documentation by lower tier sub-recipients will be at the administrative entity level if the administrative entity maintains the related sub-recipient documentation or at the sub-recipient level if the sub-recipient maintains its back-up documentation.

<b>SUBJECT:</b>  <b>ACCOUNTS PAYABLE VOUCHER</b>	Page	1 of 1
	Procedure No.	6-2-8R
	Effective	05/8/2025
	Supersedes	6-2-7R

The Accounting Coordinator will complete an Accounts Payable Voucher for any payment that does not have an electronic Purchase Order from Microix. The AP Voucher will be completed with the appropriate coding to be charged.

The Accounts Payable Voucher is a form that documents the payment process. The form's format is as follows:

VENDOR – The name of the payee.

VOUCHER NO. – An assigned voucher number from the AP log.

CHECK NO. – The number of the check or EFT that pays this voucher is entered upon issuance of check/EFT.

DATE PAID – The date the payment was issued.

DISTRIBUTION CODE - This portion is completed with a distribution code assigned in MIP for costs to be allocated based on the cost allocation plan.

GRANT CODE – Indicates appropriate funding stream to be directly charged.

COST CATEGORY – One or more of the following must be indicated: Admin or Program

WORK ACTIVITY – Indicates work activity for SERA reporting

DW FUNDS USED FOR AD – This segment is used only when using Dislocated Worker Grant Funds for Adult activities.

SERVICES – Determines whether the payment is to be process as a general operations expense, training account for a client, or a support account for a client.

GENERAL LEDGER CODE – General Ledger code assigned to the expense.

CLIENT – If the payment is for a training or support account a client ID number must be included on the voucher. If voucher is for a general operations the default is 0.

APPROVAL – The AP voucher, electronic purchase requisition or Gazelle voucher is approved by the President/CEO, CFAO, COO, or CTO prior to issuance of a check.

ATTACHMENTS - Proper attachments may include, but not limited to, the purchase requisition, purchase order, invoices, delivery tickets or other supporting documentation.

<b>SUBJECT:</b>  <b>RECORDING ACCOUNTS PAYABLE</b>	Page	1 of 1
	Procedure No.	6-3-3R
	Effective	05/08/2025
	Supersedes	6-3-2R

The following outlines the procedures necessary to record accounts payable.

Accounts payable is recorded using the MIP Accounting software system accessible at accounting computer workstations. To begin the recording of accounts payable log into MIP using name and password.

1. Select Accounts Payable from the side menu.
2. Click on Enter AP Invoices icon.
3. Enter Session ID – Session ID's are kept in a CSS log worksheet in Excel – API Log sheet for Accounts Payable Invoices. Description – enter effective date of transaction. For accruals the last day of the month will be used. All others will use the check date. Press enter.
4. Each voucher has been assigned a number from the API voucher number log. Enter the voucher number, effective date, total amount of invoice to be paid, description – list the invoice number, account number or other identifiers for the payment, vendor ID – click the pull down menu for a complete list of vendors, due date not applicable.
5. If distribution code – click on the distribution code button on the tool bar. If a direct charge fill in the fields. Each field will have a pull-down menu with a list of options.
6. For a general operations Microix purchase order click the Encumbrance button on the tool bar and find the appropriate encumbrance that matches the invoice and click ok. If processing client training or support AP payments the purchase order will be need to received first in Microix. Either all of the purchase order or a portion depending on the invoice. Microix converts that portion of the purchase order to a payable invoice and pushes they payment through as a voucher to MIP.
7. Manually key individual lines following the AP Voucher if there is not an encumbrance or distribution code to be used.
8. Offset the expense to accounts payable by clicking on the AP offset button on the tool bar. Verify voucher is in balance by checking the totals at bottom of the screen – debits and credits. Press save. Ready to enter next voucher.
9. When all accounts payable invoices have been entered and saved verify session total by running a total of invoices and compare to the document total in the API session.
10. To make corrections, open session and scroll to voucher number entered. Make changes and follow steps from #6 forward.

<b>SUBJECT:</b>  <b>CHECK ISSUANCE PROCEDURES</b>	Page	1 of 2
	Procedure No.	6-4-12R
	Effective	05/08/2025
	Supersedes	6-4-11R

Accounts Payable checks are generated utilizing Microix for electronic purchase orders & MIP Accounting software system accessible to designated users.

1. Click on Select AP Invoices to Pay icon. Enter the check session from CSS check session log. All vouchers posted will appear alphabetically. Select vouchers you wish to pay. Click ok and close screen.
2. Go to Reports Tab at top – select “Accounts Payable” and then “Invoices Selected for Payment”. Select from Report Name drop down – “Invoices Selected for Payment”. Run report. Verify that only the batch you are wanting to print checks for is listed. Save as PDF and process through Adobe Sign routing to an authorized check signer to approve the cash disbursement for the week. This report will list check and EFT cash disbursements ready for payment along with the check date. If there will be a single vendor cash disbursement of \$15,000 or greater route the report to two of the authorized check signers. Check signers will review the Invoices Selected for Payment Report against the shared AP vouchers and back up documentation for the week. Once reviewed and report signed - checks and EFTs are ready for printing with an electronic signature.
3. All checks and EFTs will require one signature. The authorized signatories on all CSS accounts are the President/CEO, Chief Operating Officer, and Chief Talent Officer. Authorized signatories will not sign a check made out to their name. This policy may have an exception if there is no other authorized co-signer.
4. Click on the Pay Selected AP Invoices icon. Select the check session from drop down list. Enter check date. Load checks face down with the check number in the lower right hand corner in the laser printer. The beginning check number will auto generate. Verify that the electronic signature selected is the check signer who approved the “Invoices Selected for Payment Report”. Click ok to start. Message will pop up and tell you how many checks will print, click ok. A second message will pop up – Did checks print properly? Before clicking yes follow through with matching the printed checks with corresponding accounts payable vouchers. Click okay. Another message will pop up if you have Electronic Funds Transfer vendors in your batch. You will enter a starting number EFTxxxx using the API log to track the numbers. Click ok. If vouchers were selected from the Cash account, a message will appear to print the Other Cash Account checks. Follow same process as for regular checks. Once printing is complete, write the check or EFT number and date paid on each PDF AP voucher.
5. Click on post transactions. Select AP check session just printed and click post.
6. Under Report tab at the top click check/voucher register. Select report name “check register” enter current from and to dates for period ran. Usually Monday through Friday dates. Save the report. Select check register under the report name and press screen pre-view button on tool bar. Press print to PDF button on tool bar. Save Check Register. Close out screen. Route for final electronic review to the check signer the Check Register and the approved Invoices Selected for Payment Report to verify the two documents

agree. Check signer is to document/review on check register prior week's last check # and EFT#, current week's check # and EFT # beginning number, initial and date.

7. Once all checks and EFTs are approved, the EFTs and check listing needs to be sent to the bank. Text files must be created for both, using MIP for EFTs and the Positive Pay software for check listings.

For EFTS:

1. Click create EFTs in MIP
2. Select the bank (only one option)
3. Rename the file using the ... button
4. Select all EFT payments
5. Click Ok
6. A file is generated and saved to the MIP Share cloud drive.
7. Move/copy file to AP/CEO Portal/EFTs

For the Positive Pay file:

1. Open Positive Pay module
  2. Change the Check Session to Posted Sessions
  3. Located the APC session(s) used for the checks printed
  4. Rename the File to match the APC session chosen
  5. Click on Write File which saves to the MIP Share drive
  6. No confirmation is given once file is created
  7. Move/copy file to AP/CEO Portal/Positive Pay
8. Log onto the bank's Vantage Portal and upload both the EFT and Check Listing files.
  9. When new signors are to be added or immediate removal due to personnel changes, the CFAO will provide the necessary notifications to the banks and update signature cards. Accounting staff are notified of the changes.



<b>SUBJECT:</b>  <b>VENDOR FILE MAINTENANCE</b>	Page	1 of 1
	Procedure No.	6-5-3R
	Effective	07/01/2015
	Supersedes	6-5-2R

MIP vendor files contain certain information necessary for the proper processing and recording of transactions with the vendors. The Vendor File Maintenance function allows the creation, deletion, and editing of that information.

This MIP function is accessed from the Maintain Tab at the top of the screen or the short cut on the accounts payable home page. This option allows for edit, inquiry or set up new vendors. Vendor IDs are set up with 6 digits – corresponding to the vendor's first three letters of the first and 2<sup>nd</sup> words in the company name. Enter in all caps. Enter the company name. This is how the name will appear printed on the check. For 1099's it must match the Employer ID number or for an individual it must match the social security number reported on the W-9. Click on the address tab and enter company address and phone. Click on the Payment & Term tab if separate checks need to be printed for each invoice of the same vendor. Click on the box. Click on the tab 1099 if the vendor must be issued a 1099 – check box, click on FEIN or SSN enter info, click on corresponding default box number.

To verify previous payments made to a vendor click on vendor balances.

<b>SUBJECT:</b>  <b>PERIODIC CLOSING OF ACCOUNTS PAYABLE</b>	Page	1 of 1
	Procedure No.	6-6-1R
	Effective	07/01/2004
	Supersedes	6-6

No formal monthly closing is required for Accounts Payable in MIP. Accounts Payable checks are posted to the general ledger after each check batch session is completed.

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SUBJECT:  <b>PETTY CASH PROCEDURE</b>	Page	1 of 1
	Procedure No.	6-7-4R
	Effective	05/08/2025
	Supersedes	6-7-3R

CSS no longer maintains a petty cash fund.

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<b>SUBJECT:</b>  <b>STAFF PAYROLL PROCEDURES</b>	Page	1 of 1
	Procedure No.	7-0-10R
	Effective	04/28/2017
	Supersedes	7-0-9R

The following outlines the procedures required to process staff payroll on a biweekly basis:

1. President/CEO initiates appointment of staff and determines pay rate and/or salary in accordance with established pay rate schedules. Chief Talent Officer completes payroll add/change form for President's signature and then forwards to Finance Department.
2. The Finance Department is responsible for maintaining the staff payment data required for issuance of paychecks by the system in Paylocity's Web Pay and Web Time Systems. Pertinent data regarding new staff members or changes in existing data are accumulated in each employee's personnel file. Authorization for a miscellaneous deduction or direct deposit will be completed by the employee, processed with the payroll service and filed in the employee's personnel file.

#### BIWEEKLY PROCEDURES

1. Each staff member logs onto their time sheet through CSS Intranet and completes an electronic time sheet biweekly. Website reference is:  
<https://paylocity.com>
2. Time sheets are reviewed and approved electronically by the appropriate supervisor.
3. The Finance Department reviews and checks accuracy of staff time sheets and compares electronically submitted time sheets to an employee list. Paper time sheets are faxed in for work experience clients and hours entered into a pay grid by the Finance Department. Total company work hours for the pay period are estimated based on the current employees. Prior to submitting the payroll online the CFAO, Accountant, or Chief Talent Officer reviews the hours and changes for the current pay period. A payroll summary report and pre-process register are printed to compare with total work hours calculated.
4. The outside payroll processing company will compile all reports after processing and put them in the reports section of the website to be viewed by users with Admin access only.
5. Pay checks that are not direct deposited are delivered to CSS the following morning. If a manual payroll check is required to be written it is the policy of the Board that an authorized check signer will not sign a manual payroll check written in their name. However, if an authorized signer is required to sign such a check an authorized co-signer is required. Any manual checks must be entered in the bank CEO Portal.
6. The accounting information supplied by the outside payroll processing company is utilized by the Finance Department for entry into the accounting system via journal entry.
7. Tax deposits and reports are filed by the outside payroll company on CSS's behalf.

<b>SUBJECT:</b>  <b>PROPERTY MANAGEMENT</b>	Page	1 of 2
	Procedure No.	8-0-7R
	Effective	07/01/2015
	Supersedes	8-0-6R

Property subject to this procedure is defined as follows – tangible non-expendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit.

Property purchased in the amount of \$5,000 or more per unit cost must be inventoried and assigned a property number. The following control procedures are used:

1. The IT Department is responsible for maintaining a property inventory file. The property file includes the property inventory list as described below and supporting procurement documentation.
2. A property tag number is assigned to the property item after the supporting documentation has been submitted to accounts payable. The tag number should be noted on the accounts payable documentation and added to the property inventory file with the following information as applicable:
  - a. Description and serial number of the asset (sufficient for identification).
  - b. Cost of the asset
  - c. Property number
  - d. Source and condition of the asset
  - e. Location or CSS office having custody of the asset.
  - f. Vendor name
  - g. Custodian's name
  - h. Date acquired
  - i. Voucher number
  - j. Federal Award Identification Number (FAIN) – If multiple funding sources are charged list program charged by Grant ID# which can be found on DEO's Notice of Fund Availability (NFA) located on the Admin drive. Distribution codes maybe noted with supporting documentation attached to inventory file.
3. The IT department conducting a physical inventory annually, and affixing identification tags in accordance with the instructions of the accounting department. The property inventory is reconciled at year-end to the general ledger property account.
4. Property that has been contributed to CSS with a fair market value of \$5,000 or more per unit will need to be added to CSS property file of \$5,000 or more per unit. An inventory contribution form will need to be completed by the IT Director. A CSS Inventory Tag number will be assigned to the property. The receipt form will include the following information:

- a. CSS Inventory Tag Number
- b. Item Description
- c. Serial Number
- d. Fair Market Value of Property Contributed
- e. Contributor
- f. Condition of Asset
- g. Custodian's Name
- h. Date Contributed/Acquired
- i. Funding Source if Federal Funds
- j. Signature of CSS Staff Receiving Property

5. Inventory Disposal – Disposal of property with an acquisition cost of \$5,000 or more per unit which has been determined an “end of life” or poor condition status requires an inventory removal form completed by the IT Director. End of Life status is determined when manufacturers of a product are no longer making replacement parts. The equipment is no longer operating consistently and prohibits staff from performing their job.

The inventory report will be updated to reflect the disposal of the equipment and the date disposed.

6. Inventory records and documents relating to the disposition of non-expendable property will be maintained for a period of 3 years from the disposition of the property.

<b>SUBJECT:</b>  <b>FINANCIAL REPORTING</b>	Page	1 of 1
	Procedure No.	9-0-2R
	Effective	07/01/2004
	Supersedes	9-0-1R

The following reports are generated from MIP – Accounting System:

Quarterly Budget to Actual Expenditure Report:

Compares actual line item expenditure to the organization budget.

These reports are presented to the Board of Directors on a quarterly basis.

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<b>SUBJECT:</b>  <b>RESOLUTION OF STALE OUTSTANDING CHECKS AND PROPERTY PRESUMED ABANDONED</b>	Page	1 of 1
	Procedure No.	10-2-2R
	Effective	05/23/2016
	Supersedes	10-2-1R

The CSS Finance Staff will investigate and resolve the circumstances of any check outstanding for ninety (90) days or longer. Attempts will be made to contact the payee at last known telephone or address. If telephone contact cannot be accomplished, a letter will be sent to the payee's last known address advising that the subject check(s) are outstanding.

If contact is made with the payee, request will be made to try to locate the check. If the check is found and deemed too stale to be cashed, a replacement check will be issued upon return of the original check. If the check cannot be found, a stop payment order, if appropriate, will be initiated and a replacement check issued.

In both situations described above, the original check will be voided in the automated accounting system (see procedure 10-3-4R).

If the payee cannot be contacted and fails to respond to our letter, procedures for property presumed abandoned, Chapter 717, Florida Statutes, will be followed.

The Annual Report of Property Presumed Abandoned for Unclaimed Property (Form DBF-AP-111) is due by April 30<sup>th</sup> of each year to the State of Florida Comptroller. Detailed instructions are outline on the Unclaimed Property website: [FLTreasureHunt.gov](http://FLTreasureHunt.gov).



<b>SUBJECT:</b>  <b>PROCEDURE FOR VOIDING CHECKS</b>	Page	1 of 1
	Procedure No.	10-3-4R
	Effective	04/28/2017
	Supersedes	10-3-3R

There will be circumstances that require a check that has been issued to be voided. The following examples do not necessarily include all of the circumstances that may require the voiding of a check:

- Issued check is lost
- Check becomes stale
- Check issued to incorrect vendor
- Check returned by payee – i.e., double payment
- Check returned as undeliverable to payee

The voiding of a check is initiated in the accounts payable module of the accounting system by selecting the Accounts Payable Menu in MIP, CSS Accounting System. The system will automatically reinstate (dr.) the cash account and (cr.) the related payable account after the following steps are taken:

1. Click on Void Checks & Payments link. Enter void check session ID from void check log.
2. Enter current date. Original effective date can only be used if in the same week issued.
3. Select check to be void. If the check consisted of a single voucher also to be voided you can select it on this screen as well. Press ok. Return to the Accounts Payable Menu and post transaction.
4. If the voided check contained multiple vouchers and is not to be replaced, the payable, reinstated by the voiding procedure, must be voided. Return to the Accounts Payable Menu and click on AP Invoices, select from the tool bar “reverse posted document”. Select the Session ID the voucher was posted in and the document number (voucher number). Remove original document date and original effective date – system will automatically place in current date. Select ok. Select Save.
5. Return to Accounts Payable Menu and select post transactions.
6. If the voided check is to be reissued just as it is, you can follow the steps listed in Procedure No. 6-4-11R, beginning with step 2.

Once the void process has been completed in MIP, the bank needs to be notified of the check void by logging onto the CEO Portal and entering the lost/spoiled check. If a new check is issued in replacement, the Check Listing must be uploaded to the bank CEO Portal as well. If the actual check that is being voided is available, the signature section will be cut off and the check stamped “void” and filed.

The accounting system maintains a historical, retrievable record of all void checks.

SUBJECT:  <b>BONDING</b>	Page	1 of 1
	Procedure No.	10-4-1R
	Effective	01/28/2002
	Supersedes	10-4

The CSS will maintain coverage for a blanket employee dishonesty bond in the amount of \$200,000.

Advance receipts will be monitored to determine if the amount of the bond coverage is sufficient to ensure that program funds are secured at all times.

DRAFT

<b>SUBJECT:</b>  <b>AUDIT AND AUDIT RESOLUTION</b>	Page	1 of 1
	Procedure No.	11-0-5R
	Effective	05/22/2025
	Supersedes	11-0-4R

CSS will conduct its audit and audit resolution responsibilities in accordance with FloridaCommerce – Grantee-Subgrantee Agreement. This policy will be revised to comply with any subsequent Guidance Papers.

CSS will have an annual independent audit conducted in accordance with generally accepted government auditing standards covering financial and compliance audits. The audit will be an organization wide single audit conducted in accordance with Uniform Guidance, 2 CFR 200, Subpart F – Audit Requirements, and section 215.97, Florida Statutes (F.S.). The completion of the audit and issuance of the audit report must be within 9 months of the end of the fiscal year. Along with copies of the audit report a copy of the letter from the audit firm transmitting the completed audit and a corrective action plan, including comments on the status of corrective actions taken on prior year findings will be submitted electronically to [audit@commerce.fl.gov](mailto:audit@commerce.fl.gov) & the Auditor General's Office – Local Government Audits. Auditor General's website (<https://flauditor.gov/>) provides instructions for filing an electronic copy of the financial reporting package. CSS will obtain the internal control work papers from the auditor(s) performing the annual independent financial statement audit. These work papers will be kept electronically with other CSS audit work papers available for review by FloridaCommerce upon request.

A copy of CSS' audit report and the data collection form will be submitted by the auditor to the Federal Audit Clearinghouse.

From the date the audit is issued CSS will retain audit information for five (5) state fiscal years after all reporting requirements are satisfied.

Service Provider Audits: CSS contractual agreements with service providers will specify audit requirements.

Upon receipt of service provider audits the reports will be reviewed to ensure compliance with Uniform Guidance, 2 CFR 200 – Subpart F – Audit Requirements, and section 215.97, Florida Statutes (F.S.) and FloridaCommerce Grantee-Subgrantee Agreement. Any findings and/or recommendations will be evaluated to determine proper actions in response to findings and/or recommendations and complete all actions that correct or resolve issues contained within the audit report.

A written decision as to whether any questioned costs and/or costs recommended for disallowance are to be allowed. Also, whether or not corrective actions in response to administrative findings are adequate. It must be stated in the decision that all findings are subject to State and Federal review.

A debt will be established if applicable and repayment methodology will be negotiated with the service provider.

Service provider will be advised of appeal rights in the event of any findings.

If there are no findings to be resolved, a notification letter will be sent to the service provider stating that there are no findings to be resolved and that the audit file is considered closed.

DRAFT

## CSS Accounting Procedures Manual – Instructions for Program and Accounting Staff

<b>SUBJECT:</b>  <b>Client Reloadable Debit Cards</b>	Page	1 of 4
	Procedure No.	12-0-R1
	Effective	05/08/2025
	Supersedes	12-0

### **Background**

A key principle in Workforce Development is to provide local areas with the authority to make policy and administrative decisions and the flexibility to tailor the public workforce system to the needs of the local community. Program Support Services and Incentives are a key element to ensuring successful service delivery to CSS clients.

### **Purpose**

To establish a CareerSource Suncoast (CSS) procedure for staff issuance of workforce development funded programmatic supportive/incentives services through the use of reloadable debit cards.

### **Reloadable Support Service/Incentive Debit Cards:**

Support services and incentive payments can be made through reloadable debit cards. For support/incentive payments issued through reloadable debit cards follow the process outlined below:

#### **Reloadable Debit Card Request:**

- CSS Program Staff will email [accounting@careersourcesc.com](mailto:accounting@careersourcesc.com) requesting the number of reloadable cards needed.
  - Note: Cards will not be pre-loaded with funds.
- Accounting will issue the requestor the bulk reloadable cards and provide SharePoint link to a card tracking spreadsheet with the bulk issued card numbers entered on the spreadsheet.

#### **Card Issuance to Client:**

- Program Staff will assign and issue the client a reloadable support service/incentive card. The cards issued will have a \$0 fund balance until funds are requested.
  - Program Staff will enter the client's information on the card tracking spreadsheet provided by the accounting team. The client's name and information must be entered with the corresponding card number issued to the client.

#### **Requesting Funds to Debit Reloadable Cards:**

- Program Staff member issuing the support service/incentive will complete the *All Programs – 016 Acknowledgment Receipt Incentive Funds* form or the Statement of Need-Support Services Fund Form -002 - to have funds loaded to the card assigned to a client. The Incentive Acknowledgement form or Statement of Need -Support Services is the authorization for accounting to load a debit card for a client's incentive or reimbursement for support payment on Comdata's Website. Refer to the CSS Incentive Policy for allowable Incentive amounts and programs. Other support services should be paid directly to a vendor when at all possible verses issuing the client a reloadable debit card. If a client is requesting a reimbursement for an allowable support services item - the debit reloadable card can be used with the required documentation as noted in the support services policy. The Acknowledgement Receipt is only used for an incentive to be issued.

- The Program Staff member shares with the accounting staff the secure file link of the client's completed Acknowledgement Receipt Incentive Form or support request. Accounting staff will download a copy of the form and save for back up to enter into the accounting system. Request is routed to CFAO for review.
- When completing the Acknowledgment form-016 or Statement of Need Form 002 through the Adobe signature process, copy the [accounting@careersourcesc.com](mailto:accounting@careersourcesc.com) email on the e-sign process. If the form is completed manually in-person, the form can be sent to [accounting@careersourcesc.com](mailto:accounting@careersourcesc.com) through Adobe as an "Acceptor" or via a secure shared link. Do not send the completed Acknowledgement form attached to an email to accounting.

This allows for secure data transmission of the form with the client's information and will notify accounting to load the funds to the card.
- Requesting Staff will assign and issue the Client the debit card at the time of the incentive criteria is met. Client will receive the debit card with a 0 balance. The requesting staff must enter the clients information on the NCPEP Card Issue List, located on the NCPEP SharePoint [Pay Cards](#) folder for the appropriate program year listed.

**Loading Funds:**

Accounting will be responsible for loading all funds to the clients' reloadable card through the process below:

- Accounting will download the Incentive Acknowledgement Receipt to file with the Journal Voucher (JV) and load report from Comdata for processing and recording in MIP.
- Accounting will log on to the ComData web site. Only the accounting staff have log ins for ComData website to load debit cards.
- Access the reloadable account by:
  - Clicking MANAGE dropdown
  - Branded Debit
  - Account Status
  - Assigned Accounts drop down
  - 10006869
  - Submit
- To load a new card:
  - Choose Cardholder information
  - Create Cardholder
  - Enter client information
  - Choose Assign Available cards
  - Enter the Card number
  - Select Load/Cancel funds
  - Enter the amount of funds
- To reload a card
  - Choose Cardholder Information
  - Search Existing Cardholder
  - Enter client information
  - Select Load/Cancel funds
  - Enter the amount of funds

- Once Accounting has loaded the funds on the card, they will notify the requesting staff of completion.
  - Note: If funds are available in ComData, the funds will usually be loaded to the card within 2-3 hours.
  - If funds are not available in ComData, the Program Staff will need to request funds.
- Program Staff will be responsible for notifying clients of available funds.

#### ComData Account Balance/Management:

The Program Coordinator/Manager is responsible for managing the Incentive/Support Service budget, ComData account balance, and reloadable debit card stock.

The Program Coordinator/Manager will be responsible for notifying accounting with a Request for Additional Funds and Cards when needed. The form is located on the CSS SharePoint in the [NCPEP TEAM](#), Debit Card folder. This form is initiated by the Coordinator/Manager providing the Accounting team the following information:

- Number of Cards Available
  - The number of cards on hand with program staff
  - The Number of cards on hand with accounting staff
- The Number of Cards to order
- Funds Available
  - Balance of Funds Available on ComData Website
  - The estimated amount of funds needed for the current month.
- Total Amount of Funds to be requested

The Request for Additional Funds form must be forwarded to Accounting through Adobe sign.

Accounting will complete the following:

- Verify # of blank cards on hand in the accounting safe
- Verify the balance of funds available on Comdata Website to load on the debit cards.
- The request is then reviewed and signed by the program staff supervisor.

Accounting will process the request in ComData. *Note: Only the accounting staff have access to log in to the ComData website to load a debit card or order bulk blank debit cards.*

#### Accounting Data Entry:

Accounting will process Journal Vouchers (JVs) to book debit card loads, fee to load the card, and the purchase of additional blank debit cards monthly (if applicable) into MIP accounting software.

Documentation for the JV entry:

- a) JV completed showing the incentive amount, fee to load, and the cost of ordering additional cards if needed.
- b) Load report from ComData showing the debit card #, date of load, client's name, amount of incentive, and fee amount.
- c) Effective date will be the date the debit card was loaded.

- d) JV and back up with be filed in the appropriate monthly JV folder on the Finance SharePoint site – Folder>Electronic Filing > PY xx-xx > mm.yyyy > monthly closings > JVs. Administrative Services Manager (ASM) prepares the JV, CFOA reviews, and ASM posts the JV.

The Accounting staff will reconcile the ComData account monthly to MIP.

**Inquiries:**

Any questions about this procedure should be directed to the Chief Financial and Administrative Officer or their designee.

DRAFT



**CAREERSOURCE SUNCOAST**  
**Related Party Agreements**  
**Board of Directors Summary Report**  
**May 22, 2025**

**Background Information:**

CareerSource Suncoast and FloridaCommecre 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.

**Conflict of Interest Requiring Approval:**

- Galen College of Nursing- Kathy Dwyer
- Manatee Chamber Foundation – Jacki Dezelski
- Bradenton Area Economic Development Corp – Sharon Hillstrom

**Related Party Agreements/Amounts:**

The following presented for approval is for a training provider agreement. The training provider agreement allows CSS to pay for eligible CSS clients to receive funding for occupational skills training.

- Galen College of Nursing/\$175,000 for PY 2025-2026

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

- Manatee Chamber Foundation/\$20,000 for PY2025-2206
- Bradenton Area Economic Development Corp/\$20,000 for PY2025-2026

**Requested Action:**

A motion for the Board of Directors to approve the Related Party agreements for PY 2025-2026 with Galen College of Nursing for a maximum of \$175,000.

A motion for the Board of Directors to approve the Related Party agreement for PY 2025-2026 with the Manatee Chamber Foundation for a maximum of \$20,000.

A motion for the Board of Directors to approve the Related Party agreement for PY 2025-2026 with the Bradenton Area Economic Development Corporation for a maximum of \$20,000.

Respectfully submitted,  
Christina Witt,  
Senior Director of Economic Development



# CEO Report



FINANCE  
AND  
PERFORMANCE  
COMMITTEE  
Report

**CAREERSOURCE SUNCOAST**  
**Finance & Performance Committee**  
**Board of Directors Summary**  
**May 22, 2025**

The Finance & Performance Committee met on May 8, 2025.

**Review of Budget to Expenditure Report PY 24-25 as of March 31, 2025:**

A copy of the report was included in the meeting materials. This report covers the period July 1, 2024 – March 31, 2025 for PY 24-25. The overall burn rate as of March 31, 2025 was 61%. Lower than expected burn rate was due to recent budget modification from additional funds received late in the program year. A Budget to Expenditure Report by Fundsource was also shared with the committee to report on burn rates by grant.

State and federal expenditure requirements reported as of March 31, 2025:

- Admin expenditure rate – 8.90%; max allowed 10%
- Individual training accounts (ITAs) – 39.77%; min requirement 50%
- Youth paid internships PY23 – 22.26% ; PY24 – 17.14%; min requirement 20%
- Youth out of school expenditures PY23- 97.57% ;PY24 – 93.93%; min requirement 50%

**Review of Non-Federal Funds Revenue & Expenditures as of March 31, 2025:**

Balance of Non-Federal Funds \$1,018,691

**Review of Planning Allocations for Program Year 2025-2026**

Overall estimated planning allocations are \$4,571,176

**Review of WIOA Performance Indicators:**

Anthony Gagliano reviewed the CSS WIOA Performance Indicators for the second quarter of program year 2024-25 as of 12/31/2024. A copy of the performance results was provided in the agenda packet.

**Review of CareerSource Florida Letter Grades:**

Anthony Gagliano reviewed the CareerSource Florida Letter Grade for the second quarter of program year 2024-25 as of 12/31/2024. CSS currently has a B+ letter grade at 89.89%.

**General Comments & Updates:**

Next meeting of the Finance & Performance Committee is scheduled for Tuesday June 12, 2025 at 8:00 a.m.

Respectfully Submitted,

Jim Bos  
CSS Treasurer



# FINANCE REPORTS

CareerSource Suncoast  
Expenditure To Budget Report - Summary  
Program Year July 1, 2024 thru June 30, 2025  
As Of 3/31/2025 (with accruals)

	PY TOTAL BUDGET MOD #2	RESTRICTED EXPENSES YTD	BUDGET MOD #2 BALANCE	% OF BUDGET EXPENDED	NOTES
PERSONNEL COSTS					
SALARIESFRINGE BENEFITS	\$4,500,994	\$3,136,577	\$1,364,417	70%	
STAFF TRAINING & EDU	\$37,953	\$33,010	\$4,943	87%	
TOTAL PERSONNEL COSTS	\$4,538,947	\$3,169,586	\$1,369,361	70%	
FACILITY COSTS	\$506,769	\$389,356	\$117,413	77%	
OFFICE FURNITURE & EQUIP	\$15,000	\$2,965	\$12,035	20%	Actual & Obligations 89% - Obs \$10,425
OPERATING COSTS:					
ACCOUNTING/AUDIT	\$92,239	\$48,561	\$43,678	53%	
CONSULTANTS/LEGAL	\$50,000	\$29,215	\$20,785	58%	Actual & Obligations 82% - OSO contract bal \$11,667
GENERAL INSURANCE	\$49,842	\$47,511	\$2,331	95%	Policies renew July 1, 2025
OFFICE EXP & SUPP	\$30,400	\$13,936	\$16,464	46%	
TRAVEL & MEETINGS	\$65,571	\$40,111	\$25,460	61%	
TOTAL OPERATING COSTS	\$288,052	\$179,334	\$108,718	62%	
PROGRAM SERVICES:					
CLIENT TRAINING/SUPPORT	\$2,731,704	\$1,207,366	\$1,524,338	44%	Actual + Obligations 65% - Recent Mod #2 included new funds for SYEP, Opioid, and Helene - lowering burn rate and SYEP in June
CLIENT & EMPLOYER SERVICES	\$50,648	\$37,506	\$13,142	74%	
OUTREACH	\$138,026	\$69,153	\$68,873	50%	Actual & Obligations 78% - EDCs & LCANs contract bal \$38,333
TOTAL PROGRAM SERVICES	\$2,920,378	\$1,314,025	\$1,606,353	45%	
TOTALS	\$8,269,146	\$5,055,266	\$3,213,880	61%	Rates below as of 03/2025: Admin 8.90% - Max 10% Fiscal Year: ITA 39.77%. Min Req 50% Prog Year: Paid Internships Exp: PY23 22.26% - PY24 17.14%, Min Req 20% Yth Out of Sch Exp: PY23 97.57% - PY24 93.93% Min Req 50%.
Expected burn rate as of 3/31/25				75%	



**Budget to Expenditure Report**  
**By Fundsource**  
**PY 24-25**  
**7/1/2024 - 03/31/2025**

	Annual Budget																				
Revenue:		TANF	WIOA AD/Dis Wkr	WIOA Youth	WIOA Rap Resp	WIOA Hope FL PW	WP Hope FL PW	WP Hope Nav	SBTI	NEG Opioid Foster Rec	NEG Hurr Ian	WP	WP App Nav	SNAP	RESEA	NCPEP	Rap Cred	Helene/M ilton	Others		
Carry Forward Funds from PY 23-24	\$2,140,510	\$216,318	\$246,130	\$371,311	\$0	\$93,329	\$28,168	\$0	\$0	\$43,444	\$402,531	\$28,814	\$0	\$0	\$190,819	\$97,368	\$408,936	\$0	\$13,343		
Allocation Awards PY 24-25	\$6,726,847	\$1,301,951	\$1,786,338	\$641,488	\$87,318	\$0	\$0	\$71,429	\$100,000	\$225,000	\$515,000	\$593,620	\$80,000	\$59,490	\$167,710	\$651,599	\$0	\$363,000	\$82,904		
Total Available Funding	\$8,867,357	\$1,518,269	\$2,032,468	\$1,012,799	\$87,318	\$93,329	\$28,168	\$71,429	\$100,000	\$268,444	\$917,531	\$622,434	\$80,000	\$59,490	\$358,529	\$748,967	\$408,936	\$363,000	\$96,247		
LESS: Planned Carry Fwd (Reserve) for PY 25-26	(\$598,211)	\$0	(\$166,929)	(\$179,836)	\$0	\$0	\$0	\$0	\$0	(\$146,062)	(\$22,000)	(\$20,000)	\$0	(\$13,071)	(\$50,313)	\$0	\$0	\$0	\$0		
Total Revenue Budgeted PY 24-25 Mod #2	\$8,269,146	\$1,518,269	\$1,865,539	\$832,963	\$87,318	\$93,329	\$28,168	\$71,429	\$100,000	\$122,382	\$895,531	\$602,434	\$80,000	\$46,419	\$308,216	\$748,967	\$408,936	\$363,000	\$96,247		
Budgeted Mod #2 Expenditures:		Expenditures To Date:																		Total Expenditures	% of Budget
Salaries & Benefits	\$4,500,994	\$690,617	\$804,674	\$364,107	\$64,182	\$53,982	\$25,734	\$52,251	\$4,221	\$25,920	\$118,609	\$203,659	\$58,306	\$31,736	\$192,018	\$253,408	\$111,629	\$49,678	\$31,843	\$3,136,576	69.7%
Staff Training & Education	\$37,953	\$7,210	\$7,043	\$3,612	\$600	\$372	\$207	\$573	\$16	\$61	\$908	\$5,220	\$422	\$313	\$1,674	\$2,008	\$894	\$144	\$1,731	\$33,010	87.0%
Facility Costs	\$506,769	\$76,017	\$68,461	\$36,226	\$7,522	\$118	\$80	\$1,250	\$77	\$959	\$25,883	\$82,927	\$4,211	\$3,741	\$17,039	\$25,402	\$13,583	\$4,717	\$21,146	\$389,356	76.8%
Furniture & Equipment	\$15,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,965	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,965	19.8%
Operating Costs	\$288,052	\$41,410	\$41,355	\$17,004	\$2,530	\$946	\$644	\$414	\$557	\$888	\$10,647	\$20,774	\$1,518	\$6,865	\$5,462	\$10,412	\$5,894	\$970	\$11,044	\$179,334	62.3%
Program Services	\$2,920,378	\$67,254	\$350,650	\$176,851	\$36	\$28	\$14	\$15	\$69,477	\$25,464	\$219,930	\$15,267	\$27	\$2,411	\$96	\$113,619	\$156,233	\$115,980	\$672	\$1,314,025	45.0%
Total Expenditures	\$8,269,146	\$882,508	\$1,272,183	\$597,799	\$74,870	\$55,446	\$26,679	\$54,503	\$74,348	\$53,291	\$375,976	\$330,812	\$64,484	\$45,067	\$216,291	\$404,851	\$288,233	\$171,489	\$66,437	\$5,055,266	61.1%
Remaining Available Funds		\$635,761	\$593,356	\$235,164	\$12,448	\$37,883	\$1,488	\$16,926	\$25,652	\$69,091	\$519,555	\$271,622	\$15,516	\$1,352	\$91,925	\$344,116	\$120,703	\$191,511	\$29,810	\$3,213,880	
% of Funds Expended by Grant		58.1%	68.2%	71.8%	85.7%	59.4%	94.7%	76.3%	74.3%	43.5%	42.0%	54.9%	80.6%	97.1%	70.2%	54.1%	70.5%	47.2%	69.0%	61.1%	
Expiration Dates		8/31/2025	6/30/2026	6/30/2026	6/30/2025	6/30/2025	6/30/2025	6/30/2025	6/30/2025	12/31/2026	9/30/2025	9/30/2025	6/30/2025	9/30/2025	9/30/2025	6/30/2025	6/30/2025	9/30/26	9/30/2025		
Note:																					
PY24 DW NFA Funds Approved-Adult Activities	\$650,000	Approved by Board 11/2024																			
PY24 DW Expended for Adult Activities	\$252,366																				
	\$397,634																				

CareerSource Suncoast  
Summary of Non-Federal Funds Revenue & Expenditures  
as of 03/31/25

<u>Account #10001 - Non-Federal Departments</u>		<u>All Non-Federal Funds Activity</u>
Balance as of 7/1/2024		\$509,675
Revenue		
Current Year		\$164,649
Revenue Total		\$164,649
Less Expenditures - Current Year		<u>\$227,565</u>
Increase/(Decrease) in Cash - Current Year		<u>(\$62,916)</u>
<b>Account # 10001 Total</b>		<b>\$446,759</b>

x	<u>Accounts # 10002, 10003, 10004, 10006 - Non-Federal Departments</u>	<u>All Non-Federal Fund Balances</u>
	Savings	\$176,932
	Certificates of Deposit	\$395,000
	<b>Accounts 10002, 10003, 10004, 10006 Total</b>	<b>\$571,932</b>

<b>Non-Federal Account Balances</b>	<b>\$1,018,691</b>
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1 Month Operating Expense Required for Reserve PY 24-25 \$377,545



CareerSource Suncoast

Formula Funds - Estimated Planning Allocations

For PY 25-26 vs PY 24-25

As of 04.22.25 email from FL Comm

	PY 25-26	PY 24-25	Difference	%	Notes
Adult	\$1,041,779	\$892,080	\$149,699	16.78%	
Dislocated Worker	\$705,124	\$894,258	(\$189,134)	-21.15%	
Youth	\$724,719	\$641,488	\$83,231	12.97%	
TANF	\$1,089,534	\$1,131,951	(\$42,417)	-3.75%	Allocation for PY 24-25 does not include additional funds received 2/2025 for SYEP June 2025 \$170,000
Wagner Peyser 7A	\$1,010,020	\$987,452	\$22,568	2.29%	Full allocation-FL Com staff salaries & benefits will be taken off top and then balance pass-thru to Board budget.
<b>Totals</b>	<b>\$4,571,176</b>	<b>\$4,547,229</b>	<b>\$23,947</b>	<b>0.53%</b>	

**Draft planning allocations until Notice of Fund Availability (NFAs) are issued in July**

**Special Grants Ending into PY 24-25:**

NCPEP expires 6/30/25	\$748,967
Rapid Response expires 6/30/25	\$87,318
Apprenticeship Navigator expires 6/30/25	\$80,000
Transportation Sector Training 6/30/25	\$100,000
HOPE WIOA & WP Nav 6/30/25	\$192,926
WIOA State Rapid Credentialing expires 6/30/25	\$408,936
<b>Total Special Grants Ending in PY 24-25</b>	<b>\$1,618,147</b>

**Special Grants Extending in PY 25-26:**

NCPEP	?
NEG Helene expires 9/30/26	?
NEG Ian expires 9/30/25	\$22,000
Opioid Fostering Recovery expires 12/31/26	\$220,656
Federal Credit Union Financial Navigator exp 06/30/26	\$125,000
<b>Total Special Grants Extending in PY 25-26</b>	<b>\$367,656</b>



# PERFORMANCE REPORTS

**LWDB 18**

Measures	PY2024-2025 1st Quarter Performance	PY2024-2025 % of Performance Goal Met For Q1	PY2024-2025 2nd Quarter Performance	PY2024-2025 % of Performance Goal Met For Q2	PY2024-2025 Performance Goals
<b>Adults:</b>					
Employed 2nd Qtr After	85.2	99.07	88.5	102.91	86
Median Wage 2nd Quarter	\$10,199.50	111.57	11177.5	122.27	\$9,142
Employed 4th Qtr After	89.5	101.24	85.9	97.17	88.4
Credential Attainment	80.9	105.06	82	106.49	77
Measurable Skill Gains	70.9	136.61	78.7	151.64	51.9
<b>Dislocated Workers:</b>					
Employed 2nd Qtr After	87.5	105.42	100	120.48	83
Median Wage 2nd Quarter	\$9,639	90.93	10200	96.23	\$10,600
Employed 4th Qtr After	60	75.00	66.7	83.38	80
Credential Attainment	72.7	145.40	77.8	155.60	50
Measurable Skill Gains	77.8	100.26	50	64.43	77.6
<b>Youth:</b>					
Employed 2nd Qtr After	87.5	106.71	88.9	108.41	82
Median Wage 2nd Quarter	\$7,094	154.55	8104	176.56	\$4,590
Employed 4th Qtr After	71.4	89.25	80	100.00	80
Credential Attainment	66.7	88.93	40	53.33	75
Measurable Skill Gains	56.5	75.33	76.9	102.53	75
<b>Wagner Peyser:</b>					
Employed 2nd Qtr After	71.8	106.06	69.6	102.81	67.7
Median Wage 2nd Quarter	\$8,302	139.53	8571.5	128.88	\$6,651
Employed 4th Qtr After	69.5	109.45	68.2	107.06	63.7

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

# Local Board Performance



## CareerSource Suncoast Program Year 2024-2025, Quarter 2

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

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

### Metrics Data

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

Local Workforce Development Board <sup>▲</sup>	PY 2022-23 Annual Score (%) <sup>▲</sup>	PY 2023-24 Annual Score (%) <sup>▲</sup>	Quarter 1 (%) <sup>▲</sup>	Quarter 2 (%) <sup>▲</sup>	Current Score <sup>▼</sup>
CareerSource Brevard	88.50	87.63	N/A	N/A	N/A
<a href="#">CareerSource Brevard Flagler Volusia</a>	N/A	N/A	88.66	89.14	B+
<a href="#">CareerSource Broward</a>	96.85	94.31	95.49	95.96	A
<a href="#">CareerSource Capital Region</a>	89.51	87.93	86.94	87.06	B+
<a href="#">CareerSource Central Florida</a>	99.97	98.67	99.12	95.86	A
<a href="#">CareerSource Chipola</a>	98.51	89.92	90.21	87.66	B+
<a href="#">CareerSource Citrus Levy Marion</a>	93.92	86.16	86.30	84.39	B
<a href="#">CareerSource Escarosa</a>	94.76	86.78	88.46	87.16	B+
CareerSource Flagler Volusia	102.41	89.82	N/A	N/A	N/A
CareerSource Florida Crown	85.50	83.14	N/A	N/A	N/A
<a href="#">CareerSource Gulf Coast</a>	93.14	86.84	83.62	83.29	B
<a href="#">CareerSource Heartland</a>	99.56	89.39	86.27	89.36	B+
<a href="#">CareerSource Hillsborough Pinellas</a>	N/A	N/A	92.81	93.54	A
<a href="#">CareerSource North Central Florida</a>	N/A	N/A	85.51	88.02	B+
CareerSource North Central Florida	85.98	80.90	N/A	N/A	N/A
<a href="#">CareerSource North Florida</a>	91.76	88.20	86.63	86.97	B
<a href="#">CareerSource Northeast Florida</a>	103.36	91.26	91.54	93.89	A
<a href="#">CareerSource Okaloosa Walton</a>	89.18	91.78	85.46	87.35	B+
<a href="#">CareerSource Palm Beach County</a>	95.16	85.68	85.55	85.09	B
<a href="#">CareerSource Pasco Hernando</a>	92.66	85.62	86.57	87.10	B+
CareerSource Pinellas	96.73	91.64	N/A	N/A	N/A
<a href="#">CareerSource Polk</a>	95.40	79.93	81.85	81.67	B-
<a href="#">CareerSource Research Coast</a>	90.58	86.96	87.18	89.15	B+
<a href="#">CareerSource South Florida</a>	97.02	101.70	102.60	104.15	A+
<a href="#">CareerSource Southwest Florida</a>	98.61	96.40	95.66	94.96	A
<a href="#">CareerSource Suncoast</a>	92.50	91.02	86.95	89.89	B+
CareerSource Tampa Bay	95.91	93.38	N/A	N/A	N/A

# Local Board Performance



## CareerSource Suncoast Program Year 2024-2025, Quarter 2

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

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

### Metrics Data

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

Data as of: 12/31/2024

Metric	Metric Category	Weight	Numerator	Denominator	Rate (%)	YOY Rate Difference	Target (%)	Target Met <sup>1</sup> (%)	Weighted Performance <sup>2</sup> (%)
1. Participants with Increased Earnings	Employment and Training Services, Self-Sufficiency	0.25	533	1,166	45.71	-	50.00	91.42	<b>22.8550</b>
2. Reduction in Public Assistance	Employment and Training Services, Self-Sufficiency	0.25	407	877	46.41	-	50.00	92.82	<b>23.2050</b>
3. Employment and Training Outcomes	Employment and Training Services	0.20	15	18	83.33	-	100.00	83.33	<b>16.6660</b>
4. Participants in Work-Related Training	Training Services	0.10	430	2,266	18.98	-	25.00	75.92	<b>7.5920</b>
5. Continued Repeat Business	Business Services	0.05	1,526	3,476	43.90	-	35.00	100.00	<b>5.0000</b>
6. Year-Over-Year Business Penetration	Business Services	0.05	-	-	-	3.17	100.00	90.00	<b>4.5000</b>
PY 2023-2024 Business Penetration		-	1,957	14,003	13.98	-	-	-	-
PY 2024-2025 Business Penetration		-	2,469	14,400	17.15	-	-	-	-
7. Completion-to-Funding Ratio	Employment and Training Services	0.10	1.41	2.78	50.72	-	100.00	50.72	<b>5.0700</b>
Exiters: Local Board (N) / Statewide (D)		-	1,080	76,854	1.41	-	-	-	-
Budget: Local Board (N) / Statewide (D)		-	\$3,989,776	\$143,574,779	2.78	-	-	-	-
Extra Credit: Serving Individuals on Public Assistance	Employment and Training Services, Self-Sufficiency	Up to 0.05 points	1,361.00	2,437	55.85	-	-	-	<b>5</b>
								<b>TOTAL</b>	<b>89.89</b>

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

≥ 4 = 100%  
 2 to < 4 = 90%  
 0 to < 2 = 80%  
 -2 to < 0 = 70%  
 -4 to < -2 = 60%  
 -6 to < -4 = 40%

<sup>2</sup> Weighted Performance for the Extra Credit Metric are extra credit points awarded based on the rate as follows:

≥ 55% = 5 points  
 51% to < 55% = 4 points  
 49% to < 51% = 3 points  
 47% to < 49% = 2 points  
 45% to < 47% = 1 point

# Programmatic Monitoring Report

CareerSource Suncoast  
Local Workforce Development Board – 18

Program Year 2023-2024

April 17, 2025

Prepared by



Division of Workforce Services  
Bureau of One-Stop and Program Support

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# Executive Summary

During the period of March 4 – 8, 2024, the Florida Department of Commerce (FloridaCommerce) conducted a programmatic monitoring review of CareerSource Suncoast's (CSS) workforce programs. CSS's service area includes Manatee and Sarasota counties which is part of the North Port-Sarasota-Bradenton Metropolitan Statistical Area.

Programmatic monitoring was conducted by FloridaCommerce's Bureau of One-Stop and Program Support (OSPS) through a remote desktop review analysis. Monitoring activities included assessing CSS's program operations, management practices, system protocols, internal controls, 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 a sample testing of randomly selected participant case file records from each of the workforce programs reviewed.

Programmatic monitoring issues identified in the report are categorized as Findings, Other Noncompliance Issues, and Observations 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 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 and operational 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 14 findings, five ONIs, and several observations. 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 and programmatic deficiencies found during compliance monitoring reviews. To reduce programmatic 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

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ABAWD – Able Bodied Adult without Dependents  
AP – Administrative Policy  
ARP – Alternative Responsibility Plan  
CAP – Corrective Action Plan  
CLEO – Chief Local Elected Official  
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  
FCDP – Farmworker Career Development Program  
FG – Final Guidance  
FLC – Foreign Labor Certification  
FLSA – Fair Labor Standards Act  
FloridaCommerce – Florida Department of Commerce  
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  
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  
OJT – On-the-Job Training  
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  
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 2023-2024 monitoring cycle; however, all acronyms may not be used in this report.**

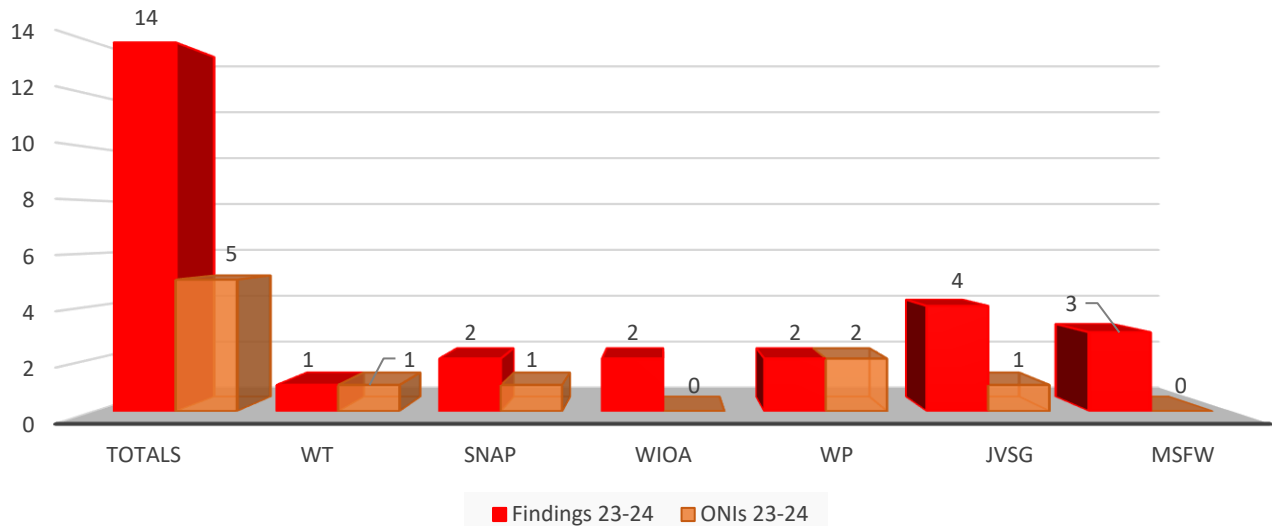
## SUMMARY TABLE OF PROGRAMMATIC MONITORING RESULTS

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

PY 2023-24 Programmatic Monitoring Results					
Workforce Program	Issue	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue
WT	The following issues with the Pre-Penalty and Sanction Process were identified:				
	<ul style="list-style-type: none"> <li>Two participants were not allowed three working days to provide good cause for a second failure within 30 days.</li> <li>Two participants were mailed a Failure to Demonstrate Satisfactory Compliance form (WTP-2292) for a second failure in 30 days in error.</li> <li>The pre-penalty and sanction process for one participant was not initiated or requested timely.</li> </ul>	N	Y		
	The dates on employment documents in one participant's case file did not match the information recorded in OSST.			N	Y
<b>WT Totals</b>		<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
SNAP E&T	One participant was not assigned 80 hours in work activities.	N	Y		
	There were no signed and dated Grievance/Complaint and Opportunities & Obligations forms retained in two participant case files.	N	Y		
	One participant did not have their 590 initial appointment status code selected within two business days of completion of the appointment or have "No show" recorded as required.			N	Y
<b>SNAP E&amp;T Totals</b>		<b>0</b>	<b>2</b>	<b>0</b>	<b>1</b>
WIOA Adult/DW	Documentation outlining the introduction of new technology for a Customized Training activity was missing from two participant case files.	N	Y		
	Documentation of the training gap determination was missing from one participant's case file.	N	Y		
		<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>
WP	Three job seekers' assessments were not documented or were missing one or more of the required elements.	Y	Y		
	One job seeker had inaccurate information recorded on their I-9 and 516 INS forms.	N	Y		
	One job order with multiple hires was missing placement wage verification for each hire recorded.			Y	Y
<b>WP/RESEA</b>	Five job seekers had services recorded in Employ Florida that did not have any staff involvement or no direct contact by staff.			N	Y
<b>WP Totals</b>		<b>1</b>	<b>2</b>	<b>1</b>	<b>2</b>
JVSG	Three veterans did not have a priority of service activity code (089 automated or 189 manual) or a case note recorded in Employ Florida when participation began.	Y	Y		
	The following issues with Veteran Intake and Eligibility were identified:				
	<ul style="list-style-type: none"> <li>One veteran participant was not contacted by a DVOP within the required two-day window period following a Referral for DVOP Services (service code 168).</li> <li>Three veteran participants had intake exceptions, but the exceptions were not identified by the DVOP in the Objective Assessment Summary (OAS) case note that</li> </ul>	Y	Y		

	they were referred to the DVOP by an eligible partner program. There were no other separate case notes identifying that the participant was referred through the VA VRE program or other programs.				
	<p>The following issues with veteran IEPs and case management were identified:</p> <ul style="list-style-type: none"> <li>One participant did not have an IEP (service code 205) recorded in Employ Florida, and another participant was missing the objectives to address identified barriers.</li> <li>Three participants did not have a JVSG service code V04 (Individual Employment Plan Update) recorded within the first 30 days following the initial IEP. Additionally, one participant file did not have required case notes documented in Employ Florida to support the V04 service code entered. Additionally, one participant did not have IEP updates recorded via service code V04.</li> <li>Eight veteran participants had incomplete Employ Florida Objective Assessment Summaries. Three participants' OAS had no employment and/or education history documented in the required location, and five participants' OAS either had "N/A" marked in all summary boxes and/or the fields were left blank.</li> <li>Four participants did not have consistent contact and/or post-employment consistent contact recorded in the system.</li> <li>One veteran participant did not have any consistent pre-employment contacts or attempted contacts documented by use of service code V09.</li> <li>One veteran participant's IEP was missing an objective addressing barriers identified on the OAS.</li> </ul>	N	Y		
	<p>The following issues with service code entry and case management were identified:</p> <ul style="list-style-type: none"> <li>One participant case file was missing case notes for a Work Readiness Case Conference service code (V11) entered in Employ Florida.</li> <li>Two participants were missing documentation to support the Work Experience service code entered (V07) in Employ Florida.</li> <li>Two participants did not have a veteran's advocacy code (E53) recorded on the employer account when a corresponding code (V12) was recorded on the participant activity history/service plan.</li> </ul>	N	Y		
	The experience of four veteran's was not captured to indicate a smooth journey or transition between services and/or departments.			N	Y
<b>JVSG Totals</b>		<b>2</b>	<b>4</b>	<b>0</b>	<b>1</b>
<b>MSFW</b>	The Bradenton significant office did not meet the Equity Ratio Indicators and Minimum Service Level Indicators during the review period.	Y	Y		
	MSFW quality and outreach contact goals were not met.	Y	Y		
	Service codes for MSFW referrals to supportive services were not documented in Employ Florida.	N	Y		
<b>MSFW Totals</b>		<b>2</b>	<b>3</b>	<b>0</b>	<b>0</b>
<b>Results – All Programs</b>		<b>5</b>	<b>14</b>	<b>1</b>	<b>5</b>

## Monitoring Issues By Program PY 2023-2024 CareerSource Suncoast



### **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 questionable 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.

**MONITORING REPORT  
CAREERSOURCE SUNCOAST  
LOCAL WORKFORCE DEVELOPMENT BOARD - 18**

## **I. DESCRIPTION OF MONITORING APPROACH**

### **Review Purpose and Scope**

Monitoring consisted of a programmatic 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 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.

### **Type of Review**

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

### **Compliance Review Abstract Information**

- Programmatic Monitoring Review Dates: March 4, 2024 to March 8, 2024
- Programmatic Monitoring Sample Review Period Dates: January 1, 2023 to December 31, 2023

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

### **Programs Reviewed:**

- Welfare Transition
- Supplemental Nutrition Assistance Program – Employment and Training
- Workforce Innovation and Opportunity Act
- Rapid Response
- Wagner-Peyser
- Jobs for Veterans State Grant
- Any identified special projects operational during the review period
- Migrant and Seasonal Farmworker

### **Monitoring Review Tools**

FloridaCommerce's PY 2023-2024 programmatic monitoring review tools were used to conduct the review. The tools were developed to provide a framework for monitoring activities performed by OSPS staff as well as the criteria used for monitoring.

## II. PROGRAMMATIC MONITORING REVIEW

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

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.

## WELFARE TRANSITION

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

### Finding

#### **Finding WT #18.24.01**

#### **Category: Pre-penalty and Sanction Process**

Condition: Of the 11 case files reviewed of participants with a pre-penalty and/or sanction recorded in OSST, the following issues were identified:

- Two (18.2 percent) participants were erroneously mailed a Failure to Demonstrate Satisfactory Compliance form (WTP-2292) for a second failure in 30 days.
- Two (18.2 percent) participants were not allowed three business days to provide good cause for a second failure in 30 days.
- Penalties and sanctions for one (9.1 percent) participant were not requested or ended timely in the system.

Criteria: FloridaCommerce Welfare Transition Final Guidance policy 03-037 states, in part, that, "If an individual is noncompliant with a work requirement, the LWDB must mail the Notice of Failure to Participate and Possible Sanction Form AWI-WTP 2290 to the individual within two working days after the first failure. The policy also states that a noncompliant participant must be allowed three business days after the date of the second failure to report good cause.

Cause: Sanction issues identified may indicate a lack of staff oversight, training, follow-through, or inadvertent errors by staff.

Effect: Not following appropriate procedures during the penalty process could potentially result in an erroneous sanction being requested which could lead a participant to file a grievance and/or request a fair hearing for a sanction that should not have occurred. Additionally, delaying or not entering penalties and sanctions timely may result in continuing benefits being provided to an ineligible individual that should have been sanctioned. Noncompliance could also affect statewide performance outcomes.

Required Action: CSS must provide documentation showing that CSS staff have case noted the reason(s) why pre-penalty and sanction protocols were not followed. CSS must also provide an assurance that all subsequent pre-penalty and/or sanction requirements will be administered timely and documented and recorded appropriately. Documentation of staff training and written notification to staff informing them of the requirements must also be provided with the CAP.

## Other Noncompliance Issues

### ONI WT #18.24.01

#### Category: Employment Verification

Condition: Of the five participant case files reviewed with an employment activity recorded in OSST, one (20 percent) had employment dates on documents in the case file that did not match the information recorded in OSST.

Criteria: Florida's Work Verification Plan states, in part, that, "LWDB or provider staff must obtain documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. Verification of employment hours or other employment information through employer contact must include the employer's name, date contacted, person talked with and the name of the provider staff person who obtained the verification. Provider staff maintains written verification in the case file." The hour documentation must be entered in the system correctly to ensure requirements are met.

Cause: Lack of follow-through, staff training, inadvertent errors, or simple oversight may be factors associated with noncompliance.

Effect: This data is used for reporting purposes and incorrect data entry impacts the validity of the data being reported which can negatively impact performance. The data entered in the system must be auditable and supported by documentation in the case files.

Required Action: CSS must provide an assurance that staff will thoroughly review each case transaction in the future to ensure employment documentation is received and the data is accurately recorded in OSST to match documentation retained in participant case files. Documentation must also be provided with the CAP that CSS staff reviewed and verified the employment data for the identified participant and efforts have been made to correct the data if the file is still open and active. Documentation of staff training and written notification to staff informing them of the requirements must also be provided with the CAP.

## SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM – EMPLOYMENT AND TRAINING

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

### Findings

#### Finding SNAP #18.24.02

##### Category: Assignment of Activity Hours

Condition: Of the 13 case files reviewed, one (7.69) participant was not assigned to 80 hours in work activities. Federal law and state guidance require participants to be engaged in qualifying components (i.e., education, work experience, job search training, etc.).

Criteria: 7 CFR 273.7(n)(i) and (ii) states, in part, that, “When participating in and complying with the requirements of a work program, individuals must participate in activities no less than 20 hours per week for the purposes of this provision (20 hours a week averaged monthly means 80 hours a month) as determined by the State agency”.

Cause: Insufficient staff training, lack of consistent policies and procedures, or the inadvertent hastiness in completing the engagement process may be causes for incorrect data entry.

Effect: Instances of participants not being assigned to the required number of hours could result in overpayment of food assistance benefits and negatively impact performance.

Required Action: CSS must provide documentation that the case files reflect the correct number of assigned hours or timesheets to support all hours recorded if the case file is still active. CSS must also provide an assurance that going forward, participants will be assigned to the mandatory work requirement of 80 hours per month and that documentation is correct and data is accurately recorded in OSST. Documentation of staff training and written notification to staff informing them of the requirements must be provided with the CAP.

#### **Finding SNAP #18.24.03**

**Category: Grievance/Complaint and Opportunities & Obligations Forms.**

Condition: Of the 18 case files reviewed, two (11.11 percent) participant case files were missing a signed and dated Grievance/Complaint and Opportunities & Obligations form.

Criteria: Section 13 of the CSRC Grantee – Subgrantee Agreement states that, “The Board must ensure grievance procedures and Equal Opportunity forms are represented and consistent with 20 CFR 683.285, are available and made known to staff, participants, and other interested parties in the local workforce development system.” FloridaCommerce Final Guidance 00-004 rev. 06/08/07 further states that, “Grievance/Complaint and Hearing/Appeal Procedures also require certain conditions be undertaken by local boards prior to and while ensuring individuals are aware of the grievance complaint/EOE process.” Additionally, 7 CFR 273.7(c)(1)(ii) 7 CFR 273.7(c)(1)(iii) states, in part, that, “...The State agency must include all applicable work requirements for all members of the household, as well as the individual’s rights and responsibilities.” Verification of this notification is documented by the provision of both forms and signed by the participant.

Cause: Lack of follow-through, staff training, or simple oversight could be causes for not completing the forms and retaining them in the files.

Effect: The inclusion of signed and dated Grievance/Complaint and O&O forms in participant case files is essential to mitigating program risks in instances where a participant may file a complaint, grievance, or request a fair hearing.

Required Action: CSS must provide documentation with the CAP showing that signed copies of the Grievance/Complaint and O&O forms have been obtained and placed in the participant case files if the cases are still open and active. CSS must also provide an assurance that all Grievance/Complaint and O&O forms will be signed and dated at the time of intake and orientation and maintained in the case files in the future. Furthermore, documentation of written notification to staff informing them of the requirements must also be provided with the CAP.

#### **Other Noncompliance Issue**

#### **ONI SNAP #18.24.02**

**Category: Initial Engagement Process**



Condition: Of the 13 case files reviewed where a 590 – appointment setting code was entered in OSST, four (30.8 percent) participants did not have their initial appointment status selected within two business days of completion of the appointment or have “No show” recorded as required. Additionally, two participants did not have the correct appointment status entered in OSST to end the activity.

These are repeat issues and are consistent with the PY 2022-2023 Monitoring Report.

Criteria: FloridaCommerce Memorandum – Supplemental Nutrition Assistance Program Employment and Training Able-Bodied Adults without Dependents Initial Engagement Process Changes dated January 5, 2017, states, in part, that, “SNAP E&T Case Managers are responsible for selecting the appointment status within two business days of completion or a “no-show”.

Cause: Not entering information in the system timely may indicate that insufficient staff training, input errors, or follow-through by staff may be reasons for noncompliance.

Required Action: CSS must provide an assurance that all future initial appointments and status codes (either a 590 or 594) will be entered in OSST within two business days of completion of the appointment or have “No Show” recorded 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 more in-depth monitoring, staff training, and written notification to staff informing them of the requirements.

CSS should consider establishing some type of tickler system to set future alerts such as options in Outlook or use the case “To Do” screen in OSST as a way of reminding or alerting staff of timelines for completing required actions. This helps ensure that a check and balance system is in place to prevent further occurrences.

## OBSERVATION

It was observed during the review that several documents did not include all USDA Food and Nutrition Services guidelines. The SNAP Memorandum issued on Feb 3, 2023, requires changes in procedural processes that include grievance requirements on the Opportunities and Obligations form, revisions to the Self-attestation form to remove the \$25 transportation cap, utilization of the new job search form, and changes in the job search activity as it is no longer a stand-alone component. For future reference, CSS must ensure that staff understand the requirements and implications of these modifications allowing for a more uniform and consistent approach to delivering services across all career centers and avoid any potential findings or other noncompliance issues. The updated Self-Attestation Reimbursement Form is located at the following link: [Self-Attestation Form](#). More information on the revised requirements is located at the following link: [Supplemental Nutrition Assistance Program Employment and Training Updates](#).

## WORKFORCE INNOVATION AND OPPORTUNITY ACT

### WIOA ADULT AND DISLOCATED WORKER PROGRAM

*The sample size consisted of 22 Adult and Dislocated Worker participant case files (14 Adults and eight Dislocated Workers). The following issues were identified:*

## Findings

### Finding WIOA #18.24.04

#### Category: Customized Training (CT) Agreement

Condition: The agreements in the two (100 percent) Adult/DW case files reviewed of participants enrolled in customized training did not specify that the introduction of new technologies, production, and procedures would be required.

Criteria: 20 CFR 680.770 states that, “The customized training relates to the purposes described in [§680.710\(c\)](#) or other appropriate purposes identified by the Local WDB.” FloridaCommerce AP 100 states, in part, that contracts for customized training must include a statement that, “training relates to introducing new technologies, production of service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the Local WDB.”

Cause: Staff oversight or misunderstanding of required contract clauses may have contributed to noncompliance.

Effect: Failure to include all required components in the CT agreement may cause CSS to be out of compliance with CT worksite guidelines which could lead to certain requirements not being fulfilled and possibly questioned costs.

Required Action: CSS must review and make the necessary changes and/or updates to the agreements if the participant case files are still open. An assurance must also be provided that CSS staff have or will review all open CT agreements and take action to amend the agreements to clearly specify all required contract provisions and clauses. A copy of the revised master agreement with all required assurances, prohibitions, and clauses must be provided with the CAP. Documentation of written notification to staff informing them of the requirements including use the same boilerplate agreement in all career centers to ensure consistency must also be provided with the CAP.

### Finding WIOA #18.24.05

#### Category: On-the-Job Training

Condition: Of the four Adult/Dislocated Worker case files reviewed of participants enrolled in an OJT activity, one (25.0 percent) case file did not contain a determination of the participant’s training gaps and training duration.

Criteria: 20 CFR 680.700 (c) states that, “An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's IEP”.

Cause: Staff oversight or lack of training may have contributed to noncompliance.

Effect: Failure to determine appropriate training needs and documentation to support the work-based activity of the participant could eventually lead the participant being placed in training not conducive to overcoming barriers leading to employment and self-sufficiency.

Required Action: CSS must provide documentation supporting that the OJT case file has been updated with the determination of the training duration as well as the participant’s training gap to allow the participant to become proficient in the occupation of the training if the file is still open and active. CSS must also review all open OJT case files to ensure the duration and determination of the training gap is documented and retained in each

participant's case file and provide documentation that this has been done. Documentation of staff training and written notification to staff informing them of the requirements must also be provided with the CAP.

## **OBSERVATION**

Of the 20 Adult/Dislocated Worker case files reviewed of participants enrolled in an education or training program, two (10 percent) did not match the MSG recorded in Employ Florida.

Going forward, 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 in accordance with WIOA Section 116; 20 CFR Part 677.155(a)(v); and TEGL 10-16, Change 1.

If technical assistance or training is needed, CSS should contact the Workforce Training and Coordination unit at [WFSTraining@commerce.fl.gov](mailto:WFSTraining@commerce.fl.gov).

## **WIOA YOUTH PROGRAM**

*The sample size consisted of 13 WIOA Youth Out-of-School participant case files.*

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

## **WIOA SPECIAL PROJECTS**

*The sample size consisted of nine (four Adults and five Dislocated Workers) participant case files from the following special projects: two COVID-19 Public Health Emergency, one Fostering Opioid Recovery DWG, one Commercial Driver's License 2022- STW AD, two Hurricane Ian DWG, and three Rapid Credentialing 2023 – Adult.*

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

## **TRADE ADJUSTMENT ASSISTANCE**

*The sample size consisted of one participant case file. The review did not reveal any Findings, ONIs, or Observations.*

## **RAPID RESPONSE**

*The review did not reveal any Findings or ONIs; however, the following Observations were noted:*

## **OBSERVATIONS**

- Rapid Response informational material distributed to affected workers did not include information and support for filling out unemployment insurance claims, the impact of layoff on health coverage or other benefits, and referral to available workforce services and community resources. CSS must ensure informational material identified under the provision of information is developed and ready for distribution upon notification of a permanent business closure, mass layoff, natural or other disaster, or the filing of a Trade Adjustment Assistance petition.

- Informational material distributed to employers did not address the needs of businesses in transition across the business lifecycle to include comprehensive business engagement and layoff aversion strategies and activities designed to prevent or minimize the duration of unemployment. CSS must ensure employers receive informational material throughout the business lifecycle to prevent potential business closures and to minimize the duration of unemployment for affected workers. CSS must also be mindful that a variety of pre-planned layoff aversion strategies will maximize their ability to deploy the appropriate solution for the various challenges faced by employers and their employees.
- CSS did not provide documentation to support the development of a local Early Warning Network system and notification process for the purpose of establishing quick alerts of potential dislocations and impending needs of employers and affected workers. CSS must ensure an early warning network system is developed and includes internal and external partners. It is also recommended that language is added to the local Rapid Response policy/procedure describing the design of their Early Warning Network system and the notification process.
- CSS did not provide documentation to verify the most current Rapid Response event resulting from the issuance of a Worker Adjustment and Retraining Notification (WARN) received from FloridaCommerce. CSS must ensure documentation is maintained to support the date in which the Rapid Response event took place, the event attendee list, and any case notes identifying the employer's plan of action.
- A list of partnerships with chief elected officials was not provided to support the required partnerships. CSS must ensure partnerships with chief elected officials are developed to ensure a coordinated response to potential dislocation events and as needed, to obtain access to State or local economic development assistance.
- A list of emergency assistance partnerships was not provided to verify CSS's ability to provide emergency assistance to dislocated workers and their families. CSS must ensure a list of emergency assistance partnerships is developed to include a description of the role for each partner.
- CSS did not provide a strategy or plan that maximizes the role of the Rapid Response program regarding continued repeat business and business penetration accountability measures under the Reimagining Education and Career Help (REACH) Act. CSS must ensure that a strategy is developed to enhance alignment and accountability for serving businesses more effectively.

## 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:*

### Findings

#### Finding WP #18.24.06

##### Category: Assessments

Condition: Of the 17 job seeker assessments recorded in Employ Florida, two (11.8 percent) did not have documentation in the files to support the service recorded. Additionally, one (5.9 percent) assessment was missing documentation of work history and education.

These are repeat issues and are consistent with the PY 2022-2023 Monitoring Report.

Criteria: The Employ Florida Service Code Guide requirements for the entry of the code for assessments, states that, “A case note is required and must record results of the assessment, to include the date of the IA [Initial Assessment] and everything listed in the definition.”

Cause: Frequently identified causes for noncompliance may be associated with incorrect recording and retention of documents, lack of recognition of individual program requirements when co-enrolled in more than one program, and a lack of staff training.

Effect: Absence of a complete assessment reduces staff’s ability to work effectively and efficiently with participants in delivering services, tracking employability goals, and determining what participants are required to do to attain their occupational goals.

Required Action: CSS must provide documentation of their attempt to document the assessments with all required elements if the case files are still open and active. Additionally, CSS must provide an assurance that staff will review all future assessment codes recorded in Employ Florida for open WP job seekers to ensure case notes have been recorded, required elements are individualized to the participant, and documentation has been retained identifying all required elements of the service(s) provided. 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.

#### **Finding WP #18.24.07**

##### **Category: Forms I-9 and 516 INS Documentation**

Condition: Of the five job seekers with an I-9 service entered in Employ Florida (service code 100 – Validate I-9), one (20 percent) participant’s Form I-9 did not match the documentation used to support completion of the Form I-9. Additionally, information on the Form 516 INS did not match the information on the Form I-9.

Criteria: U.S. Citizen and Immigration Service Instructions for the Form I-9 - Employment Eligibility Verification (Form OMB No. 1615-0047) provides direction for completion of the Form I-9 which states that, “You, the employer or authorized representative, must either physically examine, or examine consistent with an alternative procedure authorized by the Secretary of DHS, the original, acceptable, and unexpired documentation the employee presents from the Lists of Acceptable Documents to complete the applicable document fields in Section 2.” Additionally, FloridaCommerce FG 071 states that, “Once the Form I-9 has been completed on a work eligible job applicant, the One-Stop Career Center staff should complete the top portion of the Form 516 INS to include the employer’s name and address; the date of issuance; the applicant’s personal information; the job order number and position applied for; the 3 document(s) presented to verify employment eligibility; the identifying number of the document(s); the staff’s name and signature; the workforce board; name and location of One-Stop Career Center and the date.

Cause: Inadequate staff training on completion and verification of the Form I-9 and Form 516 INS, as well as staff transcription errors may have been causal factors for noncompliance.

Effect: I-9 and 516 INS forms must be properly completed to comply with federal requirements and state guidance. Absence of information or mishandling of these forms could result in a potential fine for noncompliance.

Required Action: CSS must provide an assurance that staff will review and monitor the proper completion of I-9 and 516 INS forms to ensure the forms are complete, accurate, and follow all requirements of federal and state guidance. CSS must also provide documentation of efforts to identify and verify inaccurate information and retain any amendments of the I-9/516 INS forms as necessary and allowed. A plan or process for preventing a recurrence

of this issue in the future including staff training and written notification to staff on I-9 requirements and processes must also be provided with the CAP.

#### Other Noncompliance Issue

##### ONI WP #18.24.03

##### Category: Placement Wage Rate Verification

Condition: Of the 10 job seeker files reviewed with placements, one (10 percent) job order with multiple hires documented on the job order, did not include individual case notes of the placements or corresponding wage rates for some job seekers.

Criteria: CareerSource Florida AP 099 IV(A)(6) states, in part, that, “In the case of multiple positions being filled on one job order, staff should enter a case note for each hired customer stating their name and the wage at which he/she was hired.”

Cause: Lack of staff training on recording placements on job orders and separation of data entry and verification of placements may have been factors leading to noncompliance.

Effect: Noncompliance with placement guidelines has an impact on performance reporting (Monthly Management Report and other staff reports), as well as erroneous information being recorded in the system if obtained employments are not valid.

Required Action: CSS must provide documentation of the efforts taken to identify the additional placements and wages on the job order if the job order is still open and available. CSS must also provide assurances that all future job orders with multiple job seeker placements will have the wages and individuals placed, recorded in a case note on the job order. CSS must 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.

#### OBSERVATION

During the review of a Private Employment/Staffing agency job order entered in Employ Florida, the monitor noted that the job order was missing specific required language. The employer had multiple accounts entered in the system, some of which indicated a Private Employment/Staffing agency and others that indicated other industry classifications. The LWDB indicated the multiple employer types provided a level of uncertainty in the identification of the type of employer the job order was for. In the future, the LWDB should practice due diligence during the job order verification process, up to and including contacting the employer for verification of employer type and the job order if there are multiple types of employer accounts with different industry sector identifiers in the system.

#### 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 RESEA participant case files. The following issue was identified:***

## Other Noncompliance Issue

### ONI RESEA #18.24.04

#### Category: WP Job Seeker Services and Activities

Condition: Of the 25 job seekers reviewed (20 WP and five RESEA), five (20 percent) had services (code 156 – Soft Skills Workshop) recorded in Employ Florida that did not meet the requirements of a staff-assisted service. The virtual workshop was self-service learning and the case notes indicated it was an information-only activity. CSS staff involvement was extremely limited and only consisted of the referral to the site and possibly validating completion of the workshop. Documentation to support further direct staff contact was not made available.

Criteria: CareerSource Florida AP 115 states that, “Self-service, information-only services or activities, and follow-up services do not delay, postpone, or affect the date of exit. The management of participant services includes regular, direct contact with the participant on all aspects of their workforce development needs.” The Administrative Policy goes on to state that, “Contact where the participant does not engage will not be considered direct and must not result in a participating service being recorded in Employ Florida. An offer to provide a service or a scheduled appointment to provide a service must only be entered as a case note or nonparticipating service, as appropriate.”

Cause: Lack of specific staff training on the required elements to be recorded for the service(s) entered in the state MIS may have led to noncompliance.

Effect: Errant, undocumented, or non-staff assisted services provided to job seekers which prolong participation will result in inaccurate reporting of state and federal performance numbers and could also lead to inflated participation numbers and fraudulent claiming of placements or services.

Required Action: CSS must provide an assurance that staff will review and monitor entry of all WP job seeker services in Employ Florida to ensure the services provided fit the description of the service code(s) recorded, are adequately documented, and are services that extend participation. CSS must also provide an assurance that program staff will provide a staff-assisted service in line with administrative policy that has direct staff contact and/or communication with the participants’ post-attendance in the online event. A plan or process for preventing a recurrence of this issue in the future including staff training and routine monitoring of service codes recorded for job seeker must also be included with the CAP.

## CAREER CENTER CREDENTIALING

The career center credentialing review focused on ensuring administrative requirements and records were posted and maintained, and 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 and 15 employer files.***

***The following issues were identified:***

## Findings

### Finding JVSG #18.24.08

#### Category: Veteran Priority of Service

Condition: Of the 15 veteran case files reviewed, two (13.3 percent) did not have a POS code (089 automated or 189 manual) or a case note recorded in Employ Florida when participation began.

This is a repeat issue and is consistent with the PY 2022-2023 Monitoring Report.

Criteria: CareerSource Florida AP 111 Section IV.D states, in part, “When a covered person self identifies at the point of registration in Employ Florida, the system automatically generates a service code 089 (Automated Veteran Priority of Service Notification) on the participant’s Wagner-Peyser Program Application.” Additionally, the section further states that, “In instances where a covered person does not self-identify at registration, but is later determined to be eligible, staff must ensure the covered person is provided information regarding their priority of service rights and document this staff-assisted service through Employ Florida service code 189 (Notification of Veteran Priority of Service) and include the appropriate documentation/case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.”

Cause: Lack of staff monitoring and oversight of priority of service code entry into the Employ Florida activity history and staff training regarding priority of service recording are factors that may have led to noncompliance.

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

Required Action: CSS must provide documentation that staff have made or initiated contact to verify veteran status and ensure POS was provided if the cases are still open and 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 code is present. An assurance must also be provided with the CAP that all requirements for determining POS for veterans will be met in the future. 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 more in-depth monitoring, documentation of training to front-line staff to ensure they understand to always record the POS activity code during the screening process and prior to DVOP referral (if applicable), as well as written notification to staff informing them of the requirements.

### Finding JVSG #189.24.09

#### Category: Veteran Intake and Eligibility

Condition: Of the 15 veteran cases reviewed, the following issues were identified:

- One (6.7 percent) veteran participant was not contacted by a DVOP within the required two-day window period following a Referral for DVOP Services (service code 168).
- Three (20 percent) veteran participants had intake exceptions, but the exceptions were not identified by the DVOP in the Objective Assessment Summary (OAS) case note that they were referred to the DVOP by an eligible partner program. There were no other separate case notes identifying that the participant was referred through the VA VRE program or other programs.

These are repeat issues and are consistent with the PY 2022-2023 Monitoring Report.



Criteria: CareerSource Florida AP 117 Section IV.D.3 states that, “The DVOP specialist who receives the referral must attempt to contact the eligible veteran or person within two (2) business days of receipt of the referral.” CareerSource Florida AP 102 Section IV.D also outlines exceptions for the intake process and identifying veterans via outreach and referrals.

Cause: Lack of staff training in the required collection and documentation of information at the initial veteran intake as well as the requirements of follow-up could be factors for noncompliance.

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

Required Action: CSS must ensure DVOPs are contacting SBE veterans or eligible spouses within two business days following a referral. If there is no possible way for DVOP to follow up within two business days or a delay occurred, the DVOP is responsible for recording a case note with an explanation as to the delay. Additionally, CSS must provide documentation via case notes or an indication within the overall note on the OAS if a participant is referred to the DVOP by an eligible partner program. CSS must also provide an assurance that DVOPs will include this information within the overall note on the OAS and all elements of the objective assessment will be completed using the Employ Florida Objective Assessment Summary. Because these are repeat issues, CSS must reevaluate the cause and provide a plan of action or process with the CAP for preventing a recurrence in the future including more in-depth monitoring, documentation of staff training, and written notification to staff informing them of the requirements.

#### **Finding JVSG #18.24.10**

##### **Category: Veteran Individual Employment Plans (IEP) and Case Management**

Condition: Of the 15 veteran case files reviewed, the following issues were identified:

- One (6.7 percent) veteran participant did not have an Individual Employment Plan (service code 205) recorded in Employ Florida using the Employ Florida Individual Employment Plan/Service Strategy wizard.
- Three (20 percent) veteran participants did not have a JVSG – Individual Employment Plan Update (service code V04) recorded within the first 30 days following the initial IEP. Additionally, one participant did not have required case notes documented in Employ Florida to support the V04 service code entered.
- Eight (53.3 percent) veteran participants had incomplete Employ Florida Objective Assessment Summaries. Three (20 percent) participants’ OAS had no employment and/or education history documented in the required location. Additionally, five (62.5 percent) participants’ OAS either had “N/A” marked in all summary boxes and/or the fields were left blank.
- Four (26.7 percent) veteran participants who had a case closure to employment did not receive service code V13 documenting Post-Employment Consistent Contact.
- One (6.7 percent) veteran participant did not have any consistent pre-employment contacts or attempted contacts documented by use of service code V09.
- One (6.7 percent) veteran participant’s IEP was missing an objective addressing barriers identified on the OAS.

Criteria: CareerSource Florida AP 117 Section IV.B.4.a states that, “The IEP must be created using the Employ Florida IEP/Service Strategy wizard.” CareerSource Florida AP 117 Section IV.B.4.c further states that, “At a minimum, the IEP must be reviewed with the participant every 30 days to ensure the participant’s progress in completing objectives. The IEP must be amended, as appropriate when additional needs are identified or objectives are achieved”. AP 117 also states that, “Successful consistent contact must be recorded by service code V09 (JVSG – Consistent Contact) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.” CSS staff must also include an overall note (located on the Objective

Assessment Summary General tab) that includes the Significant Barrier to Employment (SBE) or Special Population Group which affirms the participants eligibility for DVOP specialist services.

Cause: Lack of staff training in the collection of the required elements during the objective assessment process, as well as a lack of familiarity on the use of the Employ Florida Objective Assessment Wizard could be factors for noncompliance. Also, failure to schedule, regularly review, calendar, and record necessary veteran file IEPs and adjustments, as well as follow-through on code entry into Employ Florida may also be cause for noncompliance.

Effect: Failure to complete the assessment and properly develop the employment plan can result in staff's inability to work effectively and efficiently with participants and may also have an impact on veteran service delivery and performance which may result in a negative federal review of the Veterans Program.

Required Action: CSS must provide an assurance that DVOP staff will review and ensure that all subsequent IEPs will be updated within 30 days of creation and, at a minimum, every 30 days thereafter and that case notes will be recorded identifying all contact and required elements of the service(s) provided. The updates to the IEP must be recorded by service code V04 (JVSG – Individual Employment Plan Update) and include a case note that describes the updates made to the employment plan (e.g., objective added/completed, additions to goal/objective description, etc.). CSS must further ensure that DVOPs address all barriers identified in the participant's OAS on the IEP and further ensure DVOPs are maintaining consistent contact regarding the participant's IEP and documenting updates, closures, and additions based on the participant's needs utilizing the service code V04. Because of the number of instances identified, a plan of action or process for preventing a recurrence of this issue in the future must also be provided with the CAP including staff training and written notification to staff informing them of the requirements.

#### **Finding JVSG #18.24.11**

##### **Category: Service/Activity Code Use and Entry**

Condition: Of the 15 veteran case files reviewed, the following issues were noted:

- One (6.7 percent) veteran participant case note documentation for Activity Code V11, Work Readiness Case Conference, was missing required information.
- Two (13.3 percent) veteran participant case files were missing case note documentation to support the Work Experience service code V07 entered in Employ Florida.
- Two (13.3 percent) veteran participants did not have a corresponding E53 – Veteran Advocacy service code recorded on the employer account for each V12 code recorded on the participant activity history/service plan.

Criteria: Employ Florida Service Code Guide states that, "A case note attached to the service code is required and must include the following elements: meeting type (e.g., virtual or in-person), date, time, the name of the LVER referred to, and details pertaining to the discussion points that led to the decision of why the participant was deemed work ready." Additionally, for Service Code V07, "A case note attached to the service code is required and must include how the participant's employment goal is related to the work experience opportunity and which work experience program the participant was placed in." Furthermore, CareerSource Florida AP 117 Section I.(D.2 states that, "The V12 (Veteran Advocacy Contact) and E53 (Veteran Advocacy) are complementary service codes that are required for documenting individual advocacy attempts. There should be a corresponding number between both services for LVER staff."

Cause: Staff oversight and complacency with use of repetitive service codes without reviewing required documentation and proper staff training could be factors for noncompliance.

Effect: Absence of a regular review of a veteran's IEP and subsequent progress reduces staff's ability to work effectively and efficiently with veterans in delivering services, tracking employability goals, completion of

objectives, and determining what additional steps the veteran is required to do to attain their goals. Additionally, use of incorrect service codes may lead to inaccurate or invalid state or federal reporting requirements.

Required Action: CSS must provide assurance that DVOPs document the required elements within the V11 case notes to include date, time, location and salary expectation that determined work readiness of the participant. CSS must also ensure DVOPs are properly documenting services provided as outlined in reference material. CSS must further ensure that LVERs are providing proper documentation in case notes when advocating for veterans to include employer name, position title, date of contact and veteran name, and that LVERs are recording and documenting both veteran and employer profiles for veteran advocacy. CSS must also ensure that DVOPs are providing and documenting post-employment consistent contact to participants that have been closed to employment.

#### Other Noncompliance Issue

##### ONI JVSG #18.24.05

##### Category: Veteran Experience

Condition: Of the 15 veteran case files reviewed, four (26.7 percent) veteran participant's experience was not captured to indicate a smooth journey or transition between services and/or departments.

Criteria: CareerSource Florida AP 102 Section IV.B states that, "Individuals determined eligible for DVOP specialist services must immediately be referred to a DVOP specialist. Individuals who are not found to be eligible must be provided services by the first available qualified and appropriate career center staff member. In instances where a DVOP specialist is not available, individuals who would normally be served by DVOP specialists must be served by the next available qualified and appropriate career center staff member. Services to SBE and special population veterans must not be delayed or postponed due to the unavailability of a DVOP specialist."

Cause: Staff oversight and improper staff training in the required collection and documentation at an initial veteran intake, as well as the requirements of follow-up, could be factors for noncompliance.

Effect: The veteran's experience must consist of a seamless, well-documented journey from beginning to end. This is for the benefit of the veteran, staff members working with the veteran, and state and federal monitors. Noncompliance may lead to veteran complaints, negative results of federal audits, and inaccurate or invalid state or federal reporting.

Required Action: CSS must provide an assurance that all staff working with a DVOP eligible veteran or spouse must ensure that service codes and all accompanying case note documentation are used correctly and in compliance with the Employ Florida Service Code Guide, identifying a seamless transition between departments and services received. Furthermore, veterans that are referred by partner agencies must be documented via a separate case note to identify the individual's origin for receiving DVOP services. CSS must also provide documentation of staff training and written notification to staff informing them of the requirements.

#### COMPLAINT SYSTEM

*The sample size consisted of 48 complaint logs. The review did not reveal any Findings, ONIs, or Observations.*

## MIGRANT AND SEASONAL FARMWORKER PROGRAM

The MSFW review focused on compliance with the 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 significant career center's review was conducted remotely. The SMA conducted a 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. The outreach staff position is filled with a bilingual staff person who is familiar with the farmworker community, knowledgeable of farmworker services and activities, and performs job duties properly. However, the following issue was identified during the management and operational review:

*The following issues were identified during the management and operational review:*

### Findings

#### Finding MSFW #18.24.12

##### Category: Service Level Indicators Report

Condition: The Bradenton Significant Career Center did not meet four Equity Ratio Indicators and two Minimum Service Level Indicators during the review period as indicated on the MSFW Service Level Indicators Report. The Equity Ratio Indicators not met were, received staff-assisted career guidance services, referred to federal training, received individualized career services, and staff-assisted job search activities. The Minimum Service Level Indicators not met were median earnings of individuals in unsubsidized employment, and individuals placed in a job.

These are repeat issues and are consistent with the PY 2022-2023 Monitoring Report.

Criteria: In accordance with 20 CFR 653.100(a), all services of the workforce development system must be made available to all job seekers in an equitable and nondiscriminatory fashion. MSFWs must receive services on a basis which is qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWs. The United States Department of Labor (USDOL) established compliance levels for the minimum service level indicators and equity ratio indicators that must be met for comparison of services provided to MSFWs and non-MSFWs. The eight equity ratio indicators that address the provision of ES services must be met by all career centers. Significant MSFW career centers must also meet the minimum service level indicators, which include, at a minimum, individuals placed in a job, median earnings of individuals in unsubsidized employment, individuals placed in long term (150 days or more) non-agricultural jobs, as well as the 40 MSFW outreach contacts per week.

Cause: Lack of proper documentation, lack of staff training, and a lack of sufficient local operating procedures could be factors for noncompliance.

Effect: This data is used for reporting purposes and unmet indicators impact federal performance reporting for the State and LWDB. Additionally, not providing MSFWs with all the workforce development system services as provided to non-MSFWs may lead a MSFW to file an ES complaint against the State and LWDB.

Required Action: CSS must provide documentation to support efforts made by staff to refer and place MSFWs in jobs including long term non-agricultural jobs, as well as monitoring the MSFW Service Level Indicators Report regularly to identify service gaps to ensure compliance. The documentation must include an assurance that outreach staff will conduct especially vigorous outreach, including follow-up activities to the majority of MSFWs, on a full-time, year-round basis. Because this is a repeat issue, CSS must reevaluate the cause (e.g., lack of specific guidelines for staff to follow, whether the errors made are common to specific program staff, lack of follow-up, etc.) and provide a plan of action or process with the CAP including documentation of staff training and written notification to staff informing them of the requirements, as well as internal controls that will be put in place to prevent a recurrence of these issues in the future.

#### **Finding MSFW #18.24.13**

##### **Category: Outreach Services to MSFWs**

Condition: A review of CSS's Outreach Services to MSFWs Reports revealed that CSS did not meet the quality and MSFW outreach contact goal requirements during the review period. Additionally, outreach staff did not conduct especially vigorous outreach activities during the review period.

These are repeat issues and are consistent with the PY 2022-2023 Monitoring Report.

Criteria: 20 CFR 653.107(b) describes outreach staff responsibilities. Outreach staff must be employed full-time, year-round to conduct especially vigorous outreach activities to contact the majority of MSFWs in the service area. Outreach staff must locate and contact MSFWs who are not being reached by normal intake activities conducted at the career center. Outreach staff must conduct 40 MSFW contacts per week and five MSFW quality contacts per day. Outreach staff must also maintain complete records of their contacts with MSFWs and the outreach activities and services they perform. These records must include a daily log, a copy of which must be sent monthly to the Career Center Manager and FloridaCommerce and maintained on file for at least three years.

Cause: Lack of training or limited understanding of outreach staff duties and responsibilities may be causes for noncompliance.

Effect: These issues impact MSFW service delivery and performance reporting. They also limit job and training opportunities and can lead to possible farmworker civil rights violations.

Required Action: CSS must provide documentation of the efforts the significant career center staff will take to meet the MSFW quality and outreach contact goal requirements. Because this is a repeat issue, CSS must reevaluate the cause of continuing problems and provide a plan of action with the CAP including the routine review of MSFW Outreach Services Reports and written notification to outreach staff informing them of these requirements. The plan must also include documentation of staff training and other process controls that will be put in place for locating and contacting the majority of MSFWs outside of the significant career center to prevent a recurrence of this issue in the future.

#### **Finding MSFW #18.24.14**

##### **Category: Applications**

Condition: Employ Florida service codes for MSFW referrals to supportive services were not documented in Employ Florida.

Criteria: CareerSource Florida Administrative Policy 03-040 states that, “Service codes must be recorded by career center staff in Employ Florida to document services provided to MSFWs”.

Cause: Lack of sufficient staff training or limited understanding of the referral process could be a factor for noncompliance.

Effect: This issue impacts MSFW service delivery and performance reporting. They may also limit job and training opportunities, and lead to possible farmworker civil rights violations.

Required Action: CSS must provide an assurance that staff will review all MSFW applications recorded subsequent to the review and ensure applications contain all necessary requirements including referral to supportive services. CSS must provide a plan of action or process with the CAP for preventing a recurrence of the issues in the future including more in-depth monitoring, documentation of staff training, and written notification to staff informing them of the requirements.

### III. 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 Florida FG-075.

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

### IV. 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.***

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

### VI. MANAGEMENT INFORMATION SYSTEMS

The MIS security check focused on the effectiveness of the CSS’s information security controls and whether business processes and policies are in place that protect FloridaCommerce’s information system data and 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.***

## VII. TRAINING AND TECHNICAL ASSISTANCE

Although technical assistance was provided during the review, the program area will begin proactive outreach to CSE to provide program specific training and technical assistance on documentation requirements, understanding expectations, and positive practices to help alleviate or address issues such as those identified in the report. Training will be coordinated with OSPS's training unit as part of their annual training plan. However, any questions or if immediate training or technical assistance in any of the program review areas is needed, CSE should contact the respective OSPS units at the following email addresses or by sending a [Training Request Form](#) to [WFSTraining@commerce.fl.gov](mailto:WFSTraining@commerce.fl.gov).

- 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)
- Rapid Response – [RapidResponse@commerce.fl.gov](mailto:RapidResponse@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)

## CORRECTIVE ACTION PLAN REQUIREMENTS

A CAP is required to address how CSS will correct any programmatic findings and ONIs identified in the report. For the noted deficiencies, corrective 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 to improve the quality and integrity of the data collected.

## VIII. ENTRANCE AND EXIT CONFERENCE ATTENDEES

A programmatic entrance conference with CSS staff was conducted on March 4, 2024, and the programmatic exit conference was conducted on March 8, 2024. The entrance/exit conference attendees are listed below:

NAME	Agency	Entrance Conference	Exit Conference
Matrecia Bryant	FloridaCommerce (Review Lead)	x	x
Terry Wester-Johnson	FloridaCommerce	x	x
Vincent Lynn	FloridaCommerce	x	x
Alyssa Raulerson	FloridaCommerce	x	x
Andy Windsor	FloridaCommerce	x	x
Yolanda Garcia	FloridaCommerce	x	x
Sanchez Emanuel	FloridaCommerce	x	x
Katina Williams	FloridaCommerce	x	x
Carol Booth	FloridaCommerce	x	x
Barbara Walker	FloridaCommerce	x	x
Raymond Isham	FloridaCommerce	x	x

Mily Hardin	FloridaCommerce	x	x
Mary Beth Allegood	FloridaCommerce	x	x
Jill Lanier	FloridaCommerce	x	x
Minerva Figueroa	FloridaCommerce	x	x
Joshua Matlock	CSS	x	x
Robin Dawson	CSS	x	
Anthony Gagliano	CSS	x	x
Deborah Lee	CSS	x	x
Sean Zubyk	CSS	x	x
Shona Taylor	CSS	x	x
Alicia Cruz-Otero	CSS	x	x
Karima Habity	CSS	x	
Kathy Bouchard	CSS	x	
Christina Witt	CSS	x	x
Eddie Fernandez	CSS	x	x
Linda Benedict	CSS	x	x
Michael Meerman	CSS	x	x
James Disbro	CSS		x
Denisse Miranda	CSS		x
Gary Dhamsania	CSS		x
Michelle Snyder	CSS		x





# STAFF REPORTS

- Kathy Bouchard, CTO
- Anthony Gagliano, COO