



**SOUTH FLORIDA WORKFORCE INVESTMENT BOARD
EXECUTIVE COMMITTEE MEETING
THURSDAY, APRIL 9, 2026
8:15 A.M.**

CareerSource South Florida
7300 Corporate Center Drive
Miami, Florida 33126

The public may view the session online. **Registration is required:**
https://us02web.zoom.us/webinar/register/WN_ISSH7LAzTdywrtfD2Q3IA

AGENDA

1. Call to Order and Introductions
2. Public Comment
3. Approval of Executive Committee Meeting Minutes
 - A. March 12, 2026
4. Informational – Florida Legislative Update HB 221 Minimum Wage
5. Informational – Federal Legislative Update SB 528 Manufacturing
6. Informational – Florida Legislative Update SB 1300 Education and Workforce
7. Informational – REACH Act First Quarter Performance Update & Second Quarter Indicators of Performance 2025-26
8. Approval – Mayor’s Internship Program
9. Approval – Formal Inquiry to the U.S. Department of Labor – ETA
10. Approval – CSSF’s Public Comment on the WIOA Combined Plan Two-Year Modification
11. Approval – Local Workforce Board Compliance and Regulatory Submission

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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

DATE: 4/9/2026

AGENDA ITEM NUMBER: 2

AGENDA ITEM SUBJECT: PUBLIC COMMENT

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

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

BACKGROUND:

N/A

FUNDING: N/A

PERFORMANCE: N/A

NO ATTACHMENT



SFWIB EXECUTIVE COMMITTEE

DATE: 4/9/2026

AGENDA ITEM NUMBER: 3

AGENDA ITEM SUBJECT: EXECUTIVE COMMITTEE MEETING MINUTES

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: SFWIB staff recommends to the Executive Committee to approve minutes from the March 12, 2026 meeting, as set forth below.

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

N/A

FUNDING: N/A

PERFORMANCE: N/A

ATTACHMENT



SFWIB EXECUTIVE COMMITTEE MEETING MINUTES

DATE: 4/9/2026

AGENDA ITEM: 3A

AGENDA TOPIC: MEETING MINUTES

SFWIB EXECUTIVE COMMITTEE MEETING

DATE: March 12, 2026

LOCATION: Zoom Only

ZOOM: https://us02web.zoom.us/webinar/register/WN_ISSH7LAzTdywsrtfD2Q3IA

1. CALL TO ORDER & INTRODUCTIONS Chairman Gibson called to order the regular meeting of the SFWIB Executive Committee Meeting at 8:16AM on March 12, 2026.

ROLL CALL: 8 members; 5 required; 6 present: **Quorum established.**

SFWIB EXECUTIVE COMMITTEE MEMBERS PRESENT <i>(VIA ZOOM)</i>	SFWIB MEMBERS EXCUSED	SFWIB STAFF
Canales, Dequasia del Valle, Juan-Carlos, Vice-Chairman Ferradaz, Gilda Gibson, Charles, Chair Loynaz, Oscar, M.D. Mantilla, Rene Scott, Jr., Kenneth “Kenny”	Chi, Joe SFWIB EXECUTIVE COMMITTEE MEMBERS ABSENT	Beasley, Rick Bennett, Renee Morgan, Ebony Perrin, Yian Smith, Robert ADMINISTRATION/IT
OTHER ATTENDEES		

Agenda items are displayed in the order they were discussed.



2. Public Comment

Public comments should be two minutes or less.

Chairman Gibson opened the floor for comments from the public. No requests to speak were received by the Executive Office. None presented. Item closed.

3. Approval of Executive Committee Meeting Minutes – February 12, 2026

Chairman Gibson presented SFWIB Executive Committee Meeting minutes for review in advance of approval.

Motion for approval of February 12, 2026, SFWIB Executive Committee Meeting minutes by Mr. Scott; Mr. Mantilla seconded; **motion is passed without dissent.**

No further comments or suggestions were submitted by the members. Item closed.

4. Information – FY 26 Labor, Health and Human Services Appropriations Act

Chairman Gibson introduced the item; Mr. Beasley provided a brief overview of the discussion topic and then turned it over to Mr. Smith for further elaboration. Mr. Smith presented an update on the LHHS Appropriations Act for 2026, emphasizing key investments, including \$10.4 billion for workforce development and training programs in support of the Workforce Innovation and Opportunity Act (WIOA), \$285 million to expand registered apprenticeship programs, and \$1.5 billion for workplace safety, wage protections, and enforcement of retirement security.

There is ongoing federal support for long-term talent development. Specifically, \$1.4 billion has been allocated for Career and Technical Education (CTE) State grants, along with an additional \$18.4 billion for Title I programs, which includes maintaining the maximum Pell Grant award of \$7,395.

No further comments or suggestions were submitted. Item closed.

5. Information – 2Q Federal Indicators of Performance

Chairman Gibson introduced the item; Mr. Beasley presented an overview of the PY 2025–2026 Quarter 2 Indicators of Performance for all Local Workforce Development Boards (LWDBs), which was recently released from FloridaCommerce. CareerSource South Florida has continued to show strong performance across all federally negotiated WIOA measures.

Mr. Beasley highlighted key achievements with results showing strong performance across adult, dislocated worker, and youth programs, ranking among the strongest workforce boards in Florida and showing consistent year-over-year improvements compared to PY 2021–2022 and PY 2024–2025.

Ms. Canales, Chairwoman of the Performance Council, praised the team's excellent work and noted the importance of their consistent engagement with providers in enhancing overall performance.

No comments or suggestions were submitted from the members. Item closed.

6. Information – REACH Act of Performance – 1Q PY 2025-2026

Mr. Beasley introduced the agenda item and discussed the recent release of the PY 2025-2026 Quarter 1 REACH Act Letter Grade Performance Results for all Local Workforce Development Boards (LWDBs). He highlighted that CSSF remains the top-ranked workforce board in Florida, achieving an A+ grade with a score of 97.34%.

He presented CSSF's Quarter 1 performance drivers that contributed to this score of 97.34%, including the following metrics:

- Participants with Increased Earnings: 97.76% of target
- Reduction in Public Assistance: 100% of target
- Employment & Training Outcomes: 100% of target
- Participants in Work Related Training: 83.96% of target
- Continued Repeat Business: 100% of target
- Year Over Year Business Penetration: exceeded target
- Completion to Funding Ratio: met target
- Serving Individuals on Public Assistance: 59.69%

These results demonstrate CSSF's commitment to effective workforce development and support for the community.

Mr. Mantilla asked about the effect of changes in immigration policies on the numbers. Mr. Beasley responded that, so far, there has not been a significant impact. He reminded the Committee that CSSF has submitted a request to the state of Florida seeking permission from the U.S. Department of Labor to exclude individuals affected by the changing immigration policies from both the numerator and the denominator. However, we have not yet received a response.

No further comments or suggestions were submitted by the members. Item closed.

7. Informational – Amazon Rapid Response and Reemployment Services

Beasley introduced the agenda item and reported that CareerSource South Florida has initiated Rapid Response activities in response to the temporary closure of Amazon’s South Dade Fulfillment center, which is scheduled to close on July 1, 2026. This closure will result in the layoff of approximately 900 employees. The facility will be renovated and updated, a process expected to take about two years.

During a meeting with Mayor Levine Cava, Amazon representatives, and Mr. Beasley, it was confirmed that Amazon has committed to rehiring a minimum of 1,000 workers when the facility reopens in 2028.

Mr. Beasley reviewed the CSSF Rapid Response and Reemployment Strategy with the Committee, explaining that CareerSource South Florida has requested Amazon to submit a WARN notification on April 1, 2026, as opposed to May 1, 2026. This would allow staff to deploy financial incentives immediately and begin matching affected workers with available job opportunities.

No further comments or suggestions were submitted by the members. Item closed.

8. Approval – Recommendation to Approval the Creation of a Sub-Committee on Artificial Intelligence (AI)

Mr. Beasley introduced and presented a request to create a SFWIB Sub Committee on Artificial Intelligence (AI), as proposed by SFWIB Board Member, Mr. Perez. The subcommittee will assess AI's impact on Miami-Dade County's labor market, review employer needs related to AI adoption, and advise the Executive Committee and full Board on policy, program, and investment recommendations that support a competitive and future ready workforce.

The subcommittee will consist of SFWIB members with interest or expertise in technology, innovation, and workforce development, or related sectors. CSSF staff will provide research, administrative support, and coordination.

Motion for approval for the creation of the SFWIB Subcommittee on Artificial Intelligence (AI) by Ms. Canales; Mr. Mantilla seconded; **motion is passed without dissent.**



No further comments or suggestions were submitted by the members. Item closed.

The Executive Committee meeting ended at 8:44 am with no additional business. Staff and guests were asked to leave the call while the Executive Director held a closed session for his annual performance review.

9. Closed Session – Executive Director’s Annual Performance Review

The Executive Committee carried out a performance evaluation of Mr. Rick Beasley, with all members giving him a rating of 5 in every category and expressing high praise for his overall leadership.

Mr. Beasley also announced that he and other executive leaders would forgo raises due to budget constraints. Final documents will be submitted to the Mayors office for review and approval once all comments are received.

The next SFWIB Executive Committee Meeting is scheduled for Thursday, April 9, 2026, at 8:15am. Location to be announced.

DRAFT



SFWIB EXECUTIVE COMMITTEE

DATE: 4/9/2026

AGENDA ITEM NUMBER: 4

AGENDA ITEM SUBJECT: FLORIDA LEGISLATIVE UPDATE HOUSE BILL 221 MINIMUM WAGE UPDATE

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

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

STRATEGIC PROJECT: **Emphasize work-based learning and training**

BACKGROUND:

House Bill 221 (2026) Florida proposes amendments to Florida's minimum wage statute to create a limited exemption for certain work-based learning participants. The bill would allow eligible employees to voluntarily opt out of Florida's state minimum wage requirements under defined conditions, while still requiring payment at or above the federal minimum wage. The bill is scheduled to take effect July 1, 2026, if enacted.

Summary of Key Provisions:

1. Minimum Wage Opt-Out for Work-Based Learning Participants

The bill exempts employers from Florida's state minimum wage requirements for employees participating in structured work-based learning opportunities (e.g., internships, preapprenticeships, and similar programs)

2. Voluntary Waiver Requirement

Employees must voluntarily sign a waiver acknowledging their right to the state minimum wage and choosing to opt out. Employers are explicitly prohibited from coercing employees into signing a waiver. For employees under age 18, a parent or guardian must also sign the waiver.

3. Federal Minimum Wage Floor Maintained

Even when a waiver is executed, employers must still pay wages at or above the federal minimum wage. The waiver applies only to the state minimum wage requirement.

4. **Time-Limited Applicability**

Any waiver to opt out of the state minimum wage is valid for a maximum of 9 months from the start of employment. After that period, the employee must be paid at or above Florida’s state minimum wage regardless of role or title.

Current Status of the Bill:

As of March 25, 2026, House Bill 221 (2026) Florida has advanced through initial committee hearings in the Florida House and remains under consideration during the current legislative session. Companion activity in the Senate has been limited, and final passage will depend on continued movement through remaining committees and floor votes in both chambers.

No final vote has yet occurred, and the bill has not yet been presented to the Governor.

What to Expect Next;

- **Additional Committee Action:** The bill will likely be heard in remaining House committees before advancing to a full House floor vote.
- **Potential Senate Movement:** For the bill to pass, a Senate companion bill will need to advance or the Senate will need to take up the House version.
- **Amendments Possible:** Workforce, education, and labor stakeholders may influence amendments—particularly around participant protections, definitions of “work-based learning,” and enforcement provisions.
- **Timeline Pressure:** With session timelines, decisions are expected in the coming months; if passed, implementation would move quickly ahead of the July 1, 2026 effective date.

Key Considerations for the Board:

1. **Impact on Work-Based Learning Programs:** The bill directly affects internships, preapprenticeships, and similar programs commonly supported or promoted by workforce boards and their partners.
2. **Compliance and Oversight:** Workforce boards and training providers will need to ensure participating employers understand waiver requirements, documentation standards, time limits, and anti-coercion provisions.
3. **Employer Engagement:** The bill may increase employer interest in offering structured work-based learning opportunities, potentially expanding placements but requiring clear guidance on wage compliance.
4. **Participant Protections:** Boards should be attentive to safeguards for minors and other vulnerable populations, particularly regarding voluntary consent and duration limits.
5. **Policy Alignment:** Existing workforce board policies, contracts, and monitoring practices may need review to ensure alignment with the new statutory framework if enacted.

FUNDING: N/A

PERFORMANCE: N/A

NO ATTACHMENT



SFWIB EXECUTIVE COMMITTEE

DATE: 4/9/2026

AGENDA ITEM NUMBER: 5

AGENDA ITEM SUBJECT: FLORIDA LEGISLATIVE UPDATE: SENATE BILL 528 – MANUFACTURING (DIED IN COMMITTEE, MARCH 2026)

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

STRATEGIC GOAL: **STRENGTHEN THE ONE-STOP DELIVERY SYSTEM**

STRATEGIC PROJECT: **Emphasize work-based learning and training**

BACKGROUND:

Senate Bill 528 (2026) proposed a comprehensive restructuring of Florida’s approach to manufacturing policy, workforce development, and career promotion. The bill would have established a new Chief Manufacturing Officer (CMO) within the Department of Commerce, created a Florida Manufacturers’ Workforce Development Grant Program, and launched a statewide Manufacturing Promotional Campaign. The bill received favorable committee reports in January 2026 but was referred to the Senate Appropriations Committee on January 21, 2026, which was its last recorded action. SB 528 died in the Appropriations Committee on March 13, 2026, when the 2026 Florida Legislative Session concluded on March 12, 2026, without further action. The legislation did not pass and has no current effect. There have been no positive updates or adoption of this legislation since the February 2026 Executive Committee presentation.

Summary of Key Provisions:

1. Creation of the Chief Manufacturing Office (CMO)

The bill establishes a Chief Manufacturing Officer as part of the senior leadership of the Department of Commerce. The CMO serves as the state’s subject-matter expert on manufacturing and is responsible for coordinating manufacturing strategy across state, regional, and local entities. All state and local governmental entities, including workforce boards, are required to assist the CMO within existing legal and budgetary constraints.

2. **Expanded Role of Workforce Development Boards**

The CMO is explicitly directed to collaborate with regional workforce development boards to promote manufacturing as a career pathway. This includes coordination around:

- Career awareness beginning in elementary and middle school
- Work-based learning and technology demonstration centers
- Dual enrollment, industry certifications, and secondary/postsecondary alignment
- Training initiatives targeting underrepresented populations and individuals reentering the workforce

3. **Florida Manufacturer's Workforce Development Grant Program:**

The bill creates a competitive grant program administered by the Department of Commerce, under the direction of the CMO, to support:

- Workforce training and education partnerships
- Deployment of advanced manufacturing technologies and cybersecurity infrastructure
- Expansion of regional manufacturing training centers
- K-12 and postsecondary career awareness initiatives

Priority is given to projects that include workforce development components and partnerships with education and training entities. Grant funds may not be used for salaries, benefits, or general business expenses. Final award decisions rest solely with the Department of Commerce.

FUNDING: N/A

PERFORMANCE: N/A

NO ATTACHMENT



SFWIB EXECUTIVE COMMITTEE

DATE: 4/9/2026

AGENDA ITEM NUMBER: 6

AGENDA ITEM SUBJECT: FLORIDA LEGISLATIVE UPDATE: SB 1300 / CS/CS/HB 325 – EDUCATION AND WORKFORCE DEVELOPMENT FOR CURRENT AND FORMER INMATES (ENROLLED, MARCH 2026)

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

STRATEGIC GOAL: **IMPROVE SERVICES FOR INDIVIDUALS W/ BARRIERS**

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

BACKGROUND:

Senate Bill 1300 (SB 1300) / CS/CS/HB 325 (2026) has advanced through the Florida Legislature and is in its final stages of becoming law. Originally introduced as a multi-agency approach to strengthening education, training, and workforce reentry pathways for current and former inmates, the legislation has been finalized with a strong emphasis on transportation-sector careers, particularly commercial driver license (CDL) training. On March 2, 2026, SB 1300 was favorably reported by the Senate Fiscal Policy Committee with a unanimous 16-0 vote. On March 9, 2026, the Senate substituted the bill with its House companion (CS/CS/HB 325) and ordered it enrolled. The bill is scheduled to take effect July 1, 2026. The finalized legislation authorizes CDL training “behind the fence” for eligible nonviolent inmates, creates employer incentive programs, and enhances correctional education reporting requirements, with coordination among the Florida Department of Transportation (FDOT), Department of Corrections (DOC), and Department of Financial Services (DFS).

Summary of Key Provisions:

1. Expanded Use of Transportation Workforce Development Funds (FDOT)

The finalized legislation authorizes the Department of Transportation (DOT) to use workforce development funds from the State Transportation Trust Fund for CDL and transportation training programs. Up to \$5 million annually (FY 2025–2026 through FY 2029–2030) may be awarded in grants to state colleges, school districts, and private education providers, with priority for rural communities. Eligible uses include certification and training programs, simulators, instructional equipment, and curriculum development within the Florida Transportation Academy.

2. Commercial Driver License (CDL) Training for Inmates

The finalized legislation authorizes DOC to provide CDL training “behind the fence” for nonviolent inmates with two years or less remaining on their sentence. Eligible inmates may drive state-owned vehicles on designated property for training purposes, provided a certified correctional officer is present. Training programs include preparation for Class A and Class B commercial driver licenses, and DOT workforce development funds from the State Transportation Trust Fund may be used to support these activities.

3. Employer Reimbursement for Insurance Premiums (New s. 446.55, F.S.)

The bill creates a new reimbursement program allowing small Florida-based employers (100 or fewer employees) to apply to DFS for reimbursement of a portion of workers’ compensation and automobile liability insurance premiums for former inmates hired as commercial drivers with less than two years of driving experience.

- Reimbursement is capped at \$5,000 per employee and \$20,000 per employer, subject to legislative appropriation.
- Employers may not seek reimbursement for individuals convicted of specified disqualifying offenses.
- DFS must process complete applications within 45 days.

4. Enhanced Correctional Education Reporting and Alignment with Labor Market Demand

The finalized legislation requires the Correctional Education Program to report on vocational training completion and subsequent employment of inmates within six months of release. Annual reports must include completion rates, post-release employment outcomes, and alignment between training and labor market demand. Workforce demand data must be incorporated into vocational program selection.

Expanded Vocational Programs in Corrections

- Develop and implement CDL training programs within correctional institutions;
- Expand entrepreneurship, firefighter training, and transportation-related vocational programs; and
- Allow eligible inmates in approved career and technical education or CDL programs to operate state-owned vehicles under limited, controlled circumstances for training purposes.

Legislative Status Update (March 2026):

Since the initial presentation to the Executive Committee in February 2026, this legislation has moved rapidly through the final stages of the Florida legislative process. Key milestones include: (1) Favorable report from the Senate Fiscal Policy Committee on March 2, 2026, by a unanimous 16-0 vote; (2) Second reading in the Senate, substitution with the House companion bill CS/CS/HB 325, and enrollment ordered on March 9, 2026; (3) The 2026 Florida Legislative Session concluded on March 12, 2026. The bill now awaits the Governor's signature and, if signed, will take effect July 1, 2026.

Key Considerations for the Board:

1. **Reentry and Second-Chance Employment:** With the bill enrolled and effective July 1, 2026, South Florida Workforce Investment Board should begin positioning reentry initiatives to align with state-funded CDL and transportation training pipelines now being authorized within correctional facilities.
2. **Sector Strategy Implications:** Transportation, logistics, and commercial driving are now codified as priority reentry occupations under state law. SFWIB should evaluate updates to local sector strategies, Individual Training Account (ITA) eligibility lists, and employer engagement plans to reflect CDL and transportation pathways as high-priority credentials for justice-involved individuals.
3. **Employer Engagement Opportunities:** The enacted legislation creates a direct financial incentive for small employers (100 or fewer employees) in the Miami-Dade service area. Employers hiring former inmates as commercial drivers with less than two years of experience are eligible for reimbursement of workers' compensation and automobile liability premiums, capped at \$5,000 per employee and \$20,000 per employer. SFWIB should consider proactive outreach to transportation and logistics employers to publicize this program upon implementation.
4. **System Coordination:** Workforce boards may be expected to align local labor market data, career pathways, and employer demand with correctional education and FDOT-funded training efforts.
5. **Data and Performance Alignment:** The new six-month post-release employment reporting requirement creates an opportunity for SFWIB to coordinate with DOC on shared performance metrics, co-enrollment strategies, and pipeline development. Staff should monitor implementation guidance from DOC and DOT for alignment with WIOA performance measures and local reentry program design.

FUNDING: N/A

PERFORMANCE: N/A

NO ATTACHMENT



SFWIB EXECUTIVE COMMITTEE

DATE: 4/9/2026

AGENDA ITEM NUMBER: 7

AGENDA ITEM SUBJECT: REACH ACT – FIRST QUARTER PERFORMANCE UPDATE & WIOA SECOND QUARTER PERFORMANCE ANALYSIS

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N / A

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

STRATEGIC PROJECT: **Improve employment outcomes**

BACKGROUND:

FloridaCommerce has released the Program Year (PY) 2025–2026 Quarter 1 REACH Act Letter Grade performance results for all Local Workforce Development Boards (LWDBs). CareerSource South Florida (CSSF – LWDB 23) continues to demonstrate exceptional performance and remains the top ranked workforce board in the State of Florida.

Summary of Results CSSF earned a Quarter 1 score of 97.34, resulting in an A+ rating—the only workforce board in Florida to achieve this distinction for PY 25–26 Q1.

This continues CSSF’s multi year trend of high performance, following scores of 97.02 (PY 22), 101.7 (PY 23), and 103.27 (PY 24).

Statewide Comparison CSSF ranks #1 out of all 24 LWDBs, outperforming:

- CareerSource Southwest Florida – 93.15 (A)
- CareerSource Broward – 92.91 (A)
- CareerSource Suncoast – 91.22 (A)
- CareerSource Northeast Florida – 88.86 (B+)
- CareerSource Tampa Bay – 87.43 (B+)
- Remaining boards scoring between B and C range

CSSF is the only board to achieve an A+ rating this quarter.

CSSF Quarter 1 Performance Drivers CSSF's 97.34 score reflects strong outcomes across all REACH Act metrics, including:

- Participants with Increased Earnings: 48.88% (97.76% of target)
- Reduction in Public Assistance: 54.65% (100% of target)
- Employment & Training Outcomes: 100% (met target)
- Participants in Work Related Training: 20.99% (83.96% of target)
- Continued Repeat Business: 43.34% (100% of target)
- Year Over Year Business Penetration: 26.4% (exceeded target)
- Completion to Funding Ratio: 100% (met target)
- Serving Individuals on Public Assistance: 59.69%

These results demonstrate CSSF's continued leadership in workforce performance, business engagement, and service delivery effectiveness.

WIOA Second Quarter Performance Analysis – Program Year 2025–2026

This section presents the PY 2025–2026 Second Quarter (Q2) WIOA Indicators of Performance for LWDB 23 (CareerSource South Florida) across all four program streams: Adults, Dislocated Workers, Youth, and Wagner-Peyser. Results are compared against a five-year baseline spanning PY 2021–22 through PY 2024–25.

Executive Summary

PY 2025–26 Q2 shows a notable broad-based softening across virtually all indicators compared to peak performance recorded in PY 2024–25. All four program streams show year-over-year declines, though performance remains significantly above PY 2021–22 baselines. The greatest areas of concern are Adults (Credential Attainment down 7.7 points), Dislocated Workers (Median Wage down \$314), and Youth (Measurable Skill Gains down 11.3 points). Staff are conducting root cause analysis and targeted intervention planning in response to these trends.

Adults Program – Q2 Highlights

Employment 2nd Quarter After Exit declined from 89.3% (PY24-25) to 83.3%, a 6-point drop, though still 34 points above the PY21-22 baseline. Median Wage has declined for two consecutive years, from \$8,920 in PY23-24 to \$8,408 in PY25-26 Q2. Credential Attainment recorded the sharpest single-year drop in this program stream, falling from 88.2% to 80.5% (down 7.7 points) — a leading indicator of long-term wage growth that warrants priority attention. Measurable Skill Gains declined from 96.7% to 91.0%, consistent with the broader Q2 softening pattern.

Dislocated Workers Program – Q2 Highlights

Employment 2nd Quarter After Exit remains strong at 87.2%, down only marginally from the PY24-25 high of 88.1% — the most resilient metric across all program streams. Median Wage, while the highest of all streams at \$11,759, declined by \$314 from PY24-25. The 4th Quarter Employment Rate recorded a significant 6.6-point drop (91.3% to 84.7%), signaling job retention challenges. Credential Attainment and Measurable Skill Gains both declined from last year’s highs (94.3% to 89.1% and 95.9% to 92.6%, respectively).

Youth Program – Q2 Highlights

The Youth program presents a mixed picture. Credential Attainment improved significantly to 70.5% — the highest Q2 rate in the five-year comparison window, up from 55.6% in PY24-25, reflecting strong credential-focused service delivery. Median Wage rose to \$5,793, also a five-year Q2 high. Employment 4th Quarter After Exit improved to 80.1% (up from 72.6%), indicating better employment sustainability. However, Measurable Skill Gains recorded the largest single decline in the Youth stream, falling 11.3 points from 82.7% to 71.4%. Staff are auditing MSG documentation practices to determine whether this reflects a data capture issue or a genuine service gap. Employment 2nd Quarter After Exit remained relatively flat at 77.5%.

Wagner-Peyser Program – Q2 Highlights

Wagner-Peyser, which serves the broadest population, shows the most concerning employment decline in Q2. Employment 2nd Quarter After Exit dropped 7.1 points from 71.1% to 64.0% — the largest percentage-point decline in the entire dataset and the lowest Q2 rate since PY22-23. Employment 4th Quarter After Exit also declined from 69.0% to 66.5%. Median Wage is the one positive outlier, rising slightly to \$7,923 and representing the only consistently improving metric in this stream across the five-year window.

CROSS-PROGRAM TRENDS & KEY CONSIDERATIONS FOR THE BOARD

1. **System-Wide Q2 Softening:** Nearly every indicator across all four program streams declined year-over-year. The breadth of this decline — affecting Adults, Dislocated Workers, Youth, and Wagner-Peyser simultaneously — suggests external factors such as labor market cooling, changes in participant composition, or reduced employer engagement may be contributing. A data review session with program managers and business services staff is recommended to isolate root causes.
2. **Adult Credential Attainment Requires Immediate Attention:** The 7.7-point decline in Adult Credential Attainment is the most actionable indicator in this report. Credential attainment is a leading predictor of long-term wage outcomes. Staff will review participant pipelines, identify completion barriers (cost, scheduling, testing access), and consider targeted completion incentives and increased case manager touchpoints.
3. **Job Retention Gap — Dislocated Workers:** The 4th Quarter employment rate for Dislocated Workers dropped 6.6 points in one year. Staff will implement post-placement follow-up protocols at 30, 60, and 90 days and explore incumbent worker training and financial coaching partnerships to improve employment sustainability.

4. Youth Credential Best Practice Opportunity: Youth Credential Attainment reached a five-year Q2 high of 70.5%. Staff will document what interventions and case manager practices drove this result and explore cross-pollination of successful strategies into the Adult and Dislocated Worker program streams.
5. Wagner-Peyser Employment Rate — Monitor Through Q3: The 7.1-point drop in Wagner-Peyser 2nd Quarter employment is the largest percentage-point decline in the dataset. Given the breadth of population served, this metric will be monitored closely through Q3. If the rate does not recover, a formal review of job referral quality, job seeker readiness services, and resume and interview preparation programming will be initiated.
6. Employer Engagement and Sector Strategy Review: Declining employment rates in Adults and Wagner-Peyser suggest a potential erosion of employer relationships or a mismatch between training outcomes and available positions. The business services team will prioritize engagement with higher-wage employers in healthcare, logistics, advanced manufacturing, and technology to realign sector partnerships with participant placement needs.

FUNDING: N / A

PERFORMANCE: N / A

ATTACHMENT

Local Workforce Development Board	PY 2022 Annual Score (%)	PY 2023 Annual Score (%)	PY 2024 Annual Score (%)	PY 2025 Quarter 1 (%)	Current Score
CareerSource South Florida	97.02	101.7	103.27	97.34	A+
CareerSource Southwest Florida	98.61	96.4	96.4	93.15	A
CareerSource Broward	96.85	94.31	97.32	92.91	A-
CareerSource Suncoast	92.5	91.02	94.43	91.22	A-
CareerSource Northeast Florida	103.36	91.26	93.03	88.86	B+
CareerSource Tampa Bay	N/A	N/A	93.33	87.43	B+
CareerSource Research Coast	90.58	86.96	95.37	86.3	B
CareerSource Central Florida	99.97	98.67	93.56	85.49	B
CareerSource Heartland	99.56	89.39	91.64	85.27	B
CareerSource Okaloosa Walton	89.18	91.78	93.38	85.2	B
CareerSource North Central Florida	N/A	N/A	87.38	84.77	B
CareerSource Brevard Flagler Volusia	N/A	N/A	90.91	84.34	B
CareerSource Citrus Levy Marion	93.92	86.16	86.11	84	B
CareerSource Chipola	98.51	89.92	90.49	82.86	B-
CareerSource Pasco Hernando	92.66	85.62	88.45	82.11	B-
CareerSource Palm Beach County	95.16	85.68	86.52	80.46	B-
CareerSource Capital Region	89.51	87.93	85.63	79.68	C+
CareerSource Polk	95.4	79.93	83.44	78.38	C+
CareerSource North Florida	91.76	88.2	89.03	78.28	C+
CareerSource Gulf Coast	93.14	86.84	81.36	74.83	C
CareerSource Escarosa	94.76	86.78	85.38	73.34	C

Metric	Metric Category	Weight	Numerator	Denominator	Rate (%)	YOY Rate Difference	Target (%)	Target Met (%)	Weighted Performance (%)
1. Participants with Increased Earnings	Employment and Training Services, Self-Sufficiency	0.25	6,383	13,058	48.88	-	50	97.76	24.44
2. Reduction in Public Assistance	Employment and Training Services, Self-Sufficiency	0.25	7,426	13,589	54.65	-	50	100	25
3. Employment and Training Outcomes	Employment and Training Services	0.2	18	18	100	-	100	100	20
4. Participants in Work-Related Training	Training Services	0.1	4,462	21,255	20.99	-	25	83.96	8.396
5. Continued Repeat Business	Business Services	0.05	13,301	30,687	43.34	-	35	100	5
6. Year-Over-Year Business Penetration 1	Business Services	0.05	-	-	-	2.09	100	90	4.5
PY 2024-2025 Business Penetration		-	19,317	79,446	24.31	-	-	-	-
PY 2025-2026 Business Penetration		-	21,459	81,294	26.4	-	-	-	-
7. Completion-to-Funding Ratio	Employment and Training Services	0.05	20.4	12.3	100	-	100	100	5
Exiters: Local Board (N) / Statewide (D)		-	14,976	73,421	20.4	-	-	-	-
Budget: Local Board (N) / Statewide (D)		-	\$16,020,803	\$130,277,371	12.3	-	-	-	-
8. Serving Individuals on Public Assistance 2	Employment and Training Services, Self-Sufficiency	0.05	14,068	23,569	59.69	-	-	-	5
TOTAL									97.34

LWDB 23 — Workforce Program Performance

2nd Quarter Indicators of Performance: Analysis & Trends

Program Year 2025–2026 | Comparison: PY2021-22 through PY2025-26

Executive Summary

This report analyzes second quarter (Q2) performance indicators for LWDB 23 across all WIOA program streams — Adults, Dislocated Workers, Youth, and Wagner-Peyser — covering Program Years 2021-22 through 2025-26. The data reflects meaningful long-term improvements in employment outcomes, wages, and credential attainment. However, PY2025-26 Q2 shows a notable broad-based softening across virtually all indicators compared to the peak performance recorded in PY2024-25, signaling a need for targeted intervention and strategic review.

Key Finding: All four program streams show year-over-year declines from PY24-25 to PY25-26 Q2, though performance remains significantly above PY2021-22 baselines. The greatest concerns are in Adults (Credential Attainment down 7.7 pts), Dislocated Workers (Median Wage down \$314), and Youth (Measurable Skill Gains down 11.3 pts).

Adults Program Performance

Adults program participants have experienced strong multi-year improvement, with Q2 employment rates rising from 49.0% in PY21-22 to a high of 89.3% in PY24-25. The current year shows a moderate pullback.

Measure	PY21-22 Q2	PY22-23 Q2	PY23-24 Q2	PY24-25 Q2	PY25-26 Q2
Employed 2nd Qtr After Exit (%)	49%	56.3% ▲	82.4% ▲	89.3% ▲	83.3% ▼
Median Wage 2nd Qtr After Exit (\$)	\$5,860	\$6,981 ▲	\$8,920 ▲	\$8,638 ▼	\$8,408 ▼
Employed 4th Qtr After Exit (%)	53.3%	55.1% ▲	73.1% ▲	86.8% ▲	80.8% ▼
Credential Attainment Rate (%)	21.6%	55.6% ▲	84.7% ▲	88.2% ▲	80.5% ▼
Measurable Skill Gains (%)	71.6%	91.7% ▲	93.9% ▲	96.7% ▲	91% ▼

Employed 2nd Qtr After Exit: After peaking at 89.3% in PY24-25, the current Q2 rate has declined to 83.3% — a 6-point drop. While still 34 points above the PY21-22 baseline, this reversal warrants monitoring. Possible contributors include changes in participant mix, reduced employer engagement, or labor market softening.

Median Wage 2nd Qtr After Exit: Wage performance has declined for two consecutive years — from \$8,920 in PY23-24 to \$8,638 in PY24-25, and now \$8,408 in PY25-26 Q2. This sustained downward trend suggests participants may be entering lower-wage sectors or facing reduced placement quality.

Credential Attainment Rate: The sharpest single-year drop in the Adults program — from 88.2% to 80.5% (7.7 points). Credential attainment is a leading indicator of long-term wage growth; this decline, if not reversed, will compound wage challenges in future reporting periods.

Measurable Skill Gains: Skill gains declined from 96.7% to 91.0% — still strong overall, but the downward direction is consistent with the broader pattern of reduced outcomes this quarter.

Dislocated Workers Program Performance

The Dislocated Workers program shows the most sustained and consistent growth trajectory of all streams, though PY25-26 Q2 reflects some retreat from last year's peak.

Measure	PY21-22 Q2	PY22-23 Q2	PY23-24 Q2	PY24-25 Q2	PY25-26 Q2
Employed 2nd Qtr After Exit (%)	60%	66.5% ▲	82.1% ▲	88.1% ▲	87.2% ▼
Median Wage 2nd Qtr After Exit (\$)	\$2,146	\$9,178 ▲	\$10,787 ▲	\$12,073 ▲	\$11,759 ▼
Employed 4th Qtr After Exit (%)	66.7%	66.5% ▼	77.9% ▲	91.3% ▲	84.7% ▼
Credential Attainment Rate (%)	100%	76.8% ▼	84% ▲	94.3% ▲	89.1% ▼
Measurable Skill Gains (%)	67.4%	87.7% ▲	100% ▲	95.9% ▼	92.6% ▼

Employed 2nd Qtr After Exit: At 87.2%, employment performance remains near its five-year high and has declined only marginally from PY24-25's 88.1%. This is the most resilient metric across all programs in Q2.

Median Wage 2nd Qtr After Exit: Wages fell from \$12,073 to \$11,759 — a \$314 decline. Dislocated Workers consistently earn the highest wages of all program streams, reflecting prior work history, but the downward shift suggests displacement into lower-paid positions or industry sector shifts.

Employed 4th Qtr After Exit: A significant 6.6-point drop from 91.3% to 84.7% raises a sustainability concern. Participants placed in Q2 are having difficulty sustaining employment through the fourth quarter, pointing to potential job quality or retention support gaps.

Credential Attainment & Skill Gains: Both metrics declined from last year's highs (94.3% → 89.1% and 95.9% → 92.6% respectively). While still strong, the pattern is consistent with system-wide Q2 softening.

Youth Program Performance

The Youth program presents a mixed picture. Unlike Adults and Dislocated Workers, Youth employment outcomes have not followed a clean upward trend, but credential attainment is notably improving in PY25-26.

Measure	PY21-22 Q2	PY22-23 Q2	PY23-24 Q2	PY24-25 Q2	PY25-26 Q2
Employed 2nd Qtr After Exit (%)	83.3%	69.8% ▼	81.3% ▲	78.3% ▼	77.5% ▼
Median Wage 2nd Qtr After Exit (\$)	\$5,312	\$5,468 ▲	\$4,075 ▼	\$5,241 ▲	\$5,793 ▲
Employed 4th Qtr After Exit (%)	73.3%	65.6% ▼	80.3% ▲	72.6% ▼	80.1% ▲
Credential Attainment Rate (%)	28.6%	55.1% ▲	62.1% ▲	55.6% ▼	70.5% ▲
Measurable Skill Gains (%)	38.9%	81.6% ▲	84.1% ▲	82.7% ▼	71.4% ▼

Employed 2nd Qtr After Exit: At 77.5%, youth employment sits slightly below the prior year (78.3%) and well below the early peak of 83.3% in PY21-22. Youth employment has been relatively flat and volatile across the five-year window, suggesting structural challenges in youth labor market attachment.

Median Wage 2nd Qtr After Exit: This is a bright spot — youth wages have risen to \$5,793, the highest in the five-year comparison window, up from \$5,241. Higher wages may reflect improved job matching, sector targeting in higher-wage industries, or more mature participant ages within the program.

Credential Attainment Rate: Credential attainment has improved significantly to 70.5% — the highest Q2 rate recorded, up from 55.6% in PY24-25. This is the strongest positive trend in the Youth program and suggests credential-focused services are gaining traction.

Measurable Skill Gains: The largest decline in the Youth stream: from 82.7% to 71.4% — an 11.3-point drop. This is the most concerning metric in the Youth program and runs counter to the credential attainment improvement. Staff should examine whether skill gains documentation is aligned with credentialing activities.

Employed 4th Qtr After Exit: Improved to 80.1%, up from 72.6% in PY24-25 — a positive trend suggesting better employment sustainability than in the prior year despite flat Q2 placement rates.

Wagner-Peyser Program Performance

Wagner-Peyser serves as the universal employment services foundation. Performance gains through PY23-24 and PY24-25 appear to be softening in PY25-26, though wage growth remains positive.

Measure	PY21-22 Q2	PY22-23 Q2	PY23-24 Q2	PY24-25 Q2	PY25-26 Q2
Employed 2nd Qtr After Exit (%)	55.9%	56.9% ▲	71.2% ▲	71.1% ▼	64% ▼
Median Wage 2nd Qtr After Exit (\$)	\$5,754	\$6,948 ▲	\$7,567 ▲	\$7,839.5 ▲	\$7,923 ▲
Employed 4th Qtr After Exit (%)	54.9%	57.1% ▲	67.9% ▲	69% ▲	66.5% ▼

Employed 2nd Qtr After Exit: A notable decline from 71.1% to 64.0% — a 7-point drop and the lowest Q2 rate since PY22-23. Given that Wagner-Peyser reaches the broadest population, this decline may reflect labor market conditions more broadly and warrants close attention.

Median Wage 2nd Qtr After Exit: Wages rose slightly to \$7,923 from \$7,839.50 — the only consistently improving metric in the Wagner-Peyser stream and the only indicator not declining year over year.

Employed 4th Qtr After Exit: Declined from 69.0% to 66.5%, continuing a subtle downward trend from the PY23-24 high of 67.9%. Retention support for Wagner-Peyser participants appears to be an ongoing challenge.

Cross-Program Trend Analysis

Trend 1: System-Wide Q2 Softening

The most significant pattern in PY25-26 Q2 data is that nearly every indicator across every program stream has declined compared to PY24-25. This breadth — affecting Adults, Dislocated Workers, Youth, and Wagner-Peyser simultaneously — suggests external factors may be at play rather than program-specific issues. Contributing factors may include:

- Labor market cooling in key employment sectors served by LWDB 23
- Changes in the composition or characteristics of participants enrolled in early PY25-26
- Reduced employer partner engagement or hiring slowdowns
- Structural effects of service delivery changes or staff transitions

Trend 2: Long-Term Wage Growth Under Pressure

Median wages across Adults and Dislocated Workers — the two programs with the strongest wage histories — declined in Q2. Only Youth and Wagner-Peyser showed wage increases, and Wagner-Peyser's gain was marginal. If wage placement quality is declining, this could erode the long-term economic gains for participants and may require a sector-strategy review focused on higher-wage occupations.

Trend 3: Credential Attainment — Diverging Trajectories

Credential attainment shows diverging trends. Youth credential attainment improved sharply (70.5%, a five-year Q2 high) while Adults declined significantly (80.5%, down 7.7 points). Dislocated Workers also declined. This suggests Youth-focused credential programming is working, while Adult and Dislocated Worker credential pathways may need reinforcement, particularly in light of the co-occurring wage decline.

Trend 4: Employment Sustainability Gap

The gap between 2nd Quarter and 4th Quarter employment rates has widened in several streams. Dislocated Workers experienced a 2.5-point gap in PY25-26 (87.2% at Q2 vs. 84.7% at Q4 retention rate), suggesting job retention challenges. Adults show an even wider gap (83.3% at 2nd Qtr vs. 80.8% at 4th Qtr). Investment in post-placement retention services, career coaching, and incumbent worker support may be needed.

Recommendations for Improvement

1. Conduct a Root Cause Analysis for Q2 Decline

Given the breadth of Q2 softening, convene a data review session with program managers, case managers, and business services staff to identify whether the decline is attributable to participant characteristics, employer-side factors, or service delivery gaps. Disaggregate data by sector, demographics, and service type.

2. Strengthen Employer Engagement and Job Development

Declining employment rates in Adults and Wagner-Peyser suggest a potential erosion of employer relationships or a mismatch between training outcomes and available jobs. Prioritize business services team engagement with high-demand, higher-wage employers. Formalize sector partnerships with healthcare, logistics, advanced manufacturing, and technology.

3. Reinvest in Adult Credential Attainment Pathways

The 7.7-point decline in Adult credential attainment is the most actionable indicator in this report. Review the pipeline of participants pursuing credentials: Are participants enrolling in credential programs? Are there completion barriers (cost, scheduling, testing access)? Consider targeted completion incentives, stackable credential mapping, and increased case manager touchpoints during credential pursuit.

4. Address Youth Measurable Skill Gains Documentation

Youth MSGs declined 11.3 points while credential attainment improved significantly. This disconnect may indicate a documentation or data entry issue rather than a true service gap. Audit MSG recording practices among Youth case managers to ensure all learning activities — pre-occupational, occupational, and credential-linked — are being captured and entered into the system correctly.

5. Implement Job Retention Services for Dislocated Workers

The 4th Quarter employment rate for Dislocated Workers dropped 6.6 points in one year (91.3% → 84.7%). This signals a job sustainability problem. Consider implementing post-placement follow-up protocols at 30, 60, and 90 days, incumbent worker training partnerships with employers, and peer support or financial coaching services to help participants manage the transition period.

6. Leverage Youth Credential Success Across Program Streams

The Youth program's credential attainment surge to 70.5% represents a best practice opportunity. Identify what interventions, partnerships, or case manager practices drove this improvement and document them. Share these strategies with the Adult and Dislocated Worker program teams for potential cross-pollination, particularly around credential completion support.

7. Monitor Wagner-Peyser Employment Rate Through Q3

The 7-point decline in Wagner-Peyser 2nd Quarter employment (71.1% → 64.0%) is the single largest percentage-point drop in the dataset and affects the broadest population. This metric should be watched closely through Q3 to determine if it reflects a temporary dip or a sustained trend. If the Q3 rate does not recover, a formal review of job referral quality, job seeker readiness services, and resume/interview preparation programming should be initiated.

This analysis is based on LWDB 23 Quarter 2 Indicators of Performance data comparing Program Years 2021-22 through 2025-26. Trend arrows (▲/▼) indicate year-over-year direction relative to PY2024-25 Q2 performance. All recommendations should be reviewed in context of local labor market conditions and participant population characteristics.



SFWIB EXECUTIVE COMMITTEE

DATE: 4/9/2026

AGENDA ITEM NUMBER: 8

AGENDA ITEM SUBJECT: MAYOR'S OFFICE 2026 INTERNSHIP PROGRAM

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: SFWIB staff recommends the Executive Committee to recommend to the Board to approve an allocation of funds in support of the Mayor's Office 2026 Summer Internship Program. Specifically, it is recommended that the committee approve an allocation not to exceed \$30,000 in WIOA Adult funds to support ten (10) participants.

STRATEGIC GOAL: **BUILD DEMAND-DRIVEN SYSTEM W/ EMPLOYER ENGAGEMENT**

STRATEGIC PROJECT: **Emphasize work-based learning and training**

BACKGROUND:

As part of Miami-Dade County's ongoing efforts to attract and retain high-caliber talent, the Mayor's Office 2026 Summer Internship Program provides college and graduate students with meaningful exposure to public service and professional career pathways within the County government. Delivered under the "We Connect, We Thrive" initiative, the program is designed to build a sustainable pipeline of future public sector leaders through paid internship experiences across multiple departments.

CareerSource South Florida (CSSF) supported this initiative in 2025 by contributing \$20,000 in WIOA Adult funds to cover intern stipends. All seven participants from last year's program successfully completed.

This year's interns will be placed in key county departments identified through a comprehensive needs assessment conducted by the County. Participating departments include:

- Cultural Affairs
- Resilience
- Juvenile Services
- Equity & Engagement
- Animal Services
- Innovation & Economic Development
- Information Technology
- Operations

Intern responsibilities will include engaging in high-impact projects, assisting with community outreach, and contributing to policy analysis and operational improvements.

Upon successful completion of the 15-week program, interns will:

- Present a final report on their work and contributions to the Mayor
- Receive a certificate of appreciation
- Be provided with a signed letter of recommendation in support of future career opportunities

This expansion reflects both the strong interest in the program and its potential to support the County's mission of preparing a well-qualified, diverse future workforce dedicated to public service.

FUNDING: Workforce Innovation Opportunity Act Adult

PERFORMANCE: N/A

NO ATTACHMENT



SFWIB EXECUTIVE COMMITTEE

DATE: 4/9/2026

AGENDA ITEM NUMBER: 9

AGENDA ITEM SUBJECT: FORMAL INQUIRY TO THE USDOL - EMPLOYMENT AND TRAINING ADMINISTRATION

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: SFWIB staff recommends to the Executive Committee to recommend to the SFWIB to approve the transmission of a formal inquiry to the U.S. Department of Labor, Employment and Training Administration, and authorizing the Executive Director to submit on behalf of the Board.

STRATEGIC GOAL: **STRENGTHEN THE ONE-STOP DELIVERY SYSTEM**

STRATEGIC PROJECT: **Improve service delivery outcomes**

BACKGROUND:

Under WIOA, the High Poverty Area (HPA) presumption allows youth residing in census tracts with poverty rates of 25% or higher to be considered low income without individual income documentation. This presumption is codified in WIOA Section 129(a)(2) and 20 CFR § 681.260 and is widely used to streamline eligibility for WIOA Youth programs.

No equivalent provision exists for WIOA Title I Adult eligibility under WIOA Section 3(36) or 20 CFR Part 680. As a result, adults residing in the same high poverty census tracts must still provide individual income documentation, even when area level poverty data already demonstrates economic disadvantage. This creates administrative burden, delays enrollment, and disproportionately affects high poverty communities such as Miami Dade County.

To address this gap, SFWIB has prepared a formal inquiry to ETA requesting clarification on whether the Secretary of Labor has regulatory or interpretive authority to extend the HPA presumption to WIOA Adult eligibility without requiring a statutory waiver. The inquiry also requests guidance on whether HPA data may be used as corroborating evidence in adult eligibility determinations under existing documentation rules.

This inquiry aligns with federal priorities outlined in Executive Order 14278 and TEGL 05 25, both of which encourage modernization, flexibility, and reduced administrative barriers in WIOA programs.

SUMMARY OF INQUIRY PURPOSE

The formal inquiry requests ETA's written determination on:

- Whether ETA may recognize HPA residence as an alternative evidentiary method for satisfying WIOA Adult low income eligibility under Section 3(36).
- Whether ETA would consider issuing regulatory or policy guidance to that effect.
- Whether the issue should be elevated for federal regulatory or legislative consideration if interpretive authority is insufficient.
- Whether HPA data may be used as a corroborating factor in adult eligibility assessments under current guidance.

The inquiry also requests a technical assistance consultation with ETA Region 3 and the Florida Department of Commerce.

RATIONALE FOR BOARD ACTION

- Miami Dade County contains numerous census tracts with poverty rates $\geq 25\%$, including federally designated Opportunity Zones.
- 59.69% of CSSF participants in PY2025 26 Q1 are public assistance recipients—the highest rate in Florida.
- Streamlining eligibility in high poverty areas would reduce administrative burden, accelerate training enrollment, and improve access for economically disadvantaged residents.
- The inquiry does not request a waiver; it seeks a legal interpretation within existing statutory and regulatory authority.

RECOMMENDATION

Staff recommends that the Executive Committee approve the transmission of the formal inquiry to the U.S. Department of Labor, Employment and Training Administration, and authorize the President/CEO to submit the inquiry on behalf of the Board.

FUNDING: N / A

PERFORMANCE: N/A

ATTACHMENT



March 26, 2026

The Honorable Dr. Henry Mack
Assistant Secretary
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue, NW, Room S-2307
Washington, DC 20210

VIA ELECTRONIC MAIL AND U.S. CERTIFIED MAIL

RE: Formal Inquiry Regarding Regulatory Interpretation — Extension of the High-Poverty Area (HPA) Low-Income Presumption to WIOA Title I Adult Program Eligibility Under WIOA Section 3(36) and 20 CFR Part 680

Dear Assistant Secretary Dr. Mack:

I. Introduction and Purpose of Inquiry

The South Florida Workforce Investment Board (SFWIB), operator of CareerSource South Florida (CSSF) and the designated Local Workforce Development Board for Local Workforce Development Area 23 (Miami-Dade County), respectfully submits this formal written inquiry to the Employment and Training Administration (ETA) requesting clarification on a specific question of regulatory interpretation under the Workforce Innovation and Opportunity Act (WIOA).

Specifically, SFWIB requests ETA's written determination on the following question:

Whether the Secretary of Labor, acting through ETA, possesses and would exercise the authority to issue regulatory guidance or a policy interpretation that extends to WIOA Title I Adult program participants the High-Poverty Area (HPA) presumption of low-income eligibility — a presumption that Congress explicitly authorized for the WIOA Youth program in WIOA Section 129(a)(2) and that is codified in regulation at 20 CFR § 681.260 — as an additional qualifying criterion under the definition of "low-income individual" in WIOA Section 3(36), without the need for a statutory waiver under WIOA Section 189(i).

SFWIB recognizes that WIOA Section 189(i)(3)(A)(i) prohibits the Secretary from waiving requirements related to participant eligibility and accordingly does not submit this inquiry as a waiver request. Rather, SFWIB seeks ETA's determination on whether the extension of the HPA presumption to adult eligibility may be accomplished through a regulatory interpretation or policy guidance clarification, given that the HPA criterion does not waive the low-income eligibility

info@careersourcesfl.com

7300 Corporate Center Drive, Suite 500
Miami, Florida 33126

p: 305-594-7615 | f: 305-470-5629

requirement but instead provides an alternative evidentiary method of satisfying it — a distinction that we believe has meaningful legal significance and merits ETA's formal consideration.

II. Legal and Policy Framework

A. The High-Poverty Area Presumption for Youth — Statutory and Regulatory Authority

WIOA Section 129(a)(2) establishes that, for purposes of the Title I Youth formula program, the term "low-income individual" shall include a youth who lives in a high-poverty area. This provision is codified in regulation at 20 CFR § 681.260, which defines a high-poverty area as a Census tract, a set of contiguous Census tracts, an American Indian Reservation, Oklahoma Tribal Statistical Area, Alaska Native Village Statistical Area or Alaska Native Regional Corporation Area, Native Hawaiian Homeland Area, or other tribal land as defined by the Secretary in guidance, or county that has a poverty rate of at least 25 percent as set every five years using American Community Survey (ACS) 5-Year data.

The HPA presumption operates not as a waiver of the low-income criterion, but as a congressionally authorized alternative method of satisfying it. Congress determined that residence in a geographic area with a documented poverty rate of 25 percent or greater constitutes sufficient evidence of economic disadvantage to satisfy the low-income requirement, without requiring individual income documentation from each participant. This policy rationale — that area-based poverty data is a reliable and administratively efficient proxy for individual income status in demonstrably high-poverty communities — applies with equal logical force to adult participants as it does to youth participants.

B. The Adult Program Eligibility Framework — WIOA Section 3(36) and 20 CFR Part 680

WIOA Section 3(36) defines "low-income individual" as an individual who meets one or more of the following criteria: (A)(i) receives or has received public assistance; (A)(ii) whose family income does not exceed the higher of the poverty line or 70 percent of the Lower Living Standard Income Level (LLSIL); (A)(iii) is a homeless individual; (A)(iv) receives food stamps or has received food stamps in the past six months; (A)(v) is a foster child; or (A)(vi) is a person with a disability whose own income meets the low-income definition. The implementing regulations at 20 CFR Part 680 govern adult and dislocated worker eligibility and priority of service.

The HPA presumption does not appear in WIOA Section 3(36) or in 20 CFR Part 680. It is specific to the Title I Youth program, codified in 20 CFR § 681.260. No equivalent provision authorizes its use for adult eligibility determinations under current statute or regulation.

C. The Waiver Limitation and the Interpretation Distinction

WIOA Section 189(i)(3)(A)(i) expressly limits the Secretary's waiver authority by prohibiting waivers of "requirements relating to the basic purposes of title I, the definitions in section 3, and participant eligibility criteria." ETA has consistently applied this limitation. SFWIB does not submit this inquiry as a waiver request and does not contest this statutory limitation.

However, SFWIB respectfully advances the following analytical distinction: the HPA presumption is not a waiver of the low-income eligibility requirement — it is a congressional recognition that geographic residence data constitutes an alternative and sufficient form of evidence for satisfying that requirement. The eligibility criterion itself (low-income status under WIOA Section 3(36)) remains fully intact. What changes is the evidentiary framework by which that criterion is documented and satisfied. Guidance or regulatory interpretation that recognizes HPA residence as satisfying the Section 3(36)(A)(ii) income criterion for adults would be analogous to ETA's existing guidance authorizing self-attestation as an acceptable documentation method for certain eligibility elements — a policy clarification of how an existing criterion is evidenced, not a waiver of the criterion itself.

SFWIB acknowledges that this interpretation is novel and may face legal and policy objections that ETA is best positioned to evaluate. We submit it as a formal inquiry specifically because we believe it raises a question of interpretive authority that belongs before ETA rather than before the statutory waiver process.

III. Local Context and Demonstrated Need

SFWIB submits this inquiry in the context of the workforce realities of Miami-Dade County, one of the most economically complex and high-need WIOA service environments in the State of Florida and the nation. The following local data points illustrate the policy stakes:

- 59.69% of CSSF participants in Program Year 2025-26 Q1 are individuals on public assistance — the highest rate among all 21 Florida Local Workforce Development Boards and nearly double the statewide average.
- Miami-Dade County's median household income is approximately \$62,000, below the Florida statewide median, in a metropolitan area with one of the highest costs of living in the southeastern United States.
- Numerous census tracts within Miami-Dade County — including tracts designated as Qualified Opportunity Zones under the Tax Cuts and Jobs Act of 2017 — carry documented poverty rates at or above the 25 percent threshold defined in 20 CFR § 681.260.
- The individual income documentation requirement creates meaningful administrative burden for both participants and case managers in communities where the area-level poverty data already strongly predicts individual low-income status. This burden operates as a practical barrier to timely enrollment, contributing to the training enrollment gap that CSSF is actively working to close under WIOA performance accountability targets.
- CSSF has identified that requiring individual income verification in high-poverty census tracts — where collective poverty rates of 25 percent or above already demonstrate the economic conditions Congress intended WIOA to address — produces documentation burden disproportionate to its eligibility screening value.

The practical impact of an affirmative ETA determination on this inquiry would be significant: it would allow CSSF and other boards serving similar communities to streamline adult eligibility determination in documented high-poverty areas, reduce administrative friction that contributes to delayed enrollment, and align adult program accessibility with the same place-based equity logic Congress applied to the youth population in WIOA Section 129(a)(2).

IV. Alignment with Executive Order 14278 and TEGL No. 05-25

This inquiry is submitted in direct alignment with the Administration's workforce development priorities as articulated in Executive Order 14278 (April 23, 2025), "Preparing Americans for High-Paying Skilled Trade Jobs of the Future," and ETA's implementing guidance in Training and Employment Guidance Letter No. 05-25 (November 25, 2025).

TEGL No. 05-25 expressly identifies "Flexibility and Innovation" as one of the five strategic pillars for America's workforce system and states that "states and local communities need more control to tailor solutions to their regional economies without being constrained by outdated program rules or processes." It further encourages ETA and states to "identify where current policies impede system modernization" and to partner with ETA to achieve the bold vision for reform set forth by the Administration.

SFWIB respectfully submits that requiring individual income documentation from adult participants in census tracts with documented poverty rates of 25 percent or above represents precisely the kind of administrative constraint that impedes system modernization without commensurate policy benefit. An ETA determination that the HPA presumption may be extended to adult eligibility through regulatory interpretation would directly advance the strategic pillar of Flexibility and Innovation while serving the Administration's broader priority of connecting Americans — particularly those in economically distressed communities — to high-quality employment and training opportunities.

SFWIB further notes that the existing authority Congress granted the Secretary to extend the HPA designation to "other tribal land as defined by the Secretary in guidance" (20 CFR § 681.260) demonstrates that ETA possesses and has exercised interpretive flexibility within the HPA framework. This inquiry asks ETA to consider whether analogous interpretive authority exists to extend the HPA presumption across program populations within WIOA Title I.

V. Specific Questions for ETA's Determination

SFWIB respectfully requests ETA's written response to the following specific questions:

Question 1: Does ETA possess regulatory or interpretive authority — independent of the waiver process under WIOA Section 189(i) — to issue guidance clarifying that residence in a high-poverty area (as defined at 20 CFR § 681.260) constitutes an alternative method of satisfying the low-income income criterion in WIOA Section 3(36)(A)(ii) for WIOA Title I Adult program participants?

Question 2: If such authority exists, would ETA consider exercising it to issue a policy clarification or amendment to the regulatory guidance governing adult eligibility under 20 CFR Part 680 to

recognize HPA residence as an additional qualifying criterion — consistent with the congressional intent reflected in WIOA Section 129(a)(2)?

Question 3: If ETA determines that the HPA presumption cannot be extended to adult eligibility through regulatory interpretation without statutory amendment, would ETA be willing to document this determination in writing — and, separately, to consider whether the question merits inclusion in the Administration's WIOA reauthorization advocacy priorities or in pending regulatory action under WIOA?

Question 4: Regardless of ETA's determination on the above questions, would ETA clarify whether a local workforce development board may use HPA census tract data as a corroborating factor in adult eligibility assessments — for example, to support self-attestation of income status in geographic areas with documented poverty rates of 25 percent or above — under existing WIOA guidance on acceptable documentation methods?

VI. Request for Technical Assistance Consultation

In addition to a written response to the questions above, SFWIB respectfully requests the opportunity for a technical assistance consultation with the appropriate ETA program staff — including ETA Region 3 and the Florida Department of Commerce as state intermediary — to discuss the policy and legal dimensions of this inquiry. SFWIB believes that a direct dialogue with ETA subject matter experts would facilitate the most accurate and complete understanding of ETA's position and would enable SFWIB to structure any follow-on request, whether for regulatory interpretation, formal guidance, or legislative action, in a manner most aligned with ETA's framework and priorities.

We are available at ETA's convenience and are prepared to provide any additional documentation, local labor market data, or legal analysis that would assist ETA in responding to this inquiry.

VII. Conclusion

CareerSource South Florida and the South Florida Workforce Investment Board are committed partners in advancing the workforce development mission Congress entrusted to the public workforce system under WIOA. We enter PY2025-28 ranked first among all 21 Florida Local Workforce Development Boards on the REACH Act performance scorecard, and we are committed to continuous improvement in the quality, efficiency, and equity of services delivered to Miami-Dade County's workforce and business community.

This inquiry is submitted in that spirit — not to circumvent WIOA's eligibility framework, but to ask ETA to carefully examine whether the same equity rationale that led Congress to authorize the HPA presumption for youth participants can be extended through regulatory interpretation to adult participants in the same high-poverty communities, reducing administrative burden and improving program accessibility without compromising the integrity of WIOA's eligibility requirements.

The Honorable Dr. Henry Mack
Employment and Training Administration
U.S. Department of Labor
March 27, 2026
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We look forward to ETA's response and thank you for your continued leadership of the public workforce system. Please direct all responses and correspondence regarding this inquiry to:

Primary Contact: Mr. Rick Beasley
Title: Executive Director
South Florida Workforce Investment Board (SFWIB)
d/b/a CareerSource South Florida (CSSF)
Address: 7300 Corporate Center Drive, Suite 500, Miami, Florida 33126
Telephone: (305) 929-1501
Email: Rick.Beasley@careersourcesfl.com

Respectfully submitted,

Rick Beasley
Executive Director
South Florida Workforce Investment Board (SFWIB)
d/b/a CareerSource South Florida (CSSF)
Local Workforce Development Area 23
Miami-Dade County, Florida

cc:

ETA Region 3 Regional Administrator
Sam Nunn Atlanta Federal Center
61 Forsyth Street SW, Suite 6T85
Atlanta, Georgia 30303

The Honorable J. Alex Kelly
Secretary of Commerce
Florida Department of Commerce
107 East Madison Street
Caldwell Building
Tallahassee, FL 32399-4120

Ms. Adrienne Johnston
President & Chief Executive Officer
CareerSource Florida
2308 Killlearn Center Boulevard, Suite 101
Tallahassee, FL 32309



SFWIB EXECUTIVE COMMITTEE

DATE: 4/9/2026

AGENDA ITEM NUMBER: 10

AGENDA ITEM SUBJECT: CAREERSOURCE FLORIDA WIOA COMBINED PLAN 2-YEAR MODIFICATION

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: SFWIB staff recommends to the Executive Committee to recommend to the Board to approve CSSF's public comment submission on the WIOA Combined Plan Two Year Modification and authorize the Executive Director to transmit the comments on behalf of the Board.

STRATEGIC GOAL: **STRENGTHEN THE ONE-STOP DELIVERY SYSTEM**

STRATEGIC PROJECT: **Conduct an analysis of Career Centers**

BACKGROUND:

CareerSource Florida has released the WIOA Combined Plan Two Year Modification for public review and comment. CSSF conducted two comprehensive analyses—the Statewide Alignment Review and the REACH/WIOA Alignment Public Comment Analysis—to assess alignment between the Combined Plan, the REACH Act performance framework, and WIOA primary indicators.

The analyses identify several statewide strengths, including strong alignment with industry driven strategies, credential quality frameworks, and apprenticeship expansion. However, they also highlight critical gaps in statewide measurement architecture, youth performance, apprenticeship accountability, credential of value reporting, and system integration.

KEY FINDINGS FROM CSSF'S ANALYSIS:

- Split accountability systems (REACH vs. WIOA) prevent a unified statewide performance picture.
- No statewide apprenticeship performance metric, despite a 50,000 apprentice goal by 2030.
- Credential attainment not linked to credential quality (Master Credential List alignment).
- Youth performance concerns, including declining enrollment and credential outcomes below negotiated levels.

- Limited public reporting on pathway progression, referral conversion, co enrollment, and employer hiring outcomes.
- Business service metrics emphasize penetration, not hiring quality or training ROI.

Summary of CSSF's proposed public comments: CSSF supports the direction of the Combined Plan and recommends enhancements to strengthen statewide transparency, accountability, and alignment with REACH and WIOA. Key recommendations include:

1. Adopt a single integrated statewide performance scorecard combining REACH, WIOA, and pathway progression metrics.
2. Add apprenticeship enrollment and completion metrics to statewide reporting and REACH Metric 4.
3. Disaggregate credential attainment to show credentials of value aligned to the Master Credential List.
4. Add end to end career pathway measures (intake → training → credential → in field employment → retention).
5. Establish youth specific pathway and performance measures to address statewide youth underperformance.
6. Report referral conversion, co enrollment, and time to service to measure no wrong door implementation.
7. Add employer outcome measures tied to hiring from training pipelines, OJT/IWT completions, and skill match quality.
8. Disaggregate access and outcomes for individuals with barriers to strengthen equity reporting.

Recommendation: SFWIB staff recommends to the Executive Committee to recommend to the Board to approve CSSF's public comment submission on the WIOA Combined Plan Two Year Modification and authorize the Executive Director to transmit the comments on behalf of the Board.

FUNDING: N / A

PERFORMANCE: N/A

ATTACHMENT

STATEWIDE ALIGNMENT ANALYSIS

REACH Act & WIOA Core Measures

CareerSource Florida Combined 2-Year Plan

Prepared for Public Comment Submission to CareerSource Florida

WIOA 2024–2027 Combined Plan — Two-Year Modification

REPORT DATE	FRAMEWORK ASSESSED	PROGRAM YEAR
March 2026	REACH Act + WIOA Core	PY 2024-2025 / 2025-2026

Data Sources: REACH Act PY 24-25 Cumulative Performance | WIOA Statewide Indicators PY 2025-26 Q2 | CareerSource Florida WIOA 2024-2027 Combined Plan Two-Year Modification

EXECUTIVE SUMMARY

This report presents a statewide alignment analysis of the CareerSource Florida WIOA 2024–2027 Combined Plan Two-Year Modification against the Reimagining Education and Career Help (REACH) Act performance framework and WIOA core measures. It is prepared to assist CareerSource Florida (CSSF) stakeholders in submitting informed public comments and to support the adjustment of the combined two-year plan.

The analysis draws on three primary data sources: (1) the REACH Act PY 2024-2025 Cumulative Performance Report, reflecting a statewide annual score of 103.27% (A+); (2) the WIOA Statewide Indicators of Performance through PY 2025-26 Quarter 2; and (3) the WIOA 2024–2027 Combined Plan Two-Year Modification. Findings are organized across three domains: talent development, business and service delivery, and performance gaps.

KEY FINDINGS AT A GLANCE

- Florida's REACH Act statewide score reached 103.27% (A+) in PY 2024-25, with the South Florida LWDB leading at 103.27% and Gulf Coast trailing at 81.36% (B-).
- Work-Related Training participation (Metric 4) remains the most critical performance gap statewide at 21.27%—far below the 25% target—with no explicit apprenticeship or credential attainment sub-metric in the REACH framework.
- WIOA Adult Credential Attainment reached 86.5% statewide (exceeding the 75.2% negotiated goal), yet only 79.8% of Adults statewide met the credential standard in PY 2025-26 Q2—a gap widening for Youth (71.4%) and Dislocated Workers (83.6%).
- The 2-Year Plan commits to 50,000 new apprentices by 2030 with only 5,000 (10%) attributed to WIOA-funded LWDBs—a structural gap between state ambition and federal accountability.
- Declining WIOA enrollment (adults -1.1%, dislocated workers -9.8%, youth -16.6%) undermines overall system reach and contradicts the REACH Act's self-sufficiency mission.
- The plan's business engagement metrics (Metrics 5 & 6) lack alignment with WIOA employer accountability measures, creating a dual reporting burden without convergent outcome data.

SECTION I: CROSS-FRAMEWORK ALIGNMENT ANALYSIS

The REACH Act and WIOA operate from distinct but complementary mandates. WIOA establishes the federal performance accountability framework for workforce development programs, while the REACH Act (Florida Statutes §§445.004, 1008.43) establishes a state-level performance accountability system focused on self-sufficiency, training intensity, and business engagement. Where properly aligned, these frameworks create a reinforcing accountability environment. Where misaligned, they create duplication, reporting fatigue, or gaps in outcomes.

1.1 Framework Architecture Overview

The table below maps the seven REACH Act metrics to the corresponding WIOA primary indicators of performance, identifying alignment status and coverage gaps:

REACH Act Metric	REACH Category / Weight	Corresponding WIOA Indicator(s)	PY 24-25 Performance	Alignment
Metric 1: Participants with Increased Earnings	Employment & Training Services, Self-Sufficiency (25%)	Adult/DW/Youth Median Earnings 2nd Qtr After Exit	49.53% vs. 50% target (99.06%)	STRONG
Metric 2: Reduction in Public Assistance	Employment & Training, Self-Sufficiency (25%)	No direct WIOA counterpart — FL-specific metric	53.50% vs. 50% target (100%)	PARTIAL
Metric 3: Employment & Training Outcomes	Employment & Training Services (20%)	Adult/DW Employment 2nd & 4th Qtr After Exit	100% (18/18 LWDBs met)	STRONG
Metric 4: Participants in Work-Related Training	Training Services (10%)	WIOA training enrollment; no direct Credential Attainment or Apprenticeship metric	21.27% vs. 25% target (85.08%)	GAP
Metric 5: Continued Repeat Business	Business Services (5%)	No direct WIOA counterpart — FL-specific metric	56.86% vs. 35% target (100%)	PARTIAL
Metric 6: Year-Over-Year Business Penetration	Business Services (5%)	Wagner-Peyser Employment 2nd Qtr After Exit (proxy)	YOY +7.02% penetration (100%)	PARTIAL
Metric 7: Completion-to-Funding Ratio	Employment & Training (10%)	WIOA cost-efficiency proxy; no direct WIOA counterpart	19.94% exit ratio (100%)	PARTIAL
Extra Credit: Serving Public Assistance Individuals	Employment & Training, Self-Sufficiency (up to 5%)	WIOA Adults/DW with barriers; partial alignment	62.52% (5 pts earned)	MODERATE

1.2 Talent Development Alignment

Florida's REACH Act frames talent development through increased earnings (Metric 1) and training participation (Metric 4). The WIOA framework adds depth through Credential Attainment and Measurable Skill Gains—metrics absent from REACH. This creates a fundamental asymmetry: REACH rewards the volume of training enrollment while WIOA demands training quality and completion outcomes.

Earnings and Employment Alignment

The strongest alignment area between REACH and WIOA is employment and earnings outcomes. REACH Metric 1 (Increased Earnings) maps directly to the WIOA Median Earnings 2nd Quarter After Exit indicator. In PY 2024-25:

- WIOA Adults statewide achieved median earnings of \$9,959.50 vs. the negotiated goal of \$10,120—a 98.4% attainment rate.
- WIOA Dislocated Workers achieved \$11,040 vs. \$10,575 goal—exceeding target by 4.4%.
- REACH Metric 1 shows 49.53% of participants achieved increased earnings, just below the 50% target (99.06% attainment).
- The alignment is conceptually strong but measurement differs: REACH measures participant earnings trajectory while WIOA measures absolute median wages.

Training Participation vs. Credential Outcomes

The most significant talent development gap between frameworks occurs here. REACH Metric 4 measures whether participants are enrolled in work-related training (21.27% statewide vs. 25% target), but does not track whether training leads to a recognized credential. WIOA Credential Attainment within 4th Quarter After Exit shows:

- Adults: 86.5% statewide attainment (exceeding 75.2% goal) — but this is not surfaced in REACH accountability.
- Dislocated Workers: 83.3% (exceeding 82.7% goal).
- Youth: 72.6% — below the 73.4% negotiated goal, the only WIOA credential measure not met statewide.
- The 2-Year Plan identifies a Master Credential List (MCL) and Eligible Training Provider List (ETPL) but does not establish a metric linking REACH training participation to MCL-aligned credentials.

Apprenticeships and Career Pathways

The most structural gap in the 2-Year Plan is the disconnect between the REACH Act's ambitious apprenticeship goals and both the WIOA performance framework and the plan's own accountability structure:

- The plan commits to 50,000 new apprentices by 2030, with 450 registered apprenticeship programs and 110 pre-apprenticeship programs.
- Only 5,000 of these (10%) are attributed to WIOA-funded LWDB activity—meaning 90% of the goal depends on non-WIOA systems (FDOE, FCS, state apprenticeship agency).
- Neither REACH metrics nor WIOA primary indicators include a standalone apprenticeship completion or enrollment rate.
- The 2-Year Plan references Apprenticeship Navigators at LWDBs but provides no performance target, baseline, or outcome measure tied to these positions.
- Pre-apprenticeship programs lack any alignment to Measurable Skill Gains reporting under WIOA, creating an accountability gap.

1.3 Business & Service Delivery Alignment

Florida's REACH framework invests 10% of the performance score in business services (Metrics 5 and 6), a significantly higher priority than the WIOA framework, which contains no explicit business performance indicator. This represents both a strength and a gap:

REACH Business Metrics (Strengths)	WIOA Business Alignment (Gaps)
Metric 5 — Continued Repeat Business: 56.86% of businesses are repeat customers, far exceeding the 35% target. Demonstrates sustained employer relationships.	WIOA has no employer retention or satisfaction metric. Business services outcomes measured only through participant employment rates (proxy).
Metric 6 — YOY Business Penetration: Statewide business penetration grew from 24.77% (PY 23-24) to 31.79% (PY 24-25), a 7.02 percentage point gain. 100% target met.	Wagner-Peyser employer penetration is measured but reported separately from WIOA Title I employer services. No integrated employer satisfaction or training co-investment metric exists.
The Salesforce CRM platform and business engagement councils (sector strategy rounds, State of Talent events) represent strong service delivery infrastructure.	Employer-sponsored training co-investments and OJT contracts are tracked under WIOA but not reported in REACH, creating a fragmented picture of business engagement ROI.
LWDBs achieving A+ and A grades (e.g., CareerSource South Florida at 103.27%, Broward at 97.32%) demonstrate effective business service models.	LWDBs with lower REACH scores (e.g., CareerSource Gulf Coast at 81.36%, Polk at 83.44%) show that business penetration lags correlate with lower overall system performance.

1.4 WIOA Performance Deep Dive — PY 2025-26 Q2

The WIOA Statewide Indicators data through Q2 of PY 2025-26 reveal system performance trends that are not captured by the REACH framework:

WIOA Indicator	Adults Q2 PY25-26	DW Q2 PY25-26	Youth Q2 PY25-26	Trend Assessment
Employment 2nd Qtr After Exit	85.4%	85.3%	75.9%	Meeting/exceeding goals
Median Earnings 2nd Qtr After Exit	\$10,250	\$11,719	\$5,344	Wages growing YOY
Employment 4th Qtr After Exit	83.6%	83.3%	76.8%	Strong retention
Credential Attainment Rate	79.8%	83.6%	71.4%	Youth below goal
Measurable Skill Gains	77.8%	82.5%	70.9%	Youth lagging
WP Employment 2nd Qtr After Exit	64.8%	—	—	Below WP 68.2% goal

Notable: LWDB 03 (CareerSource Chipola) leads Adults Credential Attainment at 91.7%, while LWDB 01 (Escarosa) trails at 67.8%. LWDB 26 (North Central Florida) shows the lowest Adult Measurable Skill Gains at 56.9%, suggesting significant local-level disparities not visible in aggregate REACH scores.

Section II: Critical Misalignment Analysis

This section identifies the most consequential misalignments between the REACH Act, WIOA indicators, and the CareerSource Florida Combined 2-Year Plan. These gaps represent areas where the system may be performing well on one framework while underperforming on another, or where neither framework adequately captures a critical outcome.

2.1 Critical Misalignment Chart

CRITICAL MISALIGNMENT ANALYSIS — REACH ACT vs. WIOA vs. COMBINED 2-YEAR PLAN				
DOMAIN	REACH ACT POSITION	WIOA REQUIREMENT	2-YEAR PLAN RESPONSE	MISALIGNMENT RISK
APPRENTICESHIP & CAREER PATHWAYS	REACH Act calls for expanded apprenticeship and pre-apprenticeship via REACH Office coordination (§445.004). No standalone metric or target in REACH scorecard.	WIOA requires LWDBs to support registered apprenticeships; no primary indicator for apprenticeship enrollment or completion rates.	2-Year Plan sets 50,000 apprentice goal by 2030; LWDB contribution = 5,000 (10%). No REACH or WIOA metric tracks this. Apprenticeship Navigators funded but unmeasured.	HIGH RISK: 90% of apprenticeship goal falls outside any accountability framework. No performance consequence for LWDB non-participation.
CREDENTIAL ATTAINMENT	Metric 4 measures training participation rate (21.27% vs. 25% target) but not credential completion. MCL identified but not linked to REACH scoring.	WIOA Primary Indicator: Credential Attainment within 4th Quarter After Exit. Adults: 86.5% statewide; Youth: 72.6% (below 73.4% goal).	2-Year Plan references MCL and ETPL alignment, Workforce Pell, and credential review process. No binding annual targets tied to LWDB plan.	MODERATE RISK: REACH rewards training enrollment not credential completion. Youth credential gap (72.6%) not addressed by REACH Metric 4 weighting.
YOUTH WORKFORCE DEVELOPMENT	REACH Metrics 1-7 do not disaggregate	WIOA Title I Youth: separate credential, employment,	2-Year Plan includes waivers for OSY/ISY	HIGH RISK: Youth enrollment collapse (-

PARTICIPANT ENROLLMENT & REACH

by age group. Youth performance is folded into aggregate training participation and employment metrics.

skill gain targets. Youth credential attainment (72.6%) and Measurable Skill Gains (70.9%) below goals statewide.

flexibility and ITA expansion for in-school youth. Enrollment declined 16.6% YOY—the sharpest decline of any group.

16.6%) is masked by aggregate REACH scores. The 2-Year Plan lacks a dedicated youth recovery strategy with measurable milestones.

REACH Metric 7 (Completion-to-Funding Ratio) incentivizes efficiency over volume. No metric for system reach or populations served.

WIOA Section 134 requires equitable access to career services. Declining enrollment may trigger DOL scrutiny regarding access for individuals with barriers.

2-Year Plan acknowledges declining enrollment but cites analysis still in progress. Serves ~0.06-0.07% of state population—a very low penetration rate for WIOA services.

HIGH RISK: System shrinks while REACH score improves due to metric weighting. Efficiency metric masks inadequate reach to populations with barriers.

SELF-SUFFICIENCY & PUBLIC ASSISTANCE REDUCTION

REACH Metric 2 (50% weight equivalent) prioritizes welfare reduction as core outcome. Extra Credit for serving PA recipients (62.52% statewide).

WIOA does not require public assistance reduction as a performance measure. Combined Plan TANF/SNAP E&T partnerships are optional programmatic integrations.

2-Year Plan includes CLIFF Dashboard, DCF collaboration, and TANF/SNAP E&T as combined partners. No integrated cross-program outcome target for PA reduction.

MODERATE RISK: REACH prioritizes a metric (PA reduction) that WIOA doesn't count. Strong local REACH scores may not translate to federally reportable outcomes.

BUSINESS SERVICES ACCOUNTABILITY

REACH awards 10% weight to business metrics (Metrics 5 & 6). Business penetration

WIOA has no direct business services primary indicator. Wagner-Peyser employment rates are the

2-Year Plan emphasizes Salesforce CRM, sector strategy activities, and employer engagement

MODERATE RISK: Business success metrics in REACH are process-oriented (repeat customers, penetration).

GEOGRAPHIC & EQUITY DISPARITIES

rose from 24.77% to 31.79% YOY (+7.02 pts). Exceeds all targets.

closest proxy. Employer satisfaction not federally tracked.

councils. OJT reimbursement waiver approved. No outcome target for OJT completions leading to employment.

Neither framework measures quality of employer outcomes or co-investment in training.

REACH letter grades range from A+ (CareerSource South Florida: 103.27%) to B- (CareerSource Gulf Coast: 81.36%). 22-point spread indicates significant local variation.

WIOA requires equitable access for individuals with barriers. LWDB-level data shows LWDB 26 (North Central FL) at 56.9% Measurable Skill Gains vs. LWDB 03 at 83.1%.

2-Year Plan introduces REACH letter grades as accountability mechanism and references Workforce Policy G104 sanctions. Technical assistance process described but not operationalized.

MODERATE RISK: Geographic performance gaps of 20+ points suggest differential access quality that letter grades alone cannot remedy. Improvement plans lack specific timelines.

DATA INTEGRATION & REPORTING

REACH reporting system separate from WIOA FETPIP data. Performance Year calendars may differ. WITS system under development (completion mid-2027).

WIOA requires unified data reporting through FETPIP. DOL requires quarterly reports. FL WINS integration intended to bridge systems but not yet operational.

2-Year Plan initiates FL WINS and WITS (expected mid-2027). Data-hub approach under evaluation. MOU requirement for data sharing across state agencies added.

MODERATE RISK: Until WITS/FL WINS are operational, REACH and WIOA data remain siloed. Unduplicated participant counts and cross-program outcomes cannot be validated.

Section III: Performance Gaps and Root Cause Analysis

3.1 Talent Development Gaps

GAP 1: Work-Related Training Participation Below Target (Metric 4)

Current Rate: 21.27% | Target: 25% | Gap: -3.73 percentage points | Cumulative attainment: 85.08%

Root Causes: Insufficient ITA funding relative to participant volume; WIOA enrollment declining (adults -1.1%, DW -9.8%, youth -16.6%) reduces denominator baseline; high-barrier populations require longer engagement before training eligibility; OJT and customized training undercounted.

Impact: This gap directly affects the REACH score (10% weight) and signals that the system is not converting participants to training pathways at the required rate. Lower training rates translate to lower credential attainment and reduced long-term earnings gains.

GAP 2: Youth Enrollment Collapse and Credential Underperformance

Youth enrollment: -16.6% YOY | Youth Credential Attainment: 72.6% vs. 73.4% goal | Youth Measurable Skill Gains: 70.9% (Q2 PY25-26)

Root Causes: Post-pandemic labor market draws youth directly into employment over training; tight eligibility requirements for in-school youth; ISY waivers exist but may not be communicated consistently across LWDBs; geographic disparities in youth programming quality.

Impact: The youth pipeline represents Florida's long-term talent development capacity. Declining enrollment and sub-goal credential attainment undermine the state's 2030 workforce goals. REACH does not disaggregate by age, masking this deterioration.

GAP 3: No Apprenticeship Performance Metric in Either Framework

LWDB 2030 Goal: 5,000 apprentices (10% of state goal) | Current metric: None | Performance consequence: None

Root Causes: Registered apprenticeship data tracked separately by DOL Office of Apprenticeship; WIOA primary indicators do not include apprenticeship enrollment; REACH Metric 4 includes apprentices only as one type of work-related training without disaggregation.

Impact: Without a measurable performance target, apprenticeship expansion is aspirational rather than accountable. LWDBs face no consequence for not meeting apprenticeship goals, and Apprenticeship Navigators lack outcome-linked job descriptions.

3.2 Business & Service Delivery Gaps

GAP 4: Business Service Quality Not Measured Beyond Penetration

REACH business metrics exceed targets statewide | No measure of: OJT completion rates, employer satisfaction, job quality (wages/benefits), or employer-funded training co-investment

Root Causes: WIOA lacks employer outcome metrics; REACH measures access (penetration) and loyalty (repeat customers) but not quality of employer partnership outcomes. OJT reimbursement waiver approved but no utilization or completion target established.

Impact: A system can achieve 100% on REACH business metrics while placing participants in low-wage, high-turnover jobs. Without quality indicators, business services success is undefined.

GAP 5: Wagner-Peyser Employment Rate Below Goal (PY 2025-26 Q2)

WP Employment 2nd Qtr After Exit: 64.8% vs. 68.2% negotiated goal | 18 of 21 LWDBs met WP 4th Quarter goal | LWDB 24 (North Central FL): 51.2% — most critical outlier

Root Causes: Wagner-Peyser serves a broader, less-intensive service population than WIOA Title I. Self-service users inflate denominator. Labor market conditions in rural/small urban LWDBs drive geographic disparities.

Impact: WP employment rate decline is not captured by REACH metrics, creating a blind spot in the state's talent placement reporting. Rural LWDBs face structural disadvantages not addressed by REACH letter grades.

Section IV: Recommended Performance Measure Framework

The following recommendations address the identified alignment gaps, performance deficiencies, and structural misalignments. Recommendations are organized by domain and include specific metric proposals, plan modification language, and public comment action items.

4.1 Career Pathways and Apprenticeship Recommendations

RECOMMENDATION	IMPLEMENTATION GUIDANCE
<p>R1: Add Apprenticeship Enrollment Sub-Metric to REACH Metric 4</p>	<p>Disaggregate Metric 4 (Work-Related Training) to separately track: (a) ITA-funded training, (b) OJT, (c) registered apprenticeship, and (d) pre-apprenticeship enrollment. Weight apprenticeship completions at 1.5x in REACH scoring to incentivize LWDBs to prioritize registered apprenticeships. Align with DOL Office of Apprenticeship reporting standards.</p>
<p>R2: Establish LWDB-Level Apprenticeship Performance Targets with Accountability Consequences</p>	<p>Convert the 5,000 LWDB apprenticeship goal (2030) into annual interim targets per LWDB, incorporated into WIOA local plan modifications. Integrate targets into the REACH letter grade system (e.g., boards failing to meet 60% of apprenticeship target ineligible for A+ designation). Require Apprenticeship Navigators to report quarterly on pipeline development metrics.</p>
<p>R3: Create a Credential Attainment Sub-Score in REACH Metric 4</p>	<p>Amend REACH Metric 4 to require that at least 60% of work-related training participants earn a credential on the Master Credential List (MCL) within 12 months of training completion. Align MCL credential attainment tracking with WIOA Credential Attainment 4th Quarter After Exit reporting. This bridges the REACH/WIOA reporting gap and creates a compound incentive.</p>
<p>R4: Establish Career Pathway Progression Metric</p>	<p>Add a new composite indicator measuring stackable credential progression: % of participants earning a 2nd or advanced credential within 24 months of a first credential. Track participants moving from entry-level to mid-level credentials in priority sectors (healthcare, IT, advanced manufacturing). Report annually as a REACH performance supplement.</p>

4.2 Youth Workforce Recommendations

RECOMMENDATION	IMPLEMENTATION GUIDANCE
<p>R5: Establish Youth-Disaggregated Performance Targets in REACH Framework</p>	<p>Amend REACH reporting to require age-disaggregated performance on Metrics 1, 3, and 4 (youth age 14-24). Create a youth-specific sub-score weighted at 15% of REACH composite. Boards serving fewer than 90% of their youth WIOA targets subject to mandatory corrective action plan, consistent with WIOA Section 116.</p>
<p>R6: Develop a Youth Enrollment Recovery Strategy with Interim Milestones</p>	<p>The 2-Year Plan must include a youth enrollment baseline (PY 2024-25) and annual recovery targets through PY 2026-27. Require each LWDB below 90% of youth enrollment target to submit a corrective action plan within 60 days. Leverage ISY ITA waivers aggressively. Align youth career services with CTE dual enrollment programs at FCS colleges.</p>
<p>R7: Add Youth Credential Attainment to REACH Composite Score</p>	<p>Incorporate WIOA Youth Credential Attainment as a supplemental REACH performance indicator (non-weighted but published with letter grades). LWDBs achieving Youth Credential Attainment above 80% should receive recognition credit. Boards below 65% should face technical assistance activation.</p>

4.3 Business & Service Delivery Recommendations

RECOMMENDATION	IMPLEMENTATION GUIDANCE
<p>R8: Add Employer Training Co-Investment Metric to Business Services</p>	<p>Develop a Business Services Quality Index measuring: (a) OJT completion rate and employer co-investment ratio, (b) employer training satisfaction score (from Employ Florida survey expansion), and (c) % of employer partnerships resulting in hire and 90-day retention. Report as REACH supplement and align with WIOA Section 134 OJT provisions.</p>
<p>R9: Establish Wagner-Peyser Employment Recovery Targets</p>	<p>The 2-Year Plan should establish specific Wagner-Peyser 2nd Quarter Employment recovery targets for the 3 LWDBs failing to meet the 68.2% state goal (LWDB 24, LWDB 26, others below threshold). Require WP-specific improvement plans for outlier boards. Explore integrating WP employment outcomes into REACH Metric 3 for comprehensive employment reporting.</p>
<p>R10: Accelerate FL WINS / WITS Integration Timeline</p>	<p>Request that CareerSource Florida establish interim data sharing milestones before the mid-2027 WITS completion date: (a) Q3 2026 — cross-program unduplicated participant count; (b) Q4 2026 — REACH/WIOA unified participant outcome dashboard; (c) Q1 2027 — apprenticeship tracking integrated into WITS. Publish quarterly progress reports.</p>

4.4 Recommended Performance Measure Framework (Integrated)

The following framework integrates REACH Act and WIOA indicators into a recommended unified statewide performance dashboard that CSSF should consider adopting in the next plan modification:

#	PERFORMANCE INDICATOR	SOURCE FRAMEWORK	CURRENT BASELINE	RECOMMENDED TARGET	ACCOUNTABILITY LINK
1	Increased Earnings Rate	REACH Metric 1 + WIOA Median Earnings	49.53% (REACH) \$9,960/qtr (WIOA)	≥52% REACH ≥\$10,500 WIOA	REACH Score (25%wt) + WIOA Negotiated Goal
2	Public Assistance Exit Rate	REACH Metric 2	53.50%	≥55%	REACH Score (25%wt) + TANF/SNAP E&T integration target
3	Employment Rate (2nd & 4th Qtr After Exit)	REACH Metric 3 + WIOA Title I/WP	Adult 84.6% / WP 66.3% (PY24-25)	Adult ≥86% / WP ≥68%	REACH Score (20%wt) + WIOA Negotiated Goal + WP Goal
4a	Work-Related Training Participation Rate	REACH Metric 4	21.27%	≥25%	REACH Score (10%wt)
4b	MCL Credential Attainment Rate [NEW] — Recommended addition	WIOA Credential Attainment + REACH MCL alignment	Adults 86.5% / Youth 72.6% / DW 83.3%	Adults ≥88% / Youth ≥78% / DW ≥85%	WIOA Negotiated Goal + REACH Metric 4 sub-score
4c	Apprenticeship Enrollment & Completion Rate [NEW] — Recommended addition	REACH Act (\$445.004) + DOL Apprenticeship	No current metric (baseline TBD)	LWDBs: ≥annual interim target toward 5,000 by 2030	REACH letter grade eligibility + WIOA local plan
5-6	Business Engagement (Repeat + Penetration + OJT Quality)	REACH Metrics 5-6 + NEW OJT quality	56.86% repeat 31.79% penetration	Repeat ≥55% Penetration ≥33% OJT completion ≥80%	REACH Score (10%wt) + NEW employer quality metric
7	Completion-to-Funding Efficiency Ratio	REACH Metric 7	19.94% exit ratio (100%)	Maintain ≥100% attainment	REACH Score (10%wt) — with caveat against volume reduction
8	Youth Enrollment Recovery Rate [NEW] — Recommended addition	WIOA Title I Youth + REACH supplement	PY 24-25 enrollment baseline (declining - 16.6%)	≥10% YOY enrollment recovery through PY 2026-27	REACH letter grade supplement + corrective action trigger

Note: Indicators marked [NEW] are recommended additions to the current REACH/WIOA reporting framework. Green shading indicates proposed new measures. These additions do not replace existing reporting requirements—they supplement and bridge the two frameworks.

Section V: Recommended Public Comments to CareerSource Florida

The following section provides structured public comment language that stakeholders, advocacy organizations, local workforce boards, and community partners can adapt and submit to CareerSource Florida regarding the WIOA 2024–2027 Combined Plan Two-Year Modification. Comments are organized by topic area.

5.1 Public Comment on Apprenticeship Accountability

SUGGESTED PUBLIC COMMENT — APPRENTICESHIP ACCOUNTABILITY

CareerSource Florida is commended for its ambitious goal of 50,000 new apprentices by 2030. However, the Two-Year Plan as submitted allocates only 5,000 of these apprenticeships (10%) to WIOA-funded LWDB responsibility, with the remaining 45,000 dependent on non-WIOA systems. Neither the REACH Act scorecard nor the WIOA primary indicators currently include a standalone apprenticeship performance metric.

We recommend that CareerSource Florida:

- Incorporate annual apprenticeship enrollment targets per LWDB as a required element of each local plan modification, with progress reported quarterly.
- Establish an apprenticeship performance sub-indicator within REACH Metric 4, disaggregating registered apprenticeship enrollment from general work-related training participation.
- Link Apprenticeship Navigator position outcomes to measurable performance milestones (e.g., number of new employer apprenticeship partnerships, number of new apprentices registered, apprenticeship program retention rates).
- Require LWDBs failing to meet 75% of their annual apprenticeship enrollment target to submit a corrective action plan within 90 days, consistent with the accountability standards applied to WIOA primary indicators.

5.2 Public Comment on Credential Attainment and MCL Alignment

SUGGESTED PUBLIC COMMENT — CREDENTIAL ATTAINMENT

The Combined Plan's references to the Master Credential List (MCL), Eligible Training Provider List (ETPL), and Workforce Pell represent important policy commitments. However, the plan does not establish binding performance targets linking WIOA training participation to MCL credential outcomes. The result is a gap between training investment and credential attainment accountability.

Specifically of concern:

- REACH Metric 4 measures training enrollment participation (currently 21.27%) without requiring that training lead to an MCL-recognized credential. A participant can count toward this metric by completing any WIOA-approved training activity regardless of credential outcome.
- Youth Credential Attainment statewide (72.6%) is below the WIOA negotiated goal of 73.4% and declining in key LWDBs. This is not captured in the REACH composite score.

We recommend that the Two-Year Modification be amended to:

- Establish a minimum MCL credential completion rate of 60% for WIOA ITA-funded participants as a supplemental REACH performance standard.
- Publish LWDB-level credential attainment data aligned with the REACH letter grade report to enable stakeholder accountability.
- Include a youth credential attainment recovery target in the local plan modification requirements, with boards below 70% required to submit corrective action plans.

5.3 Public Comment on Youth Workforce and Enrollment Decline

SUGGESTED PUBLIC COMMENT — YOUTH WORKFORCE DEVELOPMENT

The 2-Year Plan acknowledges declining WIOA enrollment across all populations, with youth experiencing the steepest decline at -16.6% year-over-year. This trend is particularly alarming given that youth workforce development represents Florida's long-term economic competitiveness strategy and the pipeline for apprenticeship and credential attainment goals.

We recommend:

- The Two-Year Modification be amended to include a youth enrollment baseline (PY 2024-25) and specific annual recovery targets through PY 2026-27, with quarterly monitoring reports published publicly.
- CareerSource Florida develop a dedicated Youth Workforce Recovery Strategy as a plan supplement, addressing outreach, co-enrollment with FCS dual enrollment programs, and integration with CTE pathways.
- The REACH Act performance framework be amended to include age-disaggregated reporting on Metrics 1, 3, and 4, enabling youth-specific accountability at the LWDB level.
- ISY ITA and out-of-school youth waivers approved by ETA be actively promoted through LWDB policy guidance, with utilization rates tracked and reported quarterly.

5.4 Public Comment on Business Services Quality and OJT

SUGGESTED PUBLIC COMMENT — BUSINESS SERVICES AND OJT QUALITY

CareerSource Florida's REACH Act business metrics demonstrate impressive performance—statewide business penetration grew from 24.77% to 31.79% and repeat business reached 56.86%, both exceeding targets. The approved OJT reimbursement waiver represents an important innovation. However, these metrics measure access and relationship volume, not the quality of employer outcomes or the wage and benefit levels achieved through OJT.

We recommend:

- The 2-Year Plan establish OJT completion rate targets and 90-day retention targets for OJT participants, reported at the LWDB level as a business services quality supplement to REACH Metrics 5-6.
- CareerSource Florida expand the Employ Florida customer satisfaction survey to include an employer satisfaction module, with results disaggregated by LWDB and service type (OJT, customized training, job posting assistance).
- The plan include a commitment to track the wage premium associated with WIOA-connected credentials and OJT completions, benchmarked against the 15-35% wage premium documented in the plan's own labor market analysis.

5.5 Public Comment on Data Integration and Transparency

SUGGESTED PUBLIC COMMENT — DATA INTEGRATION AND PUBLIC TRANSPARENCY

The FL WINS and WITS initiatives represent critical infrastructure investments. Until these systems are operational (expected mid-2027), the state's ability to produce unduplicated participant counts, cross-program outcome data, and integrated REACH/WIOA reporting remains limited.

We recommend:

- CareerSource Florida publish interim data integration milestones in the Two-Year Modification, with quarterly public progress reports on FL WINS and WITS development.
- The state implement a cross-program participant dashboard (prior to WITS completion) that publishes REACH and WIOA outcomes side-by-side at the LWDB level, using currently available FETPIP data.
- LWDB-level WIOA Credential Attainment, Measurable Skill Gains, and Youth outcomes be published alongside REACH letter grades to provide a complete performance picture.
- The state establish a 30-day public comment period for each future LWDB local plan modification, consistent with federal requirements and Florida's commitment to stakeholder transparency.

Section VI: Conclusions

Florida's workforce development system demonstrates genuine strengths: a statewide REACH score of 103.27% (A+), strong employer engagement, growing business penetration, and WIOA outcomes that in most categories exceed negotiated goals. The REACH Act framework has successfully established an accountability culture, and the Two-Year Modification's introduction of letter grades for LWDBs represents a meaningful step toward transparency.

However, this analysis identifies several structural gaps that, if unaddressed, will undermine the system's long-term effectiveness. The most consequential of these are: (1) the absence of an apprenticeship performance metric in either the REACH or WIOA framework, (2) the masking of youth enrollment decline by aggregate performance scores, (3) the disconnect between training participation and credential attainment accountability, and (4) the business services framework's emphasis on volume over quality outcomes.

The recommended performance framework presented in Section IV provides a pathway to bridge these gaps without creating duplicative reporting burdens. By aligning REACH metrics with WIOA indicators through a unified dashboard, establishing targeted apprenticeship and credential outcome metrics, and building interim data transparency milestones, CareerSource Florida can produce a 2-Year Modification that is both federally compliant and genuinely responsive to Florida's workforce development needs.

This analysis is submitted to support CareerSource Florida's commitment to continuous improvement and to assist in the formulation of targeted public comments. It is based on data current as of March 2026 and reflects performance through WIOA PY 2025-26 Q2 and REACH PY 2024-25 Cumulative performance.

Data Sources Referenced in This Report

- REACH Act PY 2024-2025 Cumulative Performance Report (CareerSource Florida / FloridaCommerce)
- WIOA Statewide Indicators of Performance — PY 2025-26 Q2 (FloridaCommerce / FETPIP)
- CareerSource Florida WIOA 2024-2027 Combined Plan — Two-Year Modification (CareerSource Florida Board of Directors)
- Florida Department of Commerce, Bureau of Workforce Statistics and Economic Research — Occupational and Industry Employment Projections 2024-2032

This report is prepared for public comment purposes. It does not represent the official position of CareerSource Florida, FloridaCommerce, or any state agency.



SFWIB EXECUTIVE COMMITTEE

DATE: 4/9/2026

AGENDA ITEM NUMBER: 11

AGENDA ITEM SUBJECT: LWDB COMPLIANCE AND REGULATORY SUBMISSIONS - BOARD RE-CERTIFICATION

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: SFWIB staff recommends to the Executive Committee to approve the transmission of the Local Workforce Development Board Compliance and Regulatory Submissions of required documentation for board re-certification, as set forth below.

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

On February 24, 2026, FloridaCommerce issued a memorandum to all Local Workforce Development Boards (LWDBs) directing the submission of required regulatory compliance elements in accordance with Workforce Policy G105 — Composition and Certification of Local Workforce Development Boards; Certification of One-Stop Systems; and Direct Service Provider Designation. These submissions are reviewed by FloridaCommerce and CareerSource Florida, which will then make a recommendation to the State Workforce Development Board (SWDB) for approval.

The following four regulatory elements are subject to the upcoming review cycle:

- Subsequent Local Area Designation
- Board Composition and Certification
- One-Stop Certification
- Direct Service Provider Designation

Current approvals for Local Area Designation and LWDB Composition and Certification are set to expire for all LWDBs on June 30, 2026. One-Stop Operator and Direct Service Provider approvals will also expire on June 30, 2026, for applicable LWDBs. Timely renewal is required to maintain uninterrupted service delivery.

In accordance with Workforce Policy G105, local area performance is evaluated as part of the approval process. Unsatisfactory performance may negatively impact FloridaCommerce and CareerSource Florida's recommendations to the SWDB. Completed, signed documentation — along with required supporting materials — must be submitted to FloridaCommerce at LWDBGovernance@commerce.fl.gov no later than Monday, April 6, 2026. SFWIB has been granted a formal extension to ensure enough time to garner the proper signatures.

In response to the state's directive, staff has completed the required documentation packages for submission. The following forms and attachments have been prepared in accordance with FloridaCommerce guidance:

- Evaluation for LWDB Certification Form
- Evaluation for One-Stop Certification Form
- LWDB Composition Tool
- Subsequent Area Designation Form

Staff respectfully requests that the Executive Committee approve the submission of the completed regulatory compliance documentation package. Upon Committee approval, staff will transmit the documentation to Mayor Daniella Levine Cava for her review and signature. The executed documents will then be submitted to FloridaCommerce to ensure the Board's continued certification, local area designation, and operational approvals necessary for uninterrupted service delivery to Miami-Dade County residents.

FUNDING: N / A

PERFORMANCE: N/A

ATTACHMENT

Request for Subsequent Local Workforce Development Area Designation

Local Workforce Development Area 23

Name of Contact Person:

Rick Beasley

305-929-1501

Title:

Executive Director

7300 Corporate Center Dr. Miami, FL 33126

Date of Request:

Local workforce development areas that receive an initial designation will be granted a subsequent designation if, for the two most recent program years, the local workforce development area performed successfully and sustained fiscal integrity.

Performed Successfully

The term “Performed Successfully” means the local workforce development area met or exceeded the identified levels of performance for primary indicators of performance for the last two consecutive years for which data are available, and the local area has not failed the same individual measure for the last two consecutive program years.

Sustained Fiscal Integrity

The term “Sustained Fiscal Integrity” means that the Secretary of Labor has not made a formal determination, during either of the last two consecutive years preceding the determination regarding such integrity, that either the grant recipient or the administrative entity of the local workforce development area has mis-expended funds provided.

LOCAL AREA LEVELS OF PERFORMANCE

For subsequent designation of local workforce development areas, the local area must include the local negotiated levels of performance and actual levels of performance for the two program years (PY) for which data are available prior to the program year for which designation is requested.

Name of Local Workforce Development Area:				
Measures	Negotiated	Actual	Negotiated	Actual
	PY: <u>23-24</u>	PY: <u>23-24</u>	PY: <u>24-25</u>	PY: <u>24-25</u>
Adult				
Employed 2 nd Quarter After Exit	64.50	89.50	64.50	83.80
Median Wages 2 nd Quarter After Exit	\$5,034	\$9,210	\$6,813	\$8,439
Employed 4 th Quarter After Exit	66.10	77.60	66.10	85.60
Credential Attainment Rate	50.60	88.60	50.60	82.30
Measurable Skill Gains	24.90	99.10	24.90	99.30
Dislocated Worker				
Employed 2 nd Quarter After Exit	79.70	89.10	77.60	87.50
Median Wages 2 nd Quarter After Exit	\$8,160	\$10,718	\$9,718	\$13,781
Employed 4 th Quarter After Exit	81.90	79.50	74.10	86.40
Credential Attainment Rate	79.50	96.60	85.90	92.70
Measurable Skill Gains	40.00	97.60	77.00	99.10
Youth				
Employed 2 nd Quarter After Exit	75.80	75.70	78.80	81.00
Median Wages 2 nd Quarter After Exit	\$3,692	\$4,732	\$5,535	\$3,799
Employed 4 th Quarter After Exit	73.90	78.10	75.30	77.50
Credential Attainment Rate	58.50	59.80	61	56.60
Measurable Skill Gains	50.30	90.80	88.40	74.00
Wagner-Peyser				
Employed 2 nd Quarter After Exit	61.70	71.30	67.80	61.70
Median Wages 2 nd Quarter After Exit	\$5,173	\$7,667	\$8,024	\$6,063
Employed 4 th Quarter After Exit	59.40	69.90	68.70	59.40

CERTIFICATION AND APPROVAL OF REQUEST

By signing below, the local workforce board chairperson and chief local elected official certify that the local area has performed successfully and sustained fiscal integrity for subsequent designation of the existing local area.

Local Workforce Development Board Chairperson	
Name: Charles Gibson	
Signature:	
Date:	

Chief Local Elected Official	
Name: Daniella Levine Cava	County: Miami-Dade
Signature:	
Date:	

Chief Local Elected Official	
Name:	County:
Signature:	
Date:	

Chief Local Elected Official	
Name:	County:
Signature:	
Date:	

Chief Local Elected Official	
Name:	County:
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Date:	

Chief Local Elected Official	
Name:	County:
Signature:	
Date:	

Chief Local Elected Official	
Name:	County:
Signature:	
Date:	

The completed request and certification page(s) must be submitted to: LWDBGovernance@commerce.fl.gov.

Evaluation for One-Stop Certification

This form is utilized by CareerSource Florida and FloridaCommerce to review the submission of Local Workforce Development Boards (LWDBs) seeking to serve as a One-Stop Operator in compliance with all state laws and federal regulations and provide a recommendation to the State Workforce Development Board for consideration and approval, if appropriate. This form also contains minimum criteria, including those assessing the system’s effectiveness, accessibility, and commitment to continuous improvement, that LWDBs must use in the selection of each local One-Stop Delivery Systems.

Identifying Information

1. Please select how the LWDB was selected as the one-stop operator using the dropdown below.
Competative Procurement
2. **LWDB: CareerSource South Florida**
3. **Date Assessment Completed 3/23/2026**
4. **Current Certification Level: Comprehensive**
5. **Certification Level Requested: Comprehensive**

Section A: Effectiveness Criteria¹

Requirement	Citation (State)	Citation (Federal)	Met/ Not Met	Notes
Procurement: Documentation was provided that sole source procurement ² or successful competition ³ was completed in alignment with state and federal law.	S. 445.007(9) and 445.009, F.S.	20 CFR 679.410(a) (1)	Met	Attachment: #01 Eval for OS Certification: Section A – Approval Supporting Document
Approval: Documentation of approval of chief elected officer was provided.	S. 445.007(6) and 445.009	20 CFR 679.410(a) (2)	Met	Attachment: #01 Eval for OS Certification: Section A – Approval Supporting Document
Performance: Evidence was submitted indicating the LWDB met or exceeded negotiated levels of performance for federal indicators of performance.	S. 445.007(6) and 445.009	20 CFR 678.800(c)	Met	Assessed via internal review – no LWDB submissions required.
Performance Monitoring: Evidence was submitted indicated there is a regular process for local performance monitoring that includes: <ul style="list-style-type: none"> • The identification and provision of aligned and approved technical assistance designed to support performance improvement; • Customer feedback in alignment with Workforce Policy P9, Availability of 	S. 445.007(6) and 445.009	20 CFR 678.800(c)	Met	Attachment: #02: Eval for OS Certification: Performance Monitoring

¹ s. 445.007(6), Fla. Stat. and s. 445.007(6), Fla. Stat.

² [20 CFR 679.410\(a\)\(1\)\(i\)](#)

³ [20 CFR 679.410\(a\)\(1\)\(ii\)](#)

<p>Services to Floridians for both jobseekers and businesses; and</p> <ul style="list-style-type: none"> The implementation of a regular system of professional development and skills training in alignment with Workforce Policy O92, Staff Training and Credentialing Skill Standards. 				
<p>Programmatic Effectiveness: Documentation was provided that demonstrates how well the one-stop system integrates available services for participants and businesses and meets the workforce development needs of participants and the employment needs of local employers, including:</p> <ul style="list-style-type: none"> Local labor force participation rates at or below the state average; Regular collaboration with local economic development organizations and local businesses that includes regular meetings and partnerships (OJT contracts, training initiatives, etc.) that align with identified local sectors of strategic focus, identified emerging trends, or other needs identified through the use of labor market data; how access to partner programs is provided to the maximum extent possible, including the provision of services outside of regular business hours as the need is identified by LWDBs and with the feedback of one-stop customers; and Compliance with relevant state workforce policies, state and federal law, and agency technical assistance is locally monitored. 	<p>S. 445.007(6) and 445.009</p>	<p>20 CFR 678.800(b)</p>	<p>Met</p>	<p>Attachment #03: Eval for OS Certification: Programmatic Effectiveness</p>
<p>Programmatic Compliance: Documentation is provided that programmatic compliance is achieved, including:</p> <ul style="list-style-type: none"> All state and federally required services, including core services, are made available to Floridians consistent with the law, including electronically available services; All required memorandums of understanding with mandatory or optional partners participating in the one-stop delivery system have been executed; Submission of required information for employees of FloridaCommerce who deliver employment services; and Individual Training Accounts have been expended on programs aligned with labor 	<p>S. 445.009, F.S. S. 445.007, F.S.</p>	<p>20 CFR 678.800(b)</p>	<p>Not Met</p>	<p>Attachment #04: Eval for OS Certification: Programmatic Compliance & DEO Staffing Chart</p>

<p>market needs of the local area and the system utilizes locally leveraged resources from other parts of the workforce system.</p> <ul style="list-style-type: none"> Requirements specific to Education and Industry Consortium, consistent with section 445.007(15), Florida Statutes, have been met. 				
<p>Fiscal Effectiveness: Documentation is provided that describes how well the center(s) operated in a cost-efficient manner. This must include:</p> <ul style="list-style-type: none"> documentation related to indirect cost agreement(s); and that at least 90% of Wagner-Peyser funding is going into direct customer service costs; The implementation of a regular system of fiscal monitoring to identify and improve fiscal compliance and performance. 	S. 445.009	20 CFR 678.800(b)		<p>Attachment #05: Eval for OS Certification: Fiscal Effectiveness & 2025 Negotiated Indirect Cost Rate Agreement</p>
<p>Accessibility Compliance: Documentation was provided that centers meet accessibility requirements consistent with state and federal law, including the following:</p> <ul style="list-style-type: none"> Compliance with ADA and disability-related regulations implementing WIOA sec. 188, set forth at 29 CFR Part 38. This includes how the physical accessibility of one stop centers will be ensured. Provision of reasonable accommodation, auxiliary aids, services, and assistive technology. Provision of reasonable modifications to policies, practices, or procedures where necessary. The administering of programs that encourage participation. Policies and practices are designed to communicate effectively with all potential customers, including those with disabilities. 		20 CFR 678.800(b)		<p>Attachment #06: Eval for OS Certification: Accessibility Compliance & PY 25-26 SYE Report</p>

Section H: Signatures Documenting Review and Approval by the LWDB or FloridaCommerce

***The application of a LWDB seeking to serve as a one-stop operator must include a signature of the chief elected official in the local area demonstrating approval.**

CareerSource South Florida

Signature _____

Printed Name _____

Title _____

Date _____

Organization _____

Chief Local Elected Official

Signature _____

Printed Name _____

Title _____

Date _____

Organization _____