SOUTH FLORIDA WORKFORCE INVESTMENT BOARD
EXECUTIVE COMMITTEE MEETING
THURSDAY, JULY 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_ISSH7LAzTdywsrtfD2Q3IA

AGENDA

1. Call to Order and Introductions
2. Public Comment
3. Approval of Executive Committee Meeting Minutes
   A. June 11, 2026
4. Informational – Senate Bill 1134 Local DEI Prohibition
5. Informational – Registered Apprenticeship & Pre-Apprenticeship Access to Road-to-Independence
6. Recommendation as to the Approval to submit Public Comment on the Proposed Rule OMB Regulation for Federal Financial Assistance
7. Recommendation as to the Approval to Submit Work Requirement Participant Performance Accountability Waiver
8. Recommendation as to the Approval of the Proposed Program Year (PY) 2026–2027 Local Performance Targets

"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: 7/9/2026

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: 7/9/2026

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 June 11, 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: 7/9/2026
AGENDA ITEM: 3A
AGENDA TOPIC: MEETING MINUTES

SFWIB EXECUTIVE COMMITTEE MEETING

DATE: June 11, 2026
LOCATION: CareerSource South Florida Headquarters
7300 Corporate Center Drive, Suite 500
Conference Room 2
Miami, FL 33126
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 8:18AM on June 11, 2026.

   ROLL CALL: 7 members; 4 required; 5 present: Quorum established.

<table>
<tr><th>SFWIB EXECUTIVE COMMITTEE MEMBERS PRESENT
(VIA ZOOM)</th><th>SFWIB MEMBERS EXCUSED</th><th>SFWIB STAFF</th></tr>
<tr><td>del Valle, Juan-Carlos, Vice-Chairman
Ferradaz, Gilda
Gibson, Charles, Chair
Mantilla, Rene
Scott, Jr., Kenneth “Kenny”</td><td>Canales, Dequasia
Chi, Joe

SFWIB EXECUTIVE COMMITTEE MEMBERS ABSENT</td><td>Beasley, Rick
Bennett, Renee
Morgan, Ebony
Perrin, Yian

ADMINISTRATION/IT</td></tr>
<tr><th colspan="3">OTHER ATTENDEES</th></tr>
<tr><td colspan="3"></td></tr>
</table>

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.

3A & 3B. Approval of Executive Committee Meeting Minutes – May 14, 2026 and April 9, 2026

Chairman Gibson presented the SFWIB Executive Committee Meeting minutes from the May 14, 2026 and April 9, 2026 meetings for review in advance of approval.

Motion for approval of the May 14, 2026 and April 9, 2026 SFWIB Executive Committee Meeting minutes by Mr. del Valle; Ms. Ferradaz seconded; **motion is passed without dissent.**

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

4. Informational – Federal Workforce Pell Grant Final Rule

Chairman Gibson introduced the item; Mr. Beasley presented an update on the Federal Workforce Pell Grant Program Final Rule as part of staff's ongoing effort to keep the Committee informed of developments at the federal level. He explained that on May 19, 2026, the U.S. Department of Education announced it will publish the final rule implementing the new Workforce Pell Grant program in the Federal Register. The rule, authorized under the One Big Beautiful Bill Act enacted in the summer of 2025, extends Pell Grant eligibility to shorter-term, high-quality workforce training programs for the first time. Mr. Beasley noted that Pell had previously been available only for longer programs and that the expansion will allow students to apply Pell toward short-term offerings such as the fiber optics program.

Mr. Beasley reviewed the program eligibility criteria, including a duration of 8 to 15 weeks, 150 to 599 clock hours, alignment with high-skill, high-wage, or in-demand occupations, and delivery by an accredited postsecondary institution eligible for Title IV federal student aid. He also reviewed the quality and accountability requirements, including a minimum 70% completion and job placement rate, a value-added earnings benchmark comparing graduate earnings to program cost, alignment with state-identified in-demand industries, and institutional eligibility. He expressed support for the accountability guardrails while cautioning that the expansion could prompt some proprietary schools to create programs that do not meet genuine business needs.

In response to Ms. Canales' inquiry regarding the entity responsible for determining the state-identified in-demand industries and occupations to be included on the safe list, Mr. Beasley clarified that both long-term and short-term projections for occupations and industries are calculated annually, utilizing labor market information at the state level. Locally, CSSF constructs its own supply-and-demand matrix to inform funding decisions in the region.

Mr. Beasley reviewed the roles and responsibilities established under the rule, noting that the state is responsible for establishing program approval processes, identifying in-demand occupations, and maintaining the master credential list, while the local board advises jobseekers and employers, aligns training offerings with Miami-Dade's in-demand sectors, coordinates American Job Center service delivery, and captures required performance data. He clarified that state approval of a program does not guarantee that CSSF will contract with that provider. He identified an opportunity to increase enrollment by coordinating with co-located youth programs at technical colleges, enrolling students who use Workforce Pell, and directing CSSF resources toward supportive services that support program completion and placement.

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

5. Informational – Florida Special Legislative Session Update: FY '26-27 State Budget

Chairman Gibson introduced the item; Mr. Beasley provided an update on the Florida Special Legislative Session called by Governor DeSantis from May 12 through May 29, 2026, with the primary objective of finalizing the state budget for Fiscal Year 2026-27 before the new fiscal year begins on July 1, 2026. He explained that the session was necessitated by significant differences between the Governor's budget proposal and the competing spending plans passed by the Florida Senate and House, which must be reconciled into a single conference budget through closed-door negotiations between the Senate and House budget chairmen.

Mr. Beasley summarized the three proposals. The Governor's "Floridians First" budget totals $117.4 billion, the largest of the three, and includes $16.75 billion in reserves with an emphasis on fiscal conservatism. The Senate proposed a $115.0 billion budget that includes a 3% reduction in hospital Medicaid reimbursement rates, a primary sticking point in negotiations, along with a $68 million increase in nursing home funding. The House proposed a $113.6 billion budget, the most conservative of the three, opposing the Senate's hospital reimbursement cuts and proposing a larger $82.4 million recurring increase in nursing home funding.

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

6. Informational – WIOA Allocation and Enrollment Analysis

Chairman Gibson introduced the item; Mr. Beasley presented a WIOA allocation and enrollment analysis covering Program Year 2021-22 through PY 2025-26, with projections for PY 2026-27. He explained that the analysis was prompted in part by Acting Secretary of Labor Dr. Henry Mack's emphasis on enrollment levels across workforce boards; he wanted to confirm CSSF is an efficient and effective steward of its resources. Furthermore, Mr. Beasley noted that the analysis supported discussions held during his recent meeting with Dr. Mack, which Mr. Alfred Sanchez, President of the Greater Miami Chamber of Commerce, also attended. He credited CSSF staff for their work building the analysis.

Mr. Beasley continued by reviewing the key findings. CSSF enrollment outpaced allocation changes from PY 2022-23 through PY 2024-25, peaking at approximately 21,000 participants. In PY 2025-26, allocation declined approximately 8% while enrollment declined approximately 42%, a contraction he attributed primarily to the rescission of temporary work authorization affecting the region's significant immigrant population rather than to funding levels. He noted that CSSF outpaced statewide enrollment growth in the earlier program years, and that although its PY 2025-26 decline was deeper than the statewide decline, the board maintained strong cost efficiency, with a cost per enrollment that remained below the statewide figure. He further noted that CSSF's enrollment and placement shares continued to exceed its allocation share and that its cost per placement remained well below the statewide benchmark.

Mr. Beasley reviewed the PY 2026-27 allocation-driven projection of approximately 12,264 participants and outlined strategies to increase enrollment, including coordinating Workforce Pell with youth providers, conducting eligibility determinations in advance of employer hiring events to accelerate placement, and expanding apprenticeship opportunities in partnership with Miami Dade College. He also identified an opportunity to increase Dislocated Worker enrollment relative to the volume of layoff activity in the region. He advised that the full analysis was attached for the Committee's reference and that staff will be using it to inform the ongoing redesign of the service delivery model to align with WIOA and REACH Act requirements.

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

7. Approval – Federal Workforce Policy Update & NAWB Policy Survey

Chairman Gibson introduced the item; Mr. Beasley presented staff's recommendation to authorize the Executive Director to submit a survey response on behalf of the Board to the

National Association of Workforce Boards (NAWB), reflecting the priorities and challenges of the Miami-Dade workforce region. By way of background, he recalled the Administration's initial "skinny" budget proposal for Fiscal Year 2026, which outlined sweeping reductions to domestic discretionary spending, including significant cuts to the U.S. Department of Education and the U.S. Department of Labor. He noted that the current proposal significantly reduces adult program funding, holds Dislocated Worker funding flat, and zeroes out Youth and Job Corps funding, which he characterized as a contradiction given the national goal of expanding apprenticeships, which depend on a strong youth pipeline.

Mr. Beasley reported that the federal budget process has advanced, with the Acting Secretary of Labor having appeared before the Senate Appropriations Subcommittee to justify the Administration's FY27 request. He explained that the Make America Skilled Again (MASA) Block Grant remains the centerpiece of that request and would provide states with broad discretion, consolidate multiple WIOA Title I programs into a single block grant, require a new 10% set-aside for Registered Apprenticeships, and reduce reporting and compliance requirements. He expressed concern that the block grant structure could shift priorities away from serving the hardest-to-serve populations. He explained that NAWB has asked boards to submit responses and requested the Committee's approval to submit CSSF's responses on behalf of the Board.

Motion for approval to authorize the Executive Director to submit the survey response to the National Association of Workforce Boards by Mr. Scott; Ms. Canales seconded; **motion passed is without dissent.**

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

8. Approval – Related Party Training Vendor Agreements

Chairman Gibson introduced the item; Mr. Beasley presented staff's recommendation that the Executive Committee recommend to the Board the approval of Training Vendor Agreements with training vendors represented on the Board.

Mr. Mantilla, of Miami-Dade County Public Schools, recused himself and stepped out of the room for the discussion and vote on this item.

Mr. Beasley explained that, in accordance with CareerSource Florida's Contracting Policy, regional workforce boards are prohibited from using state or federal funds for any contract exceeding $25,000 with a vendor that has a relationship with a board member unless the contract is reviewed by both the Florida Department of Commerce and CareerSource Florida. He identified the institutions as the District Board of Trustees of Miami Dade College, Miami-Dade County Public Schools, Atlantis University, and the Academy of South

Florida, each of which is represented on the Board. He noted that, upon approval by the Committee and the full Board and execution by the Chairman, the agreements will be submitted to the state for the required external review, and that the item is subject to a two-thirds affirmative vote of the Board.

Motion for approval to recommend Related Party Training Vendor Agreements to the Board by Mr. Scott; Mr. del Valle seconded; **motion is passed without dissent.**

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

Other Business & Announcements

Workforce Funding Model and UI Trust Fund Proposal

Mr. Beasley reported that, during the recent national board meeting in Long Beach, he proposed that the National Workforce Association develop a funding model playbook to help workforce boards implement proven and successful workforce development practices. He described his continued effort to establish a dedicated state workforce funding source as federal investment in talent development declines, including a longstanding proposal to redirect a portion of the Unemployment Insurance Trust Fund employer contribution toward unrestricted workforce training dollars. He noted that the proposal, advanced over more than 15 years, may be better positioned now that the trust fund has returned to solvency.

Upcoming Full Board Meeting

Mr. Beasley advised that the full Board would meet the following week to finalize the budget, which reflects an approximately $3 million reduction from the prior year, and to approve the selection of an external auditor. He reminded members that make-up training will be available for those who have not yet completed it and that financial disclosures are due July 1, 2026.

Recognition

Mr. del Valle shared that, during a recent Greater Miami Chamber of Commerce call regarding the 50th anniversary of Leadership Miami, Mr. Alfred Sanchez spoke highly of Mr. Beasley's leadership on workforce issues in South Florida and his work on behalf of the community. Mr. Beasley credited the CSSF team for its work.

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

The Executive Committee meeting ended at 9:06 am. *The next SFWIB Executive Committee Meeting is scheduled for Thursday, July 9, 2026, at 8:15am. Location to be announced.*

SFWIB EXECUTIVE COMMITTEE

DATE: 7/9/2025

AGENDA ITEM NUMBER: 4

AGENDA ITEM SUBJECT: SENATE BILL 1134 PROHIBITION ON LOCAL GOVERNMENT DIVERSITY, EQUITY, AND INCLUSION (DEI) ACTION

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

On April 23, 2026, Governor Ron DeSantis signed into law Florida CS/CS/SB 1134, codified as Chapter 2026-43, Laws of Florida. The legislation prohibits counties and municipalities from funding, promoting, or taking any official action — including adopting ordinances, resolutions, rules, programs, or policies — relating to diversity, equity, and inclusion (DEI). The Act invalidates any existing local DEI ordinances, resolutions, policies, rules, or programs that conflict with its provisions and takes effect on January 1, 2027. The bill passed the Senate 25–11 and the House 77–37.

I. Key Components of the Legislation

A. Office & Funding Ban - Local governments may not expend any funds, regardless of source, to establish, support, sustain, or staff a DEI office or officer, or to fund or promote DEI initiatives

B. Official Penalties & Private Right of Action. A member of a county or municipal governing body, or other local official, who violates the prohibitions while acting in an official capacity commits misfeasance or malfeasance in office and may be subject to removal. A resident may bring a civil action against a county or municipality for violations.

C. Contractor & Grantee Certification. Recipients of a county or municipal contract or grant must certify that they do not and will not use local government funds to require employees, contractors, volunteers, vendors, or agents to ascribe to, study, or be instructed using materials relating to DEI as defined in the statute. This requirement applies to contracts executed or renewed after January 1, 2027.

D. Exemptions. The Act does not prohibit official action required to comply with state or federal law; the operation or maintenance of federal monuments and memorials; recognition of individuals or groups honored by state monuments, memorials, or museums; recognition of patriotic and national observances under federal law; recognition of Black history and Florida African American heritage; content-neutral permitting and public safety services; access to public health care services; or hiring conducted in accordance with state and federal antidiscrimination laws.

Updated Information for the Board

A. Practitioner consensus. Legal alerts issued since signing (e.g., Becker & Poliakoff; Ogletree Deakins; Littler; Fisher Phillips) emphasize that the Act is directed at government entities, not private employers — but that the grant/contract certification requirement is the primary mechanism reaching downstream recipients, vendors, and subrecipients beginning January 1, 2027.Identifying high-skill, high-wage, and in-demand occupations and sectors

B. Federal-compliance exemption preserves core EO functions. SFWIB's federally mandated equal opportunity and nondiscrimination obligations under WIOA Section 188 and 29 CFR Part 38 — including the designated Equal Opportunity Officer function — are activities required by federal law and therefore fall within the Act's exemption. The current federal enforcement posture (which treats DEI-related discrimination as an EEOC priority) is generally aligned with, rather than in tension with, the new state law.Coordinating with institutions and employers to ensure program relevance

C. Threshold applicability question. SFWIB / CSSF is a Local Workforce Development Board organized under § 445.007, Florida Statutes — not a "county or municipality." Whether, and to what extent, the Act reaches the Board therefore turns on (a) whether the Board is treated as a covered governmental unit, (b) whether it is a "recipient" of any county or municipal grant or contract, and (c) whether any county or municipal funds pass through the Board to subrecipients. .

Potential Impact on SFWIB Strategic Initiatives

A. Procurement & contracting. RFQs/RFPs, contracts, and subrecipient agreements executed or renewed after January 1, 2027 that involve county or municipal funds may require the new certification language. Staff have been advised by legal council to have all contracts reviewed even if they are standard renewals.

B. Policy & program-material review. Board policies, value statements, outreach materials, and required staff trainings should be reviewed against the statutory DEI definition, while preserving all federally required EO/nondiscrimination language (which is exempt).

C. Partner MOUs. MOUs with county or municipal partners should be reviewed for DEI-related provisions and certification needs at the next execution or renewal.

D. Priority-population services unaffected in substance. Federally defined WIOA priority populations (e.g., veterans, individuals with disabilities, dislocated workers, low-income individuals) are served pursuant to federal law and generally fall outside the statutory DEI definition; related messaging should nonetheless be reviewed for terminology.

FUNDING: N/A

PERFORMANCE: N/A

NO ATTACHMENT

SFWIB EXECUTIVE COMMITTEE

DATE: 7/9/2025

AGENDA ITEM NUMBER: 5

AGENDA ITEM SUBJECT: REGISTERED APPRENTICESHIP & PRE-APPRENTICESHIP ACCESS TO ROAD-TO-INDEPENDENCE (PESS) AND POST SECONDARY FEE-EXEMPTION BENEFITS FOR AGED-OUT FOSTER YOUTH

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

The population and the benefits. Two benefit streams support former foster youth who pursue education after aging out of care. The Road-to-Independence PESS stipend (s. 409.1451(2), F.S.) provides a monthly payment ($1,720) directed to housing and living expenses, conditioned on full-time enrollment in an eligible postsecondary institution under s. 1009.533. The postsecondary fee exemption (s. 1009.25(1), F.S.) waives tuition and fees at school-district career programs, Florida College System (FCS) institutions, and state universities, and remains valid until age 28. Housing supports — including the housing-voucher facilitation added by ch. 2025-196 and on-campus housing priority under s. 1009.25 — are tied to PESS participation.

Current recognition of apprenticeship. Apprenticeship is already partially recognized: s. 1009.25(1)(b) independently exempts a student enrolled in an approved apprenticeship program (as defined in s. 446.021) from tuition and fees. Pre-apprenticeship, however, is not separately named, and neither pathway is squarely addressed in the PESS full-time-enrollment standard.

Why it matters now. As registered apprenticeship and pre-apprenticeship become central to Florida's talent-development strategy, these work-based pathways do not map cleanly onto benefit language written around traditional, credit-hour college enrollment — creating uncertainty precisely where the State is trying to expand participation.

THE GAP

- PESS "full-time" standard is credit-hour based. Section 409.1451(2)(a)4. defines "full-time" as 9 credit hours or the vocational school equivalent. Registered apprenticeship is delivered primarily through on-the-job training plus periodic related technical instruction, which is not expressed in credit hours. Whether it satisfies the "vocational school equivalent" is left to case-by-case determination, making PESS — and the PESS-linked housing voucher — unpredictable for apprentices.

- Pre-apprenticeship is not a named fee-exemption category. Section 1009.25(1)(b) names "approved apprenticeship" but not pre-apprenticeship. Foster youth can still reach the exemption through the institution-based provisions in s. 1009.25(1)(c)/(e), but parity and clarity are lacking, and non-foster pre-apprentices have no comparable exemption.

The practical effect is a disincentive: an advisor or lead agency steering an aged-out youth toward paid work-based learning faces more benefit ambiguity than if the youth enrolls in a traditional program — the opposite of the State's workforce priorities.

PROPOSED STATUTORY AMENDMENTS

The brief proposes a narrow, two-section package. No deletions are proposed; it relies on terms already defined in s. 446.021 and institutions already eligible under s. 1009.533, and adds no new program or appropriation.

Item	Statute	Proposed Change	Effect
Amendment 1	s. 409.1451(2)(a)4., F.S.	Deem enrollment in an approved apprenticeship or pre-apprenticeship program (as defined in s. 446.021), with related technical instruction delivered by an eligible institution under s. 1009.533, the "vocational school equivalent" of full-time enrollment for PESS.	Makes PESS eligibility — and the PESS-linked housing voucher — automatic rather than case-by-case for apprentices and pre-apprentices.
Amendment 2	s. 1009.25(1)(b), F.S.	Add "or a pre-apprenticeship program" alongside "approved apprenticeship program" in the tuition-and-fee exemption.	Establishes a standalone fee exemption for pre-apprentices, parallel to apprentices, removing reliance on the institution-based reading.
Conforming review	s. 1009.533, F.S.	No amendment required — career centers and FCS institutions already qualify as eligible postsecondary institutions.	Keeps the package surgical (two sections) and reduces exposure to unrelated amendments.

RATIONALE AND BENEFITS

- **Removes a disincentive.** Aligns the benefit structure with paid work-based learning, so steering a youth into apprenticeship no longer costs them benefit certainty.
- **Advances State workforce priorities.** Supports Florida's apprenticeship-expansion goals and the pre-apprenticeship-to-registered-apprenticeship pipeline.
- **Preserves the existing framework.** Uses existing definitions and eligible institutions; adds no new program or appropriation.
- **Improves outcomes for a high-barrier population.** Apprenticeship offers earn-while-you-learn income and a credential — a strong fit for youth who need both housing stability and immediate earnings.

FISCAL CONSIDERATIONS

Minimal. The amendments do not create a new program or stipend and do not raise the PESS amount; PESS and the fee exemption are existing benefits, and the change clarifies which enrollment qualifies. Any incremental cost reflects a modest number of additional eligible youth and is offset by the earn-while-you-learn wages of apprenticeship, which reduce reliance on other supports. A precise estimate can be developed using DCF and FloridaCommerce data on aged-out youth currently in work-based learning.

RECOMMENDED PATH FORWARD

1. **Pursue an administrative clarification first.** Ask FloridaCommerce and DCF whether existing rule or guidance can treat apprenticeship and pre-apprenticeship related instruction as the "vocational school equivalent" under s. 409.1451(2)(a)4. now.
2. **Route the statutory language through the Independent Living Services Advisory Council** (s. 409.1451(7), F.S.), on which CareerSource Florida sits, so it advances as a vetted system recommendation in the Council's December 31 report.
3. **Align with the OPPAGA foster-youth housing study** due December 1, 2026, so the fix is framed as a housing-and-self-sufficiency improvement.
4. **Secure a legislative sponsor** for a narrow bill amending ss. 409.1451 and 1009.25, with FloridaCommerce and DCF as co-owners, timed to the next session.

FOR THE COMMITTEE'S INFORMATION

This item is provided for the Committee's awareness and discussion. Staff will pursue the administrative clarification in parallel and will return to the Board with any recommended formal action — including a potential resolution of support — as the proposal advances through FloridaCommerce, DCF, and the Independent Living Services Advisory Council.

FUNDING: N/A

PERFORMANCE: N/A

ATTACHMENT

Including Registered Apprenticeship and Pre-apprenticeship in the Road-to-Independence (PESS) and Postsecondary Fee-Exemption Benefits for Aged-Out Foster Youth

Prepared by	Rick Beasley, Executive Director - CareerSource South Florida (LWDB 23)
Prepared for	FloridaCommerce; Florida Department of Children and Families; CareerSource Florida, Inc.; Independent Living Services Advisory Council (s. 409.1451(7), F.S.)
Date	June 2026
Re	Proposed amendments to ss. 409.1451 and 1009.25, F.S.

I. Issue Summary

Florida's benefits for aged-out foster youth — the Road-to-Independence Postsecondary Education Services and Support (PESS) stipend and the postsecondary tuition-and-fee exemption — are written around traditional, credit-hour college enrollment. As registered apprenticeship and pre-apprenticeship become central to Florida's talent-development strategy, these work-based pathways do not map cleanly onto the current statutory language. This brief proposes two narrow, surgical amendments that place apprenticeship and pre-apprenticeship on equal footing with classroom enrollment for purposes of these benefits, without opening the broader foster-care statutes to substantive change.

II. Background

Two benefit streams support former foster youth who pursue education after aging out. **PESS (s. 409.1451(2), F.S.)** provides a monthly stipend ($1,720) that is explicitly directed to housing and living expenses and is conditioned on full-time enrollment in an eligible postsecondary institution as provided in s. 1009.533. The **postsecondary fee exemption (s. 1009.25(1), F.S.)** waives tuition and fees at school-district career programs, Florida College System (FCS) institutions, and state universities and remains valid until age 28. Housing supports — including the housing-voucher facilitation added by ch. 2025-196 and on-campus housing priority under s. 1009.25 — are tied to PESS participation.

Apprenticeship is already partially recognized: s. 1009.25(1)(b) independently exempts a student enrolled in an approved apprenticeship program (as defined in s. 446.021) from tuition and fees. Pre-apprenticeship, however, is not separately named, and neither pathway is squarely addressed in the PESS full-time-enrollment standard.

III. The Gap

- **PESS "full-time" standard is credit-hour based.** Section 409.1451(2)(a)4. defines "full-time" as "9 credit hours or the vocational school equivalent." Registered apprenticeship is delivered primarily through on-the-job training plus periodic related technical instruction, which is not expressed in credit hours. Whether it satisfies the "vocational school equivalent" is left to case-by-case determination, making PESS — and the PESS-linked housing voucher — unpredictable for apprentices.

- **Pre-apprenticeship is not a named fee-exemption category.** Section 1009.25(1)(b) names "approved apprenticeship" but not pre-apprenticeship. Foster youth can still reach the exemption through the institution-based provisions in s. 1009.25(1)(c)/(e), but parity and clarity are lacking, and non-foster pre-apprentices have no comparable exemption.

The practical effect is a disincentive: a CBC lead agency or campus advisor steering an aged-out youth toward paid work-based learning faces more benefit ambiguity than if the youth enrolls in a traditional program — the opposite of the State's workforce priorities.

IV. Proposed Statutory Amendments

Legend: Proposed new language is shown in **<u>bold underline</u>**. No deletions are proposed. Current text is reproduced verbatim from the 2025 Florida Statutes.

Amendment 1 — s. 409.1451(2)(a)4., F.S. (operative fix): apprenticeship/pre-apprenticeship as full-time-equivalent for PESS

Current Law	Proposed Change
4. Has been admitted for enrollment as a full-time student or its equivalent in an eligible postsecondary educational institution as provided in s. 1009.533. For purposes of this section, the term "full-time" means 9 credit hours or the vocational school equivalent. A student may enroll part-time if he or she has a recognized disability or is faced with another challenge or circumstance that would prevent full-time attendance…	4. Has been admitted for enrollment as a full-time student or its equivalent in an eligible postsecondary educational institution as provided in s. 1009.533. For purposes of this section, the term "full-time" means 9 credit hours or the vocational school equivalent. **<u>Enrollment in an approved apprenticeship program or a pre-apprenticeship program, as defined in s. 446.021, the related technical instruction for which is provided by an eligible postsecondary educational institution as provided in s. 1009.533, constitutes the vocational school equivalent of full-time enrollment for purposes of this subparagraph.</u>** A student may enroll part-time if he or she has a recognized disability…

Effect: *Makes PESS eligibility (and the PESS-linked housing voucher) automatic — not case-by-case — for aged-out youth in apprenticeship or pre-apprenticeship delivered through a career center or college.*

Amendment 2 — s. 1009.25(1)(b), F.S. (parity/clarity): add pre-apprenticeship to the fee exemption

Current Law	Proposed Change
(b) A student enrolled in an approved apprenticeship program, as defined in s. 446.021.	(b) A student enrolled in an approved apprenticeship program **<u>or a pre-</u>**

Current Law	Proposed Change
	apprenticeship program, as defined in s. 446.021.

Effect: *Establishes a standalone tuition-and-fee exemption for pre-apprentices (parallel to apprentices), benefiting aged-out foster youth and all pre-apprentices and removing reliance on the institution-based reading.*

Conforming review — s. 1009.533, F.S. (no amendment required)

No change to s. 1009.533 is needed. Career centers operated by school districts and Florida College System institutions — the typical providers of apprenticeship and pre-apprenticeship related technical instruction — already qualify as eligible postsecondary educational institutions under s. 1009.533(1). Amendment 1 supplies the operative clarification by defining how that enrollment counts toward the PESS full-time standard. Limiting the package to two sections keeps the proposal surgical and reduces the risk of unrelated amendments.

V. Rationale and Benefits

- **Removes a disincentive.** Aligns the benefit structure with paid work-based learning, so steering a youth into apprenticeship no longer costs them benefit certainty.
- **Advances State workforce priorities.** Supports Florida's apprenticeship-expansion goals and the pre-apprenticeship-to-registered-apprenticeship pipeline.
- **Preserves the existing framework.** Uses terms already defined in s. 446.021 and institutions already eligible under s. 1009.533; adds no new program or appropriation.
- **Improves outcomes for a high-barrier population.** Apprenticeship offers earn-while-you-learn income and a credential — a strong fit for youth who need both housing stability and immediate earnings.

VI. Fiscal Considerations

Minimal. The amendments do not create a new program or stipend and do not raise the PESS amount. PESS and the fee exemption are existing benefits; the change clarifies which enrollment qualifies. Any incremental cost reflects a modest number of additional eligible youth and is offset by the earn-while-you-learn wages of apprenticeship, which reduce reliance on other supports. A precise estimate can be developed with DCF/FloridaCommerce data on aged-out youth currently in work-based learning.

VII. Recommended Path

1. **Pursue an administrative clarification first.** Ask FloridaCommerce and DCF whether existing rule or guidance can treat apprenticeship/pre-apprenticeship related instruction as the "vocational school equivalent" under s. 409.1451(2)(a)4. now.
2. **Route the statutory language through the Independent Living Services Advisory Council** (s. 409.1451(7), F.S.), on which CareerSource Florida sits, so it advances as a vetted system recommendation in the Council's December 31 report.

3. **Align with the OPPAGA foster-youth housing study** due December 1, 2026, so the fix is framed as a housing-and-self-sufficiency improvement.
4. **Secure a legislative sponsor** for a narrow bill amending ss. 409.1451 and 1009.25, with FloridaCommerce and DCF as co-owners, timed to the next session.

VIII. Recommendation

Adopt the two-amendment package above. It is narrow, uses existing definitions, advances Florida's apprenticeship strategy, and converts uncertain, case-by-case benefit access into a clear, predictable pathway for aged-out foster youth pursuing apprenticeship and pre-apprenticeship — pursuing the administrative clarification in parallel so the benefit can be realized in the near term.

SFWIB EXECUTIVE COMMITTEE

DATE: 7/9/2025

AGENDA ITEM NUMBER: 6

AGENDA ITEM SUBJECT: PROPOSED FINAL RULE - OMB REGULATION FOR FEDERAL FINANCIAL ASSISTANCE

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: Staff recommends to the Executive Committee to authorize the Executive Director to submit public comment of behalf of the South Florida Workforce Board to OMB on Docket No. OMB-2026-0034 before July 13, 2026 deadline, as set forth below.

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

On May 29, 2026, the U.S. Office of Management and Budget (OMB), joined by approximately 40 federal grant-making agencies (including the U.S. Department of Labor), published a proposed rule in the Federal Register titled "Regulation for Federal Financial Assistance" (Docket No. OMB-2026-0034; FR Doc. 2026-10817). It is the most extensive revision of the Uniform Guidance at 2 CFR Part 200 since the framework was established in 2013.

2 CFR Part 200 sets the administrative requirements, cost principles, and audit requirements that govern every federal award CSSF administers — including WIOA Title I (Adult, Dislocated Worker, and Youth) and Wagner-Peyser funds that flow through the U.S. Department of Labor / Employment and Training Administration and FloridaCommerce. As both a recipient and a pass-through entity to contracted providers, CSSF is squarely within the rule's scope.

Key dates. The public comment period closes July 13, 2026 (a 45-day window). OMB intends for the final rule to take effect October 1, 2026 — the start of FY27 and PY 2026–27 — applying to new awards and to new incremental funding actions on existing awards on or after that date.

I. Significance to the Board

The proposal is not a technical refresh. It changes the legal posture of the grant framework and embeds new substantive conditions on how funds may be used and how awards may be ended. The provisions of greatest consequence to CSSF are summarized below.

A. Guidance becomes binding regulation

- OMB would reclassify 2 CFR, Subtitle A from guidance into binding regulation, so future OMB amendments take effect government-wide without separate agency notice-and-comment. This narrows the Board's future opportunity to shape changes and shifts the compliance climate from "remedies for noncompliance" toward "penalties for noncompliance."

B. Expanded termination and suspension authority (§ 200.340)

- Agencies would gain broadened authority to terminate awards "for convenience" when an award no longer advances agency priorities or the national interest, plus a new temporary suspension authority capped at 90 days. The standard appeal rights under §§ 200.341–200.342 would not apply to discretionary terminations, leaving judicial review as the primary recourse.
- For a board dependent on continuing federal streams, this introduces real funding-continuity risk and flows down to provider contracts — staff should review termination, suspension, and contingency language in subrecipient agreements (e.g., contracted youth and career-services providers).

C. DEI, disparate-impact, and gender-identity prohibitions (§§ 200.300, 200.218)

- New award conditions would bar the use of federal funds to fund, promote, or facilitate DEI initiatives, theories of disparate-impact liability, or specified gender-identity factors, and would prohibit "discriminatory event services" by public entities. This is the provision most likely to create a layered compliance question for CSSF.

- It intersects directly with the Board's WIOA Section 188 Equal Opportunity obligations and with Florida CS/CS/SB 1134 (Ch. 2026-43). Staff should map where federal nondiscrimination duties, the new federal restrictions, and the state law align or conflict, and identify any program or outreach activities that may require re-characterization.

D. Mandatory pre-issuance political review of discretionary awards

- All discretionary awards would require pre-issuance review by senior political appointees for consistency with Administration priorities; expert/peer review would become advisory only. Practically, this can lengthen approval timelines for any competitive or discretionary funding CSSF pursues.

E. Narrowed allowable costs (§§ 200.432, 200.454, 200.461)

- Conference costs would be unallowable unless written into the award's terms (§ 200.432); professional-organization memberships and subscriptions would require prior written approval and would be barred where the organization's primary function is issue advocacy (§ 200.454); and publication / open-access fees would be restricted (§ 200.461).

- These touch routine operations — staff training and conference attendance, association memberships, and the allowable-cost determinations staff make for subrecipients. Budgets and provider agreements would need to anticipate the new prior-approval posture.

F. Heavier payment and pass-through administration

- Recipients would owe detailed written justification of purpose for payment requests, and fixed-amount awards and subawards would be eliminated. As a pass-through entity, CSSF would carry added monitoring and documentation duties and must flow new conditions down to subrecipients — a direct administrative-cost and capacity consideration

Notable non-change — indirect cost rates

OMB declined to revise the indirect cost rate negotiation system in this rulemaking, citing FY2026 appropriations language, though it signaled a possible future Request for Information. The negotiated-rate and de minimis framework under § 200.414 is therefore not altered by this proposal — relevant given other changes to indirect-cost-rate policies and recent subrecipient rate determinations.

Updated Information for the Board

A. Practitioner consensus. Legal alerts issued since signing (e.g., Becker & Poliakoff; Ogletree Deakins; Littler; Fisher Phillips) emphasize that the Act is directed at government entities, not private employers — but that the grant/contract certification requirement is the primary mechanism reaching downstream recipients, vendors, and subrecipients beginning January 1, 2027.Identifying high-skill, high-wage, and in-demand occupations and sectors

B. Federal-compliance exemption preserves core EO functions. SFWIB's federally mandated equal opportunity and nondiscrimination obligations under WIOA Section 188 and 29 CFR Part 38 — including the designated Equal Opportunity Officer function — are activities required by federal law and therefore fall within the Act's exemption. The current federal enforcement posture (which treats DEI-related discrimination as an EEOC priority) is generally aligned with, rather than in tension with, the new state law.Coordinating with institutions and employers to ensure program relevance

C. Threshold applicability question. SFWIB / CSSF is a Local Workforce Development Board organized under § 445.007, Florida Statutes — not a "county or municipality." Whether, and to what extent, the Act reaches the Board therefore turns on (a) whether the Board is treated as a covered governmental unit, (b) whether it is a "recipient" of any county or municipal grant or contract, and (c) whether any county or municipal funds pass through the Board to subrecipients. .

Potential Impact on SFWIB Strategic Initiatives

A. Procurement & contracting. RFQs/RFPs, contracts, and subrecipient agreements executed or renewed after January 1, 2027 that involve county or municipal funds may require the new certification language. Staff have been advised by legal council to have all contracts reviewed even if they are standard renewals.

B. Policy & program-material review. Board policies, value statements, outreach materials, and required staff trainings should be reviewed against the statutory DEI definition, while preserving all federally required EO/nondiscrimination language (which is exempt).

C. Partner MOUs. MOUs with county or municipal partners should be reviewed for DEI-related provisions and certification needs at the next execution or renewal.

D. Priority-population services unaffected in substance. Federally defined WIOA priority populations (e.g., veterans, individuals with disabilities, dislocated workers, low-income individuals) are served pursuant to federal law and generally fall outside the statutory DEI definition; related messaging should nonetheless be reviewed for terminology.

Staff recommends to the Executive Committee to authorize the Exeuctive Director, or designee, to submit written public comment to OMB on Docket No. OMB-2026-0034 before the July 13, 2026 deadline, focused on operational impacts to WIOA service delivery, pass-through administration, allowable costs, and the WIOA Section 188 / nondiscrimination interface.

FUNDING: N/A

PERFORMANCE: N/A

NO ATTACHMENT

SFWIB EXECUTIVE COMMITTEE

DATE: 7/9/2025

AGENDA ITEM NUMBER: 7

AGENDA ITEM SUBJECT: PWIOA §189(I)(3)(B) WORK REQUIREMENT PARTICIPANT (WRP) PERFORMANCE ACCOUNTABILITY WAIVER — APPROVAL TO TRANSMIT TO CAREERSOURCE FLORIDA FOR STATE BOARD ADOPTION AND SUBMISSION TO USDOL-ETA

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: Staff recommends that the Executive Committee approve the WIOA §189(i)(3)(B) Work Requirement Participant (WRP) Performance Accountability Waiver request and authorize the Executive Director to transmit the waiver to CareerSource Florida for review and adoption by the State Workforce Development Board and submission, as the Governor's request, to the U.S. Department of Labor, Employment and Training Administration (ETA) for approval, as set forth below.

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

Public Law 119-21 (H.R. 1), signed July 4, 2025, expanded federal benefit work requirements. The Supplemental Nutrition Assistance Program (SNAP) Able-Bodied Adults Without Dependents (ABAWD) work requirement now extends to age 64 and eliminates prior exemptions, and a new Medicaid community engagement requirement takes effect no later than January 1, 2027. Both condition continued benefit eligibility on documenting at least 80 hours per month of qualifying activity.

Florida has not adopted Medicaid expansion, so the operative driver in this region is the expanded SNAP ABAWD population. These customers already enter CareerSource South Florida (CSSF) career centers through the SNAP Employment and Training (E&T) referral pipeline that the Florida Department of Children and Families (DCF) operates in partnership with FloridaCommerce and the local workforce development boards. The H.R. 1 expansion materially increases this inflow of compliance-driven customers who are engaged part-time and short-term to satisfy the 80-hour requirement.

Because this population is compliance-driven rather than career-driven at entry, enrolling these customers as WIOA Title I participants exerts downward or volatile pressure on the WIOA Section 116 primary performance indicators, creating a structural disincentive to serve them. The proposed waiver — developed in collaboration with Equus Workforce Solutions — is designed to neutralize that disincentive without compromising performance reporting.

I. The Federal Mandate and the New Customer Inflow

Federal benefit agencies are directed to refer non-compliant individuals to the workforce system to document required work activity. As a result, the American Job Center system — and WIOA Title I in particular — becomes the practical "front door" for individuals seeking to maintain SNAP (and, where applicable, Medicaid) eligibility. In Florida, DCF identifies who must participate and FloridaCommerce issues the Employment and Training referral that routes the customer to a CSSF career center.

II. II. The WIOA Performance Disincentive

Enrolling the compliance-driven cohort as participants pressures several of the six WIOA Section 116 primary indicators (Section 116(b)(2)(A); 20 CFR 677.155):

- Median Earnings (2nd Quarter after exit) — HIGH. Compliance is satisfied at roughly 80 hours per month, so part-time earnings pull the median below levels expected of career-seeking participants.
- Measurable Skill Gains — HIGH. Short-term, activity-based engagement often will not produce a documented skill gain within the program-year timeframe.
- Employment Rate (2nd and 4th Quarter after exit) — MODERATE. Intermittent attachment and benefit-driven exits make quarter-specific outcomes less predictable.
- Credential Attainment Rate — LOW. Generally inapplicable where the customer does not enter training.
- Effectiveness in Serving Employers — LOW. Neutral to positive, as the cohort expands the entry-level talent pool.

Absent relief, Local Workforce Development Areas face a rational disincentive to enroll this population as participants — contrary to WIOA's statutory emphasis on serving individuals with barriers to employment.

III. The Waiver Request

Under the authority of WIOA Section 189(i)(3)(B) and 20 CFR 679.600–679.640, the waiver requests a narrowly tailored adjustment to the application of the Section 116 performance requirements as applied to the WRP cohort only. The State would:

1. Designate WRP participants as a distinct, disaggregated cohort;
2. Continue full primary-indicator reporting for the cohort, with no individual removed from the reporting system; and
3. Evaluate WRP outcomes against separately negotiated, adjusted levels of performance for State and local success and sanction determinations.

In short, the waiver adjusts how WRP outcomes count toward meeting negotiated levels — not whether they are measured and reported.

IV. Why the Waiver Is Approvable

The request is structured to satisfy the limits on the Secretary's waiver authority. Under WIOA Section 189(i)(3)(A), the Section 116 performance-reporting system is treated as a "basic purpose" of Title I that may not be waived. The waiver therefore preserves full reporting and relies on mechanisms WIOA already authorizes — the statistical adjustment model and negotiated levels of performance (20 CFR 677.170) — together with the reportable-individual versus participant distinction (20 CFR 677.150), which keeps light-touch customers out of the indicators without any waiver. Exclusion-based alternatives were considered and deliberately not pursued, as ETA has declined comparable requests that sought to remove served participants from the reporting system.

V. Process and Path to Submission

1. SFWIB Executive Committee approval and authorization to transmit (this item).
2. Transmittal to CareerSource Florida for State Workforce Development Board review and adoption.
3. Public comment period of not less than 30 days, including business and organized labor.
4. Governor's submission of the waiver to USDOL-ETA through FloridaCommerce.
5. ETA decision within 90 days of receipt; the approval letter serves as the Memorandum of Understanding.
6. Implementation across CSSF career centers, with disaggregated WRP supplemental-cohort reporting to ETA.

VI. Significance to the Board

- Sanction-risk protection. By securing adjusted negotiated levels for the WRP cohort, the waiver reduces the region's and the State's exposure to performance-sanction risk as the benefit-driven inflow grows.
- Expanded access. It removes the disincentive to serve individuals with barriers to employment, consistent with WIOA and the State's REACH Act goals.
- System alignment. It strengthens coordination among DCF, FloridaCommerce, and CSSF and builds on the existing SNAP E&T partnership.

Staff recommends that the Executive Committee approve the WIOA Section 189(i)(3)(B) Work Requirement Participant (WRP) Performance Accountability Waiver and authorize the Executive Director, or designee, to transmit it to CareerSource Florida for State Workforce Development Board adoption and submission, as the Governor's request, to the U.S. Department of Labor for approval.

FUNDING: N/A

PERFORMANCE: N/A

ATTACHMENT

STATE OF FLORIDA

WIOA STATUTORY AND REGULATORY WAIVER REQUEST

Work Requirement Participant (WRP) Performance Accountability Waiver

SNAP ABAWD Employment & Training and Medicaid Community Engagement Populations — P.L. 119-21

Submitting State	State of Florida
Submitted To	U.S. Department of Labor, Employment and Training Administration (ETA), Office of Workforce Investment
Statutory Authority	WIOA § 189(i)(3)(B); 20 CFR 679.600 through 679.640 (General Statutory and Regulatory Waiver Authority)
Requesting Official	The Governor of Florida, in consultation with chief local elected officials, by and through: • CareerSource Florida, Inc. (State Workforce Development Board), and • The Florida Department of Commerce (FloridaCommerce), the Title I administrative entity (Ch. 20.60 & 445, F.S.).
Originating / Sponsoring Board	South Florida Workforce Investment Board d/b/a CareerSource South Florida (Local Workforce Development Board 23, Miami-Dade County) Rick Beasley, Executive Director — initiative lead
State Point of Contact	Ms. Adrienne Johston – President, CareerSource Florida Mr. Alex Kelly – Secretary, FloridaCommerce
Submission Date	July 9, 2026

Executive Summary

Public Law 119-21 (the One Big Beautiful Bill Act of 2025, "H.R. 1") significantly expanded federal benefit work and community-engagement requirements. In Florida, the operative driver is the **expanded SNAP Able-Bodied Adults Without Dependents (ABAWD) requirement**, which raised the work-requirement age ceiling to 64 and eliminated longstanding exemptions. These benefit-compliance customers already flow into Florida's CareerSource centers through the existing SNAP Employment and Training (E&T) referral pipeline that the Florida Department of Children and Families (DCF) operates in partnership with FloridaCommerce and the local workforce development boards (LWDBs).

Because these customers are *compliance-driven* — engaged part-time and short-term to document the required 80 hours per month — enrolling them as WIOA Title I participants exerts predictable downward pressure on the §116 primary performance indicators, creating a structural disincentive to serve them. Florida therefore requests a **narrowly tailored waiver** that neutralizes this disincentive **without removing any served individual from the WIOA performance reporting system**. The requested relief preserves full primary-indicator reporting, adds disaggregated supplemental reporting of the Work Requirement Participant (WRP) cohort, and evaluates WRP outcomes against separately negotiated, adjusted levels of performance for State and local accountability purposes. This structure is consistent with the limits on the Secretary's waiver authority at WIOA §189(i)(3)(A) and is designed for approval.

I. Waiver Request and Authority

Pursuant to **WIOA § 189(i)(3)(B)** and **20 CFR 679.600–679.640**, the Governor of Florida, in consultation with chief local elected officials and acting through CareerSource Florida (the State Workforce Development Board, which develops and modifies the WIOA Combined State Plan on the Governor's behalf under WIOA §101(d) and s. 445.003(2), F.S.) and FloridaCommerce (the Title I administrative entity), respectfully requests approval of the waiver described in Section II.

Under 20 CFR 679.620, the Secretary issues a decision within 90 days of receipt; the ETA approval letter serves as the Memorandum of Understanding (MOU) governing agreed-upon outcomes and accountability measures. A waiver may be approved for a period not to exceed the duration of the State's current WIOA Combined State Plan.

II. The Requested Waiver

Florida requests a waiver of the *standard application* of the §116 performance accountability requirements (WIOA §116(b)(2)(A); 20 CFR 677.155) **as applied to the Work Requirement Participant (WRP) cohort only**, to permit the State to:

1. **Designate the WRP cohort.** Identify, flag, and track as a distinct, disaggregable cohort those individuals who receive staff-assisted WIOA Title I services in connection with a SNAP ABAWD/E&T or Medicaid community-engagement requirement.

2. **Preserve full reporting.** Continue to collect and report all six primary indicators of performance for WRP participants — no served individual is removed from the performance reporting system.

3. **Apply adjusted negotiated levels.** Evaluate WRP-participant outcomes against separately negotiated, adjusted levels of performance for purposes of the State's and local areas' success and sanction determinations under WIOA §116(b)(3) and (f), in recognition that the cohort's compliance-oriented engagement profile differs materially from career-seeking participants.

In short, the waiver adjusts *how* WRP outcomes count toward meeting negotiated levels — not *whether* those outcomes are measured and reported.

Alternatives Considered and Not Pursued

The State considered, but deliberately did not request, two broader approaches — (a) excluding negative WRP outcomes from indicator calculations, and (b) carving the WRP cohort out of the Median Earnings indicator. Both would remove served participants from the performance reporting system. Because ETA has consistently treated the §116 performance-reporting system as a **basic purpose** of Title I that may not be waived under WIOA §189(i)(3)(A) and 20 CFR 679.610 — i.e., individuals who receive a direct WIOA service must be measured and reported — the State has instead structured the request to preserve reporting in full. This narrower design materially improves the likelihood of approval.

III. Background: The Federal Mandate and Florida's Benefit-to-Workforce Pipeline

A. The Federal Mandate

H.R. 1, signed July 4, 2025, expanded the SNAP ABAWD work requirements and established the first federal Medicaid community engagement requirement. Both condition continued benefit eligibility on documenting **at least 80 hours per month** of qualifying activity (employment, a work program such as SNAP E&T, community service, or at-least-half-time education). For SNAP, H.R. 1 raised the ABAWD age ceiling from 54 to 64, extended the requirement to parents whose youngest child is 14 or older, and eliminated exemptions for veterans, individuals experiencing homelessness, and former foster youth. The expanded SNAP requirements are already in effect; the Medicaid community engagement requirement takes effect no later than January 1, 2027.

B. Florida's Posture: SNAP Is the Operative Driver

Florida has **not** adopted the ACA Medicaid expansion. The Medicaid community engagement requirement therefore reaches only a limited Florida Medicaid population, while the **expanded SNAP ABAWD requirement applies statewide** and is the principal source of the new workforce-system inflow. This waiver is framed around the SNAP-driven WRP cohort and is structured to extend automatically to any Medicaid community-engagement population that becomes applicable in Florida (including under pending State healthcare-workforce legislation).

C. The Existing Referral Pipeline

Florida already operates the precise pipeline this waiver concerns. SNAP E&T is administered by DCF **in partnership with FloridaCommerce and the local workforce development boards**. Beginning Federal Fiscal Year 2024, Florida expanded mandatory SNAP E&T to all non-exempt individuals aged 18–59; H.R. 1 now extends the underlying ABAWD requirement through age 64. When DCF determines that an individual must participate, **FloridaCommerce mails an Employment and Training Referral Letter directing the customer to orientation and a case manager at a CareerSource center**. The H.R. 1 expansion materially increases the volume of compliance-driven customers entering CareerSource centers through this channel.

D. Scale in Florida

Indicator of Scale	Figure	Source / Basis
Floridians enrolled in SNAP (Dec. 2025) — ~1 in 8 residents	~2.59 million	DCF / ACCESS Florida
SNAP gross income eligibility limit in Florida (broader covered population)	200% FPL	Florida DCF policy
Mandatory SNAP E&T population prior to H.R. 1 (non-exempt adults)	Ages 18–59	FloridaCommerce (FFY2024)
ABAWD age ceiling after H.R. 1 (newly added 60–64 band + struck exemptions)	Ages 18–64	P.L. 119-21
Projected annual WRP referrals to CareerSource centers (to be quantified)	[DCF–FloridaCommerce data match]	Planning estimate

The projected referral volume will be quantified through a DCF–FloridaCommerce data match applying the State's SNAP E&T mandatory-participation and referral rates to the H.R. 1–expanded non-exempt ABAWD caseload.

IV. WIOA Performance Disincentive Analysis

WIOA §116(b)(2)(A) and 20 CFR 677.155 establish six primary indicators of performance applicable across the core programs. Because the WRP cohort is, by design, engaged in part-time, short-term, compliance-oriented activity, enrolling these customers as participants exerts predictable downward or volatile pressure on several indicators — the disincentive this waiver neutralizes.

Primary Indicator	Anticipated Impact of WRP Enrollment	Disincentive
Median Earnings, Q2 after exit	Compliance is satisfied at ~80 hours/month. Part-time, compliance-level earnings pull median earnings below levels expected of career-seeking participants.	**HIGH**
Measurable Skill Gains (MSG)	Short-term, activity-based engagement often will not produce a documented skill gain within the program-year timeframe.	**HIGH**
Employment Rate, Q2 after exit	Intermittent attachment and benefit-driven exits make quarter-specific employment outcomes less predictable.	**MODERATE**
Employment Rate, Q4 after exit	Fourth-quarter retention is less likely where engagement was compliance-driven and short-term.	**MODERATE**
Credential Attainment Rate	Generally inapplicable where the customer does not enter training; minimal effect if the cohort is correctly scoped.	**LOW**
Effectiveness in Serving Employers	Largely neutral; an expanded, work-ready entry-level talent pool may benefit this indicator over time.	**LOW**

Absent relief, Florida's LWDBs face a rational disincentive to enroll WRP customers as participants — contrary to WIOA's statutory emphasis on serving individuals with barriers to employment and to the State's REACH Act goals (Ch. 14.36, F.S.) of an integrated, access-oriented workforce system.

V. Why the Requested Waiver Is Approvable

A. The Performance-Reporting System Is Preserved

The waiver does not remove WRP participants from the §116 indicators; the State will continue to collect and report all primary-indicator data for the cohort. Because nothing is excluded from reporting, the request does not waive a **basic purpose** of Title I and is consistent with WIOA §189(i)(3)(A) and 20 CFR 679.610.

B. Relief Operates Through Mechanisms WIOA Already Authorizes

Adjusted levels of performance are a feature of WIOA, not a departure from it. The statistical adjustment model (WIOA §116(b)(3); 20 CFR 677.170) already accounts for the characteristics of participants served and actual economic conditions when establishing adjusted levels. This waiver applies that same logic to a defined, transparently reported cohort whose engagement profile is materially different by federal design.

C. A Light-Touch First Line Limits the Population Needing the Waiver

Many WRP customers can be served through self-service, information-only, and basic career services that do not trigger "participant" status under 20 CFR 677.150 and therefore never enter the primary indicators. The requested waiver governs only those WRP customers who progress to staff-assisted services and become participants — a deliberately narrowed scope.

VI. Programmatic Goals and Objectives

1. **Expand access.** Increase participation of individuals with barriers to employment and improve the accessibility of WIOA Title I services across Florida's CareerSource network.

2. **Strengthen workforce attachment.** Increase engagement in qualifying activity (80 hours/month) and facilitate progression from compliance activity into employment and career pathways.

3. **Align Florida's systems.** Integrate the work of DCF (SNAP/Medicaid eligibility), AHCA (Medicaid), FloridaCommerce, and the LWDBs, reducing administrative burden and fragmentation across benefit and workforce programs.

4. **Support employer needs.** Expand entry-level talent pipelines and strengthen connections between job seekers and Florida employers.

VII. Individuals Impacted by the Waiver

The Work Requirement Participant (WRP) cohort comprises individuals who present to the WIOA Title I system in connection with a federal benefit work or community-engagement requirement, including:

- Non-exempt SNAP ABAWDs (ages 18–64) subject to the work requirement and referred to SNAP E&T by DCF/FloridaCommerce;

- Parents and caretakers newly subject to SNAP work requirements (youngest child age 14 or older), and individuals who lost prior exemptions (veterans, persons experiencing homelessness, former foster youth);

- Individuals subject to the Medicaid community engagement requirement to the limited extent applicable in Florida; and

- Individuals who would not otherwise meet traditional WIOA enrollment expectations, requiring immediate, short-term engagement rather than long-term training.

WRP designation is **additive and non-stigmatizing**. It does not limit a customer's access to the full array of WIOA services, and any WRP customer who elects deeper services (for example, training toward a credential) is served and reported the same as any other participant.

VIII. Implementation Plan

A. Participant Identification

- Establish WRP designation criteria aligned with DCF's SNAP/Medicaid work-requirement determinations and exemptions, and operationalize a DCF–FloridaCommerce data match to flag the cohort;
- Configure the State's case-management and reporting system (Employ Florida) to flag and disaggregate WRP participants; and
- Issue State policy guidance to ensure consistent application across all 24 LWDBs.

B. Service Delivery Approach

- Low-friction intake and same-visit engagement aligned to the SNAP E&T referral letter;
- Immediate access to qualifying activities — supervised job search, workshops and orientations, career coaching, work experience, education, and activity-tracking support that count toward the 80-hour requirement;
- Customer segmentation by readiness, so compliance-only and career-seeking customers are routed appropriately; and
- Employer-driven pathways for entry-level employment.

C. Staff Training and Guidance

- Training on SNAP and Medicaid work-requirement rules, exemptions, and allowable activities;
- Guidance on the WRP designation, the reportable-individual vs. participant distinction, and the supplemental-cohort reporting workflow; and
- Tools for non-stigmatizing, customer-centered engagement.

D. Data Collection and Reporting

- Track enrollment, services, and outcomes for WRP participants within Employ Florida;

- Continue full primary-indicator reporting and report WRP outcomes as a disaggregated supplemental cohort to ETA; and
- Apply the adjusted negotiated levels approved under this waiver for State and local success/sanction determinations.

IX. Outcomes and Expected Impact

Horizon	Anticipated Results
Short-Term	Increased CareerSource utilization; faster access to qualifying activities; reduced confusion and administrative barriers to benefit compliance.
Intermediate	Increased workforce participation; improved placement among a population that would otherwise be unserved; greater employer engagement.
Long-Term	Reduced dependency on public benefits; improved economic mobility; durable alignment of Florida's workforce, nutrition, and health systems.

X. Monitoring and Evaluation Plan

Florida will implement a structured evaluation framework and report results to ETA on the schedule set in the MOU.

Metric	Definition / Target
WRP participants served	Unduplicated count enrolled and flagged WRP, by LWDB and program year.
Work-activity compliance rate	Share documenting ≥80 hours/month of qualifying activity.
Employment entry & retention	Entry into employment and Q2/Q4 retention among WRP participants (supplemental cohort).
Progression to training	Share advancing from compliance activity into credential-bearing training.
System-performance impact	Comparison of WRP and traditional-participant outcomes; net effect on overall §116 performance.

Florida will conduct quarterly reviews with LWDBs, identify best practices, adjust service strategies, and provide ETA regular progress reports and system-impact analysis.

XI. Assurances of Alignment with WIOA Requirements

The State assures that:

- **Reporting integrity.** WRP participants receiving direct WIOA services will continue to be measured and reported within the §116 primary indicators; this waiver does not remove served individuals from the reporting system and does not waive a basic purpose of Title I.

- **No reduction in access.** The waiver expands access and will not reduce any participant's access to services.

- **Equal opportunity.** All services will comply with applicable nondiscrimination and equal-opportunity requirements, including WIOA §188 and 29 CFR part 38.

- **Labor standards.** Applicable wage and labor standards will be maintained.

- **No federal conflict.** The waiver will not conflict with other federal requirements and is consistent with the basic purposes of Title I (20 CFR 675.100) and with Florida law (Ch. 445, F.S.).

XII. State Board and Stakeholder Engagement and Public Comment

Consistent with 20 CFR 679.620 and WIOA §189(i)(3), Florida will provide a meaningful opportunity for public comment — including comment by business and organized labor — before final submission. The State will:

- Present the waiver to the CareerSource Florida Board of Directors (State Workforce Development Board) and engage the 24 LWDBs and chief local elected officials;

- Publish the waiver for public comment for a minimum of 30 days and document all comments and responses; and

- Coordinate with DCF (SNAP and Medicaid eligibility) and AHCA (Medicaid) on identification, referral, and data-matching protocols.

XIII. Duration of Waiver

Florida requests approval for an initial period of **up to four years, not to exceed the duration of the State's current WIOA Combined State Plan**, with the option to renew based on demonstrated outcomes (20 CFR 679.620(g)). The State acknowledges the Secretary's authority to revoke the waiver (20 CFR 679.620(h)) if agreed-upon outcomes or MOU terms are not met.

XIV. CONCLUSION

H.R. 1 has made Florida's CareerSource centers the practical "front door" for a growing population of benefit-compliance customers — chiefly SNAP ABAWDs newly subject to the work requirement — referred through the State's existing DCF–FloridaCommerce SNAP E&T pipeline. Without relief, the §116 performance structure discourages LWDBs from serving these individuals as participants. This narrowly tailored waiver removes that disincentive while **preserving full performance reporting**, relying on mechanisms WIOA already authorizes. With approval, Florida will expand access, improve employment outcomes for individuals with barriers, advance the federal work-participation priorities embodied in P.L. 119-21, and strengthen alignment across the State's workforce, nutrition, and health systems. The State is prepared to execute a Memorandum of Understanding establishing the governing outcomes and accountability measures.

SFWIB EXECUTIVE COMMITTEE

DATE: 7/9/2025

AGENDA ITEM NUMBER: 8

AGENDA ITEM SUBJECT: PROGRAM YEAR 2026–2027 WIOA & WAGNER-PEYSER PERFORMANCE NEGOTIATION — PROPOSED LOCAL PERFORMANCE TARGETS

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: Staff recommends to the Executive Committee Approval of the proposed Program Year (PY) 2026–2027 local performance targets set forth in this item as CareerSource South Florida's negotiation position with FloridaCommerce, and authorization for the Executive Director to negotiate final adjusted levels of performance within the ranges presented, subject to ratification by the full Board and execution by the Board Chair and Chief Local Elected Official.

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

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

The WIOA Performance Accountability System. Under Section 116 of the Workforce Innovation and Opportunity Act (WIOA) and its implementing regulations at 20 CFR Part 677, each local workforce development area is held accountable for a common set of primary indicators of performance across the WIOA Title I Adult, Dislocated Worker, and Youth programs and the Wagner-Peyser Act Employment Service (Title III). The primary indicators are: (1) Employment Rate in the 2nd Quarter After Exit; (2) Employment Rate in the 4th Quarter After Exit; (3) Median Earnings in the 2nd Quarter After Exit; (4) Credential Attainment Rate; (5) Measurable Skill Gains; and (6) Effectiveness in Serving Employers. The Wagner-Peyser Employment Service is assessed on the first three of these indicators.

The Negotiation Structure. Expected levels of performance are established through a tiered negotiation. The U.S. Department of Labor negotiates expected levels with each State; the State, acting through FloridaCommerce in coordination with CareerSource Florida, in turn negotiates adjusted levels of performance with each of Florida's local workforce development boards. Negotiated levels are required to account for differences in economic conditions, the characteristics of participants served, and other objective factors, and are informed by the statistical adjustment model prescribed under WIOA.

Performance Consequences. A local area is generally regarded as having met an individual indicator when it achieves at least 90 percent of the negotiated adjusted level, and as having met overall program performance based on the aggregate of its indicators. Sustained failure to achieve negotiated levels can trigger mandatory technical assistance and, if uncorrected, performance sanctions that may ultimately affect a local area's continued designation.

Establishing negotiated levels that are simultaneously credible and achievable is therefore central to protecting the designation and funding of Local Workforce Development Area 23.

The PY 2026–2027 Cycle. FloridaCommerce has initiated the PY 2026–2027 performance negotiation and has transmitted proposed estimated levels of performance for each primary indicator. As the operator for Local Workforce Development Area 23, CareerSource South Florida must respond with its proposed adjusted levels. This item presents the supporting analysis and the recommended targets developed for that response.

LWDB 23 PERFORMANCE CONTEXT

CareerSource South Florida met or exceeded all eighteen WIOA core performance measures in the most recent reporting period. Notwithstanding that record, several indicators reflect declining multi-year trends that bear directly on the levels the local area can prudently commit to for PY 2026–2027. Two indicators — Median Earnings and Effectiveness in Serving Employers — have been identified as priority negotiation gaps, where the relationship between the State's estimate and recent performance warrants particular attention. Two further indicators — Wagner-Peyser Employment Rate (2nd Quarter) and Youth Employment Rate (2nd Quarter) — are treated as redesignation-protection measures in light of recent downward movement.

METHODOLOGY

For each indicator, staff developed a recommended target using four reference points captured in the negotiation worksheet: (1) the local area's actual performance history for PY 2020 through PY 2025; (2) prior negotiated goals; (3) the average of actual and negotiated performance; and (4) the State's PY 2026–2027 estimated level. Two projection methods were prepared — one anchored on the most recent single year (PY 2025) and one anchored on a three-year trailing average of actual performance (PY 2023–2025).

To maximize defensibility in negotiation, the recommended target adopts the three-year trailing-average projection, which does not rest on any single volatile year; and wherever the State's own estimate falls below that projection, the recommended target adopts the State's estimate. Consequently, every recommended target set forth below traces to either a three-year trailing average of the local area's actual performance or the State's own estimated level — no target rests on a single-year outlier. Because a lower negotiated level widens the compliance cushion above the sanction threshold, the recommended target represents the most favorable defensible floor for each indicator; the local area's actual results may, and are expected to, exceed these committed levels.

PROPOSED PERFORMANCE TARGETS

WIOA Adult Program

Primary Indicator of Performance	PY 2025 Actual	State Estimate	Recommended Target	Basis
Employment Rate, 2nd Qtr After Exit	74.1%	76.0%	**69.3%**	3-Yr Avg
Employment Rate, 4th Qtr After Exit	82.9%	71.4%	**71.4%**	State Est.
Median Earnings, 2nd Qtr After Exit	$8,075	$7,835	**$7,667**	3-Yr Avg
Effectiveness in Serving Employers	78.9%	68.0%	**68.0%**	State Est.
Credential Attainment Rate	82.1%	69.8%	**67.8%**	3-Yr Avg
Measurable Skill Gains	89.5%	72.1%	**62.5%**	3-Yr Avg

WIOA Dislocated Worker Program

Primary Indicator of Performance	PY 2025 Actual	State Estimate	Recommended Target	Basis
Employment Rate, 2nd Qtr After Exit	82.6%	82.0%	**80.1%**	3-Yr Avg
Employment Rate, 4th Qtr After Exit	87.8%	80.2%	**80.0%**	3-Yr Avg
Median Earnings, 2nd Qtr After Exit	$11,066	$12,851	**$10,798**	3-Yr Avg
Effectiveness in Serving Employers	81.8%	68.0%	**68.0%**	State Est.
Credential Attainment Rate	86.8%	86.5%	**86.5%**	State Est.
Measurable Skill Gains	92.2%	80.6%	**80.6%**	State Est.

WIOA Youth Program

Primary Indicator of Performance	PY 2025 Actual	State Estimate	Recommended Target	Basis
Employment Rate, 2nd Qtr After Exit	77.7%	81.5%	**78.8%**	3-Yr Avg
Employment Rate, 4th Qtr After Exit	78.7%	78.1%	**77.8%**	3-Yr Avg
Median Earnings, 2nd Qtr After Exit	$5,964	$5,088	**$4,795**	3-Yr Avg
Effectiveness in Serving Employers	67.8%	68.0%	**65.9%**	3-Yr Avg
Credential Attainment Rate	67.0%	60.5%	**60.4%**	3-Yr Avg
Measurable Skill Gains	89.5%	72.1%	**72.1%**	State Est.

Wagner-Peyser Employment Service

Primary Indicator of Performance	PY 2025 Actual	State Estimate	Recommended Target	Basis
Employment Rate, 2nd Qtr After Exit	60.8%	65.9%	**61.0%**	3-Yr Avg
Employment Rate, 4th Qtr After Exit	65.5%	65.4%	**59.4%**	3-Yr Avg
Median Earnings, 2nd Qtr After Exit	$7,721	$7,509	**$7,067**	3-Yr Avg

Table key: **green** *— comfortable cushion above recent actual;* **blue** *— narrow cushion;* **amber** *— target at or above the most recent actual (defend or adjust in negotiation).*

STRATEGIC CONSIDERATIONS

- Priority gaps. On Effectiveness in Serving Employers, the recommended Adult and Dislocated Worker targets rest at the State's own estimate (68.0%), the strongest defensible posture available on a flagged gap. Median Earnings is held to the conservative three-year method across all four programs, preserving room in negotiation.

- Redesignation protection. Wagner-Peyser Employment Rate 2nd Quarter (63.9%) and Youth Employment Rate 2nd Quarter (79.8%) each sit modestly above the most recent single-year actual because both series have trended downward. These are the measures to defend most carefully, and where a modest downward adjustment may be sought if the State's statistical adjustment model does not already account for the decline.

- Watch items. Three recommended targets exceed the most recent single-year actual: Dislocated Worker Median Earnings (the three-year average is lifted by the PY 2024 earnings spike), Youth Employment Rate 2nd Quarter, and Wagner-Peyser Employment Rate 2nd Quarter. Each warrants either a supporting defense narrative or a downward adjustment during negotiation.

- Overall posture. Because the recommended targets are constructed from conservative, transparent inputs, they are robust to challenge: the local area can demonstrate that no committed level was derived from a cherry-picked year, and that every figure is either its own multi-year average or the State's own estimate.

FUNDING: N/A

PERFORMANCE: N/A

ATTACHMENT

PERFORMANCE METRICS **ADULT PROGRAM**

Actual Performance	2020	2021	2022	2023	2024	2025*	2026-2027 Estimated Performance	CSSF 26-27 Projected Performance (3-Yr Avg Actual 23-25)	CSSF 26-27 Recommended Target (Most Favorable & Defensible)
Employment Rate 2nd Quarter After Exit (EERQ2)	61.2	59.9	77.1	89.5	83.8	74.1	76.0	73.1	**69.3**
Employment Rate 4th Quarter After Exit (EERQ4)	55.3	51.0	60.3	77.6	85.6	82.9	71.4	73.5	**71.4**
Median Earnings 2nd Quarter After Exit (MedWg)	4335.0	7021.5	7695.0	9210.0	8439.0	8075.0	7835.0	7666.7	**7666.7**
Retention with the Same Employer (ESE)	44.7	48.5	60.5	69.2	76.8	78.9	68.0	73.9	**68.0**
Credential Attainment Rate (CredAtt)	40.9	50.0	56.4	88.6	82.3	82.1	69.8	67.8	**67.8**
Measurable Skill Gains (MSG)	62.0	94.1	94.3	99.1	99.3	89.5	72.1	62.5	**62.5**

Negotiated Performance Goals

Employment Rate 2nd Quarter After Exit (EERQ2)	85.5	85.2	64.5	64.5	64.5	64.5
Employment Rate 4th Quarter After Exit (EERQ4)	84.0	84.5	66.1	66.1	66.1	66.1
Median Earnings 2nd Quarter After Exit (MedWg)	6500.0	6600.0	5034.0	5034.0	6813.0	6813.0
Retention with the Same Employer (ESE)						
Credential Attainment Rate (CredAtt)	60.0	70.0	50.6	50.6	50.6	50.6
Measurable Skill Gains (MSG)	47.0	55.0	24.9	24.9	24.9	24.9

Average Performance Goals (Act. Vs Neg.)

Employment Rate 2nd Quarter After Exit (EERQ2)	73.3	72.6	70.8	77.0	74.2	69.3
Employment Rate 4th Quarter After Exit (EERQ4)	69.7	67.8	63.2	71.9	75.9	74.5
Median Earnings 2nd Quarter After Exit (MedWg)	5417.5	6810.8	6364.5	7122.0	7626.0	7444.0
Retention with the Same Employer (ESE)	44.7	48.5	60.5	69.2	76.8	78.9
Credential Attainment Rate (CredAtt)	50.5	60.0	53.5	69.6	66.5	66.4
Measurable Skill Gains (MSG)	54.5	74.5	59.6	62.0	62.1	57.2

PERFORMANCE METRICS

DISLOCATED WORKER PROGRAM

Actual Performance	2020	2021	2022	2023	2024	2025*	2026-2027 Estimated Performance	CSSF 26-27 Projected Performance (3-Yr Avg Actual 23-25)	CSSF 26-27 Recommended Target (Most Favorable & Defensible)
Employment Rate 2nd Quarter After Exit (EERQ2)	66.7	68.6	76.7	89.1	87.5	82.6	82.0	81.5	**80.1**
Employment Rate 4th Quarter After Exit (EERQ4)	82.1	80.0	69.6	79.5	86.4	87.8	80.2	80.0	**80.0**
Median Earnings 2nd Quarter After Exit (MedWg)	5445.5	9416.0	9729.0	10718.0	13781.0	11066.0	12851.0	11388.1	**10798.0**
Retention with the Same Employer (ESE)	44.7	33.3	72.6	63.6	76.9	81.8	68.0	74.6	**68.0**
Credential Attainment Rate (CredAtt)	66.7	100.0	76.7	96.6	92.7	86.8	86.5	87.7	**86.5**
Measurable Skill Gains (MSG)	85.7	89.9	89.7	97.6	99.1	92.2	80.6	84.6	**80.6**

Negotiated Performance Goals						
Employment Rate 2nd Quarter After Exit (EERQ2)	85.0	85.0	79.7	79.7	77.6	77.6
Employment Rate 4th Quarter After Exit (EERQ4)	79.0	80.5	81.9	81.9	74.1	74.1
Median Earnings 2nd Quarter After Exit (MedWg)	7000.0	7100.0	8160.0	8160.0	9718.0	10209.0
Retention with the Same Employer (ESE)						
Credential Attainment Rate (CredAtt)	75.0	75.0	79.5	79.5	85.9	85.9
Measurable Skill Gains (MSG)	47.0	49.0	40.0	40.0	77.0	77.0

Average Performance Goals (Act. Vs Neg.)						
Employment Rate 2nd Quarter After Exit (EERQ2)	75.8	76.8	78.2	84.4	82.6	80.1
Employment Rate 4th Quarter After Exit (EERQ4)	80.6	80.3	75.8	80.7	80.3	81.0
Median Earnings 2nd Quarter After Exit (MedWg)	6222.8	8258.0	8944.5	9439.0	11749.5	10637.5
Retention with the Same Employer (ESE)	44.7	33.3	72.6	63.6	76.9	81.8
Credential Attainment Rate (CredAtt)	70.8	87.5	78.1	88.1	89.3	86.4
Measurable Skill Gains (MSG)	66.4	69.4	64.8	68.8	88.1	84.6

PERFORMANCE METRICS

YOUTH PROGRAM

Actual Performance	2020	2021	2022	2023	2024	2025*	2026-2027 Estimated Performance	CSSF 26-27 Projected Performance (3-Yr Avg Actual 23-25)	CSSF 26-27 Recommended Target (Most Favorable & Defensible)
Employment Rate 2nd Quarter After Exit (EERQ2)	100.0	73.2	90.2	75.7	78.8	77.7	81.5	79.8	**78.8**
Employment Rate 4th Quarter After Exit (EERQ4)	100.0	100.0	71.1	78.1	75.3	78.7	78.1	77.8	**77.8**
Median Earnings 2nd Quarter After Exit (MedWg)	5679.0	5532.0	3982.0	4732.0	5535.0	5964.0	5088.0	4794.7	**4794.7**
Retention with the Same Employer (ESE)	66.7	60.0	52.8	53.7	64.6	67.8	68.0	65.9	**65.9**
Credential Attainment Rate (CredAtt)	66.7	50.0	56.3	59.8	61.0	67.0	60.5	60.4	**60.4**
Measurable Skill Gains (MSG)	62.0	94.1	94.3	99.1	99.3	89.5	72.1	81.0	**72.1**

Negotiated Performance Goals

Employment Rate 2nd Quarter After Exit (EERQ2)	79.0	80.0	75.8	75.8	81.0	81.0
Employment Rate 4th Quarter After Exit (EERQ4)	73.0	74.0	73.9	73.9	77.5	77.5
Median Earnings 2nd Quarter After Exit (MedWg)	3200.0	3200.0	3692.0	3692.0	3799.0	3799.0
Retention with the Same Employer (ESE)						
Credential Attainment Rate (CredAtt)	72.0	72.0	58.5	58.5	56.6	56.6
Measurable Skill Gains (MSG)	45.5	46.5	50.3	50.3	74.0	74.0

Average Performance Goals (Act. Vs Neg.)

Employment Rate 2nd Quarter After Exit (EERQ2)	89.5	76.6	83.0	75.8	79.9	79.4
Employment Rate 4th Quarter After Exit (EERQ4)	86.5	87.0	72.5	76.0	76.4	78.1
Median Earnings 2nd Quarter After Exit (MedWg)	4439.5	4366.0	3837.0	4212.0	4667.0	4881.5
Retention with the Same Employer (ESE)	66.7	60.0	52.8	53.7	64.6	67.8
Credential Attainment Rate (CredAtt)	69.3	61.0	57.4	59.2	58.8	61.8
Measurable Skill Gains (MSG)	53.8	70.3	72.3	74.7	86.7	81.8

PERFORMANCE METRICS **WAGNER-PEYSER PROGRAM**

Actual Performance	2020	2021	2022	2023	2024	2025*	2026-2027 Estimated Performance	CSSF 26-27 Projected Performance (3-Yr Avg Actual 23-25)	CSSF 26-27 Recommended Target (Most Favorable & Defensible)
Employment Rate 2nd Quarter After Exit (EERQ2)	58.1	59.5	67.8	71.3	67.8	60.8	65.9	63.9	**61.0**
Employment Rate 4th Quarter After Exit (EERQ4)	57.5	58.0	61.6	69.9	68.7	65.5	65.4	63.8	**59.4**
Median Earnings 2nd Quarter After Exit (MedWg)	5041.5	6927.0	7222.0	7667.0	8024.0	7721.0	7509.0	7067.0	**7067.0**
Retention with the Same Employer (ESE)									
Credential Attainment Rate (CredAtt)									
Measurable Skill Gains (MSG)									

Negotiated Performance Goals	2020	2021	2022	2023	2024	2025*
Employment Rate 2nd Quarter After Exit (EERQ2)	65.0	65.0	61.7	61.7	61.7	61.7
Employment Rate 4th Quarter After Exit (EERQ4)	64.2	64.2	59.4	59.4	59.4	59.4
Median Earnings 2nd Quarter After Exit (MedWg)	5000.0	5100.0	5173.0	5173.0	6063.0	6063.0
Retention with the Same Employer (ESE)						
Credential Attainment Rate (CredAtt)						
Measurable Skill Gains (MSG)						

Average Performance Goals (Act. Vs Neg.)	2020	2021	2022	2023	2024	2025*
Employment Rate 2nd Quarter After Exit (EERQ2)	61.6	62.3	64.8	66.5	64.8	61.3
Employment Rate 4th Quarter After Exit (EERQ4)	60.9	61.1	60.5	64.7	64.1	62.5
Median Earnings 2nd Quarter After Exit (MedWg)	5020.8	6013.5	6197.5	6420.0	7043.5	6892.0
Retention with the Same Employer (ESE)						
Credential Attainment Rate (CredAtt)						
Measurable Skill Gains (MSG)						