



**SOUTH FLORIDA WORKFORCE INVESTMENT BOARD  
EXECUTIVE COMMITTEE  
MEETING  
THURSDAY, MARCH 10, 2022  
8:15 A.M.**

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

The public may choose to view the session online via Zoom. **Registration is required:**  
[https://us02web.zoom.us/webinar/register/WN\\_ISSH7LAzTdywsrtfD2Q3IA](https://us02web.zoom.us/webinar/register/WN_ISSH7LAzTdywsrtfD2Q3IA)

**AGENDA**

1. Call to Order and Introductions
2. Approval of Executive Committee Meeting Minutes
  - A. October 14, 2021
  - B. December 9, 2021
  - C. February 10, 2022
3. Information – Department of Labor Review Update
4. Recommendation as to Approval of the DEO 2020-21 Internal Control Questionnaire and Assessment
5. Recommendation as to Approval of New Training Providers and Programs and New Programs for Existing Training Providers

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"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

**DATE:** 03/10/2022

**AGENDA ITEM:** 2A

**AGENDA TOPIC:** MEETING MINUTES - OCTOBER 2021

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### SFWIB EXECUTIVE COMMITTEE MEETING MINUTES

**DATE:** October 14, 2021

**LOCATION:** CareerSource South Florida  
7300 Corporate Center Drive, Suite 500 (Conf. Room 2)  
Miami, FL 33126  
Zoom:  
[https://us02web.zoom.us/webinar/register/WN\\_ISSH7LAzTdywsrtfD2Q3IA](https://us02web.zoom.us/webinar/register/WN_ISSH7LAzTdywsrtfD2Q3IA)

- 1. CALL TO ORDER:** 8:29AM
- 2. ROLL CALL:** 5 members; 4 required; 4 present: Quorum established.

SFWIB EXECUTIVE COMMITTEE MEMBERS PRESENT	SFWIB MEMBERS ABSENT	SFWIB STAFF
Perez, Andy, Chair (via Zoom) Gibson, Charles, Vice-Chair  del Valle, Juan-Carlos Ferradaz, Gilda	Garza, Maria	Beasley, Rick Morgan, Ebony Smith, Robert  <b>ADMINISTRATION/IT</b> Francis, Anderson McFarlane, Cassandra
<b>OTHER ATTENDEES</b>		
Rodanes, Carlos - New Horizons of South Florida		

[No Quorum]

Agenda items are displayed in the order they were discussed.

### 3. Summer Youth Employment Program Update

Mr. Beasley introduced the item and further presented.

The report is not included; however, Mr. Beasley will provide a full copy of the report to the members it.

SFWIB staff will schedule a Youth presentation during the December meeting to share more about what we are accomplishing through the Summer Youth Internship Program (SYIP).

Mr. Beasley further advised that we are currently in discussions with the City of Miami Gardens to expand their Summer Youth Employment Program. Last year, with limited resources, we served approximately forty-five (45) youth; this year, they would like to increase the number of participants to one-hundred twenty-five (125) or more.

#### [Mr. Bridges arrived 8:32am; Quorum established]

Mr. del Valle inquired if the Children's Trust tracks those that have completed an internship and successfully transitioned to a position within the organization they were working with.

Mr. Beasley advised that he will review and advise Mr. del Valle after the meeting.

### 2. Approval of Executive Committee Meeting Minutes

A. August 12, 2021 - Mr. del Valle moved the approval of the August 12, 2021 Executive Committee Meeting Minutes. Motion seconded by Ms. Gilda Ferradaz;  
**Motion Passed Unanimously.**

B. September 9, 2021- Mr. del Valle moved the approval of the September 9, 2021 Executive Committee Meeting Minutes. Motion seconded by Ms. Gilda Ferradaz;  
**Motion Passed Unanimously.**

### 4. U.S. Department of Labor, Employment and Training Administration Report

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

Mr. Beasley and SFWIB staff reviewed the questionable costs and drafted a response to the USDOL. Mr. Beasley has requested work papers that support the claim of falsified records. We have not received a response to date; however, SFWIB staff will continue to analyze the information that has been provided while we await documentation from the USDOL.

Ms. Ferradaz asks if the report contains background on the cases that were flagged as falsified.

Mr. Beasley responded "No."

There was further discussion.

Chairman Perez asks for clarification regarding the years involved in the audit. Mr. Beasley advised the review included all contracts from 2017 through 2020; he further elaborated that all contracts within that period are considered questionable by the USDOL.

Mr. Beasley presented a draft of the SFWIB response to USDOL. A copy of the response will be forwarded to the members once finalized.

We will be hiring a legal consultant to work with the SFWIB team.

#### 5. Miami Community Ventures (MCV)

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

There was no further discussion.

Mr. Bridges moved the approval to recommend to the Board the approval to authorize staff to allocate funds to the Beacon Council Economic Development Foundation, Inc. for Miami Community Ventures. **Motion seconded by Mr. del Valle; Motion passed unanimously for recommendation to the full Board.**

#### 6. Temporary Contract for a One-Stop Career Center Operator

Mr. Beasley introduced the item and further presented.

There was no further discussion.

Mr. Bridges moved the approval to recommend to the Board the approval to extend Opa-Locka Community Development Corporation, Inc. temporary contracts to operate the Opa-Locka and Carol City CareerSource Centers. **Motion seconded by Mr. del Valle; Motion passed unanimously for recommendation to the full Board.**

#### 7. New and Existing Training Providers and Programs

Mr. Beasley introduced the item and further presented.

There was no further discussion.

Vice-Chairman Bridges moved the approval to recommend to the Board the approval of a New Non-Credit Program for Existing Training Provider. Motion seconded by Ms. Ferradaz; **Motion passed unanimously for recommendation to the full Board**

## New Business

### 1. Nominating Committee for New SFWIB Officers

Mr. Beasley requests approval from the Chairman to move forward with establishing a Nominating Committee to select new officers for the SFWIB. It will consist of the former Chair, Mr. Jeff Bridges, Mr. Thomas Roth, and Mr. Joe Chi.

**Chairman Perez approved the request.**

## Discussion/Questions Presented:

Chairman Perez presented a concern about the labor market and asked about any strategies aimed at getting the nation back to work.

Mr. Beasley acknowledged that the need is tremendous as per his many discussions with employers. CareerSource South Florida's strategy is to continue to work with employers and our proprietary schools to develop Apprenticeship/Pre-apprenticeship models – or hybrid offerings - that will combine work experience and training.

With no further business presented to the Committee, the meeting adjourned at 8:57am.



## SFWIB EXECUTIVE COMMITTEE MEETING

**DATE:** 03/10/2022

**AGENDA ITEM:** 2B

**AGENDA TOPIC:** MEETING MINUTES - DECEMBER 2021

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### SFWIB EXECUTIVE COMMITTEE MEETING MINUTES

**DATE:** December 9, 2021

**LOCATION:** CareerSource South Florida  
7300 Corporate Center Drive, Suite 500 (Conf. Room 2)  
Miami, FL 33126  
Zoom:  
[https://us02web.zoom.us/webinar/register/WN\\_ISSH7LAzTdywsrtfD2Q3IA](https://us02web.zoom.us/webinar/register/WN_ISSH7LAzTdywsrtfD2Q3IA)

- 1. CALL TO ORDER:** 8:22AM
- 2. ROLL CALL:** 5 members; 4 required; 3 present: No Quorum

<b>SFWIB EXECUTIVE COMMITTEE MEMBERS PRESENT</b>	<b>SFWIB MEMBERS ABSENT</b>	<b>SFWIB STAFF</b>
Ferradaz, Gilda Gibson, Charles, Vice-Chair Perez, Andy, Chair (via Zoom)	del Valle, Juan-Carlos Garza, Maria	Beasley, Rick Morgan, Ebony Smith, Robert  <b>ADMINISTRATION/IT</b> Francis, Anderson McFarlane, Cassandra
<b>OTHER ATTENDEES</b>		
Rodanes, Carlos - New Horizons of South Florida		

Agenda items are displayed in the order they were discussed.



### **3. Informational - Summer Youth Internship Program Update**

Mr. Beasley introduced the item; Mr. Smith further reviewed the item as presented in the agenda packet.

SFWIB staff will schedule a Youth presentation during the December meeting to share more about what we are accomplishing through the Summer Youth Internship Program (SYIP).

Mr. Beasley further advised that the program, initiated through the Children's Trust and Miami-Dade County Public Schools, has grown tremendously. The South Florida Workforce Investment Board and Miami-Dade County, in conjunction with several community organizations, have grown the program contributing approximately 4MM dollars annually. A report will be provided to the full board that delineates program perimeters, requirements, and contributions.

Mr. Beasley shared that the third cohort of the Women in Tech (WIT) program will be graduating in the afternoon. There are eleven (11) graduates, each gaining certification in a variety of areas (minimum of three). Mr. Smith will give a full review of participant employment and educational successes at the December SFWIB meeting. He also shared that we are working with Ted Lucas to increase the number of youth that have access to jobs in IT.

Chairman Perez asked if Comcast is still involved. Mr. Beasley shared that we are still working with them; however, their primary focus has been the rollout of the Internet Essentials program.

Mr. Beasley also shared that we will be launching two new initiatives, centered around TechHire, with both Microsoft and Google. Programs will be collaborating with the business community to provide training for incumbent workers as well as targeting key zip codes within Miami-Dade and Monroe counties to increase the number of individuals in IT. Training is self-paced, as such; we are looking to partner with colleges to subsidize the instructors.

Chairman Perez inquired about funding for the Children's Trust scholarships. Mr. Beasley advised that the Finance team has been out of the office for approximately a week. We will be able to connect with them and advise by Thursday of this week.

### **4. Informational – Federal Reserve Benefits Cliff Initiative**

Mr. Beasley presented and further presented. The United Way, The Greater Miami Chamber of Commerce, and CSSF will be co-chairing the initiative. Two legislative items

were presented to the Chamber yesterday are in support of this effort. We will share this information with the full Board next week.

Chairman Perez advised the team to be on the lookout for programs centered around mental health initiatives in the near future. Employers are asking for more information and programs in support of employee mental health. Mr. Beasley agreed and further elaborated on the existing partnerships we have with Key Clubhouse & Lotus House.

Mr. Beasley shared that he will be meeting with Judge Leifman and Madam President to tour his new mental health facility, which is a diversion program for individuals that have been detained.

Ms. Ferradaz advised that one of the providers of the South Florida Behavioral Health's network and the umbrella agency over the substance abuse and mental health programs for DCF, TMSF, is right across the street from CSSF. She will send a formal email introduction to the CEO, Dr. Newcomer.

#### **5. Informational - SFWIB Strategic Plan Update**

Mr. Beasley advised that he will be scheduling a Strategic Planning Meeting late in January which will serve to set the pace on areas of focus and funding for the year and an orientation for new board members that will be coming onboard this term.

A revision to the One Stop Operator process is underway. Mr. Beasley and the team will be sharing more about the monitoring and compliance processes that will be introduced with the new changes.

Ms. Ferradaz asked if other workforce boards in the state are moving in a similar direction. Mr. Smith elaborated advising the Executive Committee that boards have the option to assign the One Stop Operator (OSO) role to a service provider or become the OSO directly – but not both.

Mr. Perez suggested adding the word “Digital” or “Automate” to strategic goal #2. The pandemic has shown us that we do not need a large number of sites. The future looks more like the development of a Virtual One Stop Operator or app development.

#### **6. Recommendation as to Approval of a New Programs for an Existing Training Provider**

[Transitioned to Global Talent and Competitiveness Council]



## New Business

### 1. Organizations Interested in Developing Apprenticeship Programs

Chairman Perez advised that there are a few large construction and HVAC companies interested in launching apprenticeship programs. Chairman Perez asked for a contact person. Mr. Beasley advised to have them connect with Mr. Robert Smith.

Mr. Beasley shared that he will be scheduling a meeting with the training vendors regarding developing apprenticeship programs moving forward.

With no further business presented to the Committee, the meeting adjourned at 9:16am.

DRAFT



## SFWIB EXECUTIVE COMMITTEE MEETING

**DATE:** 03/10/2022

**AGENDA ITEM:** 2C

**AGENDA TOPIC:** MEETING MINUTES - FEBRUARY 2022

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### SFWIB EXECUTIVE COMMITTEE MEETING MINUTES

**DATE:** February 10, 2022

**LOCATION:** CareerSource South Florida  
7300 Corporate Center Drive, Suite 500 (Conf. Room 2)  
Miami, FL 33126  
Zoom:  
[https://us02web.zoom.us/webinar/register/WN\\_ISSH7LAzTdywsrtfD2Q3IA](https://us02web.zoom.us/webinar/register/WN_ISSH7LAzTdywsrtfD2Q3IA)

- 1. CALL TO ORDER:** 8:22AM
- 2. ROLL CALL:** 5 members; 4 required; 3 present: No Quorum

<b>SFWIB EXECUTIVE COMMITTEE MEMBERS PRESENT</b>	<b>SFWIB MEMBERS ABSENT</b>	<b>SFWIB STAFF</b>
del Valle, Juan-Carlos, Vice-Chairman Ferradaz, Gilda Perez, Andy, Chair	Garza, Maria Gibson, Charles, Chairman	Beasley, Rick Gilbert, David Morgan, Ebony Smith, Robert  <b>ADMINISTRATION/IT</b> Almonte, Ivan Francis, Anderson
<b>OTHER ATTENDEES</b>		
Aguilera, Ruben - New Horizons of South Florida Cooper, Jamie – New Horizons of South Florida		

Agenda items are displayed in the order they were discussed.



## 2A. Approval of Executive Committee Meeting Minutes - December 9, 2021

Deferred – Lack of quorum

### Executive Director Update

#### President of FIU Resignation

Mr. Beasley has been invited to participate on the search evaluation committee for the new President of FIU. Recommendations for possible replacements have been presented for consideration and should be moving forward in the coming weeks.

#### MDCPS Superintendent Carvalho's Departure

Mr. Beasley attended the farewell event for MDCPS Superintendent Carvalho on Wednesday, Feb. 9, 2022, where he offered well wishes and expressed appreciation on behalf of the SFWIB.

#### Apprenticeship Programs

Currently staff is working to establish a pre-apprenticeship program in the technical schools for the automotive industry that will create a pathway directly into the apprenticeship program once students have graduated.

##### New apprenticeship programs underway

- Construction program with Palmetto Homes.
- Early Learning Coalition (ELC) – the proposed apprenticeship program was forwarded to Tallahassee for review and approval; however, it was returned for revision (requires 3,000 hours vs 2,070). SFWIB will fund the program at 30%; it will be presented to the board once it has been approved by the State. Once the program is approved, we will look to create a pre-apprenticeship program.
  - We are excited about this offering as it helps to promote and push quality education in early learning.
  - We have been able to persuade employers participating in the program to increase wages, up to \$15.00 up from \$14.00, which allows them to be more competitive in today's market. Participants will earn their CDA as well as college credits.

#### Early Learning Coalition (ELC) Internship

Mr. Beasley advised that as we work to get the apprenticeship program approved, we have launched an internship program with ELC, which serves as an early entry component for an apprenticeship. Currently, parents are experiencing difficulty finding children due to the pandemic and the great recession, which directly affects their ability to work. To combat this, CSSF is targeting the older youth population, seeking to provide paid work experience (PWE).

Mr. Gilbert advised that there are several internship positions available. The team is now in the process of conducting site visits with employers that have signed up to participate in the program.

Mr. Beasley further elaborated that the apprenticeship/pre-apprenticeship programs further assist employers with recruitment and retention. In addition, the programs are incentivizing employers to increase wages.

### **Greater Miami Chamber Legislative Update**

Mr. Beasley shared that the Greater Miami Chamber of Commerce is currently pushing a number of legislative items in Tallahassee including a Nursing bill designed to increase student enrollment in nursing programs and possible ways in which to reduce the time associated with licensure. The concept and structure for the bill was cultivated during a January 2022 roundtable discussion with the colleges and medical professionals. Senator Diaz is the sponsor for this bill.

Ban the Box is another initiative currently underway at the Chamber. The bill will seek to ban questions associated with previous arrests or incarcerations on employment applications. The topic can be presented during the interview, but not as a part of the initial candidate selection process. A survey will be released regarding the bill shortly.

### **U.S. Department of Labor Enhanced Desk Monitoring Review (EDMR) Update**

Mr. Beasley advised that we have not received a response to our inquiry from the State to date. He has been in discussions with the State; however, they are awaiting feedback from USDOL.

### **Wage Subsidy Programs for Internships**

Mr. Beasley advised that we would be applying for the Innovation and Trust Academy grants. Similar to the Early Learning Coalition, we would like to work with Children's Trust to leverage our dollars to subsidize wages for internship programs, although some of the salaries may still be a little high for the business owners.

Ms. Ferradaz provided clarification that the ELC subsidy program was a partnership with United Way and additional funders. The goal was to assist providers with finding talent particularly with hardships associated with the pandemic.

Mr. Beasley further expounded on his recent meeting with Mr. Corcoran, the Florida Commissioner of Education, whereby he presented the idea of Early Learning Coalitions and Workforce Boards working together to provide incentives/additional funding, by way of apprenticeships, to the regions.

This reduces the competition for talent, especially with larger employers increasing wages to be more competitive in today's market. Apprenticeship programs also equip the talent pool to ensure both readiness and availability if the demand for talent increases in the near future.

### **Training Vendors**

Mr. Beasley and CSSF staff will be meeting with training vendors to discuss the creation of apprenticeship programs. Schools are currently experiencing a downturn in enrollment. The state is investing a lot of money in education; however, constituents do not have an appetite for what they perceive as "red tape" associated with gaining access to those funds. Apprenticeship programs provide the opportunity for education and earning. The employer creates the program, SFWIB will subsidize the employer, and the employer would pay the colleges. It is a winning strategy for all parties.

Mr. Beasley also shared that he will be meeting with Miami-Dade College, the Greater Miami & Beaches Hotel Association, and the Greater Miami Convention & Visitors Bureau to discuss the development of an apprenticeship program for the hospitality and culinary industries.

### **3. Recommendation as to Approval to Allocate funds to the Big Brothers Big Sisters of Miami, Inc. for Take Stock in Children Program Administration**

Mr. Beasley introduced the item and further elaborated.

Big Brothers Big Sisters of Miami-Dade will serve as the administrator and fiscal agent for all of the agencies that have been allocated scholarships. The approval of this item ensures that the scholarships purchased by SFWIB are managed and disseminated to agencies approved to receive them.

Mr. Beasley shared that we were not in a position to purchase scholarships last year; however, he will be reaching out to Tallahassee directly to determine if we have TANF dollars that may be used to purchase scholarships for this year.

Ms. Ferradaz asked for clarification on the funding and who will receive it if approved. Mr. Beasley clarified that the funding will go to Big Brothers Big Sisters of Miami-Dade, who have managed the scholarship program on behalf of Take Stock in Children since July 2018.

Ms. Ferradaz presented a motion to recommend to the Board; seconded by Mr. Perez. **The item is passed for recommendation to the Board by consensus of the members present.**

4. **Recommendation as to Approval to Allocate funds for the Commercial Jet Settlement Agreement**

Mr. Beasley presented and further presented.

A two-year apprenticeship program was established with Commercial Jet. Documentation to ensure participant eligibility was outstanding, as such; payment was not released. The verification process has since been completed and we are ready to remit payment for four (4) participants of the program that received on-the-job training from February 18, 2019 through February 18, 2020.

Mr. Perez presented a motion to recommend to the Board; seconded by Ms. Ferradaz. **The item is passed for recommendation to the Board by consensus of the members present.**

5. **Recommendation as to Approval to Allocate funds for the Youth Co-Op, Inc. Settlement Agreement**

Mr. Beasley introduced the item and further presented.

The items seeks to remit payment for approximately 22 Summer Youth Program participants that continued in the program through November 2021, which was after the contract expiration period. Interns were permitted to continue to ensure completion of the required 140 hours of employment.

Mr. Beasley also clarified that wages for the program were increased to \$13.88 per hour (usually \$10.00 per hour) to remain competitive with other summer youth employment/internship programs after Miami-Dade County Commissioners approved an increase.

Ms. Ferradaz presented a motion to recommend to the Board; seconded by Mr. Perez. **The item is passed for recommendation to the Board by consensus of the members present.**

6. **Recommendation as to Approval to Appoint Members for the 2022-2024 SFWIB Executive Committee**

Mr. Beasley introduced the item and further presented.



The following SFWIB have been recommended for appointment to the 2022-2024 SFWIB Executive Committee:

- Charles Gibson, SFWIB Chair
- Juan Carlos del Valle, SFWIB Vice-Chair
- Camela Glean-Jones, Finance & Efficiency Council, Chair
- Tom Roth, Finance & Efficiency Council, Vice-Chair
- Gilda Ferradaz, Global Talent & Competiveness Council, Chair
- Oscar Loynaz, M.D., Global Talent & Competiveness Council, Vice-Chair
- Dequasia Canales, Performance Council, Chair
- Joe Chi, Performance Council, Vice-Chair

Mr. Perez presented a motion to recommend to the Board; seconded by Mr. del Valle. **The item is passed for recommendation to the Board by consensus of the members present.**

## New Business

### 1. Miami-Dade County Career Fairs

Miami-Dade County will be hosting a series of Career Fairs for all County departments. The first one will be held on February 23, 2022 at the Stephen P. Clark Center in the Breezeway. Flyers are under review by the Mayor's Office but should

The second job fair will be in March at a location further South. A total of thirteen (13) events are planned throughout the county, starting in the Central region, then moving South and North.

With no further business presented to the Committee, the meeting adjourned at 9:04am.



## **SFWIB EXECUTIVE COMMITTEE**

**DATE:** 3/10/2022

**AGENDA ITEM NUMBER:** 3

**AGENDA ITEM SUBJECT:** U.S.DEPARTMENT OF LABOR, EMPLOYMENT AND TRAINING REPORT

**AGENDA ITEM TYPE:** **INFORMATIONAL**

**RECOMMENDATION:** N/A

**STRATEGIC GOAL:** **HIGH ROI THROUGH CONTINUOUS IMPROVEMENT**

**STRATEGIC PROJECT:** **Strengthen workforce system accountability**

### **BACKGROUND:**

During the period of November 16, 2020 – September 1, 2021, the U.S. Department of Labor (DOL), Employment and Training Administration (ETA) conducted an Enhanced Desk Monitoring Review (EDMR) of the WIOA Formula grants administered through the Florida Department of Economic Opportunity (DEO), by CareerSource South Florida (CSSF), Local Workforce Area (LWA) #23. The purpose of the review was to determine the level of compliance with programmatic, fiscal, and administrative requirements. The initial report outlined 50 compliance findings and no questioned cost.

This more in-depth review was conducted based on risk analysis that determined it was necessary to evaluate further CSSF's management of the programs/grants. The follow-up review focused on compliance with requirements in the grant agreements, program statutes, regulations, departmental directives, and grant management requirements specified in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. The review resulted in six (6) compliance findings and questioned costs of \$14,826,812.

- Finding #1: Improper Extension of Enrollment Dates for Adult, Dislocated Worker (DW), and Youth Participants and questioned costs of \$13,423,521.
- Finding #2 Lack of Required Policy, Procedures, and Written Agreements for the Local Workforce Development Board (LWDB) to serve as the One-Stop Operator (OSO) through Sole Source Procurement, and questioned costs of \$1,286,676.39.
- Finding #3: Lack of Documented Program and Service Eligibility for Employed Worker Participants and questioned costs of \$116, 615.



- Finding #4: Faulty Contract Administration Practices.
- Finding #5: Falsified Job Placements.
- Finding #6: Noncompliance with Customized Training Requirements.

The SFWIB along with the DEO submitted a response to the review and a corrective action plan. Since that time the DOL has responded to the corrective action plan by requesting additional information. SFWIB staff met with DEO staff and submitted the requested information. Additional information requested included items such as signed training logs, an updated calendar for the One-Stop Operator Request for Proposal, newly drafted policies and an updated contract structure. SFWIB Staff will inform the committee as to the final acceptance of the corrective action and resolution of the review findings.

**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



February 15, 2022

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

Grant Numbers: AA-32210-18-55-A-12, AA-33223-19-55-A-12, ES-31841-18-55-A-12, ES-33387-19-55-A-12

Dear Director Eagle:

Thank you for your first response to our September 30, 2021, Enhanced Desk Monitoring Review report of Florida Department of Economic Opportunity (DEO)'s WIOA titles I and III formula grants. Your December 14, 2021, letter, submitted a corrective action plan for five (5) of six (6) findings and indicated a forthcoming response by the Florida Department of Elder Affairs. All findings and questioned costs totaling \$14,826,812, remain unresolved pending the Employment and Training Administration's approval of required documentation and actions, as outlined within the report and this letter.

Please note that, for purposes of tracking, we have itemized each corrective action step within the finding.

The Regional Office will continue to be available for technical assistance, as needed. Please respond with documentation that resolves the findings within 30 days from the date of this letter.

If you have any questions, please do not hesitate to contact Julian Hardy, Office of Workforce Investment, Acting Division Chief, at (404) 302-5376 or Jeffrey Patton, Federal Project Officer, at Jeffrey Patton, [Patton.Jeffrey@dol.gov](mailto:Patton.Jeffrey@dol.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Renata Adjibodou".

Renata Adjibodou  
Acting Regional Administrator

Enclosure

## **EXECUTIVE SUMMARY**

During the period of November 16, 2020, through September 1, 2021, the U.S. Department of Labor (DOL), Employment and Training Administration (ETA) conducted an EDMR of the Workforce Innovation and Opportunity Act (WIOA) formula grants administered through the Florida Department of Economic Opportunity (DEO) by CareerSource South Florida, the Local Workforce Area (LWA) #23. The exit conference was held on September 30, 2021. The review resulted in six (6) compliance findings and questioned costs in the amount of \$14,826,812. The following grants were monitored during the review: WIOA Adult, Dislocated Worker (DW), and Wagner-Peyser AA-32210-18-55-A-12, AA-33223-19-55-A-12, ES-31841-18-55-A-12, ES-33387-19-55-A-12.

## **FINDINGS**

<b>Finding</b>	<b>Status</b>
Finding #1: Improper Extension of Enrollment Dates for Adult, Dislocated Worker (DW), and Youth Participants and questioned costs of \$13,423,521.	Unresolved
Finding #2 Lack of Required Policy, Procedures, and Written Agreements for the Local Workforce Development Board (LWDB) to serve as the One-Stop Operator (OSO) through Sole Source Procurement and questioned costs of \$1,286,676.39.	Unresolved
Finding #3: Lack of Documented Program and Service Eligibility for Employed Worker Participants and questioned costs of \$116, 615.	Unresolved
Finding #4: Faulty Contract Administration Practices.	Unresolved
Finding #5: Falsified Job Placements.	Unresolved
Finding #6: Noncompliance with Customized Training Requirements.	Unresolved

**Finding #1: Improper Extension of Enrollment Dates for Adult, DW, and Youth Participants CMG Indicators 1.a.2 Service Design and 1.e.1: Service Delivery  
Questioned Costs: \$13,423,521**

**Corrective Action:** To resolve this finding, the State must:

- a) Implement policies and procedures that include WIOA Title I participant exit requirements;
- b) Train front-line staff on these procedures;
- c) Exit participants who have not received staff-assisted career or training services for more than 90 days;
- d) Provide copies of these policies and procedures, documentation of staff training on WIOA requirements, and proof that CSSF exited WIOA participants whose enrollments were improperly extended; and

- e) Determine which of the \$13,423,521 questioned costs associated with each service provider contract were allowable, allocable, and reasonable; specifically, the State must determine that:
1. Staffing levels were reasonable in fulfilling the needs of eligible participants;
  2. Documentation supports the determined cost; and
  3. The methodology used to make this determination must be reviewed and approved by USDOL.

**DEO Response and Corrective Action Plan:** Prior to this review, DEO identified the need for state-level policy and instructions regarding expectations for the appropriate and timely closure of cases. As a result, Administrative Policy 115: Common Exit was approved by the State Workforce Development Board (SWDB) and issued by DEO in June 2021. This policy provides Local Workforce Development Boards (LWDBs) the minimum requirements for the common exit of program participants for the WIOA, Wagner-Peyser, and Trade Adjustment Assistance programs, and procedural guidance for the associated processes. When the state's common exit policy was in draft form, CSSF developed common exit procedures that became effective April 2021. CSSF provided training to its One-Stop Operator (OSO) and service provider staff (hereafter referred to as "front-line staff") on this procedure in May 2021. CSSF is also developing a local common exit policy that will align with the state's policy and be approved by the LWDB in December 2021. DEO is working closely with CSSF to review and provide technical assistance on the contents of its local common exit policy to ensure alignment with federal and state requirements. DEO is developing training on the state's common exit policy that will be delivered to all LWDBs by December 2021. CSSF will train front-line staff on its local common exit policy by January 2022. DEO will provide USDOL the state's and CSSF's training logs once the trainings are completed.

Further, DEO worked with CSSF to identify and exit enrolled participants who had not received a career or training service for more than 90 days, by June 30, 2021. The below-referenced spreadsheet shows CSSF's number of open participants in the WIOA Adult, Dislocated Worker (DW) and Youth programs prior to DEO's issuance of Administrative Policy 115: Common Exit and the number of open participants remaining subsequent to CSSF adhering to the state's policy.

DEO is in the process of determining the methodology that will be used to determine which costs associated with each service providers' contract were allowable, allocable, and reasonable. Once a proposed methodology is established, DEO will provide it to USDOL for review and approval by November 2021.

**DOL Response:** In the response, DEO provided Administrative Policy 115: Common Exit (DEO) and Common Exit Procedures (CSSF).

DEO states, "DEO is developing training on the state's common exit policy that will be delivered to all LWDBs by December 2021." This finding remains unresolved until DEO provides documentation to DOL to evidence such policies and procedures have been disseminated to grantees' employees.

For **corrective action item (b)**, the State submitted document, “Attachment 1.3-CSSF Common Exit Procedures Training Log.” The document does not include the signatures of attendees, nor the material presented at the training, to determine compliance with the corrective action. Corrective action item (b) will be resolved when CSSF provides signed training logs with the material presented.

The document labeled, “Attachment 1.4 -CSSF Open Participants Spreadsheet (DEO)” (**corrective action items: (c) & (d)**). The document provides numbers under the headings “pre” and “post” policy with no further explanation. The state did not provide a list of participants for each Program Year that have been determined eligible or non-eligible and exited as a result of the new Administrative Policy #115 to identify allowability, allocability, and reasonableness of the cost associated with each service providers’ contract. (**corrective action items: (f) & (g)**)

Regarding the questioned costs of \$13,423,521, **corrective action item (e)**, DEO must determine which costs associated with each service provider contract were allowable, allocable, and reasonable. In their corrective action plan (CAP), DEO stated that it would provide its proposed methodology to USDOL for review and approval by November 2021. However, at this time, USDOL has not received this information. The finding is **UNRESOLVED**.

## **Finding #2: Lack of Required Policy, Procedures, and Written Agreements for the LWDB to Serve as the One-Stop Operator (OSO) through Sole Source Procurement**

### **CMG Indicator 2.d.1: Procurement Standards and 2.d.2 – Competition Questioned Costs: \$1,286,676.39**

**Corrective Action:** To resolve this finding, the State must:

- (a) ensure that CSSF expeditiously conducts a competitive process for the selection of a one-stop operator according to the requirements described in TEGl 15-16 for all career centers where CSSF staff serve as the OSO.
- (b) provide evidence to demonstrate that sufficient firewalls are in place and that CSSF is not involved in every part or stage of the competitive procurement process if it intends to compete or are part of a consortium that will compete and submit a bid.
- (c) provide a timeline for the OSO procurement, and evidence of a competitive process.

**DEO Response and Corrective Action Plan:** To ensure continuity of services for its customers, CSSF asserts that it acted in the capacity of an OSO as a last resort after failed procurement attempts. Further, CSSF offers the following clarification regarding the circumstances under which it began operating as an OSO (and direct provider of workforce services):

- In understanding OSOs must be selected through a competitive procurement process, and that under its normal practices CSSF does not have an intention of serving as an OSO or direct provider of workforce services, CSSF asserts that it has only acted in these

capacities out of necessity resulting from failed procurements or failed contract negotiations.

- For Program Year (PY) 2017-2018, CSSF issued a Request for Proposals (RFP) for Workforce Services in February 2017. Since OSOs are also able to provide workforce services (except training), CSSF asserts that this RFP was intended to identify a vendor that would serve as the OSO and provider of workforce services. CSSF was unable to successfully negotiate contract terms with the respondent; therefore, sent a request to CareerSource Florida for approval for CSSF to temporarily operate direct services. The President/CEO of CareerSource Florida approved CSSF's request to provide direct services for the period of October 2–December 31, 2017.
- For PY 2018-2019, CSSF issued two RFPs (the same RFP twice) in additional attempts to competitively procure these services in April and May 2018. CSSF did not receive any responses to this RFP either time it was issued, resulting in failed procurements. Subsequently, the SWDB approved CSSF's request to be a direct provider of workforce services for the period of July 1, 2018, to June 30, 2019.
- For PY 2019-2020, CSF issued an RFP in May 2019. The selected provider rejected all offers by CSF, resulting in a failed procurement. As a result, CSSF submitted a request to the SWDB to temporarily serve in both capacities for the remainder of the program year. The SWDB extended this approval by authorizing CSSF to be a direct provider of workforce services for the period of July 1, 2018, to June 30, 2020.
- CSSF asserts that the Edison Court location is not a comprehensive career center that is subject to the OSO requirement. CSSF opened an access point at Edison Court to provide employment services to public housing residents in partnership with the Miami-Dade County Public Housing Department. It is CSSF's position that there should not be any disallowed costs associated with this location since there is no requirement for access points to be managed by the local area's OSO(s).
- DEO has requested technical assistance from USDOL to ensure a mutual understanding of the documentation or information needed to resolve the questioned costs portion of this finding. DEO has advised CSSF of the requirement to expeditiously conduct a competitive process for the selection of the OSO for all career centers where CSSF staff currently serve as the OSO. CSSF issued an RFP for OSO services on November 1, 2021. The following timeline is outlined in the RFP:
  - November 1, 2021 – RFP Issued
  - November 17, 2021 – Deadline for Request for Clarification Inquiries
  - November 22, 2021 – Offerors' Conference
  - December 10, 2021 – Deadline for Receipt of Proposals
  - January 6, 2022 – Public Review Forum
  - January 13, 2022 – Recommendations Approved at the Executive Committee Meeting
  - January 28, 2022 – Execution of Contract
  - February 1, 2022 – Contract Start Date

CSSF does not intend to compete or be part of a consortium that will compete and submit a bid in response to its RFP for OSO services.

Over the last year couple of years, DEO has taken several steps to enhance its oversight of LWDB governance related requirements. Among these steps, DEO has created additional state-level positions in its policy and monitoring units to ensure the appropriate level of staffing resources are available to ensure these requirements are met. Additionally, during the rest of this calendar year, DEO will conduct a comprehensive review of its LWDB Governance Review Tool, and correlating monitoring processes, to ensure the state's monitoring of governance related requirements captures all required elements from a federal and state perspective. Subsequently, DEO will amend its LWDB Governance Review Tool by January 2022. DEO will provide the amended monitoring tool to USDOL upon completion.

**DOL Response:** In response to the finding, DEO submitted a timeline as required in **corrective action item (b)** and an indication of no intention to compete, or be part of a consortium that will compete, and submit a bid in response to its RFP for OSO services, **element (c) of the corrective action plan** for Finding #2.

The timeline provided indicates that the results of the RFP will be approved by the Executive Committee Board by the time of this writing. ETA requires supporting documentation to review the procurement process. This documentation is required to resolve **item (a) of the corrective action plan** for Finding #2. WIOA sec. 121(d)(2)(A), requires that the LWDB select the One-Stop operator through a competitive process. CSSF asserts that it only acted as the One-Stop operator due to inadequate responses to OSO services RFPs and failed contract negotiations. The explanation provided does not waive CSSF from complying with applicable laws and regulations. Additionally, TEGL 15-16 states that for an LWA to serve as a sole source provider, the Governor and CEO should approve. However, ETA was not provided an original statement of approval for this emergency action; further, an emergency action would be temporary in nature. Therefore, questioned costs totaling **\$1,286,676.39** remain and are subject to disallowance. The finding is **UNRESOLVED**.

### **Finding #3: Lack of Documented Program and Service Eligibility for Employed Worker Participants**

**CMG Indicators 1.e.3: Participant Services; 2.e: Performance Management; 2.f: Sub-recipient Management and Oversight; and 3.a: Internal Controls**  
**Questioned Costs: \$116,615**

**Corrective Action:** To resolve this finding, the State must ensure that CSSF, as the OSO,

- (a) Documents participant eligibility for training services for Employed Workers as required by WIOA;
- (b) Creates or revises policies and procedures that include internal controls that ensure effective oversight and monitoring of service provider staff's documentation of WIOA

program eligibility for Employed Workers, the priority of service for individualized career and training services, and appropriate assessments that demonstrate a need for customized training;

- (c) provides copies of the revised policies, procedures, and staff training; and
- (d) performs required sub-recipient monitoring to ensure CSSF adheres to newly-revised policies and procedures.

Reimbursement payments of \$116,615.00 made to two (2) employers for Customized Employed Worker Training services during the period of July 1, 2017, through June 30, 2020, are questioned and subject to disallowance. To resolve questioned costs, the State must:

(e) review these files and provide documentation that demonstrates participants requested these services; and

- (e) Provide documentation that the training was determined to be an eligible WIOA Adult program and customized training services.

**DEO Response and Corrective Action Plan:** DEO is in the process of revising Administrative Policy 100: Work-Based Training to include eligibility requirements for employed workers participating in customized training, among other revisions. DEO expects to issue the revised policy by December 2021, which will replace and supersede FG-OSPS-89. DEO will provide USDOL the state's revised work-based training policy once the policy is issued. CSSF is also developing a customized training policy that will align with the state's work-based training policy and be approved by the LWDB in December 2021. DEO is working closely with CSSF to review and provide technical assistance on the contents of its local customized training policy to ensure alignment with federal and state requirements. CSSF will provide training on its local policy to front-line staff by January 2022. DEO will provide USDOL CSSF's training log once the training is completed. Additionally, CSSF will establish local operating procedures that include internal controls that ensure effective oversight and monitoring of service provider staff's documentation of WIOA program eligibility for employed workers, the priority of service for individualized career and training services, and appropriate assessments that demonstrate a need for customized training.

DEO's existing monitoring tool currently evaluates the determination of need for training services. However, the tool will be revised to align with any revisions to Administrative Policy 100: Work-Based Training necessary to strengthen eligibility requirements for employed workers participating in customized training. DEO will provide USDOL the state's revised monitoring tool subsequent to the state's work-based training policy being re-issued.

**DOL Response:** At the time of submission, DEO indicated the corrective action was ongoing and anticipated approval by the LWDB for the revised policies and procedures in December 2021, and completion of front-line staff training in January 2022, which addresses **corrective action items (a) through (d)**. Based on this timeline, documentation should now be available to demonstrate corrective action taken to address **items (a) through (d)**. The region requires evidence of CSSF's revised policies and procedures that include internal controls that ensure effective oversight and monitoring of service provider staff's documentation of WIOA program



eligibility for Employed Workers, the priority of service for individualized career and training services, and appropriate assessments that demonstrate a need for customized training to resolve the finding.

**Corrective Action items (e) & (f)** are required to resolve the questioned costs. DEO's response did not address corrective action items (e) & (f) to provide documentation that demonstrates participants requested these services (e) and were determined eligible WIOA Adult program and Customized Training services (f). The finding and questioned cost totaling \$116,615 are **UNRESOLVED**.

#### **Finding #4: Faulty Contract Administration Practices**

##### **CMG Indicator 2.d.5: Contract Administration**

**Corrective Action:** To resolve this finding, CSSF LWDA must:

- (a) submit a CAP that ensures its procurement and contract administration practices comply with Federal statutes, regulations, and the terms and conditions of the Federal award.
- (b) include in the CAP a review of its procurement practices, contract structure, boilerplate contract, and updated written procurement policies and procedures that outline a formal competitive process, and
- (c) provide documentation that appropriate staff has received training on Federal statutes and regulations for procurement.
- (d) review the CAP and relevant documents before the plan is implemented in the local area.

**DEO Response and Corrective Action Plan:** CSSF asserts that it uses an award letter to provide the contractor(s) with the awarded funding amount(s) and overall expectations of the contract, in circumstances where service providers must initiate or continue service delivery while contract terms are being negotiated and finalized. CSSF views the service provider's formal acceptance of the award letter as a binding legal document, based on guidance CSSF asserts it previously received from USDOL. Further, CSSF asserts that payments for services provided are not rendered until the contract is fully executed.

To resolve this finding, CSSF will develop and submit a CAP that ensures its procurement and contract administration practices comply with federal requirements and the terms and conditions of the federal award. The CAP will include a review of CSSF's procurement practices, contract structure, boilerplate contract, and updated written procurement policies and procedures. CSSF will submit its draft CAP to DEO by January 2022, before it is implemented in the local area. Once received, DEO will review the CAP and relevant documents to ensure required elements are met and provide CSSF with technical assistance, as needed and appropriate. DEO will provide USDOL a copy of CSSF's CAP upon review and approval by DEO. Further, CSSF will ensure local staff are trained on federal, state and local requirements governing the procurement process within 90 days of its CAP being reviewed and approved by DEO. DEO will provide USDOL a copy of CSSF's training log once training is completed.

**DOL Response:** The state asserts that a service provider's formal acceptance of an award letter is a binding legal document based on guidance from USDOL. The region requests submission of said guidance referenced in the state's response.

Based on the timeline provided, updated policies and procedures should be in draft form at the time of this writing. This finding remains unresolved until DEO submits to DOL CSSF's CAP and the results of DEO's review of CSSF's procurement practices, contract structure, boilerplate contract, and updated written procurement policies and procedures.

The region offers additional technical assistance on document review at the request of the state. The finding is **UNRESOLVED**.

**Finding #5: Falsified Job Placements**  
**CMG Indicators 1.e.3: Participant Services; 2.e: Performance Management; 2.f: Subrecipient Management and Oversight; and 3.a: Internal Controls**

**Corrective Action:** To resolve this finding:

- (a) CSSF must discontinue the above-described practices that allowed the falsification of participant records and data and **impose a hold** on all incentive payments until it is determined that payments are for valid services.
- (b) The State and CSSF must also review internal policies, processes, and training to ensure that activities permitted under the law are carried out per the statute, regulations, and ETA guidance.
- (c) The State must ensure that CSSF trains its service providers to correctly record staff-assisted career services, including job referrals and placements. This training must emphasize that a service provider cannot record staff-assisted job referrals and placements for an individual that independently obtained employment.
- (d) CSSF must provide a copy of the training materials and participant attendance sheet(s).
- (e) The State must conduct its assessment of at least 50 percent of all placements claimed and counted from 2017 to 2020, and if minimal-to-no services were provided before the placement, such placement cannot be counted. The results of the State's review of placements during these years must be part of the response to this finding.

**DEO Response and Corrective Action Plan:** CSSF asserts that it is not aware of the above-described practices that appear to have allowed the falsification of participant records and data. DEO has requested that USDOL provide a copy of the lists that were obtained to support this finding so a review can be conducted at the state and local levels. CSSF has also requested these lists for further investigation at the local level. While this review is underway, CSSF will impose a hold on all incentive payments until it is determined that payments are for valid services. Once DEO receives the requested lists, a strategy will be developed to assess the validity of the placements claimed and provide the results of the assessment to USDOL.

CSSF has local policies and procedures that govern job seeker registration, job orders and placements, and resulting referrals in the case management system. DEO has confirmed that these documented policies and procedures align with federal requirements and state policies. In addition to its ongoing training, CSSF will conduct additional training with front-line staff that emphasizes a service provider cannot record staff-assisted job referrals and placements for an

individual that independently obtained employment by October 2021. DEO will provide USDOL a copy of CSSF's training materials and training log once training is completed.

**DOL Response:** DEO states, "...while this review is underway, CSSF will impose a hold on all incentive payments until it is determined that payments are for valid services. Once DEO receives the requested lists, a strategy will be developed to assess the validity of the placements claimed and provide the results of the assessment to USDOL." The list of participants was part of a query that ETA reviewers completed using DEO's system, with parameters based upon those whose participation dates exceeded 90 days of participation date. DEO should be able to extract the same information from their system. **(corrective action item (a))**. Furthermore, no documentation has been included to resolve **corrective action items (b) through (e)** for Finding #5. The finding is **UNRESOLVED**.

**Finding #6: Noncompliance with Customized Training Requirements  
CMG Indicator 1.e: Participant Services; 1.e.7: Training Services**

**Corrective Action:** To resolve this finding, the State must ensure that CSSF:

- (a) develops a WIOA-compliant Customized Employed and Incumbent Worker Training policy, or adopt the current state policy,
- (b) trains key staff on the requirements, and
- (c) provides a copy of the policy and documentation of training.

**DEO Response and Corrective Action Plan:** As mentioned in DEO's response and CAP for Finding #3, CSSF is developing a Customized Training policy that will align with the state's work-based training policy and be approved by the LWDB in December 2021. DEO is working closely with CSSF to review and provide technical assistance on the contents of its local Customized Training policy to ensure alignment with federal and state requirements. CSSF will provide training on its local policy to front-line staff by January 2022. DEO will provide USDOL CSSF's training log once the training is complete.

DEO's existing monitoring tool currently evaluates the determination of need for training services. However, the tool will be revised to align with any revisions to Administrative Policy 100: Work-Based Training necessary to strengthen eligibility requirements for employed workers participating in customized training. DEO will provide USDOL the state's revised monitoring tool subsequent to the state's work-based training policy being reissued.

**DOL Response:** At the time of submission, the State indicated the process for resolution was ongoing; December 2021 was the anticipated approval date by the LWDB for the revised policies and procedures. Based on the timeline provided by the state, the documentation should now be available. ETA has not yet received documentation to resolve **corrective action items (a) through (c)** for Finding #6. The finding is **UNRESOLVED**.

**-- END OF RESPONSE --**



## MEMORANDUM

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**To:** Mr. Casey Penn  
Chief, Bureau of One-Stop and Program Support  
Florida Department of Economic Opportunity

Ms. Keantha B. Moore, FCCM  
Deputy Chief, Bureau of One-Stop and Program Support  
Florida Department of Economic Opportunity

**From:** Mr. Rick Beasley  
Executive Director  
South Florida Workforce Investment Board (SFWIB)  
d/b/a CareerSource South Florida (CSSF)

**Date:** March 7, 2022

**Subject:** CareerSource South Florida's Response to the USDOL Reply to DEO's CAP for the EDMR report

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Please find below CSSF recommended responses to DEO for your review/approval.

*Finding #1: Improper Extension of Enrollment Dates for Adult, Dislocated Worker (DW), and Youth Participants and questioned costs of \$13,423,521. - Unresolved*

- Signed attendance logs submitted to DEO for Common Exit Policy training conducted on October 4, 2021.

*Finding #2 Lack of Required Policy, Procedures, and Written Agreements for the Local Workforce Development Board (LWDB) to serve as the One-Stop Operator (OSO) through Sole Source Procurement and questioned costs of \$1,286,676.39. - Unresolved*

- CareerSource South Florida (CSSF) previously provided approvals from the state workforce board authorizing the LWDB to act as both one-stop operators and workforce service providers. CSSF has also begun the Request for Proposal process to competitively procure one-stop operators for their region. CSSF released the RFP on February 16, 2022 due to a delay caused by the Federal Executive Order issued by the president of the United States being



challenged in the state of Florida. The executive order required CSSF to put it in the RFP and adhere the order.

However, the governor contradicted that order and caused a delay while the issue was being challenged in the courts. CSSF has also attached their Request for Proposal Standard Operating Procedure and associated attachments as supporting documentation.

*Finding #3: Lack of Documented Program and Service Eligibility for Employed Worker Participants and questioned costs of \$116, 615. Unresolved*

- Career Source South Florida (CSSF) completed the draft of its Customized Training (CT) policy on October 21, 2021. The draft includes the elements in column E that were outlined in the response on October 28, 2021. Additionally, The Department of Economic Opportunity has submitted the revised WIOA Administrative Policy – Work-Based Learning and Work Based Training for Adults and Dislocated Workers, which includes updates to the CT section, to the Career Source Florida (CSF) board for approval. Tentative Career Source Florida Board approval is expected June 9, 2022. Upon CSF board approval, CSSF will incorporate any necessary updates and submit its revised policy to the South Florida Workforce Investment Board (SFWIB) for approval on June 22, 2022. CSSF will conduct training on its approved/revised Customized Training Policy on June 22, 2022. The signatures for all trainees will be submitted to DEO upon completion of the training.

*Finding #4: Faulty Contract Administration Practices. Unresolved*

- CareerSource South Florida (CSSF) has changed their previous unit based contracts to a more simplified cost reimbursement contract. CSSF has also requested technical assistance to obtain further guidance on the specific issues that the reviewers had with the contract structure and obtain a sample contract to use as a guide. Please see attached the request for a contract example.

*Finding #5: Falsified Job Placements. Unresolved*

- CSSF respectfully disagrees with the finding regarding falsified Job Placements. In addition, CSSF is requesting the list from USDOL/DEO of the questionable placements identified during the review period. CSSF established guidance which outlines the job referral and placement process which complies with 20 CFR 651.10
- In July of 2016, CSSF created a Placement Validation Tool. The Placement Validation Tool was revised and updated in April of 2018. The Tools flags placements that do not comply with 20 CFR 651.10, CSSF and DEO placement policies. Additionally, CSSF sends a survey to all participants that have WP placement recorded on the EF profile, asking location where services were provided, the staff member issuing the job referral, and the quality of services provided by the career center.
- Additionally, CSSF validates all placements with the Wage Credit, New Hire, and Work Number reports. Lastly, training was conducted to the One-Stop Operator/Service Providers on the following dates and topics:



Attached:

- Job Referral and Placement Training PowerPoint
- Signed Training Logs (in process of collecting)

*Finding #6: Noncompliance with Customized Training Requirements. Unresolved*

- Career Source South Florida (CSSF) completed the draft of its Customized Training (CT) policy on October 21, 2021. The draft includes the elements in column E that were outlined in the response on October 28, 2021. Additionally, The Department of Economic Opportunity has submitted the revised WIOA Administrative Policy – Work-Based Learning and Work Based Training for Adults and Dislocated Workers, which includes updates to the CT section, to the Career Source Florida (CSF) board for approval. Tentative Career Source Florida Board approval is expected June 9, 2022. Upon CSF board approval, CSSF will incorporate any necessary updates and submit its revised policy to the South Florida Workforce Investment Board (SFWIB) for approval on June 22, 2022. CSSF will conduct training on its approved/revised Customized Training Policy on June 22, 2022. The signatures for all trainees will be submitted to DEO upon completion of the training.



## **SFWIB EXECUTIVE COMMITTEE**

**DATE:** 3/10/2022

**AGENDA ITEM NUMBER:** 4

**AGENDA ITEM SUBJECT:** 2020-2021 INTERNAL CONTROL QUESTIONNAIRE AND ASSESSMENT

**AGENDA ITEM TYPE:** **APPROVAL**

**RECOMMENDATION:** SFWIB staff recommends to the Executive Committee to recommend to the Board the approval the 20-21 DEO Internal Control Questionnaire and Assessment, as set forth below.

**STRATEGIC GOAL:** **HIGH ROI THROUGH CONTINUOUS IMPROVEMENT**

**STRATEGIC PROJECT:** **Improve credential outcomes for job seekers**

### **BACKGROUND:**

The Internal Control Questionnaire and Assessment (ICQ) was developed by the Department of Economic Opportunity (DEO), Bureau of Financial Monitoring and Accountability, as a self-assessment tool to help evaluate whether a system of sound internal control exists within the Local Workforce Development Board (LWDB). An effective system of internal control provides reasonable assurance that management's goals are being properly pursued. Each LWDB's management team sets the tone and has ultimate responsibility for a strong system of internal controls.

Internal control is a process, effected by an entity's board of directors, management and other personnel, designed to provide "reasonable assurance" regarding the achievement of objectives in the following categories:

- Effectiveness and efficiency of operations
- Reliability of financial reporting
- Compliance with applicable laws and regulations

The concept of reasonable assurance implies the internal control system for any entity, will offer a reasonable level of assurance that operating objectives can be achieved.

**FUNDING:** N/A

**PERFORMANCE:** N/A

*ATTACHMENT*

# **2021-22 Internal Control Questionnaire and Assessment**

**Bureau of Financial Monitoring and Accountability  
Florida Department of Economic Opportunity**

*August 20, 2021*

107 East Madison Street  
Caldwell Building  
Tallahassee, Florida 32399  
[www.floridajobs.org](http://www.floridajobs.org)





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## OVERVIEW

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### Introduction and Purpose

The Internal Control Questionnaire and Assessment (ICQ) was developed by the Department of Economic Opportunity (DEO), Bureau of Financial Monitoring and Accountability, as a self-assessment tool to help evaluate whether a system of sound internal control exists within the Local Workforce Development Board (LWDB). An effective system of internal control provides reasonable assurance that management's goals are being properly pursued. Each LWDB's management team sets the tone and has ultimate responsibility for a strong system of internal controls.

The self-assessment ratings and responses should reflect the controls in place or identify areas where additional or compensating controls could be enhanced. When the questionnaire and the certification are complete, submit them to DEO by uploading to SharePoint.

### Definition and Objectives of Internal Controls

Internal control is a process, effected by an entity's board of directors, management and other personnel, designed to provide "reasonable assurance" regarding the achievement of objectives in the following categories:

- Effectiveness and efficiency of operations
- Reliability of financial reporting
- Compliance with applicable laws and regulations

The concept of reasonable assurance implies the internal control system for any entity, will offer a reasonable level of assurance that operating objectives can be achieved.

#### ***Need for Internal Controls***

Internal controls help to ensure the direction, policies, procedures, and practices designed and approved by management and the governing board are put in place and are functioning as designed/desired. Internal controls should be designed to achieve the objectives and adequately safeguard assets from loss or

unauthorized use or disposition, and to provide assurance that assets are used solely for authorized purposes in compliance with Federal laws, regulations, and program compliance requirements. Additionally, Title 2, Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, § 200.303 Internal controls, states:

The non-Federal entity must:

- (a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).
- (b) Comply with Federal statutes, regulations, and the terms and conditions of the Federal awards.
- (c) Evaluate and monitor the non-Federal entity's compliance with statute, regulations and the terms and conditions of Federal awards.
- (d) Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.
- (e) Take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive or the non-Federal entity considers sensitive consistent with applicable Federal, state and local laws regarding privacy and obligations of confidentiality.

### ***What Internal Controls Cannot Do***

As important as an internal control system is to an organization, an effective system will not guarantee an organization's success. Effective internal controls can keep the right people, such as management and the governing board members, informed about the organization's operations and progress toward goals and objectives. However, these controls cannot protect against economic downturns or make an understaffed entity operate at full capacity. Internal controls can only provide reasonable, but not absolute, assurance the entity's objectives can be met. Due to limitations inherent to all internal controls systems, breakdowns in the internal control system may be caused by a simple error or mistake, or by faulty judgments made at any

level of management. In addition, controls may be circumvented by collusion or by management override. The design of the internal controls system is dependent upon the resources available, which means there must be a cost-benefit analysis performed as part of designing the internal control system.

### ***Five Components of Internal Control***

- **Control Environment** – is the set of standards, processes, and structures that provide the basis for carrying out internal controls across the organization. The board of directors and senior management establish the tone at the top regarding the importance of internal controls and expected standards of conduct.
- **Risk Assessment** – involves a dynamic and iterative process for identifying and analyzing risks to achieving the entity’s objectives, forming a basis for determining how risks should be managed. Management considers possible changes in the external environment and within its own business model that may impede its ability to achieve objectives.
- **Control Activities** – are the actions established by policies and procedures to help ensure that management directives mitigate risks so the achievement of objectives are carried out. Control activities are performed at all levels of the entity and at various stages within business processes, and over the technology environment.
- **Information and Communication** – are necessary for the entity to carry out internal control responsibilities in support of achievement of its objectives. Communication occurs both internally and externally and provides the organization with the information needed to carry out day-to-day internal control activities. Communication enables personnel to understand internal control responsibilities and their importance to the achievement of objectives.
- **Monitoring** – are ongoing evaluations, separate evaluations, or some combination of the two used to ascertain whether the components of internal controls, including controls to affect the principles within each component, are present and functioning. Findings are evaluated and deficiencies are communicated in a timely manner, with serious matters reported to senior management and to the board of directors.

## Makeup of the ICQ

Subsequent sections of this document emphasize the “17 Principles” of internal controls developed by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and presented in the

Internal Controls – Integrated Framework. The five components of internal controls listed above are fundamentally the same as the five standards of internal controls and reflect the same concepts the “Standards for Internal Control in the Federal Government” utilizes.

The principles are reflected in groupings of questions related to major areas of control focus within the organization. Each question represents an element or characteristic of control that is or can be used to promote the assurance that operations are executed as management intended.

It should be noted that entities may have adequate internal controls even though some or all of the listed characteristics are not present. Entities could have other appropriate internal controls operating effectively that are not included here. The entity will need to exercise judgment in determining the most appropriate and cost effective internal controls in any given environment or circumstance to provide reasonable assurance for compliance with Federal program requirements.

## Completing the Document

On a scale of 1 to 5, with “1” indicating the greatest need for improvements in internal controls and “5” indicating that a strong system of internal controls already exists, select the number that best describes your current operating environment. Please provide details in the comments/explanations column for each statement with a score of 1 or 2. **For questions requiring a narrative, please provide in the comments/explanations column.**

## Certification of Self-Assessment of Internal Controls

Attachment A, includes a certification which should be completed and signed by the Executive Director, reviewed and signed by the Board Chair or their designee and uploaded to SharePoint.

## CONTROL ENVIRONMENT

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
<b>Principle 1. The organization demonstrates a commitment to integrity and ethical values.</b>							
1.	The LWDB's management and board of directors' commitment to integrity and ethical behavior is consistently and effectively communicated throughout the LWDB, both in words and deeds.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.	The LWDB has a code of conduct and/or ethics policy that has been communicated to all staff, board members, and outsourced service providers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.	When the LWDB hires employees from outside of the organization the person is trained or made aware of the importance of high ethics and sound internal controls.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Principle 2. The board of directors demonstrates independence from management and exercises oversight of the development and performance of internal controls.</b>							
4.	The board of directors define, maintain, and periodically evaluate the skills and expertise needed among its members to enable them to question and scrutinize management's activities and present alternate views.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.	The board of directors and/or audit committee maintains a direct line of communication with the board's external auditors and internal monitors.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.	The board of directors establishes the expectations and evaluates the performance of the chief executive officer or equivalent role.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

<b>Principle 3. Management establishes, with board oversight, structures, reporting lines, and appropriate authorities and responsibilities in the pursuit of objectives.</b>						
7.	Management reviews and modifies the organizational structure of the LWDB in light of anticipated changing conditions or revised priorities.  <b>Provide the date of last review.</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Specific lines of authority and responsibility are established to ensure compliance with federal and state laws and regulations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.	The LWDB management understands the importance of internal controls, including the division of responsibility.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Principle 4. The organization demonstrates a commitment to attract, develop, and retain competent individuals in alignment with objectives.</b>						
10.	The LWDB provides training opportunities or continuing education to develop and retain sufficient and competent personnel.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11.	The LWDB has succession plans for senior management and contingency plans for assignments of responsibilities important for internal controls.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12.	For all employees, the LWDB regularly evaluates the performance of the employee and shares the results with the employee.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Principle 5. The organization holds individuals accountable for their internal control responsibilities in the pursuit of objectives.</b>						
13.	The LWDB has mechanisms in place to ensure that all required information is timely published to the website in a manner easily	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	accessed by the public in compliance with laws, regulations, and provisions of grant agreements.						
14.	The LWDB's structure and tone at the top helps establish and enforce individual accountability for performance of internal control responsibilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15.	The LWDB has policies, processes and controls in place to evaluate and promote accountability of outsourced service providers (and other business partners) and their internal control responsibilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## RISK ASSESSMENT

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					<b>Comments/Explanations</b>
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
<b>Principle 6. The organization specifies with sufficient clarity to enable the identification and assessment of risks relating to objectives.</b>							
16.	Management establishes a materiality threshold for each of its major objectives and identifies risk at each location where the LWDB conducts activities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17.	Management uses operational objectives as a basis for allocating the resources needed to achieve desired operational and financial performance.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18.	The LWDB sets entity-wide financial reporting controls and assesses the risks that those controls will not prevent material misstatements, errors, or omissions in the financial statements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



<b>Principle 7. The organization identifies risks to the achievement of its objectives across the entity and analyzes risks as a basis for determining how the risks should be managed.</b>						
19.	<p>Management ensures that risk identification considers internal and external factors and the potential impact on the achievement of objectives.</p> <p><b>What measures are being taken to address the risk of cybersecurity in the organization?</b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20.	<p>The LWDB adequately and effectively manages risks to the organization and has designed internal controls in order to mitigate the known risks.</p> <p><b>What new controls, if any, have been implemented since the prior year and which organizational risks do they mitigate?</b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21.	<p>The LWDB's risk identification/assessment is broad and includes both internal and external business partners and outsourced service providers.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Principle 8. The organization considers the potential for fraud in assessing risks to the achievement of objectives.</b>						
22.	<p>The LWDB periodically performs an assessment of each of its operating locations' exposure to fraudulent activity and how the operations could be impacted.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

23.	<p>The LWDB’s assessment of fraud risks considers opportunities for unauthorized acquisition, use and disposal of assets, altering the reporting records, or committing other inappropriate acts.</p> <p><b>Provide a narrative of the system/process for safeguarding cash on hand, such as prepaid program items (i.e. gas cards, visa cards) against unauthorized use/distribution.</b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Principle 9. The organization identifies and assesses changes that could significantly impact the system of internal controls.</b>							
24.	<p>The LWDB has mechanisms in place to identify and react to risks presented by changes in government, regulatory, economic, operating, or other conditions that could affect the achievement of the goals and objectives.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25.	<p>The most significant risks affecting the LWDB have been identified and controls are designed and implemented that mitigate risks.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
26.	<p>Considering the most significant risks, have controls been designed and implemented that mitigate risks associated with each.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## CONTROL ACTIVITIES

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
<b>Principle 10. The organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.</b>							
27.	The LWDB has a written business continuity plan which includes contingencies for business processes, assets, human resources and business partners, and is periodically evaluated and updated to ensure continuity of operations to achieve program objectives.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
28.	Controls employed by the LWDB include authorizations, approvals, comparisons, physical counts, reconciliations, supervisory controls and allowable use of funds.  <b>What type of training is provided to program and administration staff to ensure the allowable use of funds?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
29.	The LWDB periodically (e.g., quarterly, semiannually) reviews system privileges and access controls to the different applications and databases within the IT infrastructure to determine whether system privileges and access controls are appropriate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Principle 11. The organization selects and develops general control activities over technology to support the achievement of objectives.</b>							
30.	Management selects and develops control activities that are designed and implemented to restrict technology access rights to authorized users commensurate with their job responsibilities and to protect the entity's assets from external threats.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## CONTROL ACTIVITIES

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					<b>Comments/Explanations</b>
		<i>Weak</i>		<i>Strong</i>			
		<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	
31.	Management has identified the appropriate technology controls that address the risks of using applications hosted by third-parties.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
32.	The LWDB has considered the protection of personally identifiable information (PII), as defined in section 501.171(1)(g)1, F.S., of its employees, participants/clients and vendors, and have designed and implemented policies that mitigate the associated risks.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Principle 12. The organization deploys control activities through policies that establish what is expected and procedures that put policies into action.</b>							
33.	The LWDB has policies and procedures addressing proper segregation of duties between the authorization, custody, and recordkeeping for the following tasks, if applicable: Prepaid Program Items (Participant Support Costs), Cash/Receivables, Equipment, Payables/Disbursements, Procurement/Contracting, and Payroll/Human Resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
34.	The LWDB has written procedures that minimize the time elapsing between the receipt of advanced funds and disbursement of funds as required by 2 CFR 200.305(b)(1).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## CONTROL ACTIVITIES

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					<b>Comments/Explanations</b>
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
35.	The LWDB has processes to ensure the timely submission of required reporting (i.e. financial reports, performance reports, audit reports, internal monitoring reviews, or timely resolution of audit findings).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
36.	The LWDB has a records retention policy and has implemented internal controls to ensure all records are retained, safeguarded, and accessible, demonstrating compliance with laws, regulations, and provisions of contracts and grant agreements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## INFORMATION AND COMMUNICATION

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					<b>Comments/Explanations</b>
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
<b>Principle 13. The organization obtains or generates and uses relevant, quality information to support the functioning of internal controls.</b>							
37.	Federal, state, or grant program rules or regulations are reviewed by one or more of the following: governing board, audit, finance or other type committee.  <b>How often are these reviewed?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
38.	The LWDB considers both internal and external sources of data when identifying relevant information to use in the operation of internal controls.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## INFORMATION AND COMMUNICATION

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					<b>Comments/Explanations</b>
		<i>Weak</i>		<i>Strong</i>			
		<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	
39.	The LWDB's has controls in place to ensure costs are accurately recorded and allocated to the benefiting federal/state fund or grant.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Principle 14. The organization internally communicates information, including objectives and responsibilities for internal controls, necessary to support the functioning of internal controls.</b>							
40.	Communication exists between management and the board of directors so that both have information needed to fulfill their roles with respect to the LWDB's objectives.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
41.	There is a process to quickly disseminate critical information throughout the LWDB when necessary.  <b>Provide a description of the dissemination process.</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
42.	Management has a process for the development, approval and implementation of policy updates and communicates those updates to staff.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Principle 15. The organization communicates with external parties regarding matters affecting the functioning of internal controls.</b>							

## INFORMATION AND COMMUNICATION

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					<b>Comments/Explanations</b>
		<i>Weak</i>		<i>Strong</i>			
		<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	
43.	The LWDB has a means for anyone to report suspected improprieties regarding fraud; errors in financial reporting, procurement, and contracting; improper use or disposition of equipment; and misrepresentation or false statements.  <b>Describe the process of how someone could report improprieties. Who receives/processes/investigates, etc.?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
44.	The LWDB has processes in place to communicate relevant and timely information to external parties.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
45.	The LWDB has processes in place to communicate the results of reports provided by the following external parties: Independent Auditor, DEO Bureau of Financial Monitoring and Accountability (FMA), DEO Bureau of One-Stop and Program Support, DEO Office of Inspector General, Florida Auditor General, and Federal Awarding Agencies (USDOL, USDHHS, and USDA) to the Board of Directors.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## MONITORING ACTIVITIES

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					<b>Comments/Explanations</b>
		<i>Weak</i>		<i>Strong</i>			
		<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	
<b>Principle 16. The organization selects, develops, and performs ongoing and/or separate evaluations to ascertain whether the components of internal controls are present and functioning.</b>							

## MONITORING ACTIVITIES

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					<b>Comments/Explanations</b>
		<i>Weak</i>		<i>Strong</i>			
		<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	
46.	<p>The LWDB periodically evaluates its business processes such as cash management, comparison of budget to actual results, repayment or reprogramming of interest earnings, draw down of funds, procurement, and contracting activities.</p> <p><b>Describe the process of how funding decisions are determined. What is the criteria, who initiates/approves, etc.?</b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
47.	<p>The LWDB considers the level of staffing, training and skills of people performing the monitoring given the environment and monitoring activities which include observations, inquiries and inspection of source documents.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
48.	<p>LWDB management periodically visits all career center locations in its region (including subrecipients) to ensure the policies and procedures are being followed and functioning as intended.</p> <p><b>When was the most recent visit performed, by whom, and who were the results communicated to?</b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p><b>Principle 17. The organization evaluates and communicates internal control deficiencies in a timely manner to those parties responsible for taking corrective action, including senior management and the board of directors, as appropriate.</b></p>							



## MONITORING ACTIVITIES

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					<b>Comments/Explanations</b>
		<i>Weak</i>		<i>Strong</i>			
		<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	
49.	The LWDB management takes adequate and timely actions to correct deficiencies identified by the external auditors, financial and programmatic monitoring, or internal reviews.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
50.	The LWDB monitors all subrecipients to ensure that federal funds provided are expended only for allowable activities, goods, and services and communicates the monitoring results to the LWDB's board of directors.  <b>Are subrecipient monitoring activities outsourced to a third party? If so, provide the name of the party that performs the subrecipient monitoring activities.</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## ATTACHMENT A

### Department of Economic Opportunity Certification of Self-Assessment of Internal Controls

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Local Workforce Development Board Number: \_\_\_\_\_

**To be completed by the Executive Director:**

A self-assessment of internal controls has been conducted for the 2021-2022 fiscal monitoring period. As part of this self-assessment, the Internal Control Questionnaire developed by the Department of Economic Opportunity has been completed and is available for review.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

**To be completed by the Board Chair or their designee:**

I have reviewed the self-assessment of internal controls that was conducted for the 2021-2022 fiscal monitoring period.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Please scan and upload to SharePoint an executed copy of this certification on or before **September 30, 2021**.



## **SFWIB EXECUTIVE COMMITTEE**

**DATE:** 3/10/2022

**AGENDA ITEM NUMBER:** 5

**AGENDA ITEM SUBJECT:** NEW AND EXISTING TRAINING PROVIDERS AND PROGRAMS

**AGENDA ITEM TYPE:** **APPROVAL**

**RECOMMENDATION:** SFWIB staff recommends to the Executive Committee to recommend to the Board the approval of a New Providers and Programs and New Programs for Existing Training Providers, as set forth below.

**STRATEGIC GOAL:** **HIGH ROI THROUGH CONTINUOUS IMPROVEMENT**

**STRATEGIC PROJECT:** **Improve credential outcomes for job seekers**

### **BACKGROUND:**

In accordance with Section 122 of the Workforce Innovation and Opportunity Act, regional workforce boards are permitted to independently develop criteria for the selection and subsequent eligibility of Training Providers and programs. The South Florida Workforce Investment Board (SFWIB) developed processes to evaluate an applicant's programmatic capabilities.

Below are requests to add a new training providers and programs, and new programs for existing training providers for the review and approval of the Committee.

New Request(s) to be added as a Apprenticeship Provider(s) and Program(s):

1. Knowledge Quest Education Solutions, Inc. dba Learning Alliance Corporation – Learning Alliance Corporation Apprenticeship, GNJ (FL202180626)

New Apprenticeship Programs:

- Computer Support Specialist (Alternate: Information Technology Technician) – Certificate of Completion of Apprenticeship
- Telecommunications Technician (Alternate Title: Broadband Technician) – Certificate of Completion of Apprenticeship
- Cyber Security Support Technician - Certificate of Completion of Apprenticeship
- Database Technician (Alternate Title: Cloud Administrator) - Certificate of Completion of Apprenticeship
- Digital Marketer (Alternate Title: Internet Marketing Specialist) - Certificate of Completion of Apprenticeship
- Multimedia Producer (Alternate Title: Technical Director) - Certificate of Completion of Apprenticeship

2. The Bee2Bee Network, Inc. – The Bee2Bee Network Apprenticeship Program INJ (2021-FL-93447)

New Apprenticeship Programs:

- Application Developer (Local Program Title: Software Developer (Web & Application Developer)) – Certificate of Completion of Apprenticeship

New Request(s) from Existing Training Provider(s) to add New Program(s):

1. ARGOS ATA LLC dba ARGOS-Applied Intelligence (AI) - Argos-AI Cyber Warrior Pre-Apprenticeship Program

Request to Add a new program(s) to an existing location(s):

- Cybersecurity Analyst – Certificate of Completion of Apprenticeship

2. Miami Dade County Public Schools - M-DCPS Adult Pre-Apprenticeship Program

Request to Add a new program(s) to an existing location(s):

- Automotive Service Mechanic - Certificate of Completion of Apprenticeship

**FUNDING:** N/A

**PERFORMANCE:** N/A

*NO ATTACHMENT*