



BOARD POLICY

**POLICY
NUMBER 100-25**

Title:	Career Advancement Program (CAP) Work Activities		
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I. OF INTEREST TO

This policy is of interest to American Job Center's (AJC's) that are responsible for engaging non-exempt recipients of Temporary Cash Assistance in required work activities.

II. PURPOSE AND SCOPE

CareerSource South Florida (CSSF) is mandated to fulfill the requirements of the Temporary Assistance to Needy Families (TANF) Program by requiring that non-exempt recipients of Temporary Cash Assistance (TCA) work or be engaged in work activities and participate for a minimum number of hours per month as a condition of receiving ongoing TCA.

The purpose of the TANF Program is to provide assistance to needy families. Florida has two definitions for "needy":

- a. The first definition applies to a family applying to receive Temporary Cash Assistance for on-going basic needs. Needy families with a gross income at or below 185% of the federal poverty level are eligible to receive TCA.
- b. The second applies to families seeking eligibility for a non-assistance service or activity. Needy families with a gross income at or below 200% of the federal poverty level are eligible for TANF non-assistance services.

III. BACKGROUND

The October 1996 Federal Act: [The Personal Responsibility and Work Opportunity Reconciliation Act \(PRWORA\), Public Law 104-193](#), eliminated the open-ended federal entitlement program, Aid to Families with Dependent Children (AFDC), and replaced it with the Temporary Assistance for Needy Families (TANF) welfare program. The TANF program changed the nation's welfare system from the receipt of cash assistance as an entitlement to one that requires work in exchange for time-limited assistance.

Federal law requires that all regions within the State of Florida meet a specified participation rate each fiscal year in order to receive full federal TANF funding. In order to meet the work participation rate, each work-eligible individual must be engaged in a

countable work activity for at least the minimum number of hours required per week, averaged over the month.

The Deficit Reduction Act (DRA), 2005, Public Law 109-171, includes provisions to reauthorize TANF. It directs Secretary of Health and Human Services (HHS) to publish regulations to ensure consistent measurement of work participation rates, define work activities requirements, determine how to count and verify reportable hours and determines who is work-eligible.

The Interim Final Regulations, 2006 implements the statutory changes enacted in the reauthorization of the Temporary Assistance for Needy Families (TANF) program in the Deficit Reduction Act of 2005.

The Final Regulations, 2008 implements changes to the Temporary Assistance for the Temporary Assistance for Needy Families (TANF) program required by the Deficit Reduction Act of 2005.

IV. STATUTORY AUTHORITIES

[Florida Administrative Code 65A-4 – Temporary Cash Assistance](#)
[Florida Statutes Chapter 414 – Family Self Sufficiency](#)
[Florida Statutes Statutes 445 Sec. 024 – Workforce Services](#)
[Personal Responsibility and Work Opportunity Reconciliation Act of 1996, \(PRWORA\)](#)
[TANF Work Verification Plan, 2012](#)

V. DEFINITIONS

- a. **Career Advancement Program (CAP)** *formerly Welfare Transition (WT)*: Workforce services provided to applicants of TCA, and current or former recipients of TCA.
- b. **Deferred**: Referred by the Department of Children and Families for mandatory participation but it is determined that barriers exist that would temporarily impede the ability to comply.
- c. **Domestic Violence**: Any assault, aggravated assault, battery, aggravated battery, sexual assault, sexual battery, stalking, aggravated stalking, kidnapping, false imprisonment, or any criminal offense that results in the physical injury or death of one family or household member by another.
- d. **Participant**: An individual who has applied for and receives Temporary Cash Assistance, or for non-assistance TANF programs, a participant is a person determined eligible and enrolled based on the TANF purpose served.
- e. **Public assistance**: Benefits paid based on the Temporary Cash Assistance, food assistance, Medicaid, or optional state supplementation programs.
- f. **Temporary Cash Assistance**: Cash assistance provided under the state program certified under Title IV-A of the Social Security Act, as amended.

- g. Good Cause:** Florida defines “good cause for failure to comply with work or alternative requirement activities” as the temporary inability to participate due to circumstances beyond the participant’s control. Good cause reasons include, but are not limited, to the following: hospitalization, medical emergency, or death of an immediate family member; natural disaster; court appearance; temporarily caring for a disabled family member when the participant provided verification of the need for care and alternative care is not available; or domestic violence.

VI. POLICY

a. Work Registration

- i. Individuals who apply for TCA and are not exempt must complete the work registration process as a condition of eligibility for TCA. F.S. 414.095 requires that an individual must meet certain eligibility requirements before receiving services or TCA, except that a participant shall be required to register to work and engage in work activities in accordance with F.S. 445.024.

As part of the work registration process, participants will receive an overview of the Career Advancement Program (CAP), their opportunities and responsibilities, and a complete assessment of their needs. In the event the One Stop Service Tracking (OSST) System is not functioning, AJC staff must result to a manual process in order to assist client with completing work registration. Once the applicant has completed the work registration process DCF refers the work-eligible applicant to the American Job Center (AJC) for mandatory participation.

Work-eligible individuals mean an adult (or minor child head-of-household) receiving assistance under TANF or a separate state program or a non-recipient parent living with a child receiving such assistance (usually a child-only case) unless the parent is:

- 1. A minor parent and not the head-of-household or spouse of the head-of household;
 - 2. An alien who is ineligible to receive assistance due to his or her immigration status;
 - 3. On a case-by-case basis, a recipient of Supplemental Security Income (SSI) benefits; and
 - 4. A parent providing care for a disabled family member living in the home, who does not attend school on a full-time basis, provided that the need for such care is supported by medical documentation.
- ii. **Co-enrollment into Wagner Peyser (WP) and Workforce Innovation Opportunity Act (WIOA)**

Non-Exempt recipients for cash assistance that are referred to the CAP must be co-enrolled into Wagner Peyser (WP) and WIOA. If a participant is temporarily deferred from participation at the time of referral the participant shall be co-enrolled on the deferral end date.

iii. Intake Assessments & CLIFF

Immediately upon completion of Work Registration, AJC designees shall perform intake assessments, and Career Identifier and Financial Forecaster (CLIFF) for each participant in order to determine the participant's skills, aptitudes, interests, barriers to self-sufficiency, and most appropriate work activity. Intake Assessments include:

1. Intake Assessments conducted via Systems designated by the SFWIB.
2. Budget Wizard
3. CLIFF
4. IRP
5. Learning Needs

iv. Individual Responsibility Plan (IRP)

A plan must be developed for each participant within thirty (30) calendar days of a new, re-open, reassigned or end applicant case alert. It shall be jointly developed with AJC designee and the participant. Career goals, objectives and plan steps shall be developed based upon work registration needs assessment results and any additional assessments of the participant's skills, work history or employability.

Note: The initial assessments and CLIFF must be initiated within 10 calendar days for each participant. This process must be completed within 30 days of a new, re-open, reassigned or end applicant case alert.

b. Families

i. Types of Families

1. Single Custodial Parent with a Child age 5 and under
2. Single Custodial Parent with a child 6 and older
3. Two-Parent Family not receiving federally funded childcare
4. Two-Parent Family receiving federally funded childcare
5. Two-Parent Minor Heads of Household

ii. **Participation Hours by Families**

Families	Minimum Monthly Required Hours	Minimum Monthly Core Hours
Single Custodial Parent with a Child age 5 and under	87	87
Single Custodial Parent with a child 6 and older	130	87
Two-Parent Family NOT receiving federally funded childcare	152	130
Two-Parent Family receiving federally funded childcare	252	217
Two-Parent Minor Heads of Household (Note: all work activities are core activities)	87	87

1. **Single Parent with a child age 5 and under** (Public Assistance–PA)
 - a. Each participant shall be required to participate in a work activity for a minimum of 87 hours per month in which 87 hours must be in a core activity.
2. **Single Parent with a child age 6 and older** (Public Assistance–PA)
 - a. Each participant shall be required to participate in a work activity for a minimum of 130 hours per month in which 87 hours must be in a core activity.
3. **Two-Parent** (Unemployed Parent-UP)
 - a. If the family is not receiving subsidized childcare, the family shall be required to participate in a work activity for a minimum of 152 hours per month in which 130 of the required hours must be in a core activity. If one parent is unable to participate they may be assigned to a non-countable activity.

- i. The assignment of non-countable activity should be employed to support families in addressing goals or overcoming barriers that cannot be resolved through participation in a countable activity. Childcare services shall not be provided to families in which one parent is engaged solely in a non-countable activity. Career advisors are responsible for monitoring and enforcing adherence to this policy.
 - ii. An Alternative Responsibility Plan (ARP) must be created for the parent in a two-parent family who has been assigned to a non-countable activity. The ARP should clearly define the participants status and outline the specific steps they are required to complete during the time placed in their activity.
- b. If the family is receiving subsidized childcare and neither parent is disabled, the family shall be required to participate in a work activity for a minimum of 252 hours per month in which 217 of the required hours must be in a core activity.

4. Minor Head of Household (Teen Parent -TP)

- a. A Two Parent family head of household under the age of 20 must be engaged in a work activity for a minimum of 87 hours per month. Both parents must participate in a work activity for the monthly minimum number of hours in order for hours to count in the participation rate.

5. Two-Parent Household with one parent referred (Single UP)

- a. In order to count in the All Families Rate and the Two-Parent Family Rate at least one parent must be assigned to and participate for 152 hours per month.

c. Work Activities

i. There are twelve (12) Work activities:

- 1. **Unsubsidized Employment (Core):** Unsubsidized Employment is full or part-time employment in the public or private sector that is not subsidized by TANF or any other publicly funded program, which includes the following:
 - a. Recipients whose employers claim a tax credit for hiring economically disadvantaged workers;

- b. Labor in exchange for services or other amounts (rent, utilities, etc.); and
 - c. Self-employment.: is a countable form of unsubsidized employment. To earn participation credit for hours of self-employment, a participant must provide documentation that details gross income minus business expenditures as substantiated by copies of money orders, check, and other forms of proof income and expenditures. Self-attestation is not acceptable as documentation.
 - i. Participation hours are assigned based on the number of hours that result from dividing the gross income minus business expenses (as verified by the documentation presented) by minimum wage (state or federal--whichever is higher).
- 2. **Subsidized Private Sector Employment (Core):** Subsidized Private Sector Employment is supervised in the private sector where the employer receives a subsidy from federally funded program to offset some or all of the wages and benefits paid to a TANF participant.
 - a. Subsidized Private Sector employment is limited to 12 months lifetime and shall be assigned in 6-month intervals.
- 3. **Subsidized Public Sector (Core):** Subsidized Public Sector Employment is supervised in the public or not-for-profit sector where the employer receives a subsidy to offset the cost of wages and benefits paid to a TANF participant.
 - a. Subsidized Public Sector employment is limited to 12 months lifetime and shall be assigned in 6-month intervals.
- **NOTE:** Upon entering a verification of employment, an exit survey, and CLIFF assessment must be administered.
- 4. **Job Search/Job Readiness (Core):** Job Search and Job Readiness activities are those that include the act of seeking or obtaining employment, as well as instruction on how to seek employment for participants whose barriers have been removed. Substance abuse and mental services may also be considered as part of the job search and job readiness activity.
 - a. **In-House/Remote Job Readiness (Employment Preparation):** In House/Remote job readiness must be part of a structured activity that requires daily supervision. These sessions are designed to improve an individual's job

seeking and retention skills, and provides support for job-seeking activities that are directly related to preparing for or finding employment may be conducted in-person or remotely. It will not include looking for childcare, housing or other non-work activities.

- i. All participants must log into systems designated by SFWIB during each visit to the center. A record of the visit and the service the participant receives is recorded. The participant must be assigned to the job search activity to receive credit for participation in all classroom activities.
- ii. Participants are expected to apply for jobs that match their qualifications, ensuring their resume and skills align with the positions they are pursuing. All job searches must align to the occupation of interest listed on their IRP
- iii. The AJC designee must verify at least 10% of all job searches for each participant, and record the verification using the CSSF Job Search Report.

Note: If the participant is not hired within 90 days of the start date of the activity in OSST, a re-assessment is required. An appointment letter documenting the re-assessment appointment must be included in participant case file and a case note must be entered in OSST.

b. Substance Abuse and Mental Health (SAMH): Some individuals that are not able to get and keep a job may benefit from substance abuse/mental health treatment or rehabilitation services. These services may be considered part of the job search and job readiness activity once the individual is determined to be in need of SAMH treatment by a substance abuse and mental health professional.

- i. The medical or mental health professional who determines treatment is necessary must be licensed and/or board certified to practice in the State of Florida (per F.S. 414.0655).

c. Time Limit for Job Search/Job Readiness activities: Participation in job search and job readiness activities is limited to four consecutive weeks and no more than 360

hours in a rolling twelve months. If an hour is reported on the JPR screen in any week for the job search activity it will be counted as one week of the four consecutive weeks allowed.

- i. A participant who has hours reported for participation on the JPR screen for four consecutive weeks must be removed from the activity for a period of one week—seven consecutive days. After seven days, the participant may be reassigned to the Job Search activity as necessary.

5. **Community Service Program (Core):** Community Service is limited to projects that serve a useful community purpose in health, social service, environmental protection education, urban & rural development, recreation, public facilities, public safety and childcare. Community Service is an applicable activity to demonstrate “job specific” skills, and the participant does not have post-secondary education or gained employment skills. It is also appropriate for a participant that wants to:

- a. Gain or improve their employability skills with a community organization while benefiting the community.
- b. Have an opportunity to receive work-based learning in accordance with their employment goals.
- c. Participate in community service activities while they await work authorization documents for placement into paid employment or training.

6. **Work Experience (Core):** Work Experience is a work activity performed in return for welfare combined with food stamps. This activity provides an individual with an opportunity to acquire the general skills, training, knowledge, and work habits necessary to obtain employment. It should be used to improve employability of those who cannot find unsubsidized employment. It is also an appropriate work activity for participants who lack preparation for, or experience in the workforce. And, it should provide work based learning in accordance with their employment and shall be designed to move the participant from the work experience to paid employment.

- a. **Home Based Worksites for Community Service or Work Experience activities:** a private home-based business is defined as any business or commercial activity that is conducted, or proposed to be conducted from property that is zoned for residential use or is clearly incidental or secondary to the use of the dwelling unit for residential

purpose. Community Service or Work Experience activities with a private home-based business is not authorized.

Providing Childcare (Core): Participants may provide childcare services to an individual who is **participating in a Community Service Program. The number of hours that is credited to the participant providing the childcare services is based on the number of hours that the participant is scheduled for the community service activity.**

7. **Vocational Education and Training (Core):** Vocational Education and Training is organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring other than a baccalaureate or advanced degree. Vocational Education and Training programs should be limited to activities that give individuals the knowledge and skills to perform a specific occupation. The use of funds for vocational education and training programs is permitted, contingent upon available funding.

Vocational Education and Training must be vocation in nature and must be provided by a State approved education or training organization. This may include basic skills if embedded in a vocational program and short term. It does not include remediation of basic skills through adult basic education. Any necessary remediation should be completed before a participant is referred to Vocational education and training. ESOL is not an acceptable stand-alone activity.

- a. **Self-Initiated Education:** a participant enrolled in a self-initiated education independent of CSSF at the time of referral may receive participation credit only if the participant is attending and progressing satisfactorily in training that is provided in a state approved course of study.
 - b. **Distance Learning:** Courses in which students accessing classroom training *via* the internet without having to physically report to a classroom training is considered distance learning.
8. **On-the Job Training (OJT) (Core):** OJT is paid training in the public or private sector that is provided by an employer to an eligible participant while engaged in a job that allows the participant to acquire knowledge or skills essential to the full and adequate performance on the job. Infrequently, OJT may be combined with customized training. Normally a worker would not be simultaneously utilizing OJT and customized training services, however, it is possible that a worker might be a participant in OJT and simultaneously be a participant in off-the-job customized training

such as classroom training. Combining these services requires prior CSSF approval.

9. **Satisfactory Attendance at a Secondary School (Adult Basic Education) and General Education Diploma (GED) (Core Plus):** Satisfactory Attendance at a Secondary School is regular attendance, at a secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate. This includes ABE, GED and high school credit programs that provide opportunities for an individual to achieve a diploma either through the GED testing program or the completion of high school credits required for graduation.
10. **Education Directly Related to Employment (Core Plus):** If a participant has not received a high school diploma or GED (s)he may receive credit for hours by participating in education related to a specific occupation, job or job offer. This includes courses designed to provide the knowledge and skills for specific occupation or work settings, but may also include adult basic education and ESOL. Where required as a pre-requisite for employment by employers or occupation, this activity may also include education leading to a General Education Development (GED) or high school Equivalency diploma.
11. **Job Skills Training directly Related to Employment (Core Plus):** Job Skills Training directly Related to Employment is training or education for job skills required by an employer to provide an individual with the ability to obtain employment or to advance or adapt to the changing demands of the workplace. It may include literacy training or language instruction when it is EXPLICITLY focused on skills needed for employment or combined in a unified whole with job training, customized training to meet the needs of a specific employee or it general training that prepares an individual for employment Post-secondary education that leads to a bachelor's or advanced degree may count as job skills training, if it is direct related to employment. It must be required by the employer and it must provide the participant with the ability to obtain employment and/or advance in a position under the following categories:

Training Agreement and Supervision for education activities: a signed OJT agreement is required which details full-time employment, daily supervision, hourly wage, training hours, training days, start date, end date, and the participant, authorized employer representative and AJC designee signatures.

Employment Verification for education activities: employment verifications must include the contact information such as the employer's name; date contacted, phone number, employee work

days/hours, wage rate employment start date and the name of the AJC designee who verified the employment.

ii. **Countable Work Activities**

1. TCA recipients not exempted from work activities must participate in work activities based on the minimum required hours for the family type. The minimum required monthly hours must be met by requiring each participant to participate in a countable work activity for a minimum number of hours per month. There are two types of work activities: core and core-plus. Both work activities are considered countable. The core work activities may be used individually as stand-alone activities to satisfy the required work requirements. Core-plus activities are countable if used in combination with a core activity. The core-plus hours count towards participation if the required core hours are met. There are nine (9) core activities and three (3) core plus activities.

2. **Types of Countable Work Activities**

- a. **Core** work activities may be used individually as stand-alone or in combination with core-plus activities to satisfy the required work requirements. Participants cannot be assigned a work activity for more than a maximum of 40 hours per week.
- b. **Core plus** work activities must be assigned in combination with core activities, and the core hours must be met in order for the hours to count towards participation. Each activity is to be identified in the One Stop Service Tracking System (OSST) under the Skill Development tab to report participation.

Core Work Activities	Core Plus Work Activities
1. Unsubsidized Employment	1. Satisfactory Attendance at Secondary School
2. Subsidized Private Sector Employment	2. Education Directly Related to Employment
3. Subsidized Public Sector Employment	3. Job Skills Training
4. Job Search and Job Readiness	
5. Community Service Program	
6. Work Experience	
7. Providing Childcare	
8. Vocational Training	
9. On-the-Job Training (OJT)	

- iii. **Verifying Employment for employment activities:** Verification of employment is required and must be obtained prior to entering the employment into OSST. The CSSF Employment Verification and/or automated confirmation documentation of employment maintained in recognized databases such as The Work Number (TALX) are acceptable forms of supporting documentation. The AJC designee may also verify employment by contacting the employer directly using the CSSF Collateral Contact form, providing that all other acceptable means of verification have been attempted.
- iv. **Projecting Hours of Employment for employment activities:** Using the “project forward hours” provision, the AJC designee will report projected hours of participation for up to six months. The projected hours are based on the actual hours that are documented on an employer statement of wages and hours and/or pay stubs submitted by the employed individual. Hours may be projected forwarded for up to six months beginning the closure date, and after the receipt of a full pay cycle, i.e. weekly, bi-weekly or monthly.
- v. **Employment Follow-ups:** Employment follow-ups must be conducted for participants that are employed, at 30, 60, 90, 180 and 365-day intervals while the participant is employed. The follow up must be entered in OSST.
- vi. **Alternative Responsibility Plan (ARP)**

Some participants may have circumstances that prevent them from participating in traditional work activities and they must be assigned to alternative activities to satisfy the required program participation. Their participation will be monitored using an Alternative Responsibility Plan
- vii. **Case Notes**

The AJC designee must ensure that there is sufficient information that is clear and concise and also documents the progression of the participant via case notes in OSST. The case notes are accessible for review to anyone with the proper authorization to the system. Therefore, every effort must be made to protect the participant’s privacy, while continuing to record the development of the participant. There shall not be any reference to test results nor the medical condition of the participant. Also, abbreviations should be used only if they are commonly used and are easily understood by all system users .

Note: In instances where a participant may be the victim of domestic violence, a separate, hard copy case file must be maintained in a secure location and marked “confidential”. Additionally, the addresses, telephone numbers, and social security numbers of a domestic violence victim are exempt from the open public records’ requirement and should be kept confidential except as allowed by statute. Information that may jeopardize the safety of the domestic violence victim and the victim’s children must be maintained in the separate file. The case notes should refer the reader to the confidential hard copy case file without making reference to the nature of the issue.

viii. **Participation Rate**

The Florida Commerce measures each region within the State of Florida on a monthly basis to determine if regions have met the required participation rate. The AJC designated staff must enter accurate and verifiable (valid) data into OSST by the 10th of the following month to document the participant's completed work activity.

1. Participants Excluded from the Participation Rate:
 - a. Teen parents who are in school are excluded (not required to participate) during school breaks and holidays;
 - b. Employed participants; and
 - c. Participants who are subject to sanction (currently sanctioned) are not counted toward the participation rate. Note: Currently sanctioned means the cash has been removed from the family.
 - d. Individuals who are exempt from the time limit pursuant to Florida Statutes, Section 414.105 (2015).

ix. **Participation Rate Requirements**

1. There are two participation rate requirements that an AJC provider must meet. These are known as the "all-family" and the "two-parent" family participation requirements.
 - a. All-Family Participation Rate: The "all-family" rate is that **50%** of all families containing an adult or minor head of household must be engaged in countable work activities for a minimum average number of hours per month. The hours vary by family type.
 - b. Two-parent Family Participaiton Rate: The "two-parent" family participation rate is that **90%** of two-parent families must be engaged in countable work activities for a minimum number of hours per month.
 2. If the participant is subject to sanction for more than 3 months in the preceding 12 months, the participant will not be removed from the participation rate calculation.
- d. **Holiday/Excused Absence paid Activities:** Participation hours may be granted for any holiday that an employer designates as a "paid holiday" for its employees.

Holiday policy for unpaid work activities: Participation hours may be granted if the participant is scheduled on the following holidays observed by a work activity provider:

Excused absence for paid activities: Participation credit may be granted for scheduled hours a participant misses due to illness or other good cause for which the individual was paid.

Excused absence for unpaid hours/activities: Participation hours may be excused up to 80 hours per participant during the preceding 12 month period and attributed towards participation. However no more than 16 hours per month may be granted.

Excused absences and holidays will be recorded and tracked. The AJC designee must manually maintain and track the dates and hours using a tracking document in the case file. The document will record the dates of the excused holiday, the total number of absent hours per month (no greater than 80). Prior to crediting participants with the hours, AJC designee will verify that the individual is scheduled to be in the activity.

- e. **Crediting Hours for Participation:** To ensure that participation rates are met, it is critical that work eligible individuals are assigned to an appropriate work activity and that they are engaged for the minimum required hours.
- f. **Documentation** used to credit hours for participation on the JPR screen, must meet the following criteria:
 - i. Original documentation with the required signatures must be secured;
 - ii. Documents must have a date stamp upon receipt and are maintained in the participant's electronic case file to support all entries, regardless of when the documents are obtained;
 - iii. Total hours are collected and recorded each week;
 - iv. Documentation cannot be altered – no scratch out, white out, alterations; and
 - v. Documents that are translated must be attached to the signed English version.
- g. **Failure to Participate:** The failure or refusal of the participant to become fully engaged in work or barrier removal/management activities may result in a termination of benefits. The program applies full family penalties when participants fail to meet program requirements without good cause in accordance with s. 414.065, F.S.

VII. EXCEPTIONS

Exceptions to this policy, or any part thereof, must be approved in writing by the SFWIB Executive Director in accordance with applicable laws.