



SOUTH FLORIDA WORKFORCE INVESTMENT BOARD

**THURSDAY, April 8, 2021
8:15 A.M.**

CareerSource South Florida Headquarters
7300 Corporate Center Drive
Conference Room 2
Miami, Florida 33126

AGENDA

1. Call to Order and Introductions
2. Approval of Meeting Minutes
 - A. January 28, 2021
3. Executive Director's Report
 - a. CareerSource South Florida (CSSF) Program Year 2019-2020 Annual Report
 - b. USDOL Targeted Program Compliance and Assistance Review (TPCAR) Update
 - c. Refugee Employment and Training Contract Update
4. Recommendation as to Approval to Allocate National Dislocated Worker Grant Funds for Miami Dade County and Circle of Brotherhood, Inc. Projects
5. Recommendation as to Approval to Allocate Funds for the Miami-Dade County Legislative Internship Project

South Florida Workforce Investment Board dba CareerSource South Florida is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers on this document may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711.

"Members of the public shall be given a reasonable opportunity to be heard on a specific agenda item, but must register with the agenda clerk prior to being heard."



**SFWIB EXECUTIVE COMMITTEE MEETING AND
SFWIB FINANCE AND EFFICIENCY COUNCIL**

AGENDA ITEM NUMBER: 2A

DATE: February 18, 2021 at 8:00AM

AGENDA ITEM SUBJECT: MEETING MINUTES

January 28, 2021 at 8:15am

7300 Corporate Center Drive, Suite 500 (Conference Room 2)

Miami, Florida 33126

EXECUTIVE COMMITTEE MEMBERS IN ATTENDANCE	COMMITTEE MEMBERS NOT IN ATTENDANCE	OTHER ATTENDEES
<ol style="list-style-type: none"> 1. Gibson, Charles, <i>Vice-Chairman</i> 2. del Valle, Juan Carlos 3. Ferradaz, Gilda 	<ol style="list-style-type: none"> 4. Perez, Andy, <i>Chairman</i> 5. Garza, Maria 	<p>Brunson, Tony (Anthony Brunson, PA.) Robinson, Audrey (Anthony Brunson, P.A.)</p>
<p>FINANCE AND EFFICIENCY COUNCIL MEMBERS</p> <ol style="list-style-type: none"> 1. Gibson, Charles A, <i>Chairman</i> 2. Perez, Andy, <i>Vice-Chairman</i> 3. Bridges, Jeff 4. Datorre, Roberto 5. Lampon, Brenda 	<p>FEC MEMBERS NOT IN ATTENDANCE</p> <ol style="list-style-type: none"> 6. Adrover, Bernardo 7. Glean-Jones, Camela 8. Maxwell, Michelle <p>SFWIB STAFF Beasley, Rick Almonte, Ivan Anderson, Frances Ford, Odell Jean-Baptiste, Antoinette</p>	

--	--	--

Agenda items are displayed in the order they were discussed.

1. Call to Order and Introductions

FEC Chairman Gibson called the meeting to order at 8:34am and asked those present introduce themselves. Staff verified that a quorum of Executive Committee members present had been achieved.

2. Approval of Executive Committee Meeting Minutes of November 19, 2020 and December 10, 2020

Ms. Gilda Ferradaz moved the approval of executive committee meeting minutes. Motion seconded by Mr. Juan Carlos del Valle; **Motion Passed Unanimously**

3. Information – Layoff Aversion Program Update

Chairman Gibson introduced the item and Mr. Beasley further presented.

Chairman Gibson requested more details on Layoff Aversion program and Mr. Beasley further explained.

Ms. Ferradaz inquired about special allocation and Mr. Beasley provided details. He further briefed the Committee/Councils on Notices of Funding Availability (NFA). She further inquired about the review column and Mr. Beasley provided details.

No further questions or discussions.

4. Information – USDOL Targeted Program Compliance and Assistance Review (TPCAR)

Chairman Gibson introduce the item and Mr. Beasley further presented.

Mr. Datorre asked whether if this is a yearly review. Mr. Beasley responded, “No” then further explained.

Ms. Ferradaz asked which regional workforce boards had the findings. Mr. Beasley responded this region and the state.

Mr. Datorre asked whether if this is a yearly review. Mr. Beasley responded, “No” then further explained.

Mr. del Valle inquired about the four area of concerns detailed in the report. He noted that he only saw two. Mr. Beasley explained that the item detailed in the report referenced the state. Mr. del Valle inquired about the differences between the term “findings” and “areas of concerns.” Mr. Beasley noted that he wasn’t too sure.

Mr. Datorre inquired about issues with non-compliance detailed in the report. Mr. Beasley responded that the issues were deemed by the state.

5. Recommendation as to Approval to Allocate Florida College Plan Scholarships

Mr. Beasley presented the item.

Mr. Bridges asked whether if the same participant can reapply for an additional two year scholarship in order to complete a full 4-year degree. Mr. Beasley responded “No” then further explained.

Mr. Jeff Bridges moved the approval to allocate Florida College Plan Scholarship.
Motion seconded by Mr. Juan Carlos del Valle; **Further Discussion(s)**

Ms. Ferradaz noted into record that foster children would not qualify for this particular program.

Mr. Bridges requested details as to why they would not qualify. Both Mr. Beasley and Ms. Ferradaz provided details.

There was continued discussion.

Motion Passed by Unanimous Consent

6. Recommendation as to Approval to Accept Fiscal Year 2019-2020 Audit Reports

FEC Chairman Gibson presented the item and Mr. Beasley further presented.

He later introduced SFWIB’s current (contracted) auditors from Anthony Brunson, P.A who appeared before the Committee/Council and presented fiscal year 2019-2020 audit reports.

He noted potential impact may have been as a result of high employee turnover in the Finance Department.

Ms. Ferradaz questioned the closeout delays. Mr. Brunson referenced page 32 in the report for additional details on current finding.

Mr. del Valle asked whether if the delay was as a result of the high turnover. Mr. Brunson additionally explained that part of the potential delays were possibly due to the books being closed out 16 months.

Mr. Bridges also questioned the fact the delay in close outs (totaling 16 months). He noted into record June 30th books were not closed until November 20th the following year ((2021)(16 months delay)). He furthermore asked what happens during the process books are not closed in a timely manner. SFWIB Finance Assistant Director Odell Ford explained.

There was continued discussion.

Audrey Brunson provided details.

Mr. Bridges asked who's responsible for overseeing the financials. Mr. Ford noted he oversees the processes.

Ms. Lampon shared her feedback.

There was continued discussion.

The Committee requested a final report providing a Plan of Corrective Action (POCA) be provided at a later date.

Mr. Bridges requested two reports be provided: (1) One from staff (detailing what happened and why there was a lapse since June 30th); (2) second report from the auditors on new policy recommendations to include the following:

- Getting the right system in place
- What is the agency lacking? (What are the current gaps?)
- Implement Preventative measures

Ms. Ferradaz moved the approval of above item and recommendations. Motion seconded by Mr. Jeff Bridges; **Further Discussion(s):**

Mr. del Valle requested final outcome.

There was continued discussion on follow-up report on new processes for closing books.

Mr. Datorre also requested information regarding staff's individual responsibilities.

Motion Passed by Unanimous Consent

There being no further business to come before the Council, meeting adjourned at 9:51am.



SFWIB EXECUTIVE COMMITTEE

DATE: 4/8/2021

AGENDA ITEM NUMBER: 3

AGENDA ITEM SUBJECT: SFWIB EXECUTIVE DIRECTOR'S REPORT

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **National leader in an ROI-focused enterprise**

BACKGROUND:

N/A

FUNDING: N/A

PERFORMANCE: N/A

NO ATTACHMENT



SFWIB EXECUTIVE COMMITTEE

DATE: 4/8/2021

AGENDA ITEM NUMBER: 3a

AGENDA ITEM SUBJECT: CAREERSOURCE SOUTH FLORIDA (CSSF) PROGRAM YEAR 2019-2020 ANNUAL REPORT

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

The South Florida Workforce Investment Board d/b/a CareerSource South Florida remains committed to delivering high performance employment and training programs that are critical to support the demands of today's job market.

The Annual Report for Program Year 2019-2020 highlights workforce development services in Area 23, which is comprised of Miami-Dade and Monroe Counties. The initiatives were accomplished in partnership with service providers who were integral in providing customized employment solutions to employers and jobseekers.

FUNDING: N/A

PERFORMANCE: N/A

ATTACHMENT



SFWIB EXECUTIVE COMMITTEE

DATE: 4/8/2021

AGENDA ITEM NUMBER: 3b

AGENDA ITEM SUBJECT: USDOL FLORIDA WIOA COMPREHENSIVE MONITORING REVIEW UPDATE

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

On October 16, 2020, the Florida Department of Economic Opportunity (DEO) received a letter confirming arrangements between the U.S. Department of Labor (USDOL), Employment and Training Administration (ETA) Region 3 Office, to conduct an Enhanced Desk Monitoring Review (EDMR) of your Workforce Innovation and Opportunity Act Formula (AA-32210-18-55-A-12, AA-33223-19-55-A-12) and Wagner-Peyser (ES-31841-18-55-A-12, ES-33387-19-55-A-12) Grants. The review was from November 16-20, 2020 and assessed the compliance with the programmatic and fiscal requirements of the grant. The EDMR process involves an exchange of documents (via e-mail or drop box), and interviews with key grant personnel.

The EDMR follows the review process outlined in the ETA Core Monitoring Guide (https://www.dol.gov/sites/dolgov/files/ETA/grants/pdfs/2018_Core_Monitoring_Guide.pdf). Due to the remote nature of the EDMR, the scope is limited to examining the framework that is in place to manage, administer and operate the grant in accordance with applicable Federal Statute, regulations and ETA guidance.

The Federal Project Officer (FPO) sent a separate request for the documents needed to conduct the review. The review began with a conference call on Monday, November 16, 2020, at 9:00 am EST. Julian Hardy, the FPO assigned to the grant, conducted the review.

On January 14, 2021, SFWIB staff received a copy of the USDOL compliance report for the review. The findings were detailed by local area and state. Staff reviewed and prepared responses for each of the related findings. A virtual follow up call was held on Monday, January 25, 2021 with Casey Penn, the DEO Chief, Bureau of One Stop and Program Support, to discuss the information in greater detail. The LWDB 23 response is due to the DEO on February 14, 2021.

FUNDING: N/A

PERFORMANCE: N/A

ATTACHMENT

U.S. Department of Labor

**Employment and Training Administration
Sam Nunn Atlanta Federal Center
Room 6M12 - 61 Forsyth Street, S.W.
Atlanta, Georgia 30303**



December XX, 2020

Dane Eagle
Executive Director
Florida Department of Economic Opportunity
The Caldwell Building, Suite 212
107 East Madison Street, MSC 100
Tallahassee, FL 32399-4120

Grant Type: Adult, Dislocated Worker, Youth

Grant Numbers: AA-30737-17-55-A-12, AA-32210-18-55-A-12, AA-33223-19-55-A-12

Grant Type: National Dislocated Worker Grant (NDWG)

Grant Numbers: DW-34017-19-60-A-12, DW-31163-17-60-A-12, DW-31593-18-60-A-12

Grant Type: Wagner-Peyser (WP)

Grant Numbers: ES-30982-17-55-A-12, ES-31841-18-55-A-12, ES-33387-19-55-A-12

Grant Type: Independent Initiative

Grant Number: MI-31467-18-75-A-12

Grant Type: Trade Adjustment Assistance (TAA)

Grant Numbers: TA-31693-18-55-A-12, TA-32645-19-55-A-12

Grant Type: Senior Community Service Employment Program (SCSEP)

Grant Number: AD-33731-19-60-A-12

Dear Mr. Eagle:

During the period of February 10, 2020, through August 7, 2020, the U.S. Department of Labor (DOL), Employment and Training Administration (ETA) conducted a compliance review to determine your level of compliance with programmatic, fiscal, and administrative requirements. The exit conference was held on January 13, 2021. ETA recognizes the delay in issuing the enclosed report. The broad scope of the review and the impact of the COVID-19 pandemic in gathering and analyzing additional information and data to complete the report are responsible for this delay. Despite the delay, we hope the report provides a wide range of compliance areas and promising practices that contribute to continuous improvement of the state's workforce system.

The enclosed report outlines the results of the review and identifies 50 compliance findings that must be addressed, two (2) areas of concern and four (4) promising practices. Several of the findings contained in this report have regulatory, statutory, and policy violations that carry the potential for questioned

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

costs. As a follow-up to this review, we will validate and make subsequent determinations about potential questioned costs as needed. Please submit your response to the findings outlined in the report to your Federal Project Officer (FPO) at dondlinger.jeremy@dol.gov, and RO3-RA-ATL@dol.gov within 30 days of receipt of this report.

We hope that our review and this report are helpful to you. Please express our appreciation to your staff for their cooperation and assistance during this review. If you have any questions, please contact your FPO, Jeremy Dondlinger, at (404) 302-5377 or dondlinger.jeremy@dol.gov and Sonja Baisden Shell at baisdenshell.sonja.m@dol.gov.

Sincerely,

Lenita Jacobs-Simmons
Regional Administrator

Enclosure

cc: Michelle Dennard, President and CEO, CareerSource Florida

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

EXECUTIVE SUMMARY

The comprehensive review identified 50 findings, four (4) areas of concern and four (4) promising practices:

Findings:

- ❖ Finding #1: Noncompliance with State Board Composition Requirements
- ❖ Finding #2: Incomplete SWDB Member Vacancy Policy
- ❖ Finding #3: Lack of SWDB Statewide Policy Development Delegation Policy and Procedures
- ❖ Finding #4: Absence of SWDB Staff Hiring Policy
- ❖ Finding #5: Noncompliance with Local Plan Requirements
- ❖ Finding #6: Noncompliance with “Sunshine Provision”
- ❖ Finding #7: Eligible Training Provider List does not Include Required Information
- ❖ Finding #8: Lack of a Needs-Related Payment Policy
- ❖ Finding #9: Noncompliance with Incumbent Worker Training Policy Requirements
- ❖ Finding #10: Inadequate Monitoring and Oversight of the LWDB Youth Program Design and Fiscal Requirements
- ❖ Finding #11: Lack of Required Youth Statewide Activities for Youth Eligible Provider List and Providing Additional Assistance to LWDBs
- ❖ Finding #12: Lack of SWDB Criteria for Selection of Youth Providers
- ❖ Finding #13: Noncompliance with Youth Policies and Guidance
- ❖ Finding #14: Inaccurate MIS Youth Program Service Codes and Descriptions
- ❖ Finding #15: Lack of Adult Priority of Service Policy
- ❖ Finding #16: Lack of Dislocated Worker Policies
- ❖ Finding #17: Noncompliance with Pass-through Entity Requirements
- ❖ Finding #18: Lack of Adult and Dislocated Worker Funds Transfer Policy
- ❖ Finding #19: Incomplete Processes in Employment Services and Employment-Related Law Complaint Policy
- ❖ Finding #20: WOTC Quarterly Audits Were Not Completed as Required
- ❖ Finding #21: Noncompliance with “Sunshine Provision”
- ❖ Finding #22: Noncompliance with Individual Employment Plan (IEP) Development Requirements
- ❖ Finding #23: Lack of Customized Training Policy and Guidance
- ❖ Finding #24: Lack of Incumbent Worker Training Policy
- ❖ Finding #25: Approved Occupational Training from non-ETPL Providers
- ❖ Finding #26: Improper Extension of Enrollment Dates for Adult, DW, & Youth Participants
- ❖ Finding #27: Lack of 14 Youth Element Design Framework in Local Plan
- ❖ Finding #28: Lack of Career Pathways in Standard Youth Service Provisions
- ❖ Finding #29: LWDB Lacks Parent and Youth Involvement in Program Design
- ❖ Finding #30: Incomplete Enrollment Process for Youth
- ❖ Finding #31: Lack of Access and Referrals to the WIOA Youth Program
- ❖ Finding #32: Noncompliance with WIOA Youth Eligibility Policy Guidance
- ❖ Finding #33: Local Area Determining Youth Participation Based on Age
- ❖ Finding #34: Not All 14 Youth Elements Made Available
- ❖ Finding #35: WEX Activities Do Not Include Occupational and Academic Components

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

- ❖ Finding #36: Lack of Youth Follow-up Opt-out Requirements
- ❖ Finding #37: Lack of Local Area Youth Incentive Policy
- ❖ Finding #38: Inadequate Monitoring and Oversight of Local Youth Program Design and Fiscal Requirements
- ❖ Finding #39: Lack of Adult Priority of Service Policy
- ❖ Finding #40: Lack of Dislocated Worker Policy
- ❖ Finding #41: Inadequate Contract Administration Processes
- ❖ Finding #42: Noncompliance with Grievance Process Requirements
- ❖ Finding #43: SCSEP Memorandum of Understanding Not in Place
- ❖ Finding #44: No Host Agency Policies to Govern Training Plan
- ❖ Finding #45: No Joint IEP and Service Plan Development between The Sub-Grantee, Host Agency, and Participants
- ❖ Finding #46: No Joint IEP and Service Plan Development between The Sub-Grantee, Host Agency, and Participants
- ❖ Finding #47: Inadequate Procedures for Processing ES and Employment-Related Law Complaints
- ❖ Finding #48: Incorrectly Recording Job Referrals and Placements During Mass Recruitments
- ❖ Finding #49: Lack of Trade Adjustment Assistance (TAA) Case Management Policy
- ❖ Finding #50: Noncompliance with 504 Disability Requirement

Areas of Concern:

- ❖ AOC #1: No Uniformed Strategic Plan for Rapid Response and Layoff Aversion
- ❖ AOC #2: Ineffective Prevailing Wage and Practice Surveys

Promising Practices:

- ❖ PP #1: Promoting Career-Themed Education and Industry Certifications for Middle and High Schools Students through the Career and Professional Education Act
- ❖ PP #2: WOTC Application Processing Automation through Electronic System
- ❖ PP #3: Expanding IT talent pipeline through Support of TechHire Centers at Local Non-Profits
- ❖ PP #4: Partnerships with Community-Based and Faith-Based Organizations to Create Access Points

Please note that the review did not cover any areas outside the defined scope. Although no material issues came to the reviewers' attention other than those contained in this report, this report does not provide assurance that other issues may not exist.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

SCOPE OF REVIEW

Date of Review:

February 10, 2020 – August 7, 2020

Date of Entrance Conference:

February 10, 2020

Site(s) Visited:

Department of Economic Opportunity (DEO), Tallahassee – State Level
CareerSource Florida (CSF), Tallahassee – State Level
CareerSource South Florida (CSSF), Miami – Local Level
Homestead American Job Center (AJC) – CSSF Local Level
Belle Glade AJC – Career Source Palm Beach County Local Level
AARP Foundation-Little Havana (Miami) – Local Level
City of Coral Gables Police Department- City of Coral Gables – Local Level
Independent Living Community-Liberty City-Miami – Local Level

ETA Reviewer(s):

Winston Tompoe, Office of State Systems (OSS) Director
Jessica Otieno, Federal Project Officer (FPO)
Julian Hardy, FPO
Rachel-Floyd Nelson, FPO
Arthur Brooks, FPO
Jeremy Dondlinger, FPO
Susan Tesone, FPO
Channah YisraEL, FPO
Melissa Keels, FPO
Carol Andry-Hixon, Grants Management Specialist/Regional Grant Officer
Mara Buchanan, Senior Accountant

Attendees at Exit Conference:

TBA

Programs/Grants Reviewed:

Adult, Dislocated Worker, Youth: AA-30737-17-55-A-12, AA-32210-18-55-A-12, AA-33223-19-55-A-12

National Dislocated Worker Grant (NDWG): DW-34017-19-60-A-12, DW-31163-17-60-A-12, DW-31593-18-60-A-12

Wagner-Peyser (WP), Migrant Seasonal Farmworker (MSFW), Workforce Information Grant, Work Opportunity Tax Credit (WOTC): ES-30982-17-55-A-12, ES-31841-18-55-A-12, ES-33387-19-55-A-12

Independent Initiative: MI-31467-18-75-A-12

Trade Adjustment Assistance (TAA): TA-31693-18-55-A-12, TA-32645-19-55-A-12

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Senior Community Service Employment Program (SCSEP): AD-33731-19-60-A-12

Time Period for the Review: July 1, 2017 – June 30, 2020

The purposes of the review were to:

- ❖ Determine if the grants/programs are operating in compliance with all applicable Federal laws, regulations, policies and other grants management requirements.
- ❖ Evaluate whether the grant program is likely to meet its projections for enrollments, expenditures and performance outcomes;
- ❖ Assess whether the quality of the grant program and/or services is sufficient to meet performance goals; and
- ❖ Identify any technical assistance needs.

Tools used to Conduct Review:

ETA Core Monitoring Guide (CMG), revised August 2018
Financial and Trade (TAA) Supplements
Workforce Innovation and Opportunity Act (WIOA) Youth Supplement
Joint WIOA Monitoring Guide

BACKGROUND

Service Delivery Area: State of Florida

Grant Period of Performance (in months): July 1, 2017 – June 30, 2020 (36 months)

Award Amounts:

- AA-30737-17-55-A-12 (\$153,228,630.00)
- AA-32210-18-55-A-12 (\$156,580,877.00)
- AA-33223-19-55-A-12 (\$144,785,518.00)
- DW-34017-19-60-A-12 (\$3,000,000.00)
- DW-31163-17-60-A-12 (\$30,000,000.00)
- DW-31593-18-60-A-12 (\$6,060,765.00)
- ES-30982-17-55-A-12 (\$39,907,635.00)
- ES-31841-18-55-A-12 (\$39,692,869.00)
- ES-33387-19-55-A-12 (\$39,466,503.00)
- MI-31467-18-75-A-12 (\$1,000,000.00)
- TA-31693-18-55-A-12 (\$3,280,628.00)
- TA-32645-19-55-A-12 (\$4,495,365.00)
- AD-33731-19-60-A-12 (\$4,681,926.00)

DEO serves as the administrative and fiscal entity for the WIOA Title I and Title III programs and workforce system grants. The workforce development system in Florida consists of 24 Local Workforce Development Boards (LWDBs), CareerSource Florida, Inc., the State Workforce Development Board (SWDB) and partners across the state. CSF provides oversight and policy direction for talent development programs administered by DEO.

FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida Department of Elder Affairs

The One-Stop AJC brand is CareerSource. Each local workforce development area (LWDA) has a local identifier that corresponds to the brand. For instance, LWDA 23 is titled CareerSource South Florida (CSSF).

SCSEP is administered through multiple national and state grantees. The Department of Elderly Affairs is the administrative and fiscal entity for the Florida state SCSEP grant, and is included in the scope of this review. The state grant is sub-contracted with non-profit organizations and national grantees as sub-recipients. The state grant has sub-contractors or sub-recipients present in every LWDA throughout Florida.

A review of the WIOA youth program expenditures shows the State, as a whole, is meeting the 75 percent Out of School Youth (OSY) and 20 percent Work Experience (WEX) expenditure requirements. While the State reports youth expenditures as an aggregated total of the locals, these expenditure requirements apply more strictly at the local level. The State is responsible for monitoring and ensuring that the LWDAs meet these requirements.

PY17 – PY19 Youth Expenditures: Source: 9130 Financial Report Data, as of March 6, 2020

Local Area Combined Funding				
PY	Authorized (10d)	Program Authorized (10d-10f)	% OSY of Program Expenditures	Work Experience % of Program Expenditures
PY17	40,254,942	38,278,531	89.6%	25.7%
PY18	43,412,779	41,244,088	88.4%	25.8%
PY19	39,120,332	38,933,286	91.4%	20.1%

The following chart summarizes the programmatic performance for the WIOA Title I and III programs, using program year (PY) 18 as a snapshot. For PY18, Florida met or exceeded almost all performance measures for the Title I and III programs. The final adjusted calculations demonstrate that two (2) of the youth measures are slightly low, but both of these appear to be on track as of the third quarter for PY19.

PY2018 Florida Performance Measures and Outcomes

WIOA Performance Measures	ETA Outcomes National PY18	Negotiated Levels PY18	State Reported Annual PY18	Final Adjusted PY18	Most Recent PY19 Q3*
WIOA Title I Adult					
Employment Rate 2nd quarter after exit	71.3%	85.0%	85.7%	86.2%	85.8%
Employment Rate 4th quarter after exit	70.9%	82.5%	87.0%	82.4%	84.6
Median Earnings in the 2nd quarter after exit	\$6,170	\$6,850	\$8,272	\$6,801	\$8,406
Credential Attainment Rate	62.3%	62.0%	84.2%	63.0%	80.8
Measurable Skill Gains	47.9%	Baseline	56.0%	Baseline	61.8
WIOA Title I Dislocated Worker					
Employment Rate 2nd quarter after exit	70.9%	83.0%	88.7%	84.0%	84.3%

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Employment Rate 4th quarter after exit	71.7%	79.0%	86.7%	79.4%	86.5%
Median Earnings in the 2nd quarter after exit	\$7,377	\$6,850	\$8,199	\$7,163	\$8,665
Credential Attainment Rate	66.6%	68.0%	81.9%	65.8%	81.8%
Measurable Skill Gains	43.5%	Baseline	60.8%	Baseline	64.4%
WIOA Title I Youth					
Education or Training Activities or Employment in the 2nd quarter after exit	73.1%	75.0%	81.5%	80.3%	79.8%
Education or Training Activities or Employment in the 4th quarter after exit	72.6%	69.0%	80.1%	67.3%	79.7%
Median Earnings in the 2nd quarter after exit	\$3,326	Baseline	\$3,614	Baseline	\$3,748
Credential Attainment Rate	62.2%	75.2%	79.8%	75.0%	77.9%
Measurable Skill Gains	47.0%	Baseline	49.5%	Baseline	51.7%
WIOA Title III Wagner Peyser Employment Services					
Employment Rate 2nd quarter after exit	68.3%	62.0%	66.0%	62.6%	67.6%
Employment Rate 4th quarter after exit	67.9%	64.0%	64.1%	64.6%	66.6%
Median Earnings in the 2nd quarter after exit	\$5,789	\$4,850	\$5,335	\$4,976	\$5,414

DRAFT

FINDINGS

STATE LEVEL

- 1. WIOA**
- 2. WIOA Youth**
- 3. WIOA Adult/Dislocated Worker**
- 4. WIOA Fiscal**
- 5. State Level ES/WOTC**

Section 1: WIOA

Finding #1: Noncompliance with State Board Composition Requirements State Level, WIOA CMG Indicator: 1.a.1 Strategic Planning

Condition: The SWDB does not meet representation requirements for WIOA. At the time of the review, the SWDB failed to meet the following:

- The business majority requirement;
- Two (2) or more union representatives;
- One or more registered apprenticeship representatives;
- The 20 percent workforce representation requirement; and
- WIOA core programs representation.

It was also unclear whether the board met the unique representation requirement for Adult Education and Vocational Rehabilitation based on the information provided during the review. In addition, the State website does not reflect the State Board membership composition and its confirmed members.

Cause: The SWDB failed to ensure its membership composition complied with WIOA requirements.

Criteria:

- 20 CFR 679.110 (b) outlines the requirements for SWDB composition.

Corrective Action: To resolve this finding, the State must provide a list of all current board members, identify any vacant slots, and describe the process for filling vacancies on the board.

Finding #2: Incomplete SWDB Member Vacancy Policy State Level, WIOA CMG Indicator 1.a.1 Strategic Planning

Condition: The State does not have a policy or process in place for the nomination of SWDB members when a vacancy occurs.

Cause: The SWDB failed to develop a process for the nomination of new SWDB members when a vacancy occurs.

Criteria:

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

- WIOA Section 101(b)(1)(C)(i), (ii), and (iii) requires that (1) Representatives of business have been nominated by state business organizations and business-made associations; and two (2) Representatives of labor have been nominated by state labor federations.
- 20 CFR 679.110(d) establishes the requirement for the Governor to include the SWDB chair and member nomination process in the SWDB by-laws.

Corrective Action: To resolve this finding, the State must revise the by-laws and incorporate nomination process and procedures in accordance with WIOA regulations. The State must provide a copy of the amended by-laws.

**Finding #3: Lack of SWDB Statewide Policy Development Delegation Procedures
State Level, WIOA**

CMG Indicator: 1.a.1 Strategic Planning, Indicator 1.a.3 Coordination and Integration

Condition: The State indicated that policy development activity is a function of both DEO and CSF staff. DEO is responsible for administrative policies, and CSF staff are responsible for strategic policy. Policy documents are developed and implemented in both the CSF and DEO organizations. There was evidence that the SWDB does review and approve some policy. The SWDB can delegate policy-making authority to other entities, but must have written procedures in place that outline the specific functions that they choose to delegate.

Cause: The State failed to develop statewide policies and procedures regarding the delegation of specific functions.

Criteria:

- 20 CFR 679.130(b) identifies the following as one of the functions of the SWDB: “Review of statewide policies, programs, and recommendations on actions that must be taken by the State to align workforce development programs to support a comprehensive and streamlined workforce development system.
- 679.130(f) states, “Development and review of statewide policies affecting the coordinated provision of services through the State’s one-stop delivery system described in WIOA sec. 121(e)...”
- 679.130(l) states, “Development of other policies as may promote statewide objectives for and enhance the performance of the workforce development system in the State.”

Corrective Action: To resolve this issue, the State must create policies and procedures that outline the specific functions that the SWDB delegates to other entities. The State must provide a copy of these policies and procedures.

**Finding #4: Absence of SWDB Staff Hiring Policy
State Level, WIOA
CMG 1.b.1 Designating Personnel, Staff, Hiring**

Condition: The SWDB does not have a policy for hiring staff.

Cause: The SWDB failed to develop policies that detail the objective qualifications and other appropriate criteria for hiring staff.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Criteria:

- 20 CFR 679.160 provides that the SWDB must establish and apply, in the hiring of staff, a set of objective qualifications for the position of director that ensures the individual selected has the required knowledge, skills, and abilities to carry out the functions of the SWDB. This regulation also includes salary and bonus limitations.

Corrective Action: To resolve this finding, the SWDB must develop a formal policy or procedure that establishes objective personnel qualifications for the director position. The required qualifications must ensure that the individual selected can effectively carry out the functions of the SWDB. The SWDB should also create a written agreement for staff serving in multiple roles for the board.

**Finding #5: Noncompliance with Local Plan Requirements
State Level, WIOA
CMG Indicator: 1.a.1 Strategic Planning**

Condition: CSSF, the local area visited as part of this review, is operating from a 2016 Local Plan. A subsequent review of 12 of the 24 LWDB websites revealed that two (2) of the local areas only provided the 2016 plan as their current, approved plan.

Cause: The SWDB failed to ensure all Local Areas updated their 2018 plan requirements.

Criteria:

- 20 CFR 679.550 requires that each LWDB, in partnership with the appropriate local elected officials, must develop and submit a comprehensive four (4)-year plan to the Governor.
- 20 CFR 679.580 requires that the four (4)-year plan of a local workforce area be updated at the end of the first two (2)-year period in accordance with the requirements of 20 CFR 679.530, which requires the Governor to establish procedures for plan modifications.
- 20 CFR 679.500(c), requires the Governor to establish and disseminate a policy for the submission of local and regional plans to LWDBs and regional planning areas. The policy must set a deadline for the submission of the regional and local plans that accounts for the activities required in plan development outlined in 20 CFR 679.510 and 679.550.

Corrective Action: To resolve this finding, the State must ensure all local areas are operating under current, approved local workforce plans. The State must provide ETA a copy of the policy and procedures for local plans and plan modifications, and evidence that all LWDBs comply with the local plan requirements.

**Finding #6: Noncompliance with “Sunshine Provision”
State Level, WIOA**

CMG Indicator: 3.a.3. Compliance with Applicable Laws and Regulations

Condition: Florida State Policy 2018.09.26.A.1 identifies a number of items that must be available via website by the State and local boards to meet the Sunshine Provision requirements. The following items were missing from the CSF website: the SWDB meeting minutes, the by-laws, and the new 2020 State Plan. Only one (1) local area of the 12 reviewed was in compliance with both Sunshine Provision

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

requirements and State policy. The absence of these items conflicts with both the federal Sunshine Provision requirements, in addition to State policy.

Cause: The SWDB failed to monitor the local areas to ensure compliance with the Sunshine Provision.

Criteria:

- 20 CFR 679.140 describes the State’s requirement to conduct business in an open manner under the “Sunshine Provision” of WIOA.
- 20 CFR 679.390 describes the LWDB’s requirement to conduct business in an open manner under the “Sunshine Provision” of WIOA.

Corrective Action: To resolve this finding, the State must provide evidence that it is meeting the Sunshine Provision requirements in WIOA and the State policy. The State must also provide a plan for ensuring that the LWDBs comply with the State policy. The State must provide confirmation that all LWDBs are meeting this requirement.

Finding #7: Eligible Training Provider List does not Include Required Information

State Level, WIOA

CMG Indicator: 1.c.2 Product Development

Condition: The LWDB Eligible Training Provider Lists (ETPLs) for LWDA 2, 9 and 23 does not include required performance information.

Florida provides its ETPL via two (2) different websites. One (1) ETPL is available on the Employ Florida Marketplace (EFM), the other on the DEO Florida Jobs website. The DEO website provides a separate ETPL for each LWDB in Florida, but they are not displayed in a standardized format and information about training programs varied greatly among them.

In Florida, occupational training providers apply to the EF ETPL via an online application. The EF ETPL application asks training providers to include the following information: description of training, duration, costs, class size, skills acquired, performance information and an attestation that the program is certified by a LWDB.

Cause: The State failed to ensure that training providers were submitting all required information when adding their programs to the ETPL. The table below summarizes the training programs reviewed and the missing required information:

Training Provider	Program	LWDA/s Certification	Missing information
Seminole State College of Florida	AC Refrigeration & Heating Technology	CareerSource Central Florida	Duration, class size, program prerequisites, skills acquired, performance information
Hendry County Schools – Clewiston Adult School	Applied Welding Technologies	CareerSource Southwest Florida	Class size, program prerequisites, performance information

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Broward College- CS	Cybersecurity	CareerSource Broward	Class size, program prerequisites, skills acquired, performance information
Bethune-Cookman University	Accounting Technology	CareerSource Flagler Volusia	Description, duration, costs, class size, skills acquired, performance information
Concorde Career Institute – Tampa (Polk)	Medical Assistant	Unknown (information not provided)	Costs, class size, LWDB certification, skills acquired, program prerequisites, performance information
AAA School of Dental Assistance, Inc. – Polk	Dental Assisting w/Expanded Functions	CareerSource Polk	Description, class size, program prerequisites, skills acquired, performance information
Pasco-Hernando State College-Cs	Practical Nursing-C	Certified by nine different LWDA's	Description, duration, class size, program prerequisites, performance information
The Academy of South Florida-State	Network Technician	CareerSource Broward and CareerSource Palm Beach County	Description, class size, program prerequisites, skills acquired, performance information
Miami Dade College – 315799	Respiratory Therapy Technician/Assistant	CareerSource Broward and CareerSource South Florida	Description, class size, program prerequisites, skills acquired, performance information
Santa Fe College- CSNCFI	Emergency Medical Technician-C	CareerSource North Central Florida	Description, duration, class size, program prerequisites, skills acquired, performance information

Criteria:

- 20 CFR 680.450(e) and 20 CFR 680.460(f)(1) list the performance information requirements for initial and continued eligibility of training programs included on the ETPL.
- State Administrative Policy 90: WIOA Eligible Training Provider List (Policy 90) describes CSF initial and continued training program eligibility requirements.

Corrective Action: To resolve this finding, the State must demonstrate that training provider programs on its LWDB and statewide ETPLs include all required information.

Finding #8: Lack of a Needs-Related Payment Policy

State Level, WIOA

CMG Indicator: 1.e Participant Services, 1.e.6: Supportive Services

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Condition: The State does not have a Needs-Related Payment policy to define the method for determining level of needs-related payments, the eligibility criteria and the payment amount.

Cause: The State failed to develop the required Needs-Related payment policy as required by WIOA to ensure the provision of consistent direction across the State.

Criteria:

- 20 CFR 680.930 – 680.970, states that the State Workforce Development Board must establish the payment level for participants of statewide projects.

Corrective Action: To resolve this finding, the State must develop a Needs Related Payment Policy. The State must provide a copy of the policy.

Finding #9: Noncompliance with Incumbent Worker Training Policy Requirements

State Level, WIOA

CMG Indicator: 1.e Participant Services, 1.e.7: Training Services

Condition: CareerSource Florida has not updated its current Incumbent Worker Training Policy to meet WIOA regulations. CareerSource Florida created its current policy, FG-OSPS 89, on January 11, 2016, before ETA published the WIOA regulations. The policy does not list the correct citations.

Cause: The State failed to update its Incumbent Worker Training policy to align with WIOA guidelines and regulations.

Criteria:

- 20 CFR 680.780-820; 682.210(b), 682.320(b)(4)
- WIOA sec. 134(d)(4), (B), 134(a)(3)(A)(i) and (ii), 134(d)(4)(C) and 134(d)(4)(D) (i)-(iii) and 134(d)(4)(ii)(C) and (D).

Corrective Action: To resolve this finding, the State must update its policy to comply with WIOA regulations. The State must submit a copy of the policy.

Section 2: WIOA Youth

Finding #10: Inadequate Monitoring and Oversight of the LWDB Youth Program Design and Fiscal Requirements

State Level, WIOA Youth

CMG Indicator: 2.f.4 Sub-recipient Monitoring

Condition: The State's monitoring tool is insufficient to adequately assess and ensure LWDBs compliance with federal, state, local, and other requirements for the Youth program. The State conducts annual participant file reviews and monitoring of the WIOA Adult, Dislocated Worker (DW), Youth and Employment Service program in each of the 24 LWDBs. The State also indicated that they conduct quarterly desk reviews for some programs, but that the Youth program is not included in this process.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

The State did not have a process in place for routine monitoring, identifying, and addressing LWDBs not meeting their 75 percent OSY or 20 percent Work Experience (WEX) requirements. The State tracks the Local Youth Program OSY and WEX expenditures; however, the State did not report having any process in place to respond to or address the local area's failure to comply with the 75 percent OSY or 20 percent WEX requirements.

Cause: The SWDB failed to develop a process and monitoring tool that allow for adequate oversight of the Youth program requirements.

Citation:

- 20 CFR 682.200(j), 20 CFR 683.220, and 20 CFR 683.410 identify the State's oversight and monitoring responsibility.
- The Uniform Administrative Requirements at 2 CFR 200.328(a), 2 CFR 200.331, 2 CFR 200.333, and 2 CFR 200.338 encompass overarching State requirements that require the non-federal entity to monitor its activities under federal awards to assure compliance with federal requirements and to ensure performance expectations are being achieved. In addition, these sections cover the requirement that the non-federal entity "monitor the activities of the sub-recipient as necessary to ensure that the sub-award is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the sub-award."

Corrective Action: To resolve this finding, the State must develop a monitoring plan and tool that includes programmatic monitoring. The State must provide copies of the monitoring plan, monitoring tool and monitoring schedule for the State's review of local areas.

**Finding #11: Lack of Required Youth Statewide Activities for Youth Eligible Provider List
State Level, WIOA Youth
CMG Indicator: 1.c. Products & Deliverables**

Condition: The State is not disseminating the list of eligible providers of youth activities.

Cause: The SWDB failed to disseminate the list of eligible providers of youth activities, as required.

Criteria:

- 20 CFR 682.200(b)(6) "Disseminating by various means... A list of eligible providers of youth activities as described in WIOA sec. 123..."

Corrective Action: To resolve this finding, the State must disseminate a list of eligible providers of youth activities throughout the State.

**Finding #12: Lack of SWDB Criteria for Selection of Youth Providers
State Level, WIOA Youth
CMG Indicator: 1.b. Implementation, 1.b.5 Contracts and Sub-awards, 2.d.2 Competition, 2.f.1
Sub-recipient and Contractor**

Condition: The State has not developed the criteria that local boards must use in awarding grants for youth workforce investment activities, nor have they issued procurement guidance for youth provider

FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida Department of Elder Affairs

selection process. The State indicated that it instructed the LWDBs to describe the criteria for youth provider procurement; however, it was not included in the local planning guidance or in the local plans.

Cause: The SWDB failed to create statewide criteria for the selection of youth services providers.

Criteria:

- 20 CFR 681.400, the LWDBs are required to identify youth service providers based on the criteria established in the State plan.

Corrective Action: To resolve this finding, the SWDB must reevaluate the youth program design and service delivery requirements, provider selection criteria, and related youth policies for the statewide workforce system. The State must develop criteria the local boards must use in the provider selection process and edit existing policies accordingly. The State must provide a copy of the updated policy.

Finding #13: Noncompliance with Youth Policies and Guidance

State Level, WIOA Youth

CMG Indicator: 1.a.2 Service Design and 1.c.2 Product Development

Condition: The State's policies and procedures are incomplete and inconsistent with WIOA Youth program federal regulations and guidance.

- **Low-Income Exception:** With regard to basic eligibility criteria, State Policy 95 incorrectly states that the low-income exception is in relationship to the "requires additional assistance" barrier.
- **State Requirements for In-School-Youth and Out-of-School Youth Criteria:** The State plan does not provide guidance explaining the State's interpretation of In-School-Youth (ISY) and Out-of-School Youth (OSY) by providing clear definitions of, and requirements for, determining participant statuses of "attending school" and "not attending school."
- **Basic Skills Deficient Criteria:** The State plan defers the responsibility of defining the basic skills deficient criteria with the LWDBs; this is inconsistent with State Policy 95, which sets forth a basic skills deficient definition, and does not reference the requirement for the LWDBs to fulfill this responsibility.

Without clear guidance and clarification of the full eligibility requirements, local area program staff are often unable to accurately and effectively understand and validate the individual's true eligibility status. This can lead to errors in eligibility determination, resulting in disallowed costs if participants are enrolled who are not eligible, or it could unnecessarily limit and restrict potentially eligible youth from qualifying.

Cause: The SWDB failed to provide clear State guidance for determining youth participant eligibility to LWDBs.

Criteria:

- 20 CFR 681.210-681.310 provides the eligibility criteria for the youth program.
- TEGs 8-15 and 21-16 further explain the requirements set forth in 20 CFR 681.210-681.310.
- 20 CFR 681.600 and TEG 21-16 establish and explain the WEX requirements.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

- 20 CFR 679.130 gives the SWDB the responsibility of developing policies to conduct continuous improvement and to promote statewide objectives for and enhance the performance of the workforce system.
- 20 CFR 683.410 provides that recipients are responsible for oversight of sub-recipients and contractors to determine whether there is compliance with WIOA and other federal regulations.

Corrective Action: To resolve this finding, the SWDB must revise or develop comprehensive youth policy guidance to address the issues identified in this finding. The State must then update the State plan where appropriate to ensure consistency.

**Finding #14: Inaccurate MIS Youth Program Service Codes and Descriptions
State Level, WIOA Youth
CMG Indicator: 2.e. Performance Management; 3.6 Internal Controls**

Condition: Case managers in CSSF are not properly capturing and reporting program element services provided to participants. They did not enter into the system several services that were required and incorporated into their service strategies for youth participants. Several of the codes do not align to the regulatory description and requirement of the youth program service. In some instances, case managers were using service codes for Adult Mentoring and Counseling.

Cause: DEO failed to align the MIS service codes with the youth program elements accurately, and failed to ensure that the local areas were using the correct youth codes in the MIS system.

Criteria:

- 2 CFR 200.303 and 200.61, the State Workforce Agency must have effective internal controls in place that provide “reasonable assurance” around the reliability of internal and external reporting.
- TEGL 21-16

Corrective Action: To resolve this finding, the State must clearly define the service codes in the EF system to align with the program element definitions. In its response to this report, the State must verify changes made in the EF system and describe training provided to address this issue.

Section 3: WIOA Adult/Dislocated Worker

**Finding #15: Lack of Adult Priority of Service Policy
State Level, WIOA Adult
CMG Indicator: 1.e Participant Services, 1.e.2: Priority of Service**

Condition: The State does not have an Adult Priority of Service Policy.

Cause: The State failed to develop priority of services and special population’s policies as required by WIOA regulations to provide consistent direction across the state.

Criteria:

- 20 CFR 680.600 – 680.680, requires the state to develop a priority and special population’s policy.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

- 20 CFR 680.230 and 20 CFR 680.150(b), State must comply with regulations by developing priority of services and special population policy.
- WIOA sec. 134(c)(3)(E), WIOA sec. 3(5) ‘basic skills deficient’, WIOA sec. 3(24) ‘individuals with barriers to employment’, and WIOA sec. 3(36)(A)(i) and (vi).

Corrective Action: To resolve this finding, the State must develop a priority of service and special population policy. The State must provide a copy of this policy.

Finding #16: Lack of Dislocated Worker Policies

State Level, WIOA DW

CMG Indicator: 1.e Participant Services, 1.e.3: Eligibility/Enrollment

Condition: The State does not have a Dislocated Worker eligibility policy.

Cause: The SWDB failed to develop policies to include WIOA guidelines and regulations for eligibility determination of dislocated workers.

Criteria:

- WIOA sec. 3(15)(B)(ii) or (iii), requires States to create policies to define terms such as “general announcement” of a plant closing
- WIOA sec. 3(15)(A)(iii) and 20 CFR 680.600 “unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters,” and “unlikely to return to a previous industry or occupation” .

Corrective Action: To resolve this finding, the state must develop policies for determining the eligibility of dislocated workers. The State must provide a copy of this policy.

Section 4: Fiscal

Finding #17: Noncompliance with Pass-through Entity Requirements

State Level, Fiscal

CMG Indicator: 2.f.3 Post Sub-award Responsibilities

Condition: The State’s sub-award agreement does not reflect the provision of workforce development activities as prescribed in the WIOA regulations and the Uniform Administrative Requirements. The Grantee/Sub-grantee Agreement template provided was from the year 2012, which predates the implementation of WIOA and the Uniform Administrative Requirements.

Cause: The SWDB failed to update its sub-award agreement to incorporate the provisions of workforce development activities as prescribed in the WIOA regulations and Uniform Administrative Requirements.

Criteria:

- 2 CFR 200.331 requires all pass-through entities must: (a) Ensure that every sub-award is clearly identified to the sub-recipient as a sub-award

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

- §200.331(2)(3) further requires the sub-award to include: (2) All requirements imposed by the pass-through entity on the sub-recipient so that the Federal award is used in accordance with Federal statutes, regulations and the terms and conditions of the Federal award; and

Corrective Action: To resolve this finding, the State must update the Grantee/Sub-grantee Agreement, and incorporate into the agreement required provisions of the WIOA and Wagner-Peyser Act. The State must provide a timeline by when the updated sub-award agreements will be signed and fully executed with LWDBs.

Finding #18: Lack of Adult and DW Funds Transfer Policy

State Level, Fiscal

CMG Indicator: 2.f.4 Sub-recipient Monitoring

Condition: LWDBs may transfer 100 percent of funds between the two (2) programs; however, the current transfer policy does not establish factors and criteria to allow for the transfer of funds between Adult and DW programs.

Cause: The SWDB failed to establish criteria or factors governing the transfer of funds between Adult and Dislocated Worker programs.

Criteria:

- 20 CFR 683.130(c) requires, “Before making any transfer described in paragraph (a) of this section, a Local WDB must obtain the Governor's written approval. The Governor's written approval must be based on criteria or factors that the Governor must establish in a written policy, such as the State Unified or Combined Plan or other written policy”.

Corrective Action: To resolve this finding, the State must update its policy for transferring funds between Adult and DW programs. The State must provide a copy of this updated policy.

Section 5: ES/WOTC

Finding #19: Incomplete Processes in Employment Services and Employment-Related Law

Complaint Policy

State Level, ES

CMG Indicator: 2.i.4 Grievance and Complaint System

Condition: Florida provided the DEO Employment Service Complaint Resolution System Handbook as its Employment Services (ES), employment-related law, and discrimination complaint policy. Several parts of the policy did not comply with federal regulations.

Cause: DEO’s ES complaint policy failed to include all required complaint processing requirements.

Criteria:

- 29 CFR 38.35, 29 CFR 38.69, 20 CFR 658.411, and 20 CFR 658.417, provide all requirements for processing ES and employment-related law complaints.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Corrective Action: To resolve this finding, the State must revise its ES and employment-related law complaint policy to correct the inaccurate and incomplete processes noted above. The State must provide a copy of the revised policy.

**Finding #20: WOTC Quarterly Audits Were Not Completed as Required
State Level, WOTC
CMG Indicator: 2.a.1 Specific Award Conditions**

Condition: The period of performance for the current Florida WOTC grant is from 10/01/2018 to 09/30/2020. Quarterly audits were not performed for Fiscal Year (FY) 2018 Quarter 4 (July – September 2018), FY 2019 Quarter 3 (April – June 2019), and FY 2020 Quarter 1 (October – December 2019).

Cause: DEO staff failed to conduct required quarterly audits.

Criteria:

- TEGL 10-18 and the WOTC grant agreement require that the grantee “establish and maintain an orderly system for regularly verifying the eligibility of a random sample of individuals certified under WOTC...”
- ETA Handbook 408 defines the WOTC audit process as “the post-issuance examination, performed on a quarterly basis by someone other than the person who approved the Certification, of a prescribed random sample of Certifications and supporting documentation.”

Corrective Action: To resolve this finding, DEO must complete WOTC audits for the three quarters identified above. The State must provide a copy of the completed audits.

LOCAL LEVEL FINDINGS

1. WIOA
2. WIOA Youth
3. WIOA Adult/DW
4. Fiscal
5. SCSEP/MSFW/TAA/All Programs

Section 1: WIOA

Finding #21: Noncompliance with “Sunshine Provision”

Local Level, WIOA

CMG Indicator: 3.a.3. Compliance with Applicable Laws and Regulations

Condition: CSSF does not meet the WIOA Sunshine Provision requirements in the areas of affiliation of LWDB members, selection of one-stop operators, award of grants or contracts to eligible training providers of workforce investment activities, including providers of youth workforce investment activities, minutes of formal LWDB meetings, and LWDB by-laws.

Cause: The LWDB failed to comply with the required Sunshine Provision.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Criteria:

- 20 CFR 679.390 describes the requirements for LWDBs to conduct business in an open manner under the “Sunshine Provision” of the WIOA.
- Florida State Policy 2018.09.26.A.1 identifies a number of items that must be available via website by the state and local boards in order to meet the Sunshine Provision requirements.

Corrective Action: To resolve this finding, the local area must provide evidence that it is meeting all requirements of the Sunshine Provision.

Finding #22: Noncompliance with IEP Development Requirements

Local Level, WIOA

CMG Indicator: 1.e Participant Services, 1.e.5: Participant Services Plan, 1.e.7: Training Services

Condition: The review found that the CSSF is not using participant assessment results to develop an IEP and identify the need for WIOA training services. Assessments may include diagnostic testing, other assessment tools and in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals and development of an IEP.

Cause: The LWDB failed to develop the proper guidance, processes, and procedures to guide the local service delivery system to comply with identifying a need for WIOA training services.

Criteria:

- WIOA sec. 134(C)(2)(A)(xii)(I) and (II) and 20 CFR 680.170 outlines services an individual must receive before a determination for training is made.
- WIOA sec. 134(c)(3)(A)(i) and 20 CFR 680.210, “an individuals must, at a minimum receive either an interview, evaluation or assessment, and career planning or any other method through which the one-stop center or partner can obtain enough information to make an eligibility determination to be determined eligible for training services”
- 20 CFR 680.220(b), “the case file must contain a determination of the need for training services as determined through the interview, evaluation, or assessment, and career planning informed by the local labor market information and training provider performance information, or through any other career services received.”

Corrective Action: To resolve this finding, CSSF must provide justification of the determination to provide training services for mass-recruited employed worker participants who have not completed an evaluation to determine a need for training services. CSSF must also develop an assessment policy that identifies how to document and utilize current one-stop assessments in determining the need for training. The State must provide a copy of the policy.

Finding #23: Lack of Customized Training Policy and Guidance

Local Level, WIOA

CMG Indicator: 1.e Participant Services, 1.e.7: Training Services

Condition: The participant files reviewed showed enrollment of participants employed after a mass recruitment with an employer into WIOA and then into customized training. In addition, files lacked

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

documentation that the employer paid for any of the training cost. Employed Worker Training contracts were missing in some files, and in those that had contracts, the file stated employers may be reimbursed a percentage of the total training cost for workers, which is out of compliance. As a result of missing policy and guidance from the LWDB the participant enrolled did not meet the requirements for customized training.

Cause: The LWDB has failed to develop the appropriate guidance for customized training and does not comply with the definition of customized training.

Criteria:

- WIOA sec. 134(c)(3)(D) and in paragraphs (a) through (k) lists types of training services.
- 20 CFR 680.760 and 680.770 “Customized training is conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.”

Corrective Action: To resolve this finding, CSSF must comply with regulations for customized training, and develop customized training policy, processes and procedures for program participation. The State must provide a copy of the policy.

Finding #24: Lack of Incumbent Worker Training Policy

Local Level, WIOA

CMG Indicator: 1.e Participant Services, 1.e.7: Training Services

Condition: CSSF has not established up-to-date policies and definitions to determine which workers, or groups of workers, are eligible for incumbent worker services.

Cause: The LWDB failed to develop an Incumbent Worker policy.

Criteria: The following regulations establish the requirements for the development of an Incumbent Worker Policy:

- 20 CFR 680.780-820, 682.210(b), 682.320(b)(4)
- WIOA sec. 134(d)(4), (B), 134(a)(3)(A)(i) and (ii), 134(d)(4)(C) and 134(d)(4)(D) (i)-(iii) and 134(d)(4)(ii)(C) and (D)

Corrective Action: To resolve this finding the LWDB must develop an incumbent worker training policy. The State must provide a copy of this policy.

Finding #25: Approved Occupational Training from non-ETPL Providers

Local Level, WIOA

Indicator 1.e.7: Training Services

Condition: During the review of case files, two (2) participants (IDs # 15006764 and 8486531) received training from courses that are not on the ETPL. One Youth Program participant received Certified Nursing Assistant (CNA) training from the Jackson Training Center. The Individual Service Strategy in the case file notes that Jackson Training Center is a “non-approved” provider. The Farmworker Career Development Center, also a WIOA Youth provider in CSSF, confirmed that other participants received CNA training from this provider. Another Adult Program participant received “Hospitality Institute” training from the Miami-Dade College. This training program is also not included on the Florida ETPL.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Cause: CSSF failed to ensure that customers received training from approved ETPL programs.

Criteria:

- 20 CFR 680 Subpart D requires occupational training providers to apply for inclusion on the State's eligible training provider list (ETPL).

Corrective Action: To resolve this finding, the State must work with CSSF to ensure that all WIOA Adult, DW, and Youth participants can only receive WIOA-funded occupational training from providers on the ETPL.

**Finding #26: Improper Extension of Enrollment Dates for Adult, DW, and Youth Participants
Local Level, WIOA**

CMG Indicator: 1.a.2 Service Design

Indicator 1.e.1: Service Delivery

Condition: Case file review found that AJC staff manually extended participants' enrollment in the WIOA Adult, DW and Youth programs when participants had no services for 90 days and no planned additional services.

This occurred in the following sample case files in CSSF (7901062, 15006764, 8486531, 14522452, 14294091, 9804424, 15052494, and 59391429). Case notes in these files indicate that career center staff manually extended program enrollment by stopping the "soft exit" when a participant approached 90 days without a recorded career service.

Several current WIOA participants whose enrollment period extends more than multiple years were also identified. Title I program enrollments over multiple years indicate that these Title I customers' enrollment are manually extended after ninety days, without career services. Case notes indicate that staff spend time calling customers enrolled in WIOA for multiple years to inquire about their employment status and rate of pay. Career center staff dedicate significant time to calling participants who remain incorrectly enrolled. This is not an allowable grant activity and may result in questioned costs if identified in subsequent reviews.

Cause: CSSF staff failed to detect improper extensions of enrollments during programmatic monitoring.

Criteria:

- 20 CFR 677.150(c)(1) defines the date of exit as the last date of service for Title I Adult, DW, and Youth programs. The last day of service cannot be determined until at least 90 days have elapsed since the participant last received a staff-assisted career service.

Corrective Action: To resolve this finding, the State must work with CSSF to exit all participants within 90 days of employment.

Section 2: WIOA Youth

Finding #27: Lack of 14 Youth Element Design Framework in Local Plan

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Local Level, WIOA Youth

CMG Indicator: 1.a.1 Strategic Planning

Condition: The local plan does not describe the method for ensuring that the 14 youth program elements are available. The plan lists some services available through the local WIOA Youth program, but the description and specific reference to the availability of the 14 elements within the framework is missing.

Cause: The LWDB failed to develop a proper youth program design framework that ensures that all 14 youth elements are available.

Citation:

- 20 CFR 681.420 (b) require that the local plan describe the design framework for the youth program and how the 14 program elements are to be made available in this framework.

Corrective Action: To resolve this finding, the State must work with the local area to amend its local plan to include a description that ensures that the 14 program elements are available. The State must provide a copy of the amended plan.

Finding #28: Lack of Career Pathways in Standard Youth Service Provisions

Local Level, WIOA Youth

CMG Indicator: 1.e.1 Service Delivery, 1.e.5 Participant Service Plan, 1.d.2 Career Pathways

Condition: The youth participants' Individual Service Strategy (ISS) plans template fail to incorporate Career pathways as a standard requirement. The LWDB is responsible for establishing the requirements of the ISS as part of designing the framework of services, and ensuring that program services comply with these requirements.

Cause: The LWDB failed to establish clear guidance for implementing Career Pathways into youth Individual Service Strategy plans.

Criteria:

- 20 CFR 681.420(a)(2) requires the LWDB to design the framework of youth program services to include an ISS that identifies career pathways.
- 20 CFR 679.370(f) requires LWDBs to develop and implement career pathways within the local area.

Corrective Action: The LWDB must develop guidance to incorporate Career Pathways into the development of ISS plans. LWDB must provide a copy of the guidance.

Finding #29: LWDB Lacks Parent and Youth Involvement in Program Design

Local Level, WIOA Youth

CMG Indicator: 1.a. Planning & Program Design

Condition: The LWDB's youth program design lacks the involvement and input of parents, youth participants, and community members. The LWDB is responsible for assessing the needs of the youth population in the local area, determining the vision and strategies for the youth program and developing the program design framework.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Cause: The LWDB failed to develop a process to outline the involvement of parents, youth, and community members in the creation of the local youth program design.

Citation:

- 20 CFR 681.420, outlines how LWDBs must design the youth program, requires LWDBs to ensure that parents, youth participants, and other members of the community with experience relating to youth programs are involved in both the design and implementation of its youth programs.
- 20 CFR 681.650, explains that LWDBs must also make opportunities available to successful participants to volunteer to help other participants as mentors, tutors, or in other activities.

Corrective Action: To resolve this finding, the LWDA must follow the requirement for parents, youth participants, and other members of the community with experience relating to youth programs to be involved in both the design and implementation of their youth programs. LWDA must provide a copy of the established process.

**Finding #30: Incomplete Enrollment Process for Youth
Local Level, WIOA Youth
CMG Indicator: 1.e.3. Eligibility/Enrollment**

Condition: CSSF's WIOA youth enrollment process does not comply with the law. One or more of the four (4) required activities were not completed prior to enrollment of the youth into the WIOA youth program. In several files, the objective assessment was completed after the date of participation. In many files, the objective assessment and ISS plans were incomplete.

There is a potential for questioned costs when the four (4) eligibility elements are not completed and the individual receives youth program services.

Cause: The LWDB has failed to create program design processes, procedures, policies and structures that comply with WIOA regulations.

Criteria:

- 20 CFR 681.320(b) state, "In order to be a participant in the WIOA youth program, all of the following must occur: (1) An eligibility determination; (2) The provision of an objective assessment; (3) Development of an individual service strategy; and (4) Participation in any of the 14 WIOA youth program elements."

Corrective Action: To resolve this finding, CSSF must ensure that all four (4) requirements of WIOA youth participation are met.

**Finding #31: Lack of Access and Referrals to the WIOA Youth Program
Local Level, WIOA Youth
CMG Indicator: 1.e.3. Eligibility/Enrollment**

Condition: LWDA's do not comply with local requirements for WIOA Youth program access and referrals. If a youth case manager is not present when a youth visits the AJC, the youth is referred to an

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

offsite center or told to return the next day. The LWDA also lacks a referral tracking system for youth referred to offsite centers.

Cause: The LWDB failed to ensure the one-stop system design for delivery of youth services met WIOA requirements.

Criteria:

- 20 CFR 678.305 allows direct linkage through technology as one of the three options for providing access to AJC program services, however
- 20 CFR 681.700(c) limits those options for the WIOA Youth program. The local area must have either a program staff member or a staff member from a partner program physically present at the AJC.

Corrective Action: To resolve this finding, the LWDB must ensure youth participants have access to services and develop a process for tracking partner referrals. The State must provide evidence that this has occurred.

**Finding #32: Noncompliance with WIOA Youth Eligibility Policy Guidance
Local Level, WIOA Youth
CMG Indicator: 1.e.3. Eligibility/Enrollment**

Condition: CSSF's guidance for WIOA youth program eligibility is inconsistent, incorrect, and not in compliance with WIOA and state requirements.

- Basic Skills Deficient (BSD) and Requires Additional Assistance: CSSF has defined these criteria in their local plan, but CSSF has not issued any policy communicating this requirement, and the youth provider contracts are inconsistent with this requirement.
- BSD: The provider contract document "Exhibit AA" which covers eligibility requirements for OSY providers does not provide CSSF's definitions for BSD or "requires additional assistance". The "ISY Exhibit AA" contract document does not provide a definition for BSD. The provider contract document, "Attachment F" provides a definition of BSD, but it does not match the definition in the local plan.
- "Requires additional assistance": Many of the criteria established for this barrier in the local plan are duplicates of already existing eligibility criteria, such as "having one or more disabilities" or "pregnant or parenting youth".
- ISY Exhibit AA Contract Document: Provides a definition for "requires additional assistance" that is inconsistent with the local plan.
- "Requires additional assistance" five percent exception: The memo issued by the Executive Director on February 27, 2020 does not match the definition the local area included in their local plan.
- Incorrect OSY requirements in Youth Provider Contracts: Exhibit AA has OSY eligibility requirements that are out of compliance and states that all OSY are to be low-income or living in a high poverty area, which is incorrect.

Cause: The LWDB failed to develop program and operational guidance for youth eligibility that comply with WIOA regulations.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Criteria:

- 20CFR 681.210-681.310 defines specific eligibility requirements for youth participants
- TEGs 8-15 and 21-16 defines specific eligibility requirements for youth participants.
- 20 CFR 681.290(b) and 681.300 establish the requirement for the local area to establish policy for “basic skills deficient” and “requires additional assistance” criteria.

Corrective Action: To resolve this finding, CSSF must work with the State to establish and revise youth program eligibility guidance, and review and update all contract documents that include eligibility requirements that comply with WIOA regulations. The State must submit copies of the LWDB approved policies, revised local plan and contractual documents as applicable, and any other applicable documentation to confirm resolution.

**Finding #33: Local Area Determining Youth Participation Based on Age
Local Level, WIOA Youth
CMG Indicator: 1.e.3. Eligibility/Enrollment**

Condition: The local Career Center refers young, potential participants to either the WIOA Youth or Adult program, based on their age. Determining program referrals based solely on an individual’s age does not consider other eligibility factors.

Cause: The LWDB failed to establish a referral process for services that based on factors other than age alone.

Criteria:

- 20 CFR 681.440 states that a local program must determine the appropriate program for the participant based on their service needs and if the participant is career-ready based on an assessment of their occupational skills, prior work experience, and employability.

Corrective Action: To resolve this finding, the LWDBs must establish a process based on identified need to assist in determining the appropriate program for participants between the ages of 18 and 24. The State must provide documentation to describe an established process.

**Finding #34: Not All 14 Youth Elements Made Available
Local Level, WIOA Youth
CMG Indicator: 1.e.1. Service Delivery; 1.c Products and Deliverables**

Condition: The LWDA is not providing access to all 14 youth elements. The elements noted as unavailable included: occupational skills training, leadership development opportunities, entrepreneurial skills training, and adult mentoring.

Cause: The LWDB has not established partnerships or MOUs with partner agencies to ensure that all 14 elements are available and provided.

Criteria:

- 20 CFR 681.460 requires that all 14 program element services be made available to youth participants.

FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida Department of Elder Affairs

- 20 CFR 681.470 states: “Local programs may leverage partner resources to provide some of the readily available program elements. However, the local area must ensure that if a program element is not funded with WIOA Title I youth funds, the local program has an agreement in place with a partner organization to ensure that the program element will be offered. The LWDB must ensure that the program element is closely connected and coordinated with the WIOA youth program.”
- 20 CFR 681.420 requires that LWDBs must ensure that WIOA youth service providers provide participants with information about the full array of applicable or appropriate services available through the LWDBs or other eligible providers, or one-stop partners.

Corrective Action: To resolve this finding, the LWDA must ensure they make available all 14 program elements to youth participants. The State must provide a list of the LWDB providers that they have identified to provide each of the 14 program element services, and information about how those services are made available to all youth participants in the local area. The State must provide a copy of the revised local plan, policies, MOUs and contracts.

Finding #35: Work Experience (WEX) Activities Do Not Include Occupational and Academic Components

Local Level, WIOA Youth

CMG Indicator: 1.e. Participant Services, 1.c. Products and Deliverables

Condition: Work experience services provided to youth program participants do not include the required academic and occupational education components.

Cause: The LWDB failed to ensure required academic and occupational education components were included in youth work experiences.

Citation:

- 20 CFR 681.460(a) (3) identify paid and unpaid work experiences “that have academic and occupational education as a component of the work experience” as one of the 14 program elements.
- 20 CFR 681.600 states that work experiences are a planned structured learning experience that takes place in a workplace for a limited period. Work experiences provide the youth participant with opportunities for career exploration and skill development.
- 20 CFR 681.460(b) states that the specific program services provided to the youth participants are based on each participant’s objective assessment and individual service strategy.
- 20 CFR 681.420 requires the ISS to identify the participant’s career pathways.

Corrective Action: To resolve this finding, the LWDB must redesign their program to ensure occupational and academic education components are included in all WEX. The State must provide documentation confirming the required changes.

Finding #36: Lack of Youth Follow-Up Opt-out Requirements

Local Level, WIOA Youth

CMG Indicator: 1.e.9 Follow-Up Services

FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida Department of Elder Affairs

Condition: The LWDB does not make the opt-out of follow-up services as required by law, available to youth participants. The youth service provider contract provisions do not include language that addresses the opt-out clause for youth follow-up services. The LWDB does not have any policy that covers the follow-up requirements

Cause: The LWDB failed to create policy and guidance to address the opt-out of follow-up services for youth.

Criteria:

- 20 CFR 681.580 discusses the requirement for follow-up services in general.
- TEGL 21-16 further clarifies: “If at any point in time during the program or during the 12 months following exit the youth requests to opt out of follow-up services, they may do so. The request to opt out or discontinue follow-up services made by the youth must be documented in the case file”.

Corrective Action: To resolve this finding, the LWDB must revise local level documentation to ensure compliance with youth follow-up service requirements. The State must provide a copy of the revised documentation.

Finding #37: Lack of Local Area Youth Incentive Policy

Local Level, WIOA Youth

CMG Indicator: 1.e Participant Services, 2.1 Administrative Controls

Condition: CSSF does not have a policy for the provision of incentives for youth program participants. A review of participant files revealed that incentive payments are entered into the participant record system as supportive services. Incentive payments are allowable; however, incorrectly reporting them as supportive service payments could impact the participants’ ability to receive needed supportive service assistance.

Cause: The LWDB failed to develop a youth incentive payments policy.

Criteria:

- 20 CFR 681.640, state: The local program must have written policies and procedures in place governing the award of incentives and must ensure that such incentive payments are tied to the goals of the specific program; outlined in writing before the commencement of the program that may provide incentive payments; align with the local program’s organizational policies and are in accordance with the requirements contained in 2 CFR part 200.
- 20 CFR 681.570 defines supportive services that enable an individual to participate in WIOA activities. .

Corrective Action: To resolve this finding, CSSF must develop a youth incentive payments policy, in accordance with WIOA regulations and guidance. This policy must include the method for ensuring that payments are recorded in the case management system. The State must provide a copy of the policy.

Finding #38: Inadequate Monitoring and Oversight of Local Youth Program Design and Fiscal Requirements

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Local Level, WIOA Youth

CMG Indicator: 2.f. Sub-recipient Management & Oversight

Condition: The LWDB's current monitoring processes does not ensure that providers are meeting all of the program and contract requirements, or that participants are receiving the services as required by WIOA. The LWDBs did not have a method to track and monitor the five percent eligibility exception for those qualifying under the "requires additional assistance" criteria.

Cause: The LWDB failed to create a monitoring tool that would allow them to monitor all programmatic requirements.

Criteria:

- 20 CFR 679.370 indicates that the local board must conduct oversight of youth workforce investment activities.
- 2 CFR 200.328(a) and 2 CFR 200.331(d). These sections require that the non-federal entity monitor its activities under Federal awards to assure compliance with Federal requirements and to ensure performance expectations are being achieved and that the non-federal entity "monitor the activities of the sub-recipient as necessary to ensure that the sub award is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the sub-award..."

Corrective Action: To resolve this finding, CSSF must establish and implement a formal monitoring program for their youth service providers. CSSF must describe the steps it will take to ensure its monitoring complies with WIOA regulations and CSSF must provide a copy of the monitoring tool, monitoring plan, and monitoring schedule for CSSF's monitoring of the service providers.

Section 3: Adult/Dislocated Worker

Finding #39: Lack of Adult Priority of Service Policy

Local Level, WIOA Adult

CMG Indicator: 1.e Participant Services, 1.e.2: Priority of Service

Condition: The LWDB's priority of services and special populations' policy does not comply with WIOA regulations.

Cause: The LWDB failed to develop the WIOA required priority of services policy.

Criteria:

- 20 CFR 680.600 – 680.680, establishes state and local areas must develop a priority and special population's policy.

Corrective Action: To resolve this finding, CSSF must develop a priority of service and special population policy that complies with WIOA regulations. The State must provide a copy of the policy.

Finding #40: Lack of Dislocated Worker Policies

Local Level, WIOA DW

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

CMG Indicator: 1.e Participant Services, 1.e.3: Eligibility/Enrollment

Condition: The LWDB has does not have a required Dislocated Worker policy for determining eligibility.

Cause: The local board failed to develop the WIOA required dislocated worker policy

Criteria:

- WIOA sec. 3(15)(B)(ii) or (iii), “unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters,” and “unlikely to return to a previous industry or occupation” under WIOA sec. 3(15)(A)(iii)
- 20 CFR 680.600

Corrective Action: To resolve this finding, CSSF must develop a dislocated worker policy in compliance with WIOA regulations. The State must provide a copy of the policy.

Section 4: Fiscal

Finding #41: Inadequate Contract Administration Processes

Local Level, Fiscal

CMG Indicator: 2.d.5: Contract Administration

Condition: CSSF’s one stop operator and youth provider contracts contain provisions for performance incentive payments for each Title I participant entering employment at or above a set hourly wage. The review identified numerous instances in which participants were not properly exited from the system as required when AJC staff could not confirm a favorable employment outcome. In these instances, AJC staff manually extended participants’ enrollment in the WIOA Adult, DW and Youth programs without providing a career service. CSSF’s contract structure creates an incentive to delay exit from the program when a participant does not become gainfully employed after receiving career services. Potentially paying providers for services provided to ineligible participants or for services not provided could result in questioned costs.

Other areas of the contract boilerplate that are of concern include:

- The contract is confusing and ambiguous on what the local area is actually paying for due to the numerous attachments and exhibits that describe services.
- There is no indication in the contract that the contractor is a sub-recipient. Local areas must monitor sub-recipients.
- The statement of work (SOW) does not provide a detailed process for the supervision of partners, management of State employees, and management of the one-stop center. Management of the Wagner-Peyser (WP) staff may violate the WP regulations that were in place at that time.
- Performance measures stated are not tied to WIOA indicators, which may not result in positive WIOA performance outcomes.
- The contract includes a provision to provide all business services, but LMI is not included, and it is not clear who will be performing this function.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Cause: The LWDB failed to develop contract administration processes that involve performance monitoring and quality assurance to identify deficiencies in the contract implementation, scope and conditions.

Criteria:

- 2 CFR 200.318(b) requires Non-Federal entities to maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- 20 CFR 677.150(c)(1) defines the date of exit as the last date of service for Title I Adult, DW, and Youth programs. ETA regulations do not allow an exemption to postpone an exit to wait for a better employment outcome.

Corrective Action: To resolve this finding, the State must review the invoices received and all payments made in regards to the CareerSource centers, OSY and ISY service provider contracts to ensure payments are consistent with the performance/milestones outlined in the contract

The LWDB must develop a contract template that may be modified to cover other services and reduce the number of exhibits and attachments. The contract must include a specified SOW that outlines the goods or services provided in consideration for specified payments. The State must provide a copy of the revised contract template.

Finding #42: Noncompliance with Grievance Process Requirements

Local Level, Fiscal

CMG Indicator: 2.i.4 Grievance and Complaint System

Condition: CSSF handles most complaints and grievances through informal resolution procedures, but lacks a monitoring process to track resolution of those complaints and grievances. CSSF has available on its website Grievance Procedures and Statewide Discrimination-Complaint Processing Information to address participant and interested party formal grievances and complaints.

Cause: The LWDB failed to develop a process to track and monitor grievances and complaints resolved through informal resolution.

Citation:

- WIOA sec. 188, 20 CFR 683.600-683.650, 20 CFR Part 658, and 20 CFR 683.700 requires States and local areas to establish grievance procedures that allow participants to file grievances and complaints alleging violations of the requirements of WIOA. The regulations also require a system to maintain and monitor grievances.

Corrective Action: To resolve this issue, the LWDB must update their Grievance Procedures to include a system for monitoring the resolution of informal grievances. The State must provide a copy of the policy.

Section 5: SCSEP/ES/MSFW/TAA/All Programs

**Finding #43: SCSEP Memorandum of Understanding Not in Place
AARP Foundation Sub-Grantee and Host Agency, SCSEP**

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

CMG Indicator: 1.a.3 Coordination integration, 1.b.4 Required One Stop Partner

Condition: The LWDB has not entered into a MOU and IFA Agreement with the local SCSEP provider, AARP. As a direct provider of services listed in Section 121 of the WIOA, AARP Foundation is a required partner and must enter into an MOU, including an Infrastructure Funding Agreement (IFA), with the AJC in the LWDA's where it provides those direct services.

Cause: LWDA failed to enter into a MOU and IFA with the sub-recipient.

Criteria:

- TEGL 16-16 states, "One of the critical requirements that a one-stop partner must satisfy is signing the local MOU..."
- 20 CFR 678.500, "the MOU must describe the services to be provided, infrastructure and additional costs and contributions, the duration of the agreement, and other elements..."

Corrective Action: To resolve this finding, the LWDA must enter into an MOU and IFA agreement with the AARP Foundation. The State must provide copies of the signed MOU and IFA.

**Finding #44: No Host Agency Policies to Govern Training Plan
Independent Living Facility Host Agency, SCSEP
CMG Indicator: 1.e.7 Training Service**

Condition: The Host Agency did not have policies governing the development of training plans and the delivery of training services. The participant files did not document regular contact between host agency staff and participants to discuss participants' employment goals and documentation of participants' training milestones. Training should include lectures, seminars, classroom instruction and on the job experience. The Host Agency only documented the on the job experience.

Cause: The Host Agency failed to develop required policy to guide the development of participant training plans.

Criteria:

- 20 CFR 641.540-545, OAA 502 (c) (6) (A) (ii)
- Older Workers Bulletin 04-04, "A detailed training plan must be developed through the IEP that lists the needed skills and a realistic timeline for learning them".

Corrective Action: To resolve this finding the host agency and grantee must develop a policy to ensure all requirements are included in the participant's training plan. The State must provide a copy of the policy.

**Finding #45: No Joint IEP and Service Plan Development between the Sub-Grantee, Host
Agency, and Participants
Independent Living Facility Host Agency, SCSEP
CMG Indicator: 1.e.5: Participant Service Plan**

Condition: The sub-grantee and host agency did not have a policy that provides guidance in the development of a participant's IEP.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Cause: The Host Agency failed to develop operational policy to guide local sub-grantees on IEP development.

Criteria:

- 20 CFR 641.535(a) (3) – “Using the information gathered during the initial assessment to develop an IEP that includes an appropriate employment goal for each participant...”
- WIOA sec. 134(c) (2) (A) (xii) (II)
- Older Worker Bulletin 04-04, “Quality training must have a foundation of a good assessment followed by the development of a service strategy which is documented on the Individual Employment Plan (IEP)”.

Corrective Action: To resolve this finding, the Host Agency, Independent Living Facility, must develop a policy that provides guidance in the development of the participant’s IEP. The State must provide a copy of the policy.

**Finding #46: No Joint IEP and Service Plan Development between the Sub-Grantee, Host Agency, and Participants
The City of Coral Gables Police Department Host Agency, SCSEP
CMG Indicator: 1.e.5: Participant Service Plan**

Condition: The sub-grantee and host agency did not have a policy that provides guidance in the development of a participant’s IEP.

Cause: The Host Agency failed to develop operational policy to guide local sub-grantees on IEP development.

Criteria:

- 20 CFR 641.535(a) (3) – “Using the information gathered during the initial assessment to develop an IEP that includes an appropriate employment goal for each participant...”
- WIOA sec. 134(c) (2) (A) (xii) (II)
- Older Worker Bulletin 04-04, “Quality training must have a foundation of a good assessment followed by the development of a service strategy which is documented on the Individual Employment Plan (IEP)”.

Corrective Action: To resolve this finding, the City of Coral Gables Police Department must develop a policy that provides guidance in the development of the participant’s IEP. The State must provide a copy of the policy.

**Finding #47: Inadequate Procedures for Processing ES and Employment-Related Law Complaints
Local Level, ES
CMG Indicator: 2.i.4 Grievance and Complaint System**

Condition: CSSF complaint procedures do not comply with the ES and Employment-Related law procedures. Career center staff do not use ETA Form 8429 to record complaints. The complaint form used by CSSF staff does not solicit all required information necessary to process a complaint. The process for filing complaints alleging discrimination does not include the option to file directly with the

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Civil Rights Center (CRC). State Workforce Agencies (SWAs) are required to report information pertaining to complaints and apparent violations to ETA quarterly through 5148 reports. A request to review PY 2019 complaint files was sent to the LWDB, to determine if CSSF accurately reported complaints and/or apparent violations. LWDB did not provide these files.

Cause: CSSF failed to establish requirements for processing and reporting complaints

Criteria:

- 20 CFR 658.410(c)(1-6) list the required information necessary for ES staff to process a complaint. To ensure that complainants provide this information
- 20 CFR 658.411(a)(3) requires that States use the Complaint/Referral Form 8429 (see Training and Employment Notice 20-19 to access ETA Form 8429: https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3427).
- 29 CFR 38.35 describes how individuals can file complaints alleging discrimination with the local Equal Opportunity Officer, or to file directly with the Civil Rights Center (CRC).
- 20 CFR 653.109(b)(9) requires SWAs to collect data on complaints and apparent violations.

Corrective Action: To resolve this finding, CSSF must revise its local complaint procedures to ensure career center staff are compliant with recordkeeping, processing, and reporting requirements. The State must provide a copy of the revised local complaint procedures.

Finding #48: Incorrectly Recording Job Referrals and Placements during Mass Recruitments

Local Level, MSFW

CMG Indicator: 1.e.1 Service Delivery

Condition: Career center staff incorrectly recorded job referrals and placements. Growers and farm labor contractors (FLCs) organize mass recruitment events onsite at the employer's location, and AJC staff assist workers with completing I-9 forms to verify work authorization. These farmworkers are also enrolled as ES Program participants. Federal staff reviewed the case files for several farmworkers that received the I-9 assistance. Service records, in case files # 9163621, 14714676, 9415946, 12197816, 13077355, and 14104313 show job referrals and job placements connected to the mass recruitment events. Career center staff did not provide job referrals or job placements to farmworkers at these mass recruitment events. These farmworkers were already recruited and hired by Growers and FLCs.

Cause: The LWDB failed to provide guidance on how to record job referrals and placements properly during mass recruitment events.

Criteria:

- 20 CFR 651 defines a job referral as "the act of bringing to the attention of an employer a participant or group of participants who are available for specific job openings or for a potential job" and a job placement as "the hiring by a public or private employer of an individual referred by the ES office for a job or an interview."

Corrective Action: To resolve this finding, the LWDB must revise and/or create processes that correctly define job referrals and job placements. The State must provide copies of the revised or new processes.

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

**Finding #49: Lack of Trade Adjustment Assistance (TAA) Case Management Policy
CMG Indicator: Trade Supplement 4.82 Case Management Process for Trade-Affected Workers**

Condition: CSSF does not have a policy to document the required eight (8) case management services to trade-affected workers. Without the policy, the State and LWDB could not demonstrate that they provide or offer these eight employment and case management services to eligible workers.

Cause: LWDB failed to create a required trade program policy.

Criteria:

- Trade Act Sec. 235, Governor-Secretary Agreement, and TEGL No. 22-08 Operating Instructions for Implementing the Amendments to the Trade Act of 1974 Enacted by the Trade and Globalization Adjustment Assistance Act of 2009 Section G 1
- Employment and Case Management Services Provision of Services, stated as Statutory Change: Section 1826 of the 2009 Amendments amends Section 235 of the 2002 Act to read: SEC. 235.
 - The Secretary shall make available, directly or through agreements with States under section 239, to adversely affected workers and adversely affected incumbent workers covered by a certification under subchapter A of this chapter...” eight employment and case management services.

Corrective Action: To resolve this finding, the SWDB and LWDB must develop a policy to ensure staff are aware of and make the eight (8) employment and case management services available to eligible individuals. The State must provide a copy of the policy.

Finding #50: Noncompliance with 504 Disability Requirements

Local Level, All programs

CMG Indicator: 2.i: Civil Rights, Complaints, Grievances and Incident Reporting, 2.i.3:

Facilities

Condition: CSSF one-stop career centers do not comply with disability, physical and programmatic accessibility requirements. Individuals with disabilities cannot access the water fountain, door, bathroom or parking lot in two (2) of the centers. In addition, the career centers do not provide language translation services for all non-English speaking individuals, as well as individuals who are blind or deaf.

Cause: LWDB failed to provide adequate accommodations for individuals with disabilities.

Criteria:

- Section 504 of the Rehabilitation Act of 1973: provides that no otherwise qualified individual with a disability shall, solely by reason of this or her disability, be excluded from the participation in, be denied the benefits or, be subjected to discrimination. Recipients are obligated to provide physical and programmatic accessibility and reasonable accommodation.
- WIOA 20 CFR 678.305(e) requires that all comprehensive one-stop centers must be physically and programmatically accessible to individuals with disabilities as described in 29 CFR, part 38, the implementing regulations of WIOA section 188; also reference 20 CFR 678.800(e).

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Corrective Action: To resolve this finding, the LWDA must ensure that all career centers comply with Section 504 of the Rehabilitation Act of 1973. The State must provide a copy of evidence of accommodations.

AREAS OF CONCERN

**Area of Concern #1: No Uniformed Strategic Plan for Rapid Response and Layoff Aversion
State Level, WIOA
CMG Indicator: 1.d.3 Business Services**

DEO administers Rapid Response services, while CSF delivers Layoff Aversion through the Business Services team. ETA is not providing input on which entity should deliver these services; however, there should be more collaboration between the two (2) entities, to ensure the services comply with WIOA guidance.

Criteria:

- 20 CFR 682.330 outlines required Rapid Response, and layoff aversion, activities.

Recommended Action: The State must develop a process that allows for more collaboration between both entities, in the delivery of layoff aversion and unemployment resulting from layoffs strategies and assistance.

**Area of Concern #2: Ineffective Prevailing Wage and Practice Surveys
State Level, MSFW)
CMG Indicator: 2.a.1 Specific Award Conditions**

The Office of Foreign Labor Certification (OFLC) utilizes prevailing wage and practice surveys to help determine prevailing wages and working conditions in agricultural occupations.

DEO did not complete prevailing wage and practice surveys for any agricultural occupations in 2019. In 2018, Florida mailed approximately 400 surveys to agricultural employers. Employers returned approximately ten (10) completed surveys to DEO.

Recommendation: Florida DEO should prioritize conducting H-2A prevailing wage and practice surveys.

PROMISING PRACTICES

The practices described below are noted for the record to provide a fuller picture of grant activities. Their inclusion here constitutes neither a specific endorsement nor a recommendation for future funding.

Promising Practice #1: Promoting Career-Themed Education and Industry Certifications for Middle and High Schools Students through the Career and Professional Education Act

FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida Department of Elder Affairs

State Level, WIOA

In 2007, the Florida Legislature passed the Career and Professional Education (CAPE) Act. The Act created a partnership between workforce and education stakeholders to achieve the following:

- To improve middle and high school academic performance by providing rigorous and relevant curriculum opportunities;
- To provide rigorous and relevant career-themed courses that articulate to postsecondary-level coursework and lead to industry certification;
- To support local and regional economic development;
- To respond to Florida's critical workforce needs; and
- To provide state residents with access to high-wage and high-demand careers.

The Cape Act partnership includes the Florida Department of Education, Florida DEO, and CSF. CSF's role in implementation is to recommend industry certifications based on current labor market information.

The 2018-2019 CAPE Act annual report summarizes the progress the CAPE Act has made in promoting career-themed education and industry certifications. In the 2018-2019 school year, Florida school districts registered 1,233 unique career-themed courses. Among the 505,821 CAPE student participants, 125,066 students earned industry-recognized credentials in 193 of the 264 different certifications included on the CAPE Industry Certification Funding List.

Promising Practice #2: WOTC Application Processing Automation through Electronic System State Level, WOTC

Florida implemented an electronic application system for processing WOTC applications. The system allows employers to submit WOTC applications, and for DEO to issue certifications and denials electronically. This system automates verifying WOTC eligibility for five different target groups, greatly reducing application processing time. The electronic system also assigns applications for review to Florida DEO staff to ensure timely WOTC application processing and prevent any application backlogs.

Promising Practice #3: Expanding IT talent pipeline through Support of TechHire Centers at Local Non-Profits Local Level, WIOA

CSSF partnered with two (2) local non-profits, Big Brothers Big Sister of Miami (BBBSM) and YWCA of South Florida to create onsite TechHire Centers. These centers support disadvantaged youth to explore careers in Information Technology (IT) by offering regular cohort training in topics such as network administration and application development. These trainings teach IT skills, prepare students for IT certification exams, and help young students gain experience and industry-recognized credentials. More information about the TechHire Center located at the YWCA is available online at: <https://www.ywca-miami.org/what-we-do/empowerment-and-economic-advancement/techhirecenter/>.

Promising Practice #4: Partnerships with Community-Based and Faith-Based Organizations to Create Access Points

**FY20 Comprehensive Monitoring Report: Florida Department of Economic Opportunity, Florida
Department of Elder Affairs**

Local Level, All

CSSF has established partnerships with several community-based and faith-based organizations throughout their service area to prioritize serving individuals with barriers to employments. CSSF partners with the Camillus House Homeless Shelter to create an access point for career and training services. Through a resource sharing agreement, Camillus House provides space for one kiosk and four (4) CSSF staff at their shelter with the commitment to refer at least 300 homeless individuals to career services annually. CSSF partners with the faith-based organization, Trinity Church, to provide a resource room at the church with eight computers and training on how to navigate EMD. Trinity church provides one staff to assist individuals with EMD and the space for the resource room. Another similar agreement is in place with the non-profit, Centro Campesino, to provide 20 computers and training on EMD in exchange for space onsite at the non-profit's location to serve customers; many of which are low income and MSFWs. Five (5) public libraries are also access points for career services. These partnerships have created many different locations where career and training services are accessible to individuals with barriers to employment.

- END OF REPORT -



SFWIB EXECUTIVE COMMITTEE

DATE: 4/8/2021

AGENDA ITEM NUMBER: 3c

AGENDA ITEM SUBJECT: REFUGEE REEMPLOYMENT AND TRAINING CONTRACT UPDATE

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **National leader in an ROI-focused enterprise**

BACKGROUND:

N/A

FUNDING: N/A

PERFORMANCE: N/A

NO ATTACHMENT



SFWIB EXECUTIVE COMMITTEE

DATE: 4/8/2021

AGENDA ITEM NUMBER: 4

AGENDA ITEM SUBJECT: NATIONAL DISLOCATED WORKER GRANT FUND PROJECTS

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: SFWIB staff recommends to the Executive Committee to recommend to the Board the approval to reallocate an amount not to exceed \$800,310 in National Dislocated Worker Grant (NDWG) funding, as set forth below.

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **Develop specific programs and initiatives**

BACKGROUND:

On April 28, 2020, the SFWIB received a Notice of Funds Availability from the Department of Economic Opportunity (DEO) of the State of Florida for a total award of \$1,504,880.00 in National Dislocated Worker Grant (NDWG) funds. The purpose of the award is to provide temporary jobs to assist with humanitarian aid, clean-up and restoration activities due to Coronavirus Disease 2019 (COVID-19).

Project 1: The SFWIB recommends to the Executive Committee the allocation of COVID-19 NDWG funds in the amount of \$497,280.00 to Miami-Dade County Mayor Daniella Levine Cava's Vaccine Accessibility for Community Safety (VACS) Now initiative. The VACS Now initiative was launched to address the COVID-19 pandemic and provide county residents COVID-19 vaccination information. The outreach initiative will provide up to 30 eligible dislocated workers with up to 16 weeks of disaster-relief temporary employment. The temporary staff will be responsible for the following activities:

- Provide vaccination locations, appointments and questions & answers to individuals during site visits.
- Canvass areas most affected by COVID-19.
- Conduct seminars to provide best practices on how residents can remain safe based on county research.
- Providing up-to-date information relating to COVID-19 vaccinations.

Project 2: The SFWIB recommends to the Executive Committee the allocation of COVID-19 NDWG funds in the amount of \$303,030.00 to the Circle of Brotherhood, Inc. (COB) project. The COB project will provide up to 30 eligible dislocated workers with up to 13 weeks of disaster-relief temporary employment. The temporary dislocated workers will be responsible for the following activities:

- Provide vaccination locations, appointments and questions & answers to individuals during site visits.
- Canvass areas most affected by COVID-19.
- Conduct Pre and Post COVID-19 wellness checks.
- Conduct seminars to provide best practices on how residents can remain safe based on county research.
- Providing up-to-date information relating to COVID-19 vaccinations.

In addition to temporary employment, the COB dislocated workers will receive the following trainings and certifications:

1. First Aid
2. Cardiopulmonary Resuscitation (CPR)
3. Community Emergency Response Training (CERT)

Miami-Dade County and the COB will function as the worksite partners to provide supervision for the dislocated workers. The SFWIB/CSSF will utilize Alpha 1 Staffing/Search Firm LLC (staffing agency) to serve as the employer of record for the NDWG projects.

FUNDING: WIOA National Dislocated Worker Grant COVID-19

PERFORMANCE: N/A

NO ATTACHMENT



SFWIB EXECUTIVE COMMITTEE

DATE: 4/8/2021

AGENDA ITEM NUMBER: 5

AGENDA ITEM SUBJECT: APPROVAL OF ALLOCATION FOR MIAMI-DADE COUNTY COMMISSION LEGISLATION INTERNSHIP PROGRAM

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: SFWIB staff recommends to the Executive Committee to recommend to the Board the approval to allocate WIOA Youth funding in an amount not to exceed \$100,000.00 from the period of March 1, 2021 to June 31, 2021 for the Miami-Dade County Commission Legislative Internship Project, as described below.

STRATEGIC GOAL: **DEDICATED COMMITMENT TO YOUTH PARTICIPATION**

STRATEGIC PROJECT: **Joint contribution for youth career pathway models**

BACKGROUND:

The Office of the Honorable Chairman Jose "Pepe" Diaz has developed an Legislative Internship Program. The program is being created to develop a pipeline for young adults residing in Miami-Dade County to receive instructional and mentoring activities with the goal of facilitating a ready entry-level workforce for positions within the Miami-Dade County government.

1. The Legislative Internship Program (The program) will focus on recruiting Undergraduate and postgraduate students that are interested in Policy and legislation.
 - a. The program will be born and operated out of the Office of the Chair of the Board of County Commissioners.
 - b. The program will be available to all colleges operating within Miami-Dade County.
2. The program will have a paid and unpaid component.
 - a. The paid component will be funded by Career Source South Florida.
 - i. The intent for Career Source South Florida is to place these students in a favorable position for long-term employment.
 - ii. Career Source South Florida will develop the criteria necessary for students to qualify for the paid internship portion.
 - b. The un-paid component will be available for students that do not qualify for the paid internship.
 - c. Both paid and un-paid programs will be operated, and the Office of the Chair and the Interns will be or other Commission office(s) to which the intern is assigned, in conjunction with the internship program of the sponsoring University.

3. This program is the first of its kind in Miami-Dade County, through partnerships within our Collegial Community. The Office of the Chair will develop and implement this program with the final intent of having all Commission Offices participating in this program and assigning interns based on the residency and commission district. High performing students will be eligible for the program and selected by the Office of the Chair.

FUNDING: Workforce System Funding

PERFORMANCE: N/A

NO ATTACHMENT