SOUTH FLORIDA WORKFORCE INVESTMENT BOARD
EXECUTIVE COMMITTEE MEETING
THURSDAY, AUGUST 13, 2026
8:15 A.M.

Zoom Only. 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. July 9, 2026
4. Informational - Supplemental Nutrition Program Waiver
5. Informational - Foster Care Proposal
6. Informational – SFWIB Proposed Policy Amendments – Documentation of Low-Income Status for the WIOA Adult Statutory Priority

"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: 8/13/2026

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: 8/13/2026

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 July 9, 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: 8/13/2026
AGENDA ITEM: 3A
AGENDA TOPIC: MEETING MINUTES

SFWIB EXECUTIVE COMMITTEE MEETING

DATE: July 9, 2026
LOCATION: VIA 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 at approximately 8:20 a.m. on July 9, 2026.

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

SFWIB EXECUTIVE COMMITTEE MEMBERS PRESENT *(VIA ZOOM)*	**SFWIB MEMBERS EXCUSED**	**SFWIB STAFF**
Canales, Dequasia Ferradaz, Gilda Gibson, Charles, Chair Mantilla, Rene Scott, Jr., Kenneth "Kenny"	del Valle, Juan-Carlos, Vice-Chairman **SFWIB EXECUTIVE COMMITTEE MEMBERS ABSENT** Chi, Joe	Beasley, Rick Bennett, Renee Morgan, Ebony Smith, Robert Perrin, Yian **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.

3A. Approval of Executive Committee Meeting Minutes – June 11, 2026

Chairman Gibson presented the SFWIB Executive Committee Meeting minutes from the June 11, 2026 meeting for review in advance of approval.

Motion for approval of June 11, 2026 SFWIB Executive Committee Meeting minutes by Mr. Scott; Ms. Ferradaz seconded; **motion is passed without dissent.**

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

4. Informational – Senate Bill 1134 Local DEI Prohibition

Chairman Gibson introduced the item; Mr. Beasley presented an update on Senate Bill 1134, the Local DEI Prohibition Act, signed April 23, 2026, and effective January 1, 2027. He explained that the law bars counties and municipalities from funding, promoting, or taking official action on diversity, equity, and inclusion (DEI) initiatives, and voids conflicting local DEI policies. He identified three operative components: a funding ban on DEI offices and initiatives, with penalties for misfeasance, malfeasance, and removal, and a private right of action; and a contractor and grantee certification requirement applicable to county or municipal contracts and grants executed or renewed on or after January 1, 2027.

Mr. Beasley explained the Board's exposure under the law. As a local workforce board operating under WIOA §445, CSSF is not itself a county or municipality and retains its designated EEOC officer as required by federal law, which falls within the Act's exemption. However, he noted that if the Board receives funding passed through a county or municipality, it could become subject to the Act's DEI restrictions. He advised that the Board's attorney will meet with Mr. Smith and himself to review all Board contracts and the language used in RFPs, RFQs, and MOUs to ensure compliance. No action was required on this item; it was presented for the Committee's information. Mr. Beasley thanked Mr. Smith for bringing the matter to the Committee's attention.

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

5. Informational – Registered Apprenticeship and Pre-apprenticeship Access to Road-to-Independence

Chairman Gibson introduced the item; Mr. Beasley presented an informational update on statutory language staff is proposing to expand apprenticeship access for youth aging out of foster care under the Road to Independence Program. He explained that, under current law, a youth aging out of foster care who enrolls in at least nine credit hours at a college is eligible for stipends covering housing and educational costs; however, state law does not clearly address registered apprenticeship programs, which are approved on a case-by-case basis, and does not address pre-apprenticeship programs at all.

Mr. Beasley advised that staff is proposing two narrow amendments to Sections 409.1451 and 1009.25, Florida Statutes, to place apprenticeship and pre-apprenticeship programs on equal footing with classroom enrollment for Road to Independence eligibility, using existing definitions under WIOA §446 and eligible-institution provisions under Section 1009, Florida Statutes, without creating new programs or appropriations. He noted the proposal builds on the Board's previously approved waiver eliminating fourteen required program elements under WIOA's youth program for participants pursuing apprenticeship or pre-apprenticeship tracks. Staff plans to route the proposed language for administrative clarification through the Independent Living Services Advisory Council (due December 31) and in coordination with OPPAGA (due December 1), and to seek a legislative sponsor.

Mr. Beasley reported that he has briefed Ms. Katie Black, CEO of Voices for Children, on the proposal, plans to brief Citrus Family Care Network, and has prepared correspondence to the Florida Department of Children and Families and CareerSource Florida regarding the initiative. Ms. Ferradaz and Mr. Mantilla spoke in support of the proposal, noting the growing demand for skilled-trades apprentices and the benefit to youth aging out of foster care of exposure to work-based learning as an alternative to a traditional college pathway. Mr. Scott also spoke in support, drawing on his experience with pre-apprentices in the trades.

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

6. Approval – Submit Public Comment on the Proposed Rule OMB Regulation for Federal Financial Assistance

Chairman Gibson introduced the item; Mr. Beasley presented staff's recommendation that the Executive Committee authorize the Executive Director to submit public comment on behalf of the South Florida Workforce Investment Board to the Office of Management and Budget docket referenced in the notice [docket number to be confirmed against the official Federal Register notice] prior to the July 13, 2026, comment deadline. He explained that on May 29, 2026, OMB and more than 40 federal agencies, including the U.S. Department of Labor, published proposed revisions to 2 CFR Part 200, representing the most extensive revision to the federal uniform guidance for financial assistance since 2013.

Mr. Beasley advised that, as both a direct recipient and pass-through entity for Wagner-Peyser and WIOA Title I funds, CSSF would be affected by provisions narrowing allowable costs for conferences, memberships, and related fees; eliminating DEI- and disparate-impact-related activities; and expanding remedies, including financial penalties, for noncompliance with OMB requirements, while noting the proposal does not affect indirect cost rates. He recommended the Board submit comments addressing the provisions expected to affect the workforce system.

Motion for approval to authorize the Executive Director to submit public comments to OMB on the proposed 2 CFR Part 200 revisions by Ms. Canales; Mr. Scott seconded; **motion is passed without dissent.**

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

7. Approval – Submit Work Requirement Participant Performance Accountability Waiver

Chairman Gibson introduced the item; Mr. Beasley presented staff's recommendation that the Executive Committee approve a Work Requirement Participation Accountability Waiver request [statutory citation as referenced in the meeting materials to be confirmed] and authorize the Executive Director to transmit the waiver to CareerSource Florida for review and adoption by the State Workforce Board and subsequent submission, at the Governor's request, to the U.S. Department of Labor, Employment and Training Administration, for approval.

Mr. Beasley explained that under H.R. 1, signed into law in July 2025, federal work-benefit requirements for able-bodied adults without dependents receiving Supplemental Nutrition Assistance Program (SNAP) benefits were expanded, raising the applicable age to 64 and eliminating certain exemptions, and establishing a new Medicaid community engagement requirement effective no later than January 1, 2027; both provisions condition benefit eligibility on documenting at least 80 hours of qualifying work activity per month. He explained that individuals meeting these requirements through WIOA participation could create a part-time, short-term, compliance-driven cohort that would adversely affect the Board's federal performance measures, particularly median earnings and measurable skills gains, creating a disincentive to serve SNAP recipients.

Mr. Beasley explained that the proposed waiver would disaggregate this cohort, preserving full primary-indicator reporting under WIOA while evaluating this population against separately negotiated measures, removing the disincentive to serve this population without adversely affecting the Board's overall performance results. He noted the waiver is limited to the SNAP population, as Florida has not expanded Medicaid, but that Medicaid participants would be added to the waiver's scope if the state expands Medicaid in the future. In response to Ms. Ferradaz's question, Mr. Beasley clarified that the waiver affects how performance data for this population is collected and reported, not participants' eligibility for services or the manner in which they are served.

Motion for approval to submit the Work Requirement Participation Accountability Waiver request by Mr. Mantilla; Ms. Ferradaz seconded; **motion is passed without dissent.**

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

8. Approval – Proposed Program Year (PY) 2026–2027 Local Performance Targets

Chairman Gibson introduced the item; Mr. Beasley presented staff's recommendation that the Executive Committee approve the proposed Program Year 2026-27 local performance targets set forth in the negotiation worksheet provided by Florida Commerce and authorize 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 the Chief Elected Official.

Mr. Beasley explained that, under WIOA §116, local boards are required to negotiate performance standards annually with the state. He advised that staff developed target recommendations using four reference points: local actual performance from Program Year 2020-21 through 2024-25; prior negotiated measures; the average of actual and negotiated performance; and the state's estimated Program Year 2026-27 levels, applying two projection methods, one anchored to the most recent single year (2024-25) and one anchored to a three-year trailing average (2022-23 through 2024-25). He reviewed proposed targets for the Adult, Dislocated Worker, Youth, and Wagner-Peyser programs, noting, by way of example, that CSSF proposed an adult target of 69% compared to the state's proposed 76%, reflecting a downward performance trend attributable in part to the rescission of temporary work authorization.

In response to questions from Ms. Ferradaz and Mr. Mantilla regarding why the proposed targets were lower than CSSF's recent actual performance and how the state's methodology accounts for regional differences, Mr. Beasley explained that the state applies a statistical regression model that adjusts negotiated targets based on each board's population characteristics. He reviewed demographic data showing that CSSF serves a comparatively harder-to-serve population, including higher rates of low-income participants and lower rates of prior work history and post-secondary attainment, relative to other regions such as Northeast Florida. He noted that CSSF uses a three-year average to reduce the effect of outlier years, and that two consecutive years of underperformance against negotiated targets could result in the state restructuring or merging the region.

Mr. Smith added that the national labor force participation rate has fallen to 61.5%, a five-decade low, and that revised federal jobs data showed approximately 720,000 additional individuals left the labor force in June — factors staff considered in developing the proposed targets. Mr. Beasley further noted an increase in WARN Act layoff notices compared to the prior year as an additional indicator of a softening labor market and stated that CSSF will continue to serve its hardest-to-serve population while proposing targets it believes are realistically achievable.

Motion for approval to submit the proposed Program Year 2026-27 local performance targets for negotiation with the state by Mr. Scott; Mr. Mantilla seconded; **motion is passed without dissent.**

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

Other Business & Announcements

Mr. Beasley thanked staff for their continued monitoring of federal and state legislative developments and thanked the Committee for its support of the items presented.

Motion to adjourn by Mr. Scott; Mr. Mantilla seconded; **motion is passed without dissent.**

The Executive Committee meeting ended at approximately 9:00 a.m.

The next SFWIB Executive Committee Meeting is anticipated on Thursday, August 13, 2026. Location to be announced.

SFWIB EXECUTIVE COMMITTEE

DATE: 8/13/2026

AGENDA ITEM NUMBER: 4

AGENDA ITEM SUBJECT: SUPPLEMENTAL NUTRITION PROGRAM WAIVER REQUEST

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

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

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

The South Florida Workforce Investment Board (SFWIB) d/b/a CareerSource South Florida (CSSF), has developed and advanced a proposed statewide Workforce Innovation and Opportunity Act (WIOA) waiver request designed to address emerging performance accountability challenges resulting from expanded federal work requirements established under Public Law 119-21 (H.R. 1). The waiver request was developed by CSSF for consideration by the State of Florida, CareerSource Florida, and FloridaCommerce as a potential statewide strategy to mitigate unintended impacts on workforce system performance outcomes while maintaining service access for individuals with barriers to employment.

The federal legislation significantly expanded Supplemental Nutrition Assistance Program (SNAP) work requirements by increasing the age range of Able-Bodied Adults Without Dependents (ABAWDs) subject to work requirements from age 54 to age 64, extending requirements to additional parents, and eliminating exemptions for several vulnerable populations. These provisions are expected to substantially increase the number of individuals referred to the workforce system through Florida's SNAP Employment and Training referral process.

The proposed waiver focuses on a newly defined Work Requirement Participant (WRP) Cohort, consisting of individuals who engage with the workforce system primarily to satisfy federal benefit eligibility requirements rather than to pursue traditional career development pathways. CSSF's analysis indicates that these customers often participate in short-term or part-time activities designed to meet benefit compliance standards, which differs significantly from the engagement patterns of traditional WIOA participants. As a result, enrolling these individuals as WIOA participants may place downward pressure on federally negotiated performance measures, particularly Median Earnings and Measurable Skill Gains, despite boards providing appropriate services and support.

The waiver does not seek to exempt participants from reporting requirements or remove them from federal accountability systems. Instead, it proposes that WRP outcomes continue to be fully measured and reported across all six WIOA primary performance indicators while allowing federal and state performance negotiations to account for this distinct cohort through separately adjusted performance targets. This approach preserves accountability, transparency, and participant-level reporting while reducing potential disincentives for local workforce boards to serve individuals affected by expanded federal work requirements.

STRATEGIC SIGNIFICANCE

The waiver offers several potential benefits for both Florida's workforce system and local workforce development boards. Most importantly, it helps ensure continued alignment with WIOA's mission of serving individuals with barriers to employment by removing performance-related disincentives associated with serving this population. The proposal would also provide protection against potential performance sanctions driven by changes in federal benefit policy rather than workforce program effectiveness.

At the statewide level, the proposal seeks to protect Florida's negotiated WIOA performance outcomes by recognizing the unique characteristics of the WRP population while continuing to utilize existing federal accountability and statistical adjustment frameworks. The approach is intentionally narrow in scope, legally defensible, and consistent with existing WIOA waiver authorities. Additionally, it promotes stronger alignment among workforce, public assistance, and economic opportunity programs administered by FloridaCommerce, the Department of Children and Families, and local workforce boards.

FUNDING: N/A

PERFORMANCE: N/A

ATTACHMENT

MEMORANDUM

TO: Ms. Adrienne Johnston, President & Chief Executive Officer, CareerSource Florida

FROM: Rick Beasley, Executive Director, South Florida Workforce Investment Board d/b/a CareerSource South Florida (Local Workforce Development Board 23)

DATE: July 21, 2026

RE: **State of Florida WIOA Waiver Request — Work Requirement Participant (WRP) Performance Accountability — Briefing in Preparation for Our Meeting**

I. PURPOSE OF THIS BRIEFING

CareerSource South Florida (Local Workforce Development Board 23, Miami-Dade County) developed and initiated the attached statewide WIOA waiver request addressing the performance-accountability conflict created by the expanded federal work requirements under P.L. 119-21 (H.R. 1). The waiver is submitted by the Governor of Florida — in consultation with chief local elected officials — through CareerSource Florida (the State Workforce Development Board) and FloridaCommerce (the Title I administrative entity), with CareerSource Florida and FloridaCommerce named as the State leads. This briefing is prepared for our meeting to equip you to:

- Understand the waiver's structure and the single design choice that makes it approvable;
- Weigh the local and statewide performance impact both of acting and of not acting;
- Consider the respective roles of CareerSource Florida and FloridaCommerce in implementation; and
- Review the cohort methodology CSSF has developed and offers as a ready statewide template; and
- Anticipate the questions the request will draw from the CareerSource Florida Board of Directors, the local boards, and ETA.

Our shared objective is a narrowly tailored, approval-oriented request that neutralizes the performance disincentive without abandoning accountability — and positions Florida to implement cleanly and early.

II. Overview of the Waiver

The core idea in one line: the waiver changes how a defined cohort's outcomes count toward negotiated performance targets — not whether those outcomes are measured and reported.

Instrument	Statewide WIOA statutory/regulatory waiver request (DRAFT).
Authority	WIOA §189(i)(3)(B); 20 CFR 679.600–679.640 (general waiver authority).
Submitted by	Governor of Florida, through CareerSource Florida (State Board) and FloridaCommerce (Title I administrative entity). Developed and initiated by CareerSource South Florida (LWDB 23).
State leads	Adrienne Johnston, President, CareerSource Florida; J. Alex Kelly, Secretary, FloridaCommerce.
Submitted to	U.S. DOL Employment & Training Administration (ETA), Office of Workforce Investment.
What is waived	Standard application of the §116 performance requirements — for the Work Requirement Participant (WRP) cohort only.
What is preserved	Full collection and reporting of all six primary performance indicators for every WRP served. No served individual leaves the reporting system.
Duration	Up to four years, not to exceed the current WIOA Combined State Plan. ETA decides within 90 days; the approval letter serves as the governing MOU.

The Trigger. H.R. 1 (signed July 4, 2025) raised the SNAP ABAWD work-requirement 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. It also created the first federal Medicaid community-engagement requirement (effective no later than January 1, 2027; CMS issued the implementing Interim Final Rule on June 1, 2026). Both condition continued benefits on roughly 80 hours per month of qualifying activity. Because Florida has not adopted ACA Medicaid expansion, the expanded SNAP ABAWD requirement is the operative statewide driver.

The Pipeline and the Problem. These customers already reach Florida's CareerSource centers through the DCF–FloridaCommerce SNAP E&T referral channel, and H.R. 1 sharply increases that inflow. Because the Work Requirement Participant (WRP) cohort engages part-time and short-term simply to document compliance, enrolling them as WIOA Title I participants exerts predictable downward pressure on the six §116 primary indicators — most acutely Median Earnings and Measurable Skill Gains. The result is a rational disincentive for boards to serve them as participants, in tension with WIOA's emphasis on individuals with barriers to employment.

The Request. Florida asks ETA to waive the standard application of §116 accountability for the WRP cohort only, to (1) designate and track WRPs as a distinct, disaggregable cohort; (2) preserve full reporting of all six primary indicators; and (3) evaluate WRP outcomes against separately negotiated, adjusted levels of performance for State and local success/sanction determinations.

The Design Choice That Makes It Approvable. Florida deliberately rejected two broader options — excluding negative WRP outcomes from the indicators, and carving the cohort out of Median Earnings — because both would remove served individuals from the reporting system, which ETA treats as a basic purpose of Title I that cannot be waived (WIOA §189(i)(3)(A); 20 CFR 679.610). Preserving full reporting is the crux of the strategy: relief runs through WIOA's existing statistical-adjustment logic (§116(b)(3); 20 CFR 677.170) rather than around the accountability system.

III. ADVANTAGES — LOCAL AND STATE IMPACT

The waiver's value accrues at both levels of the system CareerSource Florida oversees.

Local impact:

1. **Realigns incentives with mission.** Removes the disincentive to serve high-barrier customers, restoring alignment between board behavior and WIOA's core purpose.

2. **Shields local boards from unfair sanctions.** Protects the boards from performance consequences driven by federal program design rather than board effort.

3. **Deliberately narrow scope.** A light-touch, self-service first line keeps many WRPs from ever reaching participant status, so the waiver reaches only staff-assisted cases.

Statewide impact:

- **Protects the State's negotiated performance.** Florida's statewide §116 levels are computed from the same cohorts and negotiated with USDOL against the same indicators. Whatever these customers do to local numbers registers in the aggregate the State reports to Washington — so a solution that protects the local boards protects the State.

- **Uses tools WIOA already provides.** The statistical adjustment model already adjusts performance levels for participant characteristics and economic conditions; the waiver extends that same logic to a federally-defined cohort — no new mechanism required.

- **Legally and politically defensible.** Narrowly tailored, fully transparent, and expressly designed within the limits of the Secretary's waiver authority under §189(i)(3)(A).

- **Advances systems alignment.** Integrates DCF (SNAP/Medicaid eligibility), AHCA (Medicaid), FloridaCommerce, and the local boards, reducing fragmentation across benefit and workforce programs and advancing the State's REACH Act goals.

- **First-mover position.** This is a national problem with a national fix; Florida is well positioned to implement cleanly and early, and the model is replicable for other states — strengthening Florida's standing in federal workforce-policy discussions.

IV. Risks and Vulnerabilities

1. **Accountability optics.** A cohort-specific "adjusted level" can be characterized as diluting accountability or masking weak outcomes, even with full reporting preserved. Mitigation: full primary-indicator reporting, disaggregated supplemental reporting, and reliance on the existing statistical-adjustment mechanism.

2. **Discretionary approval.** Relief depends entirely on ETA's discretion; approval, denial, or added conditions are all possible, and the "MOU-by-approval-letter" mechanism gives ETA leverage over the final terms.

3. **Unquantified scale.** Projected referral volume is still to be quantified via a DCF–FloridaCommerce data match; reviewers will want hard numbers to gauge materiality. Mitigation: complete the data match and present the WRP count as a range with the submission.

4. **Implementation lift.** WRP flagging, the data match, Employ Florida configuration, statewide policy guidance, and staff training across all 21 local boards is a substantial undertaking; negotiating cohort-specific levels adds complexity and potential local disputes.

5. **Does not address resources.** The waiver fixes the performance disincentive but not the workload and funding strain of a much larger customer volume — a natural companion point for federal advocacy.

6. **Labeling concerns.** A formal "Work Requirement Participant" designation may invite scrutiny about tracking or labeling benefit recipients, notwithstanding its additive, non-stigmatizing design.

7. **Medicaid element is speculative in Florida.** With no ACA Medicaid expansion, the community-engagement population is limited; the Medicaid framing, while structured to extend automatically, could be seen as premature.

8. **Sustainability.** Success depends on a durable DCF partnership and data infrastructure across a multi-year term.

V. How CareerSource Florida and FloridaCommerce Can Implement

The waiver is submitted by the Governor, in consultation with chief local elected officials, through CareerSource Florida (State Board) and FloridaCommerce (Title I administrative entity). Responsibilities divide naturally along existing roles. CSSF is prepared to support each step and, if useful, to pilot flagging and service segmentation in LWDB 23.

Lead	Responsibilities
CareerSource Florida (State Board)	• Develop/modify the WIOA Combined State Plan to incorporate the waiver on the Governor's behalf (WIOA §101(d); s. 445.003(2), F.S.). • Present the waiver to the CareerSource Florida Board of Directors and secure State Board endorsement. • Lead engagement across the 21 local boards and chief local elected officials, and conduct the required public-comment process (minimum 30 days, including business and organized labor). • Sponsor the submission to ETA and serve as State point of contact on negotiated terms.
FloridaCommerce (Title I administrative entity)	• Configure Employ Florida to flag and disaggregate the WRP cohort, and confirm the data flows correctly to the State's reporting. • Operationalize the DCF–FloridaCommerce data match to define the cohort and quantify scale. • Issue statewide policy guidance to all 21 local boards on WRP designation criteria, the reportable-individual vs. participant distinction, exit and reporting mechanics, and data-validation treatment. • • Lead negotiation of the separately adjusted levels of performance with ETA and administer the resulting MOU and §116 reporting.

Suggested near-term sequence

1. **Quantify.** Complete the DCF–FloridaCommerce data match to size WRP referral volume (as a range), applying the CSSF cohort methodology in Section VI — the single most-requested figure.

2. **Finalize.** Bring the DRAFT to State Board review and CLEO consultation.

3. **Comment.** Publish for public comment (≥30 days) and document responses.

4. **Submit.** File with ETA; decision within 90 days; the approval letter serves as the governing MOU.

5. **Operationalize in parallel.** Configure Employ Florida and issue statewide guidance so implementation can begin on approval. Term: up to four years, not to exceed the current Combined State Plan, renewable on demonstrated outcomes.

VI. CSSF Cohort Methodology

As the originating board, CSSF has developed a cohort methodology that the State can adopt as a ready statewide template. It does the three things the request depends on: it defines the WRP cohort precisely, sizes it defensibly, and quantifies its effect on the §116 indicators. CSSF offers to share the methodology in full, to support the DCF–FloridaCommerce data match, and to pilot it in LWDB 23.

A. Cohort definition. The WRP cohort comprises individuals who receive staff-assisted WIOA Title I services — and, where scoped, Wagner-Peyser — in connection with a SNAP ABAWD/E&T work requirement, or, to the limited extent applicable in Florida, a Medicaid community-engagement requirement, identified from the DCF referral. The definition turns on the reportable-individual vs. participant distinction (20 CFR 677.150): only customers who cross into participant status enter the primary indicators; the self-service, information-only first line is excluded by design. Designation is additive — a WRP who elects deeper services (for example, training toward a credential) is served and reported as any other participant while remaining flagged for disaggregation.

B. Identification and flagging. The cohort is tagged at intake from two authoritative sources: the DCF Employment and Training Referral Letter and the underlying DCF work-requirement determination and exemption status. A DCF–FloridaCommerce data match applies these at the record level. Each flagged record captures the referral basis (SNAP ABAWD or Medicaid community engagement), the work-requirement determination date, the exemption-loss category (newly-covered 55–64 band, parent of a child 14 or older, veteran, individual experiencing homelessness, former foster youth), and the service level (self-service vs. staff-assisted participant). Pending Employ Florida configuration, CSSF can run an interim manual flag so no record is lost.

C. Sizing the cohort. CSSF sizes the cohort with a funnel that moves from the SNAP caseload to the projected participant count, expressed as a low–expected–high range with sensitivity on the staff-assisted conversion rate:

Estimation step	Input / basis
SNAP caseload (area or statewide)	*DCF / ACCESS Florida*
× Non-exempt ABAWD share, ages 18–64 (H.R. 1–expanded, less exemptions)	*P.L. 119-21; DCF determinations*
× SNAP E&T mandatory-participation rate	*FloridaCommerce (FFY2024 baseline, extended to 64)*
× DCF → CareerSource referral rate	*Referral-letter volumes*
× Staff-assisted conversion rate (share reaching participant status)	*Employ Florida service records*
= Projected WRP participant count (low–expected–high)	*DCF–FloridaCommerce data match*

For LWDA 23, CSSF applies Miami-Dade caseload inputs; the same funnel scales to the State by substituting statewide inputs. The DCF–FloridaCommerce data match operationalizes the funnel at the record level and replaces the planning estimate with an actual range.

D. Estimating the performance impact. CSSF maps the cohort to the six §116 primary indicators and estimates the net drag on each by comparing projected cohort outcomes to the negotiated levels, weighted by the cohort's share of the relevant exit cohort:

Primary indicator	Anticipated impact of WRP enrollment	Disincentive
Median Earnings, Q2 after exit	Compliance is satisfied at ~80 hours/month; part-time earnings pull the median below levels expected of career-seeking participants.	**HIGH**
Measurable Skill Gains	Short-term, activity-based engagement often yields no documented skill gain within the program year.	**HIGH**
Employment Rate, Q2 after exit	Intermittent attachment and benefit-driven exits make quarter-specific 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	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**

The weighted comparison yields an estimated effect, per indicator, at both the LWDA 23 and statewide levels — the quantitative basis for the separately negotiated adjusted levels the waiver requests.

E. Tracking and data-validation. For every WRP participant, CSSF preserves a producible record — designation basis, determination date, services delivered, and exit reason and date — supports disaggregated supplemental reporting to ETA, and documents source records for data-validation and monitoring defensibility. The estimate is refreshed quarterly as the data match matures.

F. Statewide implementation. The same methodology scales to a State-owned implementation that FloridaCommerce would run and standardize across the 24 boards. CSSF offers it as a template; the statewide version is the State's to own. Each element resolves to a single statewide instance rather than 24 local variants:

Methodology element	Statewide implementation (State-owned, standardized across the 24 boards)
Cohort definition	FloridaCommerce issues one statewide definition and guidance so every board identifies WRPs identically — one definition, not 21. Divergent local practice is itself a monitoring risk for the State.
Identification & flagging	Employ Florida is configured centrally with the WRP flag and disaggregation fields; every board flags from the same DCF referral and determination data, so records are consistent statewide.
Sizing (the funnel)	A single statewide DCF–FloridaCommerce data match runs the funnel against the ACCESS caseload — one match, not 24 — producing the State's WRP range and each area's share from the same source.
Performance impact	The State computes the aggregate §116 effect once and carries it into the separately negotiated adjusted levels with USDOL — the same figures that protect the local boards protect the State's reported numbers.
Tracking & validation	Standardized source-documentation and data-validation treatment are issued statewide, so a monitor sees one consistent, defensible basis across every board.

Because each element resolves to a single statewide instance — one definition, one flag configuration, one data match, one negotiation — FloridaCommerce can implement the method at scale without adjudicating 21 local approaches, and the boards inherit a consistent, monitoring-defensible convention. CSSF is prepared to hand over its definitions, funnel, and impact model to seed that statewide build, and to pilot in LWDB 23.

VII. Anticipated Questions and Suggested Responses

Q. Doesn't this weaken workforce accountability?

A. No. Every WRP receiving direct services is still measured and reported across all six indicators. The waiver adjusts only how those outcomes count toward negotiated targets, applying WIOA's existing statistical-adjustment logic to a cohort whose engagement profile differs by federal design.

Q. Then why not simply exclude these customers from the metrics?

A. Because ETA treats the §116 reporting system as a basic purpose of Title I that cannot be waived. Removing served individuals would likely be denied. Preserving full reporting is precisely what makes this request approvable.

Q. What is the State's exposure if we do nothing?

A. The H.R. 1 inflow arrives regardless of the waiver. Without relief, local boards face a rational disincentive to serve these customers as participants, and any resulting outcomes still register in Florida's statewide §116 performance negotiated with USDOL. The waiver protects both the local boards and the State's aggregate numbers.

Q. How large is the affected population?

A. Florida has roughly 2.59 million SNAP recipients (about one in eight residents). The age expansion alone brings the 55–64 band newly under the requirement, and DCF projects that roughly 181,000 residents could lose benefits absent compliance — the pool from which E&T referrals are drawn. The WRP participant count is a subset, since many customers are handled through the self-service first line; the precise figure is being quantified through a DCF–FloridaCommerce data match and should accompany the submission as a range.

Q. What must the State do before submission, and on what timeline?

A. The Governor requests the waiver in consultation with chief local elected officials; CareerSource Florida develops the Combined State Plan modification and engages the State Board and the 24 local boards; and Florida provides a public-comment period of at least 30 days. ETA then issues a decision within 90 days of receipt, and the approval letter serves as the governing MOU.

Q. Does this reduce services to the traditional WIOA population?

A. No. WRP designation is additive. Any WRP customer who elects deeper services — for example, training toward a credential — is served and reported exactly like any other participant.

Q. What about the cost of serving many more people?

A. The waiver resolves the performance disincentive, not the resource strain. Additional volume without additional funding is a real pressure — and a natural companion advocacy point at the federal level.

Q. Could ETA see cohort-specific adjusted levels as an end-run on accountability?

A. That is the principal risk. It is mitigated by full primary-indicator reporting, disaggregated supplemental reporting of the cohort, and reliance on the statistical-adjustment mechanism WIOA already authorizes — but it is the point on which the request is most likely to be tested.

I welcome the opportunity to discuss how CareerSource Florida and FloridaCommerce might advance this request. CSSF stands ready to apply the cohort methodology set out above, to provide the resulting cohort data and impact analysis, and to support implementation and a pilot in LWDB 23 at your convenience.

SFWIB EXECUTIVE COMMITTEE

DATE: 8/13/2026

AGENDA ITEM NUMBER: 5

AGENDA ITEM SUBJECT: FOSTER YOUTH APPRENTICESHIP LEGISLATIVE PROPOSAL – STATUS UPDATE

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

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

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

BACKGROUND:

CareerSource South Florida (CSSF) has developed a legislative proposal intended to align Florida's foster youth support statutes with the State's growing emphasis on Registered Apprenticeship and work-based learning. The proposal originated from CSSF's Youth Program framework and seeks to ensure that youth transitioning from foster care may fully access existing state benefits while participating in registered apprenticeship and pre-apprenticeship programs.

The proposal would amend sections 409.1451 and 1009.25, Florida Statutes, by clarifying that registered apprenticeship and pre-apprenticeship programs constitute the "vocational school equivalent" of full-time enrollment for purposes of existing foster youth benefits and by extending the current tuition and fee exemption to eligible pre-apprentices. The proposal does not create a new program, establish a new eligibility category, or require additional state appropriations. Instead, it would allow existing benefits to follow eligible foster youth into the apprenticeship pathway already encouraged by state workforce policy.

The proposal addresses a gap identified by CSSF in which foster youth participating in apprenticeship may not clearly qualify for benefits that support housing stability and educational participation because current statutory language is tied primarily to traditional postsecondary enrollment measures. The proposal seeks to provide parity between college and apprenticeship pathways while preserving existing eligibility and administrative oversight.

Updated Information for the Board

CSSF has completed stakeholder review of the proposal with child welfare and workforce partners, including Citrus Family Care Network, the Circuit 11 community-based care lead agency serving Miami-Dade and Monroe Counties, and representatives from Voices for Children Foundation. Feedback received during the review process was incorporated into the legislative language.

The proposal has secured a Senate sponsor for the 2027 Legislative Session. Senator Alexis Calatayud, Chair of the Senate Committee on Education Postsecondary, has agreed to sponsor the measure. This support represents a significant milestone toward advancing the proposal during the upcoming legislative session.

In addition, Miami-Dade County Mayor Daniella Levine Cava has directed that the proposal be included in the County's legislative package and has encouraged pursuit of Board of County Commissioners support as part of the County's state lobbying priorities. County intergovernmental affairs and legislative staff are currently assisting with advancing the proposal.

CSSF is now working with workforce, child welfare, and state agency partners to identify a House sponsor and conduct technical reviews with relevant state agencies prior to bill filing. If filed for the 2027 Legislative Session, the proposal would advance as a state workforce and foster youth support initiative intended to strengthen access to apprenticeship opportunities while preserving housing and educational supports for eligible youth.

FUNDING: N/A

PERFORMANCE: N/A

ATTACHMENT

LEGISLATIVE BRIEFING

TO: **The Honorable Alexis Calatayud**
Florida Senate, District 38
Chair, Committee on Education Postsecondary

FROM: **Mr. Rick Beasley, Executive Director**
CareerSource South Florida (LWDB 23)

DATE: July 22, 2026

RE: **Aligning Florida's foster youth benefit statutes with the State's apprenticeship strategy — proposed amendments to ss. 409.1451 and 1009.25, F.S.**
Supporting evidence: OPPAGA Report No. 22-08 (Dec. 2022); Florida's 14 Youth Program Elements Waiver (May 2026); national outcome data; and the Washington State precedent at ch. 28B.117 RCW.

I. PURPOSE OF THE LEGISLATIVE PROPOSAL

Florida has made a deliberate policy decision to move at-risk youth into apprenticeship. Through the 14 Youth Program Elements Waiver — developed by CareerSource South Florida and advanced by FloridaCommerce and CareerSource Florida — the State has asked the U.S. Department of Labor for the flexibility to concentrate WIOA youth funding on work experience, pre-apprenticeship, and Registered Apprenticeship. That is the service-delivery side of the system.

The benefit side has not moved with it. The two statutes that make postsecondary participation financially survivable for a young adult who has aged out of foster care — the Road-to-Independence Postsecondary Education Services and Support (PESS) stipend under s. 409.1451, F.S., and the fee exemption under s. 1009.25, F.S. — still measure eligibility against a credit-hour degree model. A youth the workforce system places into a Registered Apprenticeship may therefore be at risk of losing the stipend that pays for housing, because a four-year apprenticeship does not look like nine credit hours.

This proposal closes that gap. It is a two-section clarification, not a new program. It creates no new benefit, no new eligibility class, and no new appropriation. It defines an existing statutory term — "the vocational school equivalent" of full-time enrollment — by reference to the apprenticeship definitions the Legislature has already adopted in ch. 446, F.S., and it extends to pre-apprentices the same fee exemption apprentices already have.

The Proposal at a Glance	
What it does	Clarifies that enrollment in an approved apprenticeship or pre-apprenticeship program is the "vocational school equivalent" of full-time enrollment for PESS, and extends the s. 1009.25 fee exemption to pre-apprentices.
Who it covers	Young adults already eligible for PESS and the foster care fee exemption. No new population is added.
Statutes amended	s. 409.1451(2)(a)4., F.S., and s. 1009.25(1)(b), F.S. Two subparagraphs. One optional third provision is offered in reserve.
Fiscal posture	No new appropriation requested. Youth in apprenticeship earn progressive wages from day one, which offsets — rather than adds to — the State's support obligation.
What it is not	Not a new scholarship program, not a new administering office, not an expansion of who qualifies as a former foster youth, and not a change to the underlying eligibility criteria in s. 1009.25(1)(c), F.S.

This briefing sets out (1) the Florida evidentiary record; (2) the national outcome data; (3) the State's own apprenticeship commitment under the waiver; (4) the controlling synthesis; (5) a comparison to Washington State, the only state to have legislated this alignment directly; (6) the statutory redline; (7) suggested legislative findings; (8) a finding-to-provision crosswalk; and (9) the timing relationship to the forthcoming OPPAGA housing study.

II. EVIDENTIARY BASIS

A. OPPAGA Report No. 22-08 — the traditional pathway is failing this population in Florida.

OPPAGA's December 2022 review of Florida's homeless and foster youth services predates the State's apprenticeship-expansion strategy and does not itself address work-based learning. What it documents, precisely, are the failures in the credit-hour pathway that these amendments are designed to remedy — and its recommendations on benefit administration, eligibility duration, and housing map directly onto the changes proposed here.

- **Postsecondary participation is far below peers.** Roughly 20 percent of foster youth attend a postsecondary institution, against 66 percent of the general population. Of the youth OPPAGA identified as eligible for the tuition waiver, only 18 percent had any Florida College System or State University System enrollment during the review period.

- **Completion is rare.** Fewer than 1 in 10 foster youth complete a two- or four-year degree by early adulthood. Among waiver-population students who first enrolled in the Florida College System, 18 percent completed an associate degree during the review period.

- **Housing is the single greatest unmet need.** Safe and affordable housing was the primary need identified across OPPAGA's interviews and focus groups, and most institutions do not prioritize housing for these students. One youth reported campus room and board costing twice the PESS stipend; youth also cited the absence of an adult to cosign and a lack of established credit. OPPAGA recommended that institutions prioritize housing for foster youth (Rec. 5).

- **Benefit eligibility is case-by-case and administratively fragile.** Eligibility is determined by community-based care lead agencies case-by-case; DCF maintains no list of eligible youth; and youth reported delays, coverage gaps, and repeated demands to resubmit documentation — including roughly 1 in 10 transfer students who received no waiver in their first term after transferring. OPPAGA recommended that DCF generate lists of newly eligible youth and build an eligibility-verification system (Recs. 1–2).

- **Interrupted enrollment is the norm, not the exception.** Stop-outs affected 56 percent of Florida College System waiver students and 31 percent of State University System waiver students, lengthening time-to-credential.

- **The age-28 cliff pressures youth.** Eligibility ends at age 28, and youth reported feeling rushed to finish before losing it. OPPAGA recommended that the Legislature consider raising the age (Rec. 3).

B. National data — the same failure, at national scale, and a documented alternative.

The national research literature confirms that Florida's experience is not a Florida problem. It also supplies what OPPAGA does not: outcome data on the alternative pathway.

Degree attainment for youth who age out

- *Chapin Hall's Midwest Evaluation of the Adult Functioning of Former Foster Youth* (outcomes at age 26) found that while about 40 percent of these young adults had completed at least one year of college, only 8 percent held a postsecondary degree from a two- or four-year institution.

- Cross-state syntheses of linked administrative data and the major longitudinal studies (Midwest Evaluation, CalYOUTH) place degree attainment for youth who age out at roughly 8 to 12 percent by the mid-to-late twenties, against approximately half of the general population.

- Between 25,000 and 30,000 young people age out of foster care nationally each year, entering adulthood without the family financial backstop most students rely on.

Housing — the constraint that drives everything else

- Longitudinal research reports that between 31 and 46 percent of youth who age out of foster care experience at least one episode of homelessness by age 26, compared with roughly 4 percent of a nationally representative sample of peers in the same age range.

- Recent syntheses place the rate of homelessness during the transition to adulthood at 22 to 30 percent. This is the national counterpart to OPPAGA's Florida finding that housing is the primary unmet need, and it is why the PESS stipend — a housing-and-living-expense benefit — is the operative benefit in this package.

The alternative pathway has the stronger outcome record

- The U.S. Government Accountability Office reported in April 2025 that Registered Apprenticeship Programs enrolled approximately 940,000 people in FY 2024, and that apprentices who completed a program between April 2022 and March 2023 earned average annual wages of about $80,000 in their first year after exit.

- The U.S. Department of Labor's guidance to the public workforce system reports that apprenticeship completers retain employment at rates above 90 percent, and that apprenticeship contributes positively to every WIOA primary indicator — employment, retention, earnings, credential attainment, and measurable skill gains — because the apprentice is employed from the first day.

- For a population whose defining constraint is housing, the decisive feature is not the completion wage but the **timing of income**. A degree pathway asks a housing-insecure young adult to absorb two to four years of cost before the first paycheck. An apprenticeship pays a progressive wage from day one, alongside the stipend, with little or no student debt.

Sources: OPPAGA Report No. 22-08, Homeless and Foster Youth Services (Dec. 2022); Courtney et al., Midwest Evaluation of the Adult Functioning of Former Foster Youth: Outcomes at Age 26, Chapin Hall at the University of Chicago (2011); Dworsky, Napolitano & Courtney, homelessness among youth aging out of foster care (Am. J. Public Health, 2013); U.S. GAO, Apprenticeship: Earn-and-Learn Opportunities Can Benefit Workers and Employers, GAO-25-107040 (Apr. 28, 2025); USDOL ETA, TEGL No. 13-16, Attachment III.

III. THE 14 YOUTH PROGRAM ELEMENTS WAIVER

In May 2026, FloridaCommerce and CareerSource Florida advanced the State's 14 Youth Program Elements Waiver — a strategy developed by CareerSource South Florida — requesting a waiver of WIOA § 129(c)(2) and 20 CFR 681.460(a) so that each local workforce development area may concentrate youth funding on work experiences, expressly including pre-apprenticeships and Registered Apprenticeships, and on occupational skills training, rather than being required to provide all fourteen youth program elements. The request aligns with TEGL No. 05-25 and with America's Talent Strategy, Pillar I (Industry-Driven Strategies) and Pillar V (Flexibility and Innovation). The 30-day public comment period closed June 11, 2026, with no comments received.

The waiver is pending before the U.S. Department of Labor, Employment and Training Administration.

- **The State's stated rationale is a worsening youth-employment gap.** Florida's youth unemployment rate has risen 3.4 percentage points from its April 2025 low of 7.6 percent — an increase more than five times the corresponding rise at the national level. Florida's remedy is to concentrate youth funding on work-based learning and apprenticeship.

- **Work-based learning participation is collapsing on the current trajectory.** Per the waiver's own baseline data, youth participating in work-based learning fell from 1,990 in PY 2023 to 1,360 in PY 2024 to 411 through PY 2025 Q2. Participating employers fell from roughly 3,020–3,037 to 1,998 over the same period.

- **The waiver commits the State to measurable increases.** It targets five percent increases in youth work-based learning participation, occupational skills training completion, and employer partnerships, together with improved entered-employment, measurable-skill-gain, and credential-attainment outcomes.

The fourth stated strategic goal of the waiver is to improve service provision for at-risk youth with complex needs. Aged-out foster youth are the clearest instance of that population in the State's caseload.

IV. THE CONTROLLING SYNTHESIS

Read together, the Florida record, the national record, and the State's own waiver describe a single, resolvable contradiction. The evidence establishes that aged-out foster youth are among the least likely of any group to enter or complete a credit-hour degree. The waiver establishes that Florida has now made a deliberate policy choice to move these same youth into apprenticeship and pre-apprenticeship. Yet the benefit statutes that make participation financially viable still key full-time-equivalent eligibility to the degree model.

Service-delivery side (where the State is going)	Benefit side (where the statutes still are)
WIOA youth funding concentrated on work experience, pre-apprenticeship, and Registered Apprenticeship.	PESS full-time-equivalent eligibility measured in credit hours, with "vocational school equivalent" undefined for apprenticeship.
Local boards affirmatively steering at-risk youth — including foster youth — into multi-year earn-and-learn programs.	Fee exemption naming apprentices but not pre-apprentices.
Performance targets tied to work-based learning participation and credential attainment.	Eligibility determined case-by-case by lead agencies, with documented gaps and resubmission burdens.

The consequence is that the State channels a foster youth into apprenticeship with one hand while the benefit that funds that youth's housing does not clearly follow. This package is the benefit-side companion to the waiver. It ensures that when Florida directs a young adult into a Registered Apprenticeship, the stipend and the fee exemption travel with the youth — without the case-by-case friction the record documents.

V. COMPARATIVE LEGISLATIVE LANGUAGE — WASHINGTON STATE

Washington is the state that has legislated this alignment most directly, and its statute is the most useful drafting reference available. In 2018, the Washington Legislature restructured its foster youth postsecondary support program into Passport to Careers, codified at ch. 28B.117 RCW, with two co-equal pathways: the Passport to College Promise program and the Passport to Apprenticeship Opportunities program. The Legislature expanded the program again in 2024.

The core Washington drafting move is the one this package proposes for Florida: apprenticeship is written into the statute as an enrollment pathway equal in dignity to degree enrollment, rather than left to be inferred from an undefined equivalence term. Washington's statement of purpose provides that the program exists to encourage current and former foster youth and unaccompanied homeless youth to prepare for, enroll in, and complete higher education or a registered apprenticeship or pre-apprenticeship program — the disjunctive appears in the purpose section itself, and it carries through every operative provision.

Provision-by-provision comparison

Design element	Washington (ch. 28B.117 RCW)	Florida today	Florida under this proposal
Statutory purpose	RCW 28B.117.010 states the purpose as preparing for and completing higher education or a registered apprenticeship or pre-apprenticeship.	Purpose framed around postsecondary enrollment; apprenticeship not named in the benefit statutes' framing.	Legislative findings in Part VII supply the equivalent statement of intent.
Enrollment pathway	RCW 28B.117.030(3)(c): student must enroll at least half-time with an institution of higher education or a registered apprenticeship or recognized pre-apprenticeship.	s. 409.1451(2)(a)4.: "full-time" means 9 credit hours "or the vocational school equivalent" — which is nowhere defined for apprenticeship.	Amendment 1 defines the vocational school equivalent to include approved apprenticeship and pre-apprenticeship under s. 446.021.
Satisfactory progress	RCW 28B.117.030(3)(d): progress measured toward a degree, certificate, or registered apprenticeship or pre-apprenticeship.	Progress measured on academic terms only.	Optional Amendment 3 keys continued eligibility to satisfactory progress in the apprenticeship.

Duration of eligibility	RCW 28B.117.030(5)(b) and (6)(c): six years or 150 percent of the published program length — the same measure for both pathways. Duration follows the program, not a birthday.	Hard cutoff at age 28 under s. 1009.25, which OPPAGA found leaves youth feeling rushed (Rec. 3).	Optional Amendment 3 protects a youth already in a program at age 28 through completion.
Costs covered	RCW 28B.117.030(6)(b): assistance for apprenticeship and pre-apprenticeship entrance requirements and occupational-specific costs.	Exemption reaches tuition and fees; silent on program-required and related-instruction fees.	Amendment 2 confirms the exemption reaches related technical instruction and program-required fees.
Identification and verification	RCW 28B.117.040 directs the child welfare agencies to devise procedures for promptly and accurately identifying eligible students and sharing that information with the administering office and institutions, with consent safeguards.	Lead agencies determine eligibility case-by-case; DCF maintains no list (OPPAGA Recs. 1–2).	Amendment 1 makes the full-time-equivalent determination follow from verified registration. See the drafting note in Part VI.
Pathway switching	RCW 28B.117.030(7): a recipient may use either pathway at different times, but not concurrently, subject to a combined cap.	No express provision; a youth moving between college and apprenticeship risks a coverage gap.	Addressed in substance: both pathways qualify, so movement between them does not break eligibility.

What Florida should take from Washington — and what it should not

Take: four design principles that translate cleanly into Florida law — (1) name apprenticeship and pre-apprenticeship in the statute rather than relying on an undefined equivalence term; (2) measure duration by program length rather than by a birthday; (3) make the benefit reach the costs a program actually charges; and (4) resolve eligibility at the system level rather than case-by-case at intake.

Do not take: the structure. Washington built a new program. Passport to Careers created a scholarship, an administering state agency role, an advisory committee, contracted nongovernmental service providers, and a recurring appropriation, and it made program operation expressly contingent on funds being appropriated. Florida does not need any of that, because Florida already has both benefits — the PESS stipend and the fee exemption — on the books, already funded, and already serving this exact population. What Florida lacks is one definition and one word.

This is the fiscal argument, and it is the argument to lead with. Washington had to appropriate money to reach apprenticeship parity because it was building a program. Florida reaches the same result by amending two subparagraphs, because the benefit already exists and the youth in question are already eligible for it. The only thing that changes is whether the benefit follows the youth into the pathway the State is now steering that youth toward.

Sources: ch. 28B.117 RCW (Passport to Careers), RCW 28B.117.010, .030, and .040; Laws of 2018, ch. 232; Laws of 2024, ch. 323.

VI. STRENGTHENED STATUTORY AMENDMENTS

Legend. Proposed new language is shown in **<u>bold underline</u>**. No deletions are proposed. Current text is reproduced from the 2025 Florida Statutes and is shown in condensed form where the omitted text is not affected.

Amendment 1 — s. 409.1451(2)(a)4., F.S. (the operative fix)

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. A community-based care lead agency shall accept verification of the youth's registration in such a program as establishing full-time-equivalent enrollment, and a youth who has</u>**

	<u>established eligibility under this subparagraph may not be required to resubmit enrollment verification more than once per program term to maintain the award and the housing supports linked to it under this section and s. 1009.25.</u> A student may enroll part-time if he or she has a recognized disability …

Note. *The first added sentence is the operative fix: it supplies the missing definition of "vocational school equivalent" using the definitions the Legislature has already adopted in ch. 446, F.S. The second added sentence responds to OPPAGA Recommendations 1–2 by tying the full-time-equivalent determination to verified registration and barring repeated term-by-term documentation demands — the precise coverage gaps and resubmission burdens OPPAGA documented. The scope remains surgical: one subparagraph.*

Drafting note for staff — the verification sentence

Independent-living advocates who reviewed this package endorsed the core clarification without reservation and recommended framing the bill exactly as it is framed here: no new benefit, no expanded eligibility, a clarification of "vocational school equivalent" using existing ch. 446 definitions.

They flagged one point worth resolving before filing. An earlier draft of the verification sentence provided that registration "conclusively establishes" full-time-equivalent enrollment "without a case-by-case determination." That formulation reaches into administrative implementation and could be read to limit the department's existing oversight. The version shown above has been narrowed accordingly.

Two further options are available if the department raises concerns: (a) add "in accordance with rules adopted by the department" to the verification sentence, preserving DCF rulemaking; or (b) drop the verification sentence entirely and rely on the first sentence alone, which is the operative fix. Option (b) preserves the core result. The verification sentence exists because lead-agency intake practice is inconsistent — some staff do not currently recognize a Registered Apprenticeship as a qualifying vocational school equivalent — and the sentence is what prevents the definition from being read away at the counter.

Amendment 2 — s. 1009.25(1)(b), F.S. (parity and clarity)

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 **or a pre-apprenticeship program**, as defined in s. 446.021. **The exemption under this paragraph applies to the tuition and fees assessed for the related technical instruction and to any program-required fees charged by an eligible institution under s. 1009.533 in connection with such enrollment.**

Note. *The first addition mirrors the waiver's express inclusion of pre-apprenticeship as a funded work-based-learning activity, and mirrors Washington's treatment of registered apprenticeship and recognized pre-apprenticeship as a single eligible category. The second sentence is a clarifier confirming that the exemption reaches the fees actually charged for related technical instruction and program-required costs — the same ground Washington covers expressly at RCW 28B.117.030(6)(b). If the sponsor prefers to keep paragraph (b) to a single clause, the second sentence can be dropped without affecting the core parity fix.*

Optional Amendment 3 — duration protection for the apprenticeship pathway (OPPAGA Rec. 3)

OPPAGA documented frequent stop-outs and youth feeling rushed to finish before losing eligibility at age 28, and recommended that the Legislature consider raising the age. Registered Apprenticeship terms commonly run three to five years — a duration the waiver actively encourages youth to enter. Washington resolves this by measuring eligibility against the published length of the program rather than against the participant's age. The following optional provision achieves the narrower Florida version of that result: it protects a youth already in a program from losing the exemption mid-term. It may be placed in s. 1009.25 or mirrored for PESS in s. 409.1451.

Suggested optional language
A student who is enrolled in and making satisfactory progress in a registered apprenticeship program, as defined in s. 446.021, on the date the student reaches 28 years of age retains the exemption under this section until the student completes or otherwise leaves the program, but not beyond _____ years of age.

Bracket to resolve: *insert an outer age cap the sponsor is comfortable defending (30 is the natural figure, and is roughly consistent with Washington's six-year / 150-percent measure applied to a multi-year apprenticeship), or delete the outer cap and tie the protection solely to program completion. This provision expands the package beyond the two core sections and should be weighed against the surgical framing; it is offered so it can be added if the age-28 cliff becomes a point of discussion in committee.*

VII. SUGGESTED LEGISLATIVE FINDINGS / STATEMENT OF INTENT

The following may be used as a findings section in the bill or as the "present situation" framing in a staff analysis. Each finding is drawn from OPPAGA Report No. 22-08, from Florida's 14 Youth Program Elements Waiver, from the national research record, or from the underlying benefit statutes.

(1) The Legislature finds that, according to OPPAGA Report No. 22-08 (December 2022), only approximately 20 percent of Florida's foster youth attend a postsecondary institution, compared with 66 percent of their peers, and fewer than 1 in 10 complete a postsecondary degree.

(2) The Legislature further finds that national longitudinal research reports comparable results, with approximately 8 percent of young adults who have aged out of foster care holding a two- or four-year degree by age 26, and with between 31 and 46 percent experiencing at least one episode of homelessness by that age.

(3) The Legislature finds that safe and affordable housing is the primary unmet need of aged-out foster youth pursuing postsecondary education, and that the Road-to-Independence stipend under s. 409.1451, F.S., is directed to the housing and living expenses of these youth.

(4) The Legislature finds that, through the State's 14 Youth Program Elements Waiver, Florida has elected to concentrate available youth workforce funding on work-based learning, pre-apprenticeship, and Registered Apprenticeship in order to address a youth unemployment rate that has risen 3.4 percentage points since April 2025 — an increase more than five times the national rate of increase.

(5) The Legislature finds that registered apprenticeship and pre-apprenticeship combine a nationally recognized credential with earn-while-you-learn wages beginning on the first day of participation, and that national data report high rates of employment retention and first-year post-completion earnings substantially above those associated with a two-year degree.

(6) The Legislature finds that other states have aligned foster youth education benefits with apprenticeship by statute, including Washington, which by ch. 28B.117 RCW treats enrollment in a registered apprenticeship or recognized pre-apprenticeship as a qualifying enrollment pathway co-equal with enrollment in an institution of higher education.

(7) It is the intent of the Legislature that the benefit provisions of ss. 409.1451 and 1009.25, F.S., align with the State's workforce strategy by treating enrollment in an approved apprenticeship program or a pre-apprenticeship program on equal footing with traditional postsecondary enrollment.

(8) It is further the intent of the Legislature that eligibility for the resulting benefits be predictable rather than determined anew on a case-by-case basis at each term, so that a youth directed into an apprenticeship pathway does not lose the housing-directed stipend and fee exemption through administrative friction.

VIII. FINDING-TO-PROVISION CROSSWALK

Documented finding or recommendation	Proposed provision	How the provision responds
Only ~20% of Florida foster youth enroll (vs. 66%); fewer than 1 in 10 complete a degree (OPPAGA)	Amendments 1 and 2	Opens an alternative pathway pairing a credential with wages, meeting youth who do not enter or complete the traditional degree route
~8% of youth who age out hold a degree by age 26; 31–46% experience homelessness by 26 (national longitudinal research)	Amendments 1 and 2	Confirms the Florida finding is structural rather than local, and directs the benefit toward the pathway that produces income during training rather than after it
Housing is the primary unmet need; campus room and board reported at twice the PESS stipend (OPPAGA Rec. 5)	Amendment 1 (PESS plus linked housing supports)	Secures the housing-directed stipend for apprentices; apprenticeship wages further supplement housing costs from the first day of participation
Case-by-case eligibility; repeated resubmission; coverage gaps; ~1 in 10 transfers unmatched (OPPAGA Recs. 1–2)	Amendment 1, verification sentence	Ties the determination to verified registration and limits repeat documentation demands; parallels the identification duties Washington places on its child welfare agencies at RCW 28B.117.040
State is concentrating youth funding on work-based learning, pre-apprenticeship, and Registered Apprenticeship (14 Youth Program Elements Waiver)	Amendments 1 and 2 (benefit-side parity)	Makes the benefit statutes follow the youth into the pathway the State is now funding, closing the service/benefit gap
Work-based learning participation falling (1,990 → 411); youth unemployment up 3.4 points (waiver baseline)	Amendments 1 and 2	Removes a benefit-eligibility disincentive to apprenticeship enrollment, supporting the waiver's five percent participation targets
Frequent stop-outs (56% FCS / 31% SUS); age-28 cliff; youth report feeling rushed (OPPAGA Rec. 3)	Optional Amendment 3 (duration protection)	Protects eligibility through apprenticeship completion for a youth already in a program at age 28, on the

		Washington model of measuring by program length
Pre-apprentices have no exemption parallel to apprentices	Amendment 2	Establishes a standalone pre-apprenticeship fee exemption, removing reliance on the institution-based reading
Washington treats apprenticeship as a co-equal enrollment pathway by statute (ch. 28B.117 RCW)	Findings (6) and (7); Amendments 1 and 2	Supplies tested statutory precedent, while Florida achieves the result without creating a new program, office, or appropriation

Shading key: *amber marks a documented gap the package addresses; green marks a provision that resolves an identified problem; light blue marks an alignment point drawn from the State's waiver or from comparative state law.*

IX. NOTE ON THE FORTHCOMING OPPAGA HOUSING STUDY

The evidentiary basis above rests on OPPAGA's 2022 report, on Florida's 2026 waiver, and on the national research record. All three should be distinguished from the forthcoming OPPAGA foster youth housing study due December 1, 2026.

The 2022 report supplies the documented baseline — low enrollment and completion, housing as the primary unmet need, and case-by-case benefit friction — that these amendments answer today. The 2026 waiver supplies the State's own forward-looking commitment to apprenticeship as the remedy for a worsening youth-employment gap. The December 2026 housing study offers a natural alignment point: this package can be positioned as a concrete, low-cost, and already-vetted response to be considered alongside that study's housing findings, advanced through the Independent Living Services Advisory Council's December 31 report, and carried into the 2027 Regular Session with FloridaCommerce and DCF as co-owners of a narrow bill amending ss. 409.1451 and 1009.25, F.S.

The sequencing is favorable. A bill filed for the 2027 Regular Session would be moving through committee at the moment the housing study lands, which allows the study to be cited in support of a measure already before the Legislature rather than as the reason to begin drafting one.

X. REQUESTED ACTION AND COMMITTEE PATH

CareerSource South Florida respectfully requests the following.

- **File the measure for the 2027 Regular Session.** A single bill amending s. 409.1451(2)(a)4. and s. 1009.25(1)(b), F.S., with Optional Amendment 3 held in reserve pending committee discussion of the age-28 cliff.

- **Anticipate a dual referral.** s. 1009.25 falls to the Committee on Education Postsecondary; s. 409.1451 falls to the Committee on Children, Families, and Elder Affairs. A House companion is best carried through the Careers and Workforce committee, given the waiver connection.

- **Permit a technical review before filing.** CareerSource South Florida will coordinate review by FloridaCommerce, DCF, and the Circuit 11 community-based care lead agency so that the verification language arrives at first committee already reconciled with administrative practice.

- **Align the record.** The proposal has been submitted as part of Miami-Dade County's legislative priorities, and CareerSource Florida is submitting the underlying youth apprenticeship waiver to USDOL-ETA. The Independent Living Services Advisory Council's December 31 report is the natural vehicle for aligning the child welfare record with the workforce record.

CareerSource South Florida is prepared to supply bill-drafting support, a fiscal narrative, local data on Miami-Dade foster youth served through LWDA 23, and testimony at every committee stop.

APPENDIX — SOURCES RELIED UPON

- OPPAGA, Homeless and Foster Youth Services, Report No. 22-08 (December 2022).

- State of Florida, WIOA 14 Youth Program Elements Waiver Request, FloridaCommerce / CareerSource Florida (May 2026); public comment period closed June 11, 2026.

- USDOL ETA, Training and Employment Guidance Letter No. 05-25; America's Talent Strategy, Pillars I and V.

- Courtney, Dworsky, Brown, Cary, Love & Vorhies, Midwest Evaluation of the Adult Functioning of Former Foster Youth: Outcomes at Age 26, Chapin Hall at the University of Chicago (2011).

- Dworsky, Napolitano & Courtney, homelessness during the transition from foster care to adulthood, American Journal of Public Health (2013).

- U.S. Government Accountability Office, Apprenticeship: Earn-and-Learn Opportunities Can Benefit Workers and Employers, GAO-25-107040 (April 28, 2025).

- USDOL ETA, TEGL No. 13-16, Attachment III (Registered Apprenticeship performance outcomes).

- ch. 28B.117 RCW, Passport to Careers Program (Washington), including RCW 28B.117.010, .030, and .040; Laws of 2018, ch. 232; Laws of 2024, ch. 323.

- ss. 409.1451, 409.1452, 446.021, 1009.25, and 1009.533, Florida Statutes (2025).

SFWIB EXECUTIVE COMMITTEE

DATE: 8/13/2026

AGENDA ITEM NUMBER: 6

AGENDA ITEM SUBJECT: CSSF LOW-INCOME DOCUMENTATION POLICY — PROPOSED AMENDMENTS TO DOCUMENTATION OF LOW-INCOME STATUS FOR THE WIOA ADULT STATUTORY PRIORITY

AGENDA ITEM TYPE: **INFORMATIONAL**

RECOMMENDATION: N/A

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

The proposed CSSF Low-Income Documentation Policy amendments address how low-income status is documented for purposes of WIOA Adult priority of service. The amendments do not change program eligibility requirements, expand the definition of a low-income individual, create new participant categories, or require additional funding. Instead, they establish alternative methods for documenting an existing priority determination.

The proposal is intended to reduce documentation barriers for low-income applicants who do not receive TANF or SNAP benefits and therefore cannot establish priority status through public assistance records. Under current practice, these individuals may be required to provide extensive family income documentation that is often difficult to obtain, resulting in delays or participant disengagement.

Miami-Dade County has a significant population of low-income residents, including many living in census tracts that meet the federal high-poverty threshold. In Program Year 2025–2026, approximately 60 percent of CSSF participants received public assistance, while the remaining eligible applicants often faced greater documentation challenges in establishing priority status.

Proposed Policy Amendments

The proposed amendments would allow Local Workforce Development Boards to document low-income status through a combination of participant self-attestation, residence in a federally recognized high-poverty area, and case note documentation when traditional income records are unavailable. The amendments also direct staff to consider existing alternative verification sources before requesting extensive family income documentation.

The proposal is consistent with recent federal guidance affirming that low-income status is a priority-of-service factor rather than a condition of eligibility for WIOA Adult services. The amendments are designed to streamline participant access while maintaining documentation and accountability requirements.

Updated Information for the Board

The proposed changes are limited to documentation procedures and do not affect eligibility standards, priority categories, funding allocations, or performance measures. The amendments maintain existing oversight and data validation requirements while reducing barriers to service enrollment.

If adopted by FloridaCommerce and CareerSource Florida, the amendments are expected to improve access to career and training services for eligible participants while supporting continued compliance with federal and state workforce requirements.

FUNDING: N/A

PERFORMANCE: N/A

ATTACHMENT

SOUTH FLORIDA WORKFORCE INVESTMENT BOARD

Proposed Policy Amendments — Documentation of Low-Income Status for the WIOA Adult Statutory Priority

Workforce Policy P122 (eff. 08/21/2025) • Workforce Policy P105 • Includable and Excludable Income

Revised for FloridaCommerce consultation — July 29, 2026

I. PURPOSE

This package proposes coordinated amendments permitting Local Workforce Development Boards (LWDBs) to *document* an applicant's low-income status for the WIOA Adult statutory priority through participant self-attestation supported by documentation of residence in a high-poverty area — a census tract with a poverty rate of at least 25 percent according to the most recent American Community Survey (ACS) 5-Year Estimates, the standard set at 20 CFR 681.260.

The amendments address a specific population: low-income applicants who receive neither Temporary Assistance for Needy Families (TANF) nor Supplemental Nutrition Assistance Program (SNAP) benefits, and who therefore cannot establish low-income status through a public assistance record. Under current operational practice these applicants must reconstruct up to six months of family income from wage records they frequently cannot obtain. No amendment alters an eligibility criterion, creates a participant category, changes a reported data element definition, expands the low-income definition at WIOA sec. 3(36), or requires an appropriation. The method is one of documentation and sequence only.

II. THE PROBLEM THIS SOLVES

Miami-Dade's need is documented and acute. In PY 2025-26, 59.69 percent of CSSF's WIOA participants received public assistance — the highest share among Florida's twenty-one LWDBs — and numerous county census tracts, including designated Qualified Opportunity Zones, meet or exceed the 25-percent poverty threshold at 20 CFR 681.260.

The burden falls on a defined minority of applicants. Of 637 actively enrolled Adult and Dislocated Worker participants, 537 — roughly 84 percent — established low-income priority status through a public assistance record. The remaining applicants, who receive neither TANF nor SNAP, must assemble family income records to claim a priority slot. This is the population the amendments serve, and it is where applicants most often disengage: staff report that drop-off occurs precisely at the step where required documentation cannot be obtained or the applicant declines to reconstruct it.

The change is low-risk. CSSF has taken no FloridaCommerce monitoring finding for insufficient income-eligibility documentation in the last five years (2022–2025), and it enters PY 2025-28 ranked first among all twenty-one Florida LWDBs on the REACH Act performance scorecard. The board proposes to reduce documentary burden without loosening stewardship.

The federal position is settled. By letter dated July 13, 2026, the Assistant Secretary for Employment and Training confirmed that low-income status is not an eligibility requirement for WIOA Adult participants; that documentation of low-income status must not be used as a factor in determining eligibility; and that services may commence before a participant provides low-income documentation, which may be collected later for data-validation purposes under TEGL 23-19, Change 3. These amendments implement that construction in Florida policy.

III. FINDINGS

A. Low-income status is not a condition of WIOA Adult eligibility. The July 13, 2026 ETA letter so states. The state structure is consistent: Workforce Policy P122, Sections IV(A) and IV(B), set the eligibility criteria for career and training services and neither conditions eligibility on income; Section IV(C) addresses the statutory priority for Adult funds and delegates its administration to Workforce Policy P105. Low-income status therefore operates in Florida policy as a priority-of-service factor and a reported data element — not as an eligibility gate.

B. No binding state instrument prescribes a six-month measurement period. Neither the current Workforce Policy P122 (effective 08/21/2025) nor Workforce Policy P105 prescribes a measurement period for the family-income test. P105, Section V(3)(b), states the test without reference to any period; the six-month look-back in the public-assistance prong applies only to receipt of public assistance, consistent with WIOA sec. 3(36)(A)(i). A six-month family-income collection instruction did appear in the prior December 19, 2022 family-income guidance and persists in the Includable and Excludable Income resource document (12/19/2022), whose calculation methods are expressly illustrative and whose lists state on their face that they are not all-inclusive. The operational burden therefore flows from legacy practice and from an illustrative resource treated as a documentary minimum — not from the binding instrument now in effect. Amendment 3 and Amendment 1(d) correct that treatment at its source.

C. Federal source documentation already recognizes high-poverty-area residence. TEGL 23-19, Change 3, Attachment II recognizes case notes documenting high-poverty-area status as acceptable source documentation for PIRL element 802 (Low Income Status at Program Entry), presently for the WIOA Youth program. The precedent for treating high-poverty-area residence as documentary support for low-income status is thus federal and established; the limitation is one of program scope, not methodology. Attachment II permits satisfying an element with any one listed source and cautions grantees electing a narrower subset to weigh the effect on populations for whom particular documents are difficult to obtain.

D. Attachment II continues to govern the validated source of record. Attachment II does not list bare self-attestation among the acceptable sources for element 802. Accordingly, the high-poverty-area case note — not self-attestation alone — is the documentary source these amendments rely upon. Contingent on the federal extension requested in Section X, and in the interim on FloridaCommerce's administrative acceptance of that case note as the Adult element-802 source, the case note both establishes the priority determination and populates element 802 at the time of determination, so no data element is left outstanding. This construction places the amendments within existing federal guidance rather than in tension with it.

IV. AMENDMENT 1 — WORKFORCE POLICY P122, SECTION IV(D)

Redesignate the existing text of Section IV(D), Eligibility Documentation, as subsection (1), and add a new subsection (2) as follows.

2. **Documentation of Low-Income Status for the Adult Statutory Priority.** Consistent with WIOA sec. 134(c)(3)(E) and Workforce Policy P105, low-income status is a factor in the determination of priority of service under the WIOA Adult program and is not a condition of eligibility for the WIOA Adult or Dislocated Worker programs. An LWDB may not condition an applicant's eligibility determination, enrollment, or receipt of individualized career services or training services upon the prior production of low-income source documentation.

   a. Alternative Sources to Be Considered First. Before requesting that an applicant assemble family income records, LWDB staff must determine whether the applicant's priority status can be established through (i) a cross-match with public assistance records or Reemployment Assistance wage records; (ii) an employer statement or documented employer contact; (iii) basic skills deficiency established through assessment administered by the LWDB; or (iv) status as a homeless individual under Workforce Policy P105, Section V(3)(c).

   b. High-Poverty Area Documentation. Where the sources in subsection (a) are unavailable, an LWDB may document an applicant's low-income status for the Adult statutory priority using each of the following: (i) a written or electronic self-attestation of family size and total family income for the determination period, signed and dated by the applicant; (ii) documentation of the applicant's residential address together with a system-generated or staff-prepared record identifying the corresponding census tract and its poverty rate from the most recent ACS 5-Year Estimates, establishing that the tract has a poverty rate of at least 25 percent — the high-poverty-area standard set at 20 CFR 681.260; and (iii) a case note meeting the standard in TEGL 23-19, Change 3, Attachment II, recording the determination, the date on which the information was obtained, and the name of the staff member who obtained it.

c. **Sequencing and Validation.** The case note under subsection (b) is the source documentation for PIRL element 802 and is recorded at the time of the priority determination, permitting individualized career services and training services to commence. Where Attachment II has not yet been extended to list this case note for the Adult program, the LWDB must obtain at least one Attachment II source for element 802 before the obligation of an Individual Training Account (ITA) or before program exit, whichever occurs first; services must not be suspended, delayed, or terminated pending its receipt.

d. **Limitation on Local Documentation Requirements.** Consistent with Section V of this policy, an LWDB may not impose a documentation requirement beyond those listed in TEGL 23-19, Change 3, Attachment II for a given data element, including any requirement as to the number of income documents to be produced, where Attachment II lists multiple acceptable sources. The calculation methods described in Includable and Excludable Income are illustrative and do not establish a minimum number of records.

e. **Consequence of Non-Production.** Where subsection (c) requires a subsequent Attachment II source and none is produced by the applicable deadline, the LWDB shall: (i) allow a cure window of forty-five (45) days after that deadline, during which staff must continue attempting to obtain the source, modeled on the open-application cure practice at Texas WFCMS-05, Change 2; (ii) before treating the case as unresolved, re-screen the applicant against the subsection (a) alternatives and document the result, since a public-assistance cross-match or other source may have become available after enrollment; (iii) if basic Adult eligibility under Section IV(A) or IV(B) is independently documented, permit the participant to stand as enrolled with the priority flag corrected, rather than voiding the enrollment, consistent with Finding A; (iv) treat any priority-dependent cost that cannot be supported — principally an ITA — by reclassification where an alternate basis exists (for example, Dislocated Worker status or another priority category) or, absent any alternate basis, by charge to non-federal funds; and (v) enter a closing case note recording the outcome, the re-screen result, the eligibility disposition, and the cost treatment applied.

V. Amendment 2 — Workforce Policy P105, Section IV(A)(2)

Amend Section IV(A)(2) by adding the following after the existing text.

Low-income status under this policy is a priority determination and is not a condition of eligibility for the WIOA Adult program. An LWDB must document low-income status in accordance with Workforce Policy P122, Section IV(D)(2), and may not defer the priority determination, the enrollment, or the provision of individualized career services or training services pending an applicant's production of family income records.

VI. Amendment 3 — Includable and Excludable Income

Amend the section captioned Examples of Methods for Calculating Income by adding a fourth method and a closing instruction as follows.

High-Poverty Area Method. Use this method for individuals who reside in a high-poverty area — a census tract with a poverty rate of at least 25 percent per the most recent ACS 5-Year Estimates, the standard at 20 CFR 681.260 — and who are unable to produce family income records. The individual provides a signed, dated self-attestation of family size and total family income for the determination period. Staff document the residential address using any document establishing residence and record the corresponding census tract and its poverty rate. Staff record the method selected, the reason for its selection, the date the information was obtained, and the staff member's name in case notes. This method documents the existing family-income test for the priority determination and permits services to commence; the element-802 case note is recorded under Workforce Policy P122, Section IV(D)(2)(c).

Closing instruction. None of the methods above requires a fixed number of pay stubs, bank statements, or other records, and the methods are illustrative rather than exhaustive. Where an individual is unable to produce documentation covering the full determination period, staff must apply the Intermittent Work Method or the High-Poverty Area Method rather than delay the determination or the provision of services, documenting the method selected and the basis for its selection in case notes.

VII. Operational Implementation in Employ Florida

Two Employ Florida (VOS) characteristics shape implementation and are addressed here so the method is operable rather than aspirational.

Element 802 is a required field. The system will not record a priority category while element 802 remains unpopulated. The high-poverty-area case note is therefore entered as the element-802 source at the time of determination (Finding D), so no data element is left outstanding and services may proceed. This is the operational reason the federal extension in Section X — and FloridaCommerce's interim administrative acceptance of the case note as the Adult 802 source — are load-bearing rather than incidental. Staff select, in Employ Florida, the specific source used to verify each applicable criterion, so a monitor can confirm which source supported element 802.

No geocoder resides in the platform. Employ Florida performs no address-to-tract or tract-to-poverty lookup. The tract determination is made outside the system using the U.S. Census Bureau Geocoder and the corresponding ACS 5-Year poverty table, and the result — tract number and poverty rate — is entered as supporting documentation in the case file. CSSF will maintain a county census-tract poverty reference list identifying tracts at or above the 25-percent threshold, designate the unit responsible for its upkeep, and refresh it annually upon each ACS 5-Year release.

VIII. Effect of the Amendments

Provision	Federal / State Authority	Effect
P122 § IV(D)(2) opening	WIOA sec. 134(c)(3)(E); ETA letter 7/13/2026	States that low-income documentation is not an eligibility gate. No change to eligibility criteria.
P122 § IV(D)(2)(a)	TEGL 23-19, Ch. 3, Att. II	Directs staff first to sources already permitted, several requiring no participant-produced document.
P122 § IV(D)(2)(b)	20 CFR 681.260 (as source of the 25% standard); Att. II	Substitutes address documentation and a tract lookup for participant-assembled income records at the priority determination.
P122 § IV(D)(2)(c)	Att. II; ETA letter 7/13/2026	Makes the HPA case note the element-802 source; preserves an Att. II source of record where the case note is not yet listed for Adults.
P122 § IV(D)(2)(d)	P122 Sec. V; Att. II Instruction A.3	Applies the existing prohibition on added local criteria to documentation practice.
P122 § IV(D)(2)(e)	WIOA sec. 134(c)(3)(E); TWC WFCMS-05, Ch. 2 (model)	Defines a cure window, re-screen, disposition, and cost treatment when a required Att. II source is not produced.
P105 § IV(A)(2)	WIOA sec. 3(36); sec. 134(c)(3)(E)	Ties the priority determination to the P122 documentation method and bars deferral. No new low-income category.
Income resource, new method	20 CFR 681.260; Att. II	Corrects treatment of an illustrative resource as a documentary minimum. This is the provision that removes the burden in practice.

The amendments carry no fiscal impact. They do not expand the population eligible for WIOA Adult services, do not alter the statutory priority categories or their sequence, and do not change any reported data element definition. Their operation is confined to how an existing determination is documented and the sequence in which documentation is obtained.

IX. Conforming Corrections Identified

Four items in the effective instruments warrant correction in the same issuance. Each is independent of the amendments above.

Instrument	Issue	Correction
P122, Sec. V, fn. 8	Cites TEGL 23-19, Change 1, rescinded by Change 3 (eff. 12/1/2025).	Update the citation and add TEGL 23-19, Change 3 to the Section VI authority list.
P122, Sec. IV(C)	Recites only one of three statutory priority categories (recipients of public assistance) while citing WIOA sec. 134(c)(3)(E).	Restore "other low-income individuals" and "individuals who are basic skills deficient," consistent with P105 Sec. IV(A).
P105, Sec. V(3)(b)	Reads that family income must not exceed the poverty line, or 70 percent of the LLSIL; WIOA sec. 3(36)(A)(ii) applies the higher of the two.	Conform to the statutory "higher of" formulation.
P105 generally	Effective 02/20/2020; refers throughout to the Department of Economic Opportunity and predates TEGL 23-19, Change 3.	Update agency references to FloridaCommerce and refresh the authority list.

Companion Request to the U.S. Department of Labor

The amendments above are available to FloridaCommerce and CareerSource Florida under existing federal guidance. A durable solution requires a corresponding federal change. It is recommended that FloridaCommerce, on behalf of the state workforce system and its twenty-one Local Workforce Development Boards, request that the Employment and Training Administration extend the high-poverty-area case-note source for PIRL element 802 in TEGL 23-19, Change 3, Attachment II from the WIOA Youth program to WIOA Adult participants receiving individualized career services or training services.

The request is narrow. It amends a source-documentation table rather than a statute or regulation; it does not disturb the definition of a low-income individual at WIOA sec. 3(36); and, because low-income status carries no eligibility consequence for Adult participants, it affects only how an existing data element is substantiated. It also resolves the Employ Florida required-field constraint at its root: once the case note is a listed Adult source for element 802, it satisfies the field at determination. A request advanced by the state on behalf of all twenty-one boards presents a system-wide policy proposal rather than a single local exception.

X. Requested Action

That FloridaCommerce and CareerSource Florida:

(1) adopt Amendments 1 through 3, as revised, in the next revision of the affected instruments;

(2) make the four conforming corrections identified in Section IX in the same issuance;

(3) conform the state monitoring instrument and the data-element-validation sampling protocol to the amended provisions — including sampling for cases that reach the Section IV(D)(2)(c) deadline without cure — so monitoring practice does not reinstate the burden the amendments remove;

(4) confirm and, if necessary, adjust the Employ Florida configuration so the high-poverty-area case note is selectable as an element-802 source for Adult participants, and, pending the federal action in item (5), accept that case note administratively as the Adult element-802 source of record; and

(5) transmit the request described in Section X to the Employment and Training Administration, Region 3 and the National Office.