CareerSource SOUTH FLORIDA

SOUTH FLORIDA WORKFORCE INVESTMENT BOARD
GLOBAL TALENT AND COMPETITIVENESS COUNCIL (GTCC) MEETING
THURSDAY, OCTOBER 29, 2026
8:30 AM

Miami Dade College - North Campus
Science Complex - Bldg. A (Room A102)
11380 NW 27th Avenue
Miami, FL 33167

The public may choose to view the session online via Zoom. **Registration is required:**
https://us02web.zoom.us/meeting/register/tZApcuCuqDoiHdfQcKvvSUWUz1vGZIiStRim

AGENDA

1. Call to Order and Introductions
2. Public Comment
3. Approval of GTCC Meeting Minutes
   A. August 20, 2026
4. Recommendation as to Approval of Miami Dade College Amendment to Registered Apprenticeship Programs
5. Recommendation as to Approval of a New Registered Apprenticeship Program at Atlantis University
6. Recommendation as to Approval of a New registered Apprenticeship Program at Fleet Force Truck Driving School
7. Recommendation as to Approval of a New SFWIB Subrecipient/Vendor Determination Policy
8. Recommendation as to Approval of a New SFWIB State Subrecipient/Vendor Determination Policy
9. Recommendation as to Approval of a New SFWIB CAP Incentive Policy
10. Recommendation as to Approval of SFWIB CAP Incentive Allocation
11. Recommendation as to Approval of Apprenticeship Employer Wage Reimbursement

SFWIB GLOBAL TALENT COMPETITIVENESS COUNCIL

DATE: 10/29/2026

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 GLOBAL TALENT COMPETITIVENESS COUNCIL

DATE: 10/29/2026

AGENDA ITEM NUMBER: 3

AGENDA ITEM SUBJECT: GLOBAL TALENT AND COMPETITIVENESS COUNCIL COMMITTEE MEETING MINUTES

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: SFWIB staff recommends to the Global Talent and Competitiveness Council Committee to approve minutes from the August 20, 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 GLOBAL TALENT & COMPETITIVENESS COUNCIL MEETING

DATE: 10/29/2026

AGENDA ITEM: 3A

AGENDA TOPIC: MEETING MINUTES

SFWIB GLOBAL TALENT & COMPETITIVENESS COUNCIL MEETING MINUTES

DATE/TIME: August 20, 2026, 8:30AM

LOCATION: The Landing at MIA, 5 Star Conference Center (Florida Key Room)
7415 Corporate Center Drive, Suite H
Miami, Florida 33126

1. CALL TO ORDER: The Chairwoman Ferradaz called to order the regularly scheduled meeting of the SFWIB Global Talent and Competitiveness Council on August 20, 2026, at approximately 8:36 a.m.

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

SFWIB GTCC MEMBERS PRESENT	SFWIB GTCC MEMBERS ABSENT	SFWIB STAFF
Brecheisen, Bruce Brown, Clarence del Valle, Juan-Carlos (Zoom) Ferradaz, Gilda, Chair Grice, Sonia Palacios, Carol (Zoom)	None **SFWIB GTCC Members Excused** Vasquez, Fermin Whitaker, David	Parson, Robert Smith, Robert **ADMINISTRATION / IT** Mumford, Ronald (Zoom)
OTHER ATTENDEES		
Mitchell, Carlena, Miami-Dade County Public Schools		

Agenda items are displayed in the order they were discussed.

2. Public Comment

Public comments should be two minutes or less.

Chairwoman Ferradaz opened the floor for comments from the public. No requests to speak were received by the Executive Office, and no public comment was presented.

No further questions or comments were presented. Item closed.

3. Approval – Global Talent and Competitiveness Council Meeting Minutes – April 16, 2026 and June 18, 2026

Chairwoman Ferradaz presented the April 16, 2026 and June 18, 2026 Global Talent and Competitiveness Council meeting minutes for consideration. The two sets of minutes were considered separately.

April 16, 2026 Minutes: These minutes were returned following their deferral at the June 18, 2026 meeting and reflect an amendment clarifying remarks attributed to Mr. Smith regarding the impact of artificial intelligence (AI) on employment. Mr. Smith clarified that, from the workforce perspective, AI is changing the nature of jobs rather than simply eliminating them. He cited the fast food industry, where ordering kiosks have allowed cashiers to be repurposed into other roles, and noted that new positions supporting AI are being created. He acknowledged that some job loss will occur as certain positions are no longer needed, and emphasized that affected workers are being given the opportunity to be retrained and repurposed rather than simply laid off.

Motion: by Mr. Brecheisen to approve the April 16, 2026 Global Talent and Competitiveness Council meeting minutes; seconded by Ms. Grice; **item is passed without dissent.**

June 18, 2026 Minutes:

Motion: by Mr. Brecheisen to approve the June 18, 2026 Global Talent and Competitiveness Council meeting minutes; seconded by Ms. Palacios; **item is passed without dissent.**

No further questions or comments were presented. Item closed.

4. Approval – New Registered Apprenticeship Programs

Chairwoman Ferradaz introduced the item; Mr. Smith presented two new apprenticeship programs under Miami Dade College: 911 Dispatcher and Airframe Mechanic. Mr. Smith reviewed the program dynamics, including hours of on-the-job training and related instruction.

Motion: by Mr. Brown to recommend to the Board the approval of the new Registered Apprenticeship Programs for 911 Dispatcher and Airframe Mechanic under the Miami Dade College Apprenticeship Program, as set forth in the agenda item; Mr. Brecheisen seconded; **item is passed without dissent.**

No further questions or comments were presented. Item closed.

5. Approval – Miami Dade College Kendall Learning Academy Paid Work Experience (PWE) Cohort 2

Chairwoman Ferradaz introduced the item; Mr. Smith presented the second cohort of the Kendall Learning Academy (KLA). KLA is a college transition program at Miami Dade College for neurodivergent individuals, and the paid work experience, supported by job coaching and job shadowing, is intended to move participants toward self-sufficiency and part-time or full-time employment. The initial cohort, approved by the SFWIB on February 19, 2026, produced 12 successful completions out of 16 approved students, with 4 students unable to participate due to eligibility issues. For Cohort 2, KLA will provide 18 students who will work 20 hours per week at a rate of $20 per hour for 16 weeks beginning in September 2026, at designated Miami-Dade County sites located primarily in the southern part of the county.

Motion: by Mr. Grice to recommend to the Board the approval to allocate an amount not to exceed $124,012.80 in Workforce Innovation and Opportunity Act funds for Paid Work Experience for the Kendall Learning Academy Cohort 2, as set forth in the agenda item; Ms. Grice seconded; **item is passed without dissent.**

During discussion, Mr. Brecheisen asked Mr. Smith to describe the population served; Mr. Smith explained that participants are generally high-functioning neurodivergent individuals who often excel at mathematical, analytical, and repetitive tasks but may find social interaction challenging. Mr. Brecheisen also asked how mid-term success would be measured; Mr. Smith advised that participants are tracked beyond program completion and committed to providing the Council a follow-up report on the outcomes of the Cohort 1 participants. In response to a related question, Mr. Smith confirmed that KLA funds job coaching and case management from a separate source and continues those services after the funded period, while SFWIB funds cover participant wages as an incentive for employers to host participants.

Ms. Palacios and another member asked whether eligibility is determined before enrollment. Mr. Smith explained that participants are pre-screened, but that WIOA eligibility requires a complete checklist of documentation and that some parents declined to provide required household income information. A member shared his organization's experience hosting three neurodivergent students in an information technology environment, noting strong technical performance when participants are placed in a suitable work setting. Mr. Smith acknowledged the need for stronger parental education before enrollment to prevent mid-program withdrawals, after which replacement participants cannot be substituted.

No further questions or comments were presented. Item closed.

6. Approval – Apprenticeship Program Wage Reimbursements for New Apprentices

Chairwoman Ferradaz introduced the item; Mr. Smith presented On-the-Job Training wage reimbursements, at 40 percent of wages, for employers bringing on new apprentices in existing apprenticeship programs sponsored by Miami Dade College: Earl's Kitchen Dadeland, Culinary Specialist (Cook), 12 apprentices, $172,800.00; St. Albans Enrichment Center, Teacher Assistant (Early Childhood Education), 1 apprentice, $12,400.00; and The Carter Academy, Teacher Assistant (Early Childhood Education), 1 apprentice, $12,600.00. Miami Dade College serves as the Apprenticeship Sponsor and delivers the related technical instruction.

Motion: by Mr. del Valle to recommend to the Board the approval to allocate an amount not to exceed $197,800.00 in Workforce Innovation and Opportunity Act funds for On-the-Job Training wage reimbursements for new apprentices, as set forth in the agenda item; Mr. Brown seconded; **item is passed without dissent.**

During discussion, Mr. Brecheisen noted that the projected return on investment (ROI) for these programs is $1.50, compared with $2.65 and $5.64 for the Barrington Irving program under Item 7, and asked whether the Council has, or should set, a minimum ROI threshold for items brought before it. Mr. Smith explained that investments are guided by the four quadrants of the SFWIB policy based on industry growth and wage levels; that low-wage industries such as hospitality, tourism, and childcare are major employers in Miami-Dade County and must be served; and that higher-ROI programs are balanced against lower-ROI programs to meet the federal average wage measure. He further noted that the Board may establish a minimum ROI if it chooses.

Mr. Brecheisen further asked whether programs with a single apprentice represent efficient use of staff time. Mr. Smith responded that the teacher assistant apprenticeships address the broader community issue of childcare availability and affordability; that the SFWIB works alongside the Early Learning Coalition and The Children's Trust, which provide additional incentives to childcare providers; that apprenticeships are designed for small employers as well as large ones; that the program required a starting wage above the minimum wage in effect at its launch; and that the apprenticeship connects to Miami Dade College credit pathways toward teacher certification. Members discussed the tension between raising childcare wages and the resulting cost to families. Mr. Brecheisen acknowledged the community's need and asked that Mr. Smith continue to weigh administrative capacity and economies of scale in future single-apprentice items.

No further questions or comments were presented. Item closed.

7. Approval – Barrington Irving Aviation Workforce Training (BITTS) Program Cohort 3

Chairwoman Ferradaz introduced the item; Mr. Smith presented to implement a third cohort of the BITTS Aviation Workforce Development Program. This cohort will expand training access, continue strengthening the aviation talent pipeline in Miami-Dade County, and deepen employer engagement for job placement.

Mr. Smith reviewed the participant graduation and placement stats for Cohorts 1 and 2 . In addition, he added that, since the agenda item was written, a third Cohort 2 participant has been hired, and the remaining graduates are interviewing with local aviation employers. Full Cohort 2 employment statistics will be provided once available. Cohort 3 is projected to serve 15 participants with a projected ROI of $5.64.

Motion: by Mr. Brown to recommend to the Board the approval to allocate an amount not to exceed $120,000 in Workforce Innovation and Opportunity Act funds for a third Barrington Irving Aviation Workforce Training Program cohort, as set forth in the agenda item; Mr. Brecheisen seconded; **item is passed without dissent.**

During discussion, Chairwoman Ferradaz asked whether training providers are held to a placement threshold. Mr. Parson explained that the objective is to place every participant, with a minimum performance standard of 75 percent, consistent with the REACH Act and the standards applied to other training providers. Mr. Smith noted that providers must report their outcomes to the State and may be removed from the Eligible Training Provider List if they fall below the standard.

No further questions or comments were presented. Item closed.

There being no further business, the meeting adjourned at 9:30am.

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SFWIB GLOBAL TALENT COMPETITIVENESS COUNCIL

DATE: 10/29/2026

AGENDA ITEM NUMBER: 4

AGENDA ITEM SUBJECT: MIAMI DADE COLLEGE APPRENTICESHIP PROGRAM AMENDMENT

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: Staff recommends to the Global Talent and Competitive Council to recommend to the Board the approval of the program amendments to Registered Apprenticeship Program, as set forth below.

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

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

BACKGROUND:

Miami Dade College has submitted an amendment to its registered apprenticeship program to update the approved occupation from Teacher Assistant to Early Childhood Educator. This update better reflects today's early childhood education standards and supports a clearer pathway for apprentices entering or advancing in the early learning field.

The amendment includes the following key updates:

- Occupation Title Updated: The approved occupation will change from Teacher Assistant to Early Childhood Educator.
- Program Length Streamlined: On-the-job training hours will be reduced from 3,000 to 2,000, helping apprentices complete the program in a shorter timeframe.
- Instructional Component Updated: The required instruction remains 15 college credits and will align with Miami Dade College's Early Childhood Education – Birth Through Age Five certificate program.
- Curriculum Strengthened: The updated standards emphasize child development, family engagement, inclusive learning, assessment, ethics, and curriculum planning.
- Access Expanded: The revised program expands outreach to include Broward County and adds employer partners to support more apprenticeship opportunities.
- Credential Alignment Maintained: Apprentices will continue to earn recognized credentials, including Florida Department of Children and Families child care training and the Child Development Associate Credential.

Staff has reviewed the proposed amendment and finds that it supports workforce demand, employer engagement, and continued apprenticeship pathway development. Active apprentices will transition to the revised Early Childhood Educator requirements to ensure consistency with the updated program standards.

FUNDING: N/A

PERFORMANCE: N/A

NO ATTACHMENT

SFWIB GLOBAL TALENT COMPETITIVENESS COUNCIL

DATE: 10/29/2026

AGENDA ITEM NUMBER: 5

AGENDA ITEM SUBJECT: NEW PROGRAMS FOR AN EXISTING PROVIDER ATLANTIS UNIVERSITY

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: Staff recommends to the Global Talent and Competitiveness Council to recommend to the Board the approval of a new program for an existing provider, as set forth below.

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

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

BACKGROUND:

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

SFWIB staff completed the review process and recommends to the Council to approve the following program to the existing training provider.

1. Technology Trade Group Inc, dba Atlantis University
    - Information Technology Associates of Science

Atlantis University offers Information Technology programs designed to prepare students for careers in information systems, networking, cybersecurity, cloud computing, and technical support. The curriculum combines theoretical knowledge with hands-on training, allowing students to develop practical skills using industry-standard technologies and tools. Students learn to install, manage, secure, and troubleshoot computer systems and networks while gaining experience with emerging technologies. The program emphasizes problem-solving, critical thinking, and technical proficiency to meet the needs of today's technology-driven workforce. Graduates are prepared for entry-level and advanced IT roles across a variety of industries and may pursue industry-recognized certifications to enhance their career opportunities. The Associate of Science in Information Technology has been approved by the FloridaCommerce Eligible Training Provider List and is included on the Florida Master Credential List.

FUNDING: N/A

PERFORMANCE: N/A

NO ATTACHMENT

SFWIB GLOBAL TALENT COMPETITIVENESS COUNCIL

DATE: 10/29/2026

AGENDA ITEM NUMBER: 6

AGENDA ITEM SUBJECT: NEW REGISTERED APPRENTICESHIP PROGRAM

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: Staff recommends to the Global Talent and Competitive Council to recommend to the Board the approval of a new Registered Apprenticeship Program, as set forth below.

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

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

BACKGROUND:

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

SFWIB staff completed the review process and recommends to the Council to approve the following new apprenticeship program.

1. FleetForce Truck Driving School Apprenticeship Program – GNJ (2022-FL-113162)

    • Heavy and Tractor Trailer Truck Driver (RAPIDS Code 0980CB)

FleetForce Truck Driving School has established a Registered Apprenticeship Program for Heavy and Tractor-Trailer Truck Driver that combines 2,000 hours of paid on-the-job training with 160 hours of related technical instruction. The program prepares participants for careers in the transportation and logistics industry through structured training leading to CDL licensure and industry-recognized skills. The apprenticeship is registered with the Florida Department of Education and includes partnerships with Domino's, Publix, and Armellini Logistics. The program currently serves multiple counties throughout Florida, including Broward County, and is expected to expand into the Miami-Dade area, providing additional apprenticeship opportunities for local residents and employers.

FUNDING: N/A

PERFORMANCE: N/A

NO ATTACHMENT

SFWIB GLOBAL TALENT COMPETITIVENESS COUNCIL

DATE: 10/29/2026

AGENDA ITEM NUMBER: 7

AGENDA ITEM SUBJECT: SUBRECIPIENT VENDOR DETERMINATION POLICY

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: Staff recomments to the Global Talent and Competitive Council to recommend to the Board the approval of a new Subrecipient Vendor Determination Policy, as set forth below

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

As the Local Workforce Development Board for Workforce Development Area 23, the South Florida Workforce Investment Board (SFWIB), d/b/a CareerSource South Florida (CSSF), enters into agreements through which federal and state workforce development funds are disbursed to third parties. Federal Uniform Guidance requires CSSF to determine, based on the substance of each relationship, whether the receiving entity is a subrecipient or a vendor/contractor.

CareerSource Florida sunsetted the former statewide guidance, AWI FG 063, "Subrecipient and Vendor Determinations - Federal Funds." As a result, CSSF must establish and document its local process for making these determinations in accordance with 2 CFR Part 200. The proposed policy provides a consistent and defensible framework for classifying agreements before execution and for applying the appropriate compliance, monitoring, procurement, and audit requirements. Each agreement will be evaluated individually because an entity may be classified differently under separate agreements depending on the substance of the relationship.

Summary of Policy

- Applies to all CSSF agreements involving the disbursement or expenditure of federal or state workforce development funds, regardless of the agreement's title or form.
- Requires a documented, case-by-case subrecipient or vendor/contractor determination before an agreement is executed, using the Subrecipient and Vendor/Contractor Determination Checklist.
- Bases each determination on the characteristics in 2 CFR § 200.331, with the substance of the relationship controlling over the agreement's title or terminology.

- Assigns responsibility for the initial analysis to the Contracts and Policy Manager, or designee, and requires review and approval by the Executive Director, or designee.

- Requires a narrative justification when an agreement presents characteristics of both a subrecipient and a vendor/contractor.

- Establishes the compliance consequences of each classification, including pass-through entity responsibilities, risk assessment, monitoring, and Single Audit oversight for subrecipients, and applicable procurement standards for vendor/contractor relationships.

- Requires a pre-award risk assessment for entities classified as subrecipients and permits CSSF to impose specific conditions or adjust monitoring based on the assessed risk.

- Requires annual review of active agreements and a refreshed determination for material amendments, renewals, or changes to the scope, payment structure, or compliance obligations.

- Provides presumptive classifications for common CSSF agreement types while preserving the required case-by-case analysis for every agreement.

- Requires the Determination Checklist and, when applicable, the Subrecipient Pre-Award Risk Assessment Form to be retained in the official contract file.

- Requires staff training within 60 days of policy adoption and annually thereafter, or whenever the policy is materially revised.

- Requires the policy to be reviewed at least annually and updated when federal regulations, state law, CareerSource Florida guidance, monitoring findings, or CSSF contracting practices warrant revision.

- Includes Attachment A, the Subrecipient and Vendor/Contractor Determination Checklist, and Attachment B, the Subrecipient Pre-Award Risk Assessment Form.

The proposed policy strengthens internal controls by ensuring that each agreement is classified and approved before execution and that the resulting oversight requirements are applied consistently. Adoption also establishes a clear documentation trail to support CSSF's determinations during monitoring, audit, or other oversight review.

There is no direct fiscal impact associated with policy adoption. Implementation will require staff training and the completion, review, and retention of the required determination and risk assessment documentation as part of CSSF's existing contracting and compliance processes.

FUNDING: N/A

PERFORMANCE: N/A

ATTACHMENT

CareerSource SOUTH FLORIDA	BOARD POLICY	POLICY NUMBER [TO BE ASSIGNED]

Title:	**Subrecipient and Vendor/Contractor Determinations for Federal and State Awards**		
Effective:	[BOARD APPROVAL DATE]	**Revised:**	
Supersedes:	AWI FG 063 (Sunsetted by CareerSource Florida)	**Version:**	1.0

I. OF INTEREST TO

South Florida Workforce Investment Board members; CareerSource South Florida staff involved in contracting, procurement, fiscal oversight, program administration, monitoring, and compliance; and entities receiving federal or state workforce funds under CSSF agreements.

II. PURPOSE AND SCOPE

This policy establishes the process by which the South Florida Workforce Investment Board d/b/a CareerSource South Florida (CSSF), serving as the Local Workforce Development Board for Workforce Development Area 23 (Miami-Dade), determines whether an entity receiving federal or state workforce funds under a CSSF agreement is classified as a subrecipient or a vendor/contractor. This policy ensures compliance with the Workforce Innovation and Opportunity Act (WIOA), as amended provides a documented, defensible framework for these determinations.

This policy applies to all agreements entered into by CSSF for the disbursement or expenditure of federal and state workforce development funds, regardless of the form of the agreement or the terminology used to describe the parties. This includes, but is not limited to:

1. Career center service provider agreements
2. Youth services contracts
3. Training vendor agreements (Individual Training Account voucher-based)
4. Rapid Response and National Dislocated Worker Grant service delivery agreements
5. Memoranda of Understanding with mandatory and non-mandatory one-stop partners
6. Any other agreement through which CSSF passes federal or state award funds to a third party for the performance of services or delivery of goods

The determination must be made on a case-by-case basis for each agreement before execution. An entity may simultaneously hold agreements with CSSF in which it is classified as a subrecipient under one agreement and a vendor/contractor under another, depending on the substance of each relationship.

III. BACKGROUND

This policy supersedes reliance on the former Workforce Florida, Inc. / Agency for Workforce Innovation Final Guidance Paper AWI FG 063, “Subrecipient and Vendor Determinations — Federal Funds” (July 21, 2008), which was sunsetted by the

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CareerSource Florida Board of Directors. With the sunset of that statewide guidance, CSSF assumes full local responsibility for making and documenting subrecipient and vendor/contractor determinations in accordance with federal law.

IV. STATUTORY AUTHORITIES

1. Workforce Innovation and Opportunity Act (WIOA), as amended and including its references to the Uniform Guidance framework under the following provisions:
2. Title 2 CFR § 200.331 — Subrecipient and contractor determinations
3. Title 2 CFR § 200.332 — Requirements for pass-through entities (subaward content, risk assessment, monitoring, and enforcement)
4. Title 2 CFR § 200.333 — Fixed amount subawards
5. Title 2 CFR §§ 200.317–200.327 — Procurement Standards (applicable to contractor/vendor relationships)
6. Title 2 CFR § 200.501 — Audit requirements (Single Audit thresholds applicable to subrecipients)
7. Workforce Innovation and Opportunity Act (WIOA), Public Law 113–128, and implementing regulations at 20 CFR Parts 680–683
8. Chapter 445, Florida Statutes, and applicable administrative rules of FloridaCommerce

Where federal and state requirements conflict, the more restrictive requirement applies unless federal law preempts state law.

V. DEFINITIONS

Subrecipient: A non-federal entity that receives a subaward from CSSF (acting as a pass-through entity) to carry out part of a federal or state program. A subaward is for the purpose of carrying out a portion of a federal award and creates a federal assistance relationship with the subrecipient. (2 CFR § 200.1)

Vendor/Contractor: An entity that receives a contract from CSSF for the purpose of obtaining goods and services for CSSF's own use in administering its programs. A contract with a vendor/contractor creates a procurement relationship. (2 CFR § 200.1) The terms "vendor" and "contractor" are used interchangeably in this policy and carry the same meaning under the Uniform Guidance.

Pass-Through Entity: A non-federal entity that provides a subaward to a subrecipient to carry out part of a federal program. CSSF functions as a pass-through entity when it makes subawards to subrecipients. (2 CFR § 200.1)

Subaward: An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual who is a beneficiary of a federal program. (2 CFR § 200.1)

VI. POLICY

General Requirement

CSSF shall make a documented subrecipient or vendor/contractor determination for every agreement through which CSSF disburses federal or state award funds to a third party. The determination shall be based on the substance of the relationship between CSSF and the receiving entity, not on the form, title, or nomenclature of the agreement. The determination shall be made before the agreement is executed and shall be documented using the Subrecipient and Vendor/Contractor Determination Checklist (Attachment A).

The Contracts and Policy Manager, or designee, shall perform the initial determination analysis. The Executive Director, or designee, shall review and approve the determination before the agreement is executed. The completed Determination Checklist shall be retained in the official contract file for the duration of the agreement plus the applicable records retention period.

Determination Criteria

The determination shall be based on the five-factor tests established in 2 CFR § 200.331(a) and (b), as applied to the specific facts and circumstances of each agreement. The following characteristics support classification of the receiving entity as a subrecipient. The entity:

1. Determines who is eligible to receive what federal financial assistance
2. Has its performance measured in relation to whether objectives of a federal program were met
3. Has responsibility for programmatic decision-making
4. Is responsible for adherence to applicable federal program requirements specified in the federal award
5. Uses federal funds to carry out a program for a public purpose specified in the authorizing statute, as opposed to providing goods or services for the benefit of CSSF

The following characteristics support classification of the receiving entity as a vendor/contractor. The entity:

1. Provides the goods and services within normal business operations
2. Provides similar goods or services to many different purchasers
3. Normally operates in a competitive environment
4. Provides goods or services that are ancillary to the operation of the federal program
5. Is not subject to the compliance requirements of the federal program as a result of the agreement

Consistent with 2 CFR § 200.331(c), all of the characteristics above may not be present in all cases, and characteristics from both categories may be present simultaneously. The substance of the relationship is more important than the form of the agreement. CSSF shall use professional judgment in classifying each agreement, and the Determination Checklist (Attachment A) shall include a narrative justification when characteristics from both categories are present. The following additional indicators shall be considered where the five-factor test produces a mixed result:

1. **Payment basis:** Cost-reimbursement and cost-plus-fixed-fee arrangements are strongly indicative of a subrecipient relationship. Fixed-price-per-unit or deliverable-based payments are more consistent with a vendor/contractor relationship.
2. **Program design authority:** Where CSSF designs the program and the entity executes it under CSSF's direction, the operational latitude granted to the entity — including eligibility determinations, service sequencing, and case management discretion — may still establish a subrecipient relationship even though CSSF retains ultimate programmatic decision-making authority.
3. **Risk sharing:** Subrecipients share performance and compliance risk with CSSF. Vendors/contractors bear commercial risk but not federal program compliance risk.
1. **Exclusivity:** Where the entity's services are customized for CSSF's specific program requirements and not offered as a standard product to the general market, this weighs toward a subrecipient classification.

Consequences of the Determination

Where CSSF determines an entity is a subrecipient, CSSF assumes pass-through entity responsibilities under 2 CFR § 200.332, including:

1. Ensuring the subaward agreement includes all elements required by 2 CFR § 200.332(a), including the federal award identification, the subrecipient's Unique Entity Identifier, the indirect cost rate (or de minimis rate election), all applicable compliance requirements, and the terms and conditions of the federal award
2. Conducting a pre-award risk assessment to evaluate the subrecipient's risk of noncompliance, using factors such as prior experience, audit history, management systems, and new personnel or systems
3. Establishing monitoring procedures sufficient to ensure the subrecipient uses the subaward funds for authorized purposes, including reviewing financial and performance reports, conducting site visits, and reviewing the subrecipient's Single Audit results
4. Establishing specific conditions where warranted by the risk assessment and taking enforcement action for noncompliance, including imposing additional conditions, disallowing costs, withholding funds, suspending or terminating the subaward, or initiating suspension and debarment proceedings
5. Verifying that the subrecipient has obtained a Single Audit when required by 2 CFR Part 200, Subpart F, and ensuring CSSF has access to the audit results, including any findings, corrective action plans, and management letters relevant to the administration of the subaward

Where CSSF determines an entity is a vendor/contractor, the agreement is subject to CSSF's procurement standards under 2 CFR §§ 200.317–200.327, including requirements for full and open competition, cost and price analysis, and documentation of procurement decisions. Vendor/contractor agreements do not trigger the pass-through entity monitoring and Single Audit oversight responsibilities that apply to subrecipient relationships. However, where a vendor/contractor agreement is structured such that the vendor/contractor is responsible for program compliance, or where the vendor/contractor's records must be reviewed to determine program compliance, CSSF retains compliance responsibility and must include appropriate terms in the agreement. (2 CFR § 200.501(h))

Procedures

Before any new agreement for the disbursement of federal or state award funds is executed, the Contracts and Policy Manager (or designee) shall complete the Determination Checklist (Attachment A), analyzing the proposed relationship against the criteria above. The completed Checklist, including the narrative justification, shall be submitted to the Executive Director (or designee) for review and approval, and the approved Checklist shall be filed in the official contract file before the agreement is executed. No agreement shall be executed until the determination has been completed and approved.

Where the determination results in a subrecipient classification, the Contracts and Policy Manager (or designee) shall perform a pre-award risk assessment in accordance with 2 CFR § 200.332(b) using the Subrecipient Pre-Award Risk Assessment Form (Attachment B), evaluating factors including prior experience with the same or similar subawards, results of previous audits, whether the subrecipient has new personnel or new or substantially changed systems, the extent and results of any federal awarding agency monitoring, and the subrecipient's financial stability. Based on the risk assessment, CSSF may impose specific conditions on the subaward, adjust monitoring frequency, or require additional reporting, as permitted by 2 CFR § 200.208 and § 200.332(d).

The Contracts and Policy Manager (or designee) shall conduct an annual review of all active agreements to confirm that the subrecipient or vendor/contractor classification remains accurate, and shall evaluate whether any subrecipient's risk profile has changed and whether monitoring adjustments are warranted. If the substance of the relationship has changed such that the original classification is no longer appropriate, the Contracts and Policy Manager shall prepare a revised Determination Checklist and submit it for Executive Director approval, and the agreement shall be amended accordingly. Any material amendment to the scope, payment structure, or compliance obligations of an existing agreement, and all contract renewals, shall trigger a refreshed Determination Checklist.

Common Classifications — CSSF Agreement Types

The following table provides general guidance on the typical classification of CSSF's recurring agreement types. These are presumptive classifications only; each agreement must be individually assessed using the Determination Checklist.

Agreement Type	Typical Classification	Rationale
Career Center Service Provider Contracts (Adult/DW/TANF/SNAP)	Subrecipient	Contractor determines eligibility, performance measured against federal program objectives, cost-reimbursement basis, subject to full federal compliance requirements, operates WIOA/TANF programs on behalf of CSSF.
Youth Services Contracts (ISY/OSY)	Subrecipient	Same characteristics as career center contracts; additionally, contractor determines youth eligibility and delivers the 14 WIOA Youth program elements.
Training Vendor Agreements (ITA voucher-based)	Vendor/Contractor	Training vendor provides occupational training within normal business operations, serves multiple purchasers, operates in a competitive ETPL environment, does not determine eligibility, and is paid per-student on a deliverable basis.
National Dislocated Worker Grant Service Delivery Agreements	Subrecipient	Contractor carries out a federal grant program, determines participant eligibility, must comply with grant-specific terms and conditions, cost-reimbursement basis.
Supportive Services Vendors (e.g., childcare, transportation, supplies)	Vendor/Contractor	Provides goods or services ancillary to program operations, within normal business operations, to multiple purchasers in a competitive market.
Staffing or Temporary Services Agencies	Vendor/Contractor	Provides staffing services within normal business operations on a fee-for-service basis; does not carry out a program for a public purpose.

Note: This table is illustrative guidance, not a substitute for the required case-by-case analysis. Unusual agreement structures may produce a different classification than the presumption shown above.

Documentation, Training, and Policy Review

The completed Determination Checklist (Attachment A) and, where applicable, the Subrecipient Pre-Award Risk Assessment Form (Attachment B) shall be maintained in the official contract file for each agreement. Determination and risk assessment documentation shall be retained for five years following the later of the final expenditure report for the related federal award, the resolution of any audit, dispute, or litigation involving the agreement, or the end of the agreement's records retention period. Documentation shall be made available to FloridaCommerce, the U.S. Department of Labor, the U.S. Department of Health and Human Services, the Inspector General, and any other authorized oversight entity upon request.

The Contracts and Policy Manager shall ensure that CSSF staff involved in the development, negotiation, execution, and monitoring of agreements receive training on subrecipient and vendor/contractor determination requirements, including the requirements of 2 CFR §§ 200.331–200.333, the use of the Determination Checklist, the pass-through entity responsibilities that attach to subrecipient classifications, and the procurement standards that apply to vendor/contractor classifications. Training shall be provided within sixty (60) days of policy adoption and annually thereafter, or whenever the policy is materially revised.

This policy shall be reviewed at least annually by the Contracts and Policy Manager to ensure continued alignment with federal regulations, state law, and CareerSource Florida policy, and shall be revised whenever the Office of Management and Budget issues revisions to 2 CFR Part 200 that affect the subrecipient/contractor determination framework; CareerSource Florida or FloridaCommerce issues new guidance affecting local board responsibilities for these determinations; monitoring findings by any oversight entity identify deficiencies in CSSF's determination process; or changes in CSSF's contracting practices create agreement structures not adequately addressed by the current policy.

VII. LIMITATIONS

No agreement involving the disbursement of federal or state award funds to a third party shall be executed until the required classification has been documented and approved. Presumptive classifications in this policy do not replace the required case-by-case analysis. Material amendments, renewals, or changes in the substance of an agreement require reassessment in accordance with this policy.

VIII. EXCEPTIONS

Exceptions to this policy, or any part thereof, must be approved in writing by the SFWIB Executive Director.

IX. REVISION HISTORY

There are no revisions to this policy.

X. RESCISSIONS/CANCELATIONS

This policy supersedes reliance on AWI FG 063, "Subrecipient and Vendor Determinations — Federal Funds," which was sunsetted by CareerSource Florida. There are no other rescissions or cancelations for this policy.

XI. RESOURCES

Attachment A: Subrecipient and Vendor/Contractor Determination Checklist

Attachment B: Subrecipient Pre-Award Risk Assessment Form

Companion CSSF state-funds subrecipient/vendor determination policy [policy number to be assigned]

ATTACHMENT A: SUBRECIPIENT AND VENDOR/CONTRACTOR DETERMINATION CHECKLIST

Reference: 2 CFR § 200.331 | CSSF Local Operating Policy CSSF-FIN-[XXX]

Agreement Information

Field	Response
Agreement/Contract Number	
Entity Name	
Unique Entity Identifier	
CFDA Number(s)	
FAIN	
Agreement Period	
Total Award Amount	
Description of Services	
Determination Prepared By	
Date Prepared	

Part A: Subrecipient Characteristics — 2 CFR § 200.331(a)

For each characteristic below, indicate whether it is present (Yes), absent (No), or partially present (Partial), and provide a brief explanation.

Characteristic	Yes	No	Partial	Explanation
1. The entity determines who is eligible to receive what federal financial assistance.	☐	☐	☐	
2. The entity has its performance measured in relation to whether the objectives of a federal program were met.	☐	☐	☐	
3. The entity has responsibility for programmatic decision-making.	☐	☐	☐	
4. The entity is responsible for adherence to applicable federal program requirements specified in the federal award.	☐	☐	☐	
5. The entity uses federal funds to carry out a program for a public purpose specified in the authorizing statute, as opposed to providing goods or services for the benefit of CSSF.	☐	☐	☐	

Part B: Vendor/Contractor Characteristics — 2 CFR § 200.331(b)

Characteristic	Yes	No	Partial	Explanation
1. The entity provides the goods and services within normal business operations.	☐	☐	☐	

2. The entity provides similar goods or services to many different purchasers.	☐	☐	☐	
3. The entity normally operates in a competitive environment.	☐	☐	☐	
4. The entity provides goods or services that are ancillary to the operation of the federal program.	☐	☐	☐	
5. The entity is not subject to the compliance requirements of the federal program as a result of the agreement.	☐	☐	☐	

Part C: Additional Indicators

Indicator	Subrecipient	Vendor/Contractor
Payment Basis	☐ Cost reimbursement	☐ Fixed-price per unit/deliverable
Program Design	☐ Customized for CSSF's program	☐ Standard product/service from inventory
Audit Requirements	☐ Single Audit required	☐ No Single Audit requirement
Risk Sharing	☐ Shares program/compliance risk with CSSF	☐ Bears only commercial risk
Market Exclusivity	☐ Services customized/exclusive to CSSF	☐ Off-the-shelf, available to many buyers

Part D: Determination and Narrative Justification

Based on the analysis above, the entity is classified as (check one):

☐ SUBRECIPIENT ☐ VENDOR/CONTRACTOR

Narrative Justification (required; explain the basis for the determination, addressing any mixed characteristics and how professional judgment was applied; attach additional pages if necessary):

_____

_____

_____

_____

_____

Part E: Review and Approval

Role	Signature / Name / Date
Prepared By: Contracts and Policy Manager (or designee)	
Reviewed and Approved By: Executive Director (or designee)	

ATTACHMENT B: SUBRECIPIENT PRE-AWARD RISK ASSESSMENT FORM

Reference: 2 CFR § 200.332(b) | CSSF Local Operating Policy CSSF-FIN-[XXX]

Part 1: Subrecipient Information

Field	Response
Subrecipient Name	
Agreement Number	
Award Amount	
Assessment Prepared By	
Date	

Part 2: Risk Factors

Evaluate each risk factor below and assign a risk rating of Low, Medium, or High. Provide a brief explanation for each rating.

Risk Factor	Low	Medium	High	Explanation
1. Prior experience with same or similar subawards	☐	☐	☐	
2. Results of previous audits (including Single Audit findings, if applicable)	☐	☐	☐	
3. New or substantially changed personnel, systems, or organizational structure	☐	☐	☐	
4. Extent and results of prior CSSF or state monitoring	☐	☐	☐	
5. Financial stability (including going-concern opinions or material weaknesses)	☐	☐	☐	
6. Adequacy of internal controls and financial management systems	☐	☐	☐	
7. History of corrective action plans or unresolved findings	☐	☐	☐	
8. Complexity of the subaward (dollar amount, number of programs, compliance burden)	☐	☐	☐	

Part 3: Overall Risk Determination and Monitoring Plan

Overall Risk Rating (check one):

☐ LOW ☐ MEDIUM ☐ HIGH

Monitoring Plan / Specific Conditions (describe the monitoring approach and any specific conditions imposed based on the risk assessment; for Medium and High risk subrecipients, document additional monitoring activities such as increased reporting frequency, site visit schedule, restricted payment terms, or required technical assistance):

_____

_____

_____

Part 4: Review and Approval

Role	Signature / Name / Date
Prepared By: Contracts and Policy Manager (or designee)	
Reviewed and Approved By: Executive Director (or designee)	

SFWIB GLOBAL TALENT COMPETITIVENESS COUNCIL

DATE: 10/29/2026

AGENDA ITEM NUMBER: 8

AGENDA ITEM SUBJECT: STATE FUNDS SUBRECIPIENT VENDOR DETERMINATION POLICY

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: Staff recommends to the Global Talent and Competitive Council to recommend to the Board the approval of a new Subrecipient Vendor Determination Policy, as set forth below

STRATEGIC GOAL: **STRONG WORKFORCE SYSTEM LEADERSHIP**

STRATEGIC PROJECT: **Strengthen workforce system accountability**

BACKGROUND:

As the Local Workforce Development Board for Workforce Development Area 23, the South Florida Workforce Investment Board (SFWIB), d/b/a CareerSource South Florida (CSSF), enters into agreements that disburse state financial assistance to non-state organizations. The Florida Single Audit Act, section 215.97, Florida Statutes, requires CSSF to determine whether each receiving entity is a recipient/subrecipient or a vendor based on the substance of the relationship.

CareerSource Florida sunsetted former Agency for Workforce Innovation Final Guidance Paper AWI FG 064, "Subrecipient and Vendor Determinations (State Funds)." CSSF must therefore establish and document a local process for state-funds determinations consistent with Florida law and Department of Financial Services requirements. The proposed policy provides a consistent framework for classifying agreements before execution and applying the appropriate fiscal, monitoring, procurement, and audit requirements. Each agreement will be evaluated individually.

Summary of Policy

- Applies to CSSF agreements that disburse state financial assistance to non-state organizations, regardless of the agreement title or terminology.
- Requires a documented recipient/subrecipient or vendor determination before execution using the State Funds Subrecipient and Vendor Determination Checklist
- Uses the indicators in section 215.97, Florida Statutes, and Department of Financial Services Form DFS-A2-NS.

- Assigns the initial analysis to the Contracts and Policy Manager, or designee, and requires review and approval by the Executive Director, or designee.

- Requires applicable DFS-A2-CL language, CSFA information, payment coding, monitoring, and audit oversight for recipient/subrecipient agreements.

- Treats vendor payments as outside the Florida Single Audit Act while preserving applicable CSSF procurement requirements.

- Requires separate federal and state determinations for agreements containing both funding sources because classifications may differ.

- Requires annual review and reassessment when a material amendment or renewal changes the agreement's scope, payment structure, requirements, or obligations.

- Requires determination and exemption records to be retained in the official contract file under the applicable five-year retention standard.

- Requires staff training within 60 days after adoption, annually thereafter, and whenever the policy is materially revised.

- Requires staff training within 60 days of policy adoption and annually thereafter, or whenever the policy is materially revised.

- Documents exemptions for specified entities, commodity purchases, federal-only or matching resources, and qualifying state maintenance-of-effort resources.

- Requires annual policy review and updates when controlling requirements, guidance, findings, or CSSF contracting practices change.

The proposed policy strengthens internal controls by requiring each state-funded agreement to be classified and approved before execution and the resulting requirements to be applied consistently. Adoption also establishes a documentation trail supporting CSSF's determinations during monitoring, audit, or other oversight review.

There is no direct fiscal impact associated with policy adoption. Implementation will require staff training and completion, approval, and retention of the required documentation within CSSF's existing contracting, fiscal, and compliance processes.

FUNDING: N/A

PERFORMANCE: N/A

ATTACHMENT

CareerSource SOUTH FLORIDA	BOARD POLICY	POLICY NUMBER

Title:	**Subrecipient and Vendor Determinations for State Financial Assistance Awards**		
Effective:	October 15, 2026	**Revised:**	
Supersedes:	AWI FG 064 (Sunsetted by CareerSource Florida)	**Version:**	1.0

I. OF INTEREST TO

South Florida Workforce Investment Board staff involved in developing, negotiating, executing, monitoring, accounting for, or maintaining agreements funded wholly or partly with state financial assistance; non-state organizations receiving such funds; and other stakeholders responsible for contract, fiscal, compliance, and audit functions.

II. PURPOSE AND SCOPE

This policy establishes how the South Florida Workforce Investment Board d/b/a CareerSource South Florida (CSSF), serving Workforce Development Area 23, determines whether an entity receiving state financial assistance under a CSSF agreement is a recipient/subrecipient or a vendor for purposes of the Florida Single Audit Act, section 215.97, Florida Statutes.

It applies to all CSSF agreements that disburse state financial assistance to non-state organizations, regardless of the agreement title or terminology used. Each agreement must be evaluated before execution based on the substance of the relationship. An entity may be a subrecipient under one agreement and a vendor under another. If an agreement contains both federal and state funds, the state and federal determination requirements both apply.

III. BACKGROUND

This policy replaces reliance on former Agency for Workforce Innovation Final Guidance Paper AWI FG 064, “Subrecipient and Vendor Determinations (State Funds),” dated July 21, 2008, which was sunsetted by the CareerSource Florida Board of Directors. Following that sunset, CSSF is responsible for making and documenting state-funds determinations in accordance with Florida law and applicable Department of Financial Services requirements.

IV. STATUTORY AUTHORITIES

1. Section 215.97, Florida Statutes, Florida Single Audit Act
2. Rule 69I-5, Florida Administrative Code, Florida Single Audit Act implementation rules
3. Department of Financial Services Form DFS-A2-NS, Florida Single Audit Act Checklist for Non-State Organizations
4. Department of Financial Services Form DFS-A2-CL, standard audit language for subrecipient agreements
5. Workforce Innovation and Opportunity Act, Public Law 113-128, and 20 CFR Parts 680-683, when state-funded activities are within the WIOA service-delivery framework

DRAFT

6. Chapter 445, Florida Statutes, and applicable FloridaCommerce administrative rules
7. 2 CFR 200.331 and 2 CFR 200.332, when federal and state funds are included in one agreement

V. DEFINITIONS

State Financial Assistance: State resources provided to a non-state entity to carry out a state project, including state grants, state-purpose appropriations, and other state funds disbursed through CSSF to third parties. It does not include procurement of commodities or contractual services for CSSF's direct use.

State Project: A state program that provides state financial assistance to non-state organizations and is assigned a Catalog of State Financial Assistance (CSFA) number by the administering state agency.

Recipient/Subrecipient: A non-state organization that receives state financial assistance to carry out a state project and is subject to the Florida Single Audit Act.

Vendor: A non-state organization paid from state financial assistance for goods or services in a buyer-seller transaction rather than to carry out a state project. Vendor payments are not state financial assistance subject to the Florida Single Audit Act.

Non-State Organization: An entity other than a state agency, including a nonprofit organization, for-profit entity, local government, or individual.

CSFA Number: The Catalog of State Financial Assistance number assigned to a state project and maintained by the Department of Financial Services.

VI. POLICY

General Requirement

CSSF shall make and document a subrecipient or vendor determination for each agreement through which CSSF disburses state financial assistance to a non-state organization, unless an exemption in this policy applies. The determination shall be based on the substance of the relationship rather than the form, title, or nomenclature of the agreement.

The Contracts and Policy Manager, or designee, shall complete the initial analysis before execution. The Executive Director, or designee, shall review and approve the determination. The completed checklist shall be maintained in the official contract file.

State-Funds Subrecipient Indicators

A recipient/subrecipient relationship exists if any one of the following factors is answered "Yes":

1. State law or legislative proviso creates the non-state organization to carry out the state project.
2. The non-state organization must provide matching resources that are not related to a federal program.
3. The non-state organization must meet specified state-project requirements to receive state resources. These may include project-specific laws, rules, eligibility guidelines, required job types, or specified asset donations, but do not include general procurement standards or laws.
4. The non-state organization must make state-project decisions that CSSF would otherwise make, including eligibility determinations, case management, or discretionary service-delivery decisions.

5. The non-state organization's performance is measured against state-project objectives, including participants served, jobs created, placement rates, or similar outcomes.

If none of these factors is present, the non-state organization is classified as a vendor for state-funds purposes.

Consequences of Determination

When an organization is classified as a recipient/subrecipient, CSSF shall include the applicable DFS-A2-CL audit language and Exhibit 1 information in the agreement; identify the applicable CSFA number and state-project title; properly code payments as state financial assistance; monitor compliance and applicable audit requirements; and notify the Finance Unit of the classification.

When an organization is classified as a vendor, payments are not state financial assistance subject to the Florida Single Audit Act. The agreement remains subject to applicable procurement requirements and CSSF procurement policies, and DFS-A2-CL language is not required solely for the state-funds portion.

Federal and State Funds in One Agreement

When an agreement contains federal and state funds, CSSF shall complete both determination checklists. Because federal and state standards differ, classifications may diverge. The agreement shall include every requirement applicable to each funding stream. If the entity is a federal subrecipient and state vendor, federal pass-through requirements apply without DFS-A2-CL requirements for the state portion. If the entity is a federal vendor and state subrecipient, DFS-A2-CL language, CSFA identification, and Florida Single Audit requirements apply to the state portion. If the entity is a subrecipient under both frameworks, both sets of requirements apply.

Review, Documentation, and Training

CSSF shall review active state-funded agreements annually and reassess a determination when a material amendment or renewal changes the scope, payment structure, state-project requirements, or compliance obligations. A revised determination shall be approved and the agreement amended when necessary.

Determination records shall be retained for five years after the latest applicable event: final expenditure reporting, resolution of an audit/dispute/litigation, or the agreement's stated retention period. Records shall be available to authorized oversight entities upon request.

Staff involved in state-funded agreements shall receive training within sixty days after policy adoption, annually thereafter, and when the policy is materially revised. This policy shall be reviewed at least annually and updated when controlling law, rules, DFS forms, state guidance, monitoring findings, or CSSF contracting practices change.

VII. LIMITATIONS

The agreement title, procurement vehicle, or terminology used by the parties shall not control the determination. A vendor classification for state funds does not determine the federal classification, and a federal classification does not replace the state analysis. No agreement subject to this policy may be executed until the required determination and approval are complete.

VIII. EXCEPTIONS

The Florida Single Audit Act recipient/vendor determination is not required when the non-state organization or relationship falls into one of the following categories. The applicable exemption must still be documented and retained in the contract file:

The organization is a district school board, charter school, community college, public university, government entity outside Florida, or federal agency.

The relationship is solely for procurement of commodities as defined in section 287.012(5), Florida Statutes.

The relationship involves only federal resources, state matching resources for federal programs, or local matching resources for federal programs.

The relationship involves only state maintenance-of-effort resources that meet all three DFS-A2-NS criteria regarding federal-use requirements, contract identification, and federal audit testing.

Any other exception to this policy, or any part thereof, must be approved in writing by the SFWIB Executive Director.

IX. REVISION HISTORY

There are no revisions to this policy.

X. RESCISSIONS/CANCELATIONS

This policy supersedes reliance on AWI FG 064, "Subrecipient and Vendor Determinations (State Funds)," which was sunsetted by CareerSource Florida. There are no other rescissions or cancelations for this policy.

XI. RESOURCES

Attachment A: State Funds Subrecipient and Vendor Determination Checklist

DFS Form DFS-A2-NS

DFS Form DFS-A2-CL

Companion CSSF federal-funds subrecipient/vendor determination policy [policy number to be assigned]

ATTACHMENT A: STATE FUNDS SUBRECIPIENT AND VENDOR DETERMINATION CHECKLIST

Reference: Section 215.97, Florida Statutes | DFS Form DFS-A2-NS | CSSF policy number [TBD]

Agreement Information

Field	Response
Agreement/Contract Number	
Non-State Organization Name	
Type of Organization	Nonprofit / For-profit / Local government / Other
Awarding Agency	South Florida Workforce Investment Board d/b/a CareerSource South Florida
Title of State Project	
CSFA Number	
Agreement Period	
Total State Award Amount	
Description of Services	
Determination Prepared By	
Date Prepared	

Part A: Exemption Screening

Exemption Question	Yes	No
1. Is the organization an exempt public or governmental entity identified in the policy?	☐	☐
2. Is the relationship only for procurement of commodities under section 287.012(5), F.S.?	☐	☐
3. Does the relationship involve only federal resources or federal-program matching resources?	☐	☐
4. Does the relationship involve only qualifying state MOE resources meeting all three DFS criteria?	☐	☐

If any answer is “Yes,” document the exemption and proceed to Part D.

Part B: Recipient/Subrecipient Indicators

Factor	Yes	No	Explanation
1. Created by state law or legislative proviso to carry out the state project?	☐	☐	
2. Required to provide non-federal matching resources?	☐	☐	
3. Required to comply with specified state-project requirements to receive resources?	☐	☐	
4. Required to make state-project decisions CSSF would otherwise make?	☐	☐	
5. Performance measured against state-project objectives?	☐	☐	

If any answer is “Yes,” a recipient/subrecipient relationship exists. Explain each response.

Part C: Federal-Funds Companion Determination

Question	Yes	No
Does the agreement also involve federal award funds?	☐	☐
If yes, has the federal-funds determination checklist been completed?	☐	☐
Federal classification, if applicable	☐ Subrecipient ☐ Vendor/Contractor ☐ N/A	

Part D: Determination and Comments

Classification: ☐ RECIPIENT / SUBRECIPIENT ☐ VENDOR ☐ EXEMPT ORGANIZATION

Comments / Narrative Justification:

_____

_____

_____

_____

_____

If Recipient/Subrecipient: DFS-A2-CL language and Exhibit 1 incorporated? ☐ Yes ☐ N/A

Finance Unit notified? ☐ Yes ☐ N/A

Part E: Review and Approval

Role	Signature / Name	Date
Prepared By: Contracts and Policy Manager (or designee)		
Reviewed and Approved By: Executive Director (or designee)		

SFWIB GLOBAL TALENT COMPETITIVENESS COUNCIL

DATE: 10/29/2026

AGENDA ITEM NUMBER: 9

AGENDA ITEM SUBJECT: APPROVAL OF THE CAREER ADVANCEMENT PROGRAM (CAP) INCENTIVE POLICY

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: Staff recommends to the Global Talent Competitiveness Council to recommend to the Board to approve the Career Advancement Program (CAP) Incentive Policy, as attached.

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

STRATEGIC PROJECT: **Improve service delivery outcomes**

BACKGROUND:

CareerSource South Florida (CSSF) administers the Career Advancement Program (CAP), the TANF work program serving Miami-Dade County. CSSF currently has 288 participants enrolled in the TANF program, including 48 participants in transitional status. The State participation standard is 50 percent for all families and 90 percent for two-parent families. As of August, the All-Family Participation Rate was 4.7 percent and the Two-Parent Family Participation Rate was 6.5 percent, well below these standards.

The proposed CAP Incentive Policy establishes a structured set of participant incentives, paid from TANF funds, to encourage consistent participation, recognize achievement in training and employment, reward job retention and wage growth, and support families' transition off public assistance. This policy will enable CSSF to significantly improve TANF (CAP) participation and reduce public assistance.

GLOBAL TALENT COMPETITIVENESS COUNCIL CONSIDERATIONS – CAP INCENTIVE POLICY

The policy, attached for the Council's review, is built around verified participation and employment outcomes. Its key provisions are:

- Participation Incentives: Participants earn $75 for program activation, $75 for the first month, and $50 for each of the second and third months of verified participation, followed by $25 per month for months 4 through 12 (up to $225 per participation episode). A $50 re-engagement incentive, paid in two $25 installments, rewards participants who return after a penalty period and complete the required hours.

- Training and Employment Incentives: $100 for training enrollment; $75 per measurable skill gain and $150 per credential ($200 for a targeted occupation), up to two of each per program year; $50 for employment achievement; and $100 for training-related employment ($150 for a targeted occupation).

- Retention and Earnings Incentives: Retention incentives at 30, 60, 90, 180, and 365 days range from $50 to $225 for part-time employment and $100 to $300 for full-time employment. Additional payments include a $200 self-sufficiency wage supplement paid in three installments tied to verified earnings, a $100 wage progression incentive, and a $100 payment when a family's TANF case closes because of earnings and stays closed for six months.

- Funding and Compliance: Incentives are paid from TANF funds only; WIOA funds are not used. Payments require work activity hours verified in OSST, and no incentive category may be issued until CSSF obtains written guidance from FloridaCommerce or state program counsel on whether it constitutes TANF assistance, with a separate determination for the monthly payment.

- Controls and Evaluation: The policy requires fiscal modeling and cost limits, uniform incentive amounts, monthly reconciliation of payments to verified hours, and a phased rollout with baselines, quarterly cost-per-outcome reporting, and an annual review of amounts based on results.

Staff recommends that the Council approve the CAP Incentive Policy. The first implementation phase may be limited to selected career centers so that participation and cost results can be compared before the incentives are expanded.

Staff will finalize the procedures needed to implement the policy, including the self-sufficiency threshold and the wage progression percentage, and will keep the Council informed of implementation and results.

FUNDING: TANF funds only; no WIOA funds. Costs will be modeled before each implementation phase and are subject to the cost limits in the policy.

PERFORMANCE: Improve the TANF All-Family and Two-Parent Family Participation Rates and reduce public assistance, measured against baselines with quarterly reporting.

ATTACHMENT

CareerSource SOUTH FLORIDA BOARD POLICY			**POLICY NUMBER POL XXX-X**
Title:	**Career Advancement Program (CAP) Incentive Policy**		
Effective:	TBD	**Revised:**	TBD
Supersedes:		**Version:**	01

I. OF INTEREST TO

This policy is applicable to CareerSource South Florida (CSSF) American Job Centers (AJC), partners and service providers

II. PURPOSE AND SCOPE

This policy establishes the governing requirements for providing incentives to eligible Career Advancement Program (CAP) participants. Incentives are intended to promote meaningful engagement, recognize participant achievement, reduce barriers to participation, reinforce measurable outcomes, and support the transition from public assistance to employment and economic self-sufficiency.

III. BACKGROUND

The Career Advancement Program introduces participant incentives to encourage consistent participation, improve engagement, recognize participant achievements, and support successful completion of employment and training activities. The incentive framework is designed to reduce participation barriers and contribute to positive workforce and self-sufficiency outcomes.

IV. STATUTORY AUTHORITIES

CAP incentives shall be administered in accordance with applicable federal and state laws, rules, funding requirements, and approved CareerSource South Florida guidance.

Approved By: Rick Beasley, Executive Director	

(a) FEDERAL AUTHORITY

Citation	Subject
Social Security Act, Title IV-A (Temporary Assistance for Needy Families), 42 U.S.C. § 601 et seq.	Establishes TANF and its four statutory purposes, including promoting job preparation, work, and reduced dependence on government benefits — the purpose category under which participant work incentives are generally administered.
Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. No. 104-193, as amended	Establishes TANF as a state block-grant program, referenced in Fla. Stat. § 445.004(5)(b)6. as the federal basis for welfare transition services.
45 CFR Parts 260-265	General TANF program regulations, including work-activity and participation-rate requirements at 45 CFR Part 261.
2 CFR § 200.334	Federal record-retention floor of three years from submission of the final expenditure report for records supporting federal award expenditures, including TANF-funded incentive payments; CSSF's five-year retention standard (Section IX below) exceeds this floor.
Workforce Innovation and Opportunity Act (WIOA), Pub. L. 113-128 (29 U.S.C. § 3101 et seq.)	Federal workforce development statute; governs WIOA Title I Adult and Dislocated Worker program funds proposed to be blended with TANF funds for CAP incentive payments under this policy.
WIOA sec. 134(d)(2); 20 CFR § 680.900	Defines WIOA supportive services as services necessary to enable an individual to participate in career or training services, available only when the service cannot be obtained through another program — a narrower authority than TANF's incentive-payment structure.
WIOA sec. 134(d)(3); 20 CFR §§ 680.930–680.970	Defines needs-related payments, a category of WIOA supportive services limited to participants enrolled in training under WIOA sec. 134(c)(3) who are unemployed and ineligible for (or have exhausted) unemployment compensation. Does not on its face authorize a general milestone-based incentive.
2 CFR § 200.405	Allocable costs standard: a cost charged to a federal award must be assignable to that award in accordance with relative benefits received. Governs the cost-allocation methodology required whenever a single CAP incentive is charged to blended TANF and WIOA funds (see new "Funding Source and Cost Allocation" subsection below).

Citation	Subject
45 CFR §§ 261.10–261.16	Individual work requirements, the Individual Responsibility Plan (IRP), and the penalties for failing to follow it — the federal basis for the participant-level compliance checks in this policy.
45 CFR §§ 261.30–261.31	Defines the countable work activities and the hours of participation that determine whether a family counts toward the State's TANF work participation rate (WPR).
45 CFR §§ 261.60–261.65 (Subpart F)	Requires the State to maintain an approved Work Verification Plan and internal controls ensuring the accuracy of work-participation data reported on the TANF Data Report. CAP incentive records must support, not conflict with, this data.
WIOA sec. 116; 20 CFR Part 677	Establishes the WIOA performance accountability system and its six primary indicators (e.g., employment and median earnings in the 2nd/4th quarter after exit, credential attainment). CAP incentive timing and data entry for co-enrolled participants must not distort these measurements.

(b) STATE AUTHORITY

Citation	Subject
Florida Statutes Chapter 445 (Workforce Innovation and Opportunity Act; Welfare Transition Program)	Florida’s Welfare Transition Program and CareerSource Florida/local workforce development board administration of TANF-funded welfare transition services.
Fla. Stat. § 445.004	Defines welfare transition services funded by TANF and designates CareerSource Florida's role providing policy direction for TANF-funded activities.
Fla. Stat. § 445.024	Governs Welfare Transition Program work requirements and participant standards and authorizes performance-based incentive payment structures in program contracting.
Fla. Stat. § 445.028	Requires transitional benefits and services, including case-manager contact and information, for families leaving temporary cash assistance.

Citation	Subject
Fla. Stat. § 445.0281 (created by Ch. 2024-240, Laws of Florida)	Establishes transitional case management services — including career planning, job search assistance, résumé building, basic financial planning, and benefits management using a tool that demonstrates the future financial impacts of changes in income and benefits (CSSF designates the Career Ladder Identifier and Financial Forecaster (CLIFF) Navigator for this purpose) for families leaving temporary cash assistance.
Fla. Stat. § 445.035	Requires standardized intake and exit surveys to track participant barriers and program effectiveness.
Fla. Stat. § 414.065	Govern penalties for noncompliance with Temporary Cash Assistance (TCA) work requirements: a minimum 10-day (or until compliance) termination for a first occurrence, a 1-month (or until compliance) termination for a second occurrence, and a 3-month (or until compliance) termination for a third occurrence, with six months of continuous compliance resetting the penalty count. This is the statutory basis for this policy's sanctioned-participant limitation (Section VIII).
House Bill 1267 (2024 Regular Session), Ch. 2024-240, Laws of Florida, "Economic Self-Sufficiency," approved June 13, 2024, effective July 1, 2024,	Amended Fla. Stat. §§ 414.065, 414.105, 414.455, 445.009, 445.011, 445.017, 445.024, 445.028, and 445.035, and created §§ 445.0281 and 1002.935 — including the benefits-management tool requirement of transitional case management referenced in this policy. This resolves the source policy's placeholder reference to "House Bill 1267."
CSF Policy 109 — Supportive Services and Needs-Related Payments (CareerSource Florida Board of Directors, rev. 02/23/2021)	States expressly that supportive services must not be used as incentive payments and that WIOA incentive payments are allowable for youth participants only. This is the controlling state-policy basis for excluding all CAP milestones from WIOA Adult/DW funding (see Table 2).
CSF Policy 37 — Work Requirement Penalties and Pre-Penalty Counseling (rev. 10/07/2024)	Governs the sanction/penalty process referenced in this policy's Limitations section and requires staff, when a participant reports obtaining employment, to counsel the participant on both transitional benefits and the Cash Assistance Severance Benefit (CSF Policy 24) in the same conversation.

Citation	Subject
CSF Policy F50 — Cost Allocation Plans for Regional Workforce Boards (approved 07/27/2005)	Requires CSSF to maintain an approved Cost Allocation Plan on file with Florida Commerce and confirms that a cost allocable to one funding source may not be shifted to another to avoid restrictions — consistent with 2 CFR § 200.405. CAP's cost-allocation methodology must be reflected in that existing plan, not developed as a freestanding determination.
CSF Policy O115 — Common Exit (approved 06/09/2021)	Defines the WIOA/Wagner-Peyser/TAA common-exit mechanic (a system-generated, retroactive determination after 90 days without a participating service) and confirms this framework does not apply to TANF/Welfare Transition, which follows its own closure process. Governs the WIOA Performance Compliance checks in this policy.

(c) DEFINITIONS

Term	Definition
CAP	Career Advancement Program
CSSF	CareerSource South Florida
CLIFF	Career Ladder Identifier and Financial Forecaster — the financial-planning and benefits-cliff forecasting tool that CSSF designates to satisfy the benefits-management tool requirement of Fla. Stat. § 445.0281, created by House Bill 1267 (2024).
IRP	Individual Responsibility Plan
OSST	One-Stop Service Tracking System
TANF	Temporary Assistance for Needy Families
WFMS	Workforce Management System
CAP	Career Advancement Program
WIOA	Workforce Innovation and Opportunity Act
ITA	Individual Training Account
NRP	Needs-Related Payment — a WIOA supportive service under WIOA sec. 134(d)(3) and 20 CFR §§ 680.930–680.970; not a CAP incentive
MSG	Measurable Skill Gain — a WIOA primary indicator of performance under WIOA sec. 116 and 20 CFR § 677.155(a)(1)(v)

Term	Definition
Full-Time Employment	Employment averaging at least 30 hours per week across all of the participant's qualifying jobs during the retention period.
Part-Time Employment	Employment averaging at least 20 but fewer than 30 hours per week across all of the participant's qualifying jobs during the retention period.
Participation Episode	A continuous period of CAP enrollment from Program Activation until CAP case closure. Re-enrollment after case closure begins a new participation episode.
Program Year	The WIOA program year, July 1 through June 30.

V. POLICY

General Requirements

CSSF may provide approved incentives to eligible CAP participants who complete verified program milestones. Incentives shall be administered consistently, equitably, subject to funding availability, and in accordance with applicable CAP / Welfare Transition, TANF, fiscal, monitoring, and records requirements.

No incentive shall be authorized or issued unless eligibility and milestone completion have been verified, required approvals have been obtained, and supporting documentation has been retained.

Effective Date and Classification Condition. No CAP incentive category shall be implemented or issued until CSSF has obtained and retained written guidance from FloridaCommerce or appropriate state program counsel identifying whether the category constitutes TANF assistance or non-assistance under 45 CFR § 260.31. The written determination must address the treatment of the payments under the participant's 48-month TANF time limit, TANF data-reporting, child-support, eligibility, and fiscal-treatment requirements, and the treatment of incentive payments as income for other benefits in coordination with the Department of Children and Families. Any category determined to constitute assistance shall remain suspended until corresponding procedures, participant notices, system controls, and reporting requirements are approved.

Funding Source and Cost Allocation

CAP incentives shall be charged to TANF (Welfare Transition) funds, except in the narrow WIOA Youth case described in the "Note" to Table 2. WIOA Title I Adult and Dislocated Worker funds may not be charged for CAP incentives, but may fund WIOA services for co-enrolled participants, including supportive services and needs-related payments as provided in the "WIOA Needs-Related Payments for Co-Enrolled CAP Participants" subsection below. Program staff must determine and document, on a milestone-by-milestone and participant-by-participant basis, the funding source charged for each incentive payment (TANF or, in the narrow Youth case, the qualifying WIOA Youth authority) before it is authorized.

Shared allowable service costs between TANF and WIOA, such as the braided activities identified in Table 1, may be allocated under CSSF's approved Cost Allocation Plan on file with Florida Commerce (CSF Policy F50) using a documented methodology consistent with 2 CFR § 200.405, in proportion to the relative benefit each funding stream receives. The methodology and the basis for each allocation must be retained and available for audit. This allocation does not apply to CAP incentive payments, which are not allocated between TANF and WIOA funds and may not be paid from more than one funding source for the same occurrence.

CAP incentive milestones are paid from TANF funds only. WIOA career, training, and supportive services, including needs-related payments, follow their own requirements under WIOA sec. 134 and 20 CFR Part 680 and are not CAP incentives. CSF Policy 109 (Supportive Services and Needs-Related Payments) states expressly that supportive services must not be used as incentive payments and that WIOA incentive payments are allowable for youth participants only. Accordingly, none of the milestones in Table 2 below may be charged to WIOA Adult or Dislocated Worker funds. Any WIOA Youth incentive requires its own qualifying authority (20 CFR § 681.640) and a documented participant-specific determination retained in the policy file, and is outside the scope of the Table 2 milestones.

Table 1 — Activities Covered by TANF and WIOA Funding

Activity	TANF	WIOA	Basis for Allocation
Eligibility determination / redetermination (CAP, TCA, WIOA Adult/DW)	Yes	Yes	Each program determines its own eligibility independently; not a shared or allocable cost.
Basic career services (labor market information, initial job search resources)	Yes	Yes	Braided; allocate per 2 CFR § 200.405 based on relative benefit to each program.
Job search and job readiness workshops	Yes	Yes	Braided; a single workshop may satisfy both the TANF work-activity requirement (Fla. Stat. § 445.024(1)(g)) and the WIOA career service (WIOA sec. 134(c)(2)) simultaneously.
Work experience / subsidized employment placement	Yes	Yes	Braided; allocate by the funding source of the participant's placement slot or wage subsidy.
Employer engagement / job development (Business Services function)	Yes	Yes	Braided; typically, a shared Business Services function — allocate by staff time or relative caseload benefit.
Supportive services (transportation, childcare)	Yes	Yes	Braided under Fla. Stat. § 445.025 and WIOA sec. 134(d)(2); allocate by which program's activity the support enables. The same expense may not be billed to both sources.
Individual Responsibility Plan (IRP) development and TANF work-activity hour verification	Yes	No	Core TANF program-administration function (Fla. Stat. § 445.024); not allocable to WIOA.

Activity	TANF	WIOA	Basis for Allocation
Sanction determination and penalty-period administration	Yes	No	Core TANF compliance function under Fla. Stat. § 414.065; not a WIOA-authorized activity.
TANF intake/exit survey administration	Yes	No	TANF-specific statutory requirement (Fla. Stat. § 445.035); not allocable to WIOA.
Transitional case management after TCA exit	Yes	No	TANF-specific statutory authority (Fla. Stat. § 445.0281); WIOA has no equivalent post-exit case management authority.
Individual Employment Plan (IEP) development	No	Yes	WIOA-specific case-management document; not a TANF requirement.
Occupational skills training funded through an Individual Training Account (ITA)	No	Yes	WIOA-specific funding mechanism (WIOA sec. 134(c)(3)); TANF may separately fund training under its own authority, but not through an ITA.
Needs-related payments	No	Yes	WIOA-only; limited to participants enrolled in WIOA training and meeting unemployment/UI-eligibility criteria (WIOA sec. 134(d)(3); 20 CFR §§ 680.930–680.970). For co-enrolled CAP participants, needs-related payments are provided only as set out in the "WIOA Needs-Related Payments for Co-Enrolled CAP Participants" subsection; a needs-related payment is not a CAP incentive.
On-the-Job Training (OJT) employer wage reimbursement	Yes	Yes	Braided; OJT is a TANF work activity under Fla. Stat. § 445.024(1)(d) as well as a WIOA training service (WIOA sec. 134(c)(3)(C)), subject to applicable state requirements. Allocate by the funding source of the OJT agreement; the same wage reimbursement may not be billed to both sources.
WIOA performance follow-up (2nd/4th-quarter employment, credential attainment, median earnings)	No	Yes	WIOA sec. 116 performance-reporting function; not a TANF requirement.
CAP participant incentive payments	Yes	No	TANF-funded only; see Table 2 and the Effective Date and Classification Condition.

Table 2 — CAP Incentive Milestones by Funding Source

Milestone	Incentive Amount	TANF	WIOA	Basis / Note
Program Activation and First Verified Activity	$75	Yes	No	Paid once per participation episode when orientation, the required assessment, barrier screening, and an executed or updated IRP are complete, the first assigned countable activity has started, at least one week of verified participation is recorded, and required OSST entries are complete. TANF-funded only; not an independently authorized WIOA career, training, or supportive service.
Job Search & Job Readiness	$50	Yes	No	The bonus itself does not meet the WIOA supportive-services (sec. 134(d)(2)) or needs-related-payment (sec. 134(d)(3)) definitions; the underlying workshop, not the incentive, is the allocable WIOA activity (see Table 1).
Employer Engagement	$50	Yes	No	Same rationale as above.
Training Enrollment	$100	Yes	No	Paid once per approved training program upon documented enrollment and verified attendance through the first 14 calendar days. TANF-funded only; the training itself may be WIOA- or TANF-funded, but the incentive is not an allowable WIOA Adult/DW cost (CSF Policy 109).
Measurable Skill Gain (MSG)	$75 per MSG	Yes	No	Paid per verified MSG, max. 2 per participant per program year. Documented MSG under 20 CFR § 677.155(a)(1)(v) (educational functioning level gain, transcript or report card showing satisfactory progress, training milestone, or passed technical/occupational exam). TANF-funded only; it may not be paid twice for the same documented gain.
Credential Attainment	$150 per credential ($200 for a targeted occupation)	Yes	No	Paid once per credential, max. 2 per participant per program year. Recognized postsecondary or industry-recognized credential under 20 CFR § 677.155(a)(1)(iv), verified by issuer documentation. TANF-funded only. The higher amount applies to a credential for a targeted occupation, as defined in Milestone Definitions and Measurement Rules.

Milestone	Incentive Amount	TANF	WIOA	Basis / Note
Employment Achievement	$50	Yes	No	Participants are eligible for this incentive upon obtaining unsubsidized employment, either full-time or part-time, provided that the part-time employment results in case closure due to income. Once per program year.

Milestone	Incentive Amount	TANF	WIOA	Basis / Note
Training-Related Employment	$100 ($150 for a targeted occupation)	Yes	No	One-time payment, in addition to Employment Achievement, for unsubsidized employment in an occupation related to the completed training or credential, verified within 180 days of training completion or credential attainment. Does not replace or reduce the Employment Achievement or retention incentives. TANF-funded only. The higher amount applies to employment in a targeted occupation, as defined in Milestone Definitions and Measurement Rules.
Participation Requirement (First Month of Activity Enrollment)	$75	Yes	No	Directly tied to the TANF work-participation requirement (45 CFR Part 261); not WIOA use of funds. Once per participation episode, and not more than twice per participant per program year.
Sustained Participation (Second Month of Activity Enrollment)	$50	Yes	No	Paid when the countable work-activity hours required by the participant's IRP are verified in OSST for the second month of enrollment (45 CFR §§ 261.30–261.31). TANF-funded only. Not payable if the participant is sanctioned, or is deferred without an approved alternate requirement plan, at issuance. Not issued until the Effective Date and Classification Condition is satisfied. Once per participation episode, and not more than twice per participant per program year.
Sustained Participation (Third Month of Activity Enrollment)	$50	Yes	No	Same conditions as the second-month milestone, for the third month of enrollment. After the third month, continued participation is rewarded only through the Sustained Participation (Months 4 through 12) milestone; all other later payments are outcome-based. Once per participation episode, and not more than twice per participant per program year.

Milestone	Incentive Amount	TANF	WIOA	Basis / Note
Sustained Participation (Months 4 through 12 of Activity Enrollment)	$25 per month	Yes	No	Paid for each of months 4 through 12 of enrollment in which the countable work-activity hours required by the participant's IRP are verified in OSST (45 CFR §§ 261.30–261.31), up to nine payments ($225) per participation episode. A month that is not compliant is not paid but does not end eligibility for later months. Excused absences and approved alternate requirement plans count as provided in Milestone Definitions and Measurement Rules. Not payable if the participant is sanctioned, or is deferred without an approved alternate requirement plan, at issuance. TANF-funded only. Not issued until the Effective Date and Classification Condition is satisfied, and subject to the Incentive Checks and Balances subsection.
Re-Engagement After Penalty Period	$50 ($25 at return / $25 at completion)	Yes	No	Paid in two installments, once per participant per program year (unless the Executive Director approves an exception in writing). The first $25 is paid after the penalty period is served, the TCA case reopens, pre-penalty counseling and barrier reassessment are complete, and the IRP is updated. The second $25 is paid when the participant completes the required countable hours on every required scheduled day during a 30-calendar-day period. Not payable during the penalty period or as a substitute for a sanction determination (CSF Policy 37; Fla. Stat. § 414.065). TANF-funded only.
30-Day Employment Retention	PT $50 / FT $100	Yes	No	Not WIOA-eligible for Adult/Dislocated Worker participants. CSF Policy 109 limits WIOA incentive payments to youth participants only; supportive services may not be used as incentive payments for Adult/DW.
60-Day Employment Retention	PT $75 / FT $150	Yes	No	Same as above — not WIOA eligible for Adult/DW participants under CSF Policy 109.
90-Day Employment Retention	PT $125 / FT $200	Yes	No	Same as above — not WIOA-eligible for Adult/DW participants under CSF Policy 109.

Milestone	Incentive Amount	TANF	WIOA	Basis / Note
Self-Sufficiency Wage Supplement	$200 ($100 / $50 / $50)	Yes	No	Paid in three installments, in addition to the retention milestones: $100 at the 90-day retention verification, $50 at the 180-day verification, and $50 at the 365-day verification. Each installment is payable when employment continues and the participant's verified earnings at that verification are at or above the self-sufficiency wage threshold set in the CAP Incentives Procedures under the Earnings and Self-Sufficiency Provisions subsection. TANF-funded only; verified by pay records or wage data.
180-Day Employment Retention	PT $175 / FT $250	Yes	No	Same as above — not WIOA-eligible for Adult/DW participants under CSF Policy 109.
365-Day Employment Retention	PT $225 / FT $300	Yes	No	Same as above — not WIOA-eligible for Adult/DW participants under CSF Policy 109. Retention through 365 days is intended to align with the fourth-quarter-after-exit measurement of the Reduction in Public Assistance metric.
Wage Progression	$100	Yes	No	One-time payment per employment episode, in addition to the retention milestones, when the participant's verified hourly wage or average weekly earnings at the 180-day or 365-day retention verification exceed the verified starting wage or earnings by at least the percentage set in the CAP Incentives Procedures and employment continues. TANF-funded only; verified by pay records or wage data.
Durable TCA Exit (6 Months After Closure)	$100	Yes	No	One-time payment per participation episode when the participant's TCA case closed because verified earnings exceeded eligibility limits and the case remains closed six months after the closure date, as verified by DCF recipient data. Not payable for closures due to sanctions, time limit, or administrative reasons. TANF-funded only.

Participation Strengthening Provisions

To increase and sustain CAP participation, CSSF shall apply the following provisions together with the incentive milestones in Table 2.

(a) **Sustained Participation.** The Second Month and Third Month milestones are paid when the countable work-activity hours required by the participant's IRP for that month are verified in OSST consistent with 45 CFR §§ 261.30–261.31 and reconciled under the Work Verification Plan. Each is paid once. Non-sanctioned status, and either non-deferred status or participation in an approved alternate requirement plan, must be verified at issuance. After the third month, the Sustained Participation (Months 4 through 12) milestone is the only attendance-based incentive. It is paid for each month, from the fourth through the twelfth, in which the IRP hours are verified, subject to the same non-sanctioned and non-deferred verification at issuance. A month that is not compliant is not paid but does not end eligibility for later months. No attendance-based incentive is payable after the twelfth month of enrollment.

(b) **Re-Engagement After Penalty Period.** A participant whose penalty period under Fla. Stat. § 414.065 has been served and whose Temporary Cash Assistance case has reopened may receive the Re-Engagement incentive in two installments, once per participant per program year, unless an exception is approved in writing by the Executive Director: $25 after (1) completing the pre-penalty counseling required by CSF Policy 37; (2) a documented barrier reassessment; and (3) an updated IRP; and a second $25 after (4) completing the required countable hours on every required scheduled day during a 30-calendar-day period, not simply some participation. No incentive is payable during a penalty period, and the incentive does not replace or defer a sanction determination or the pre-penalty counseling required by CSF Policy 37. Program management shall track the 30- and 90-day outcomes of re-engaged participants separately and report them as provided in the Performance Targets, Evaluation, and Reporting subsection.

(c) **Barrier Screening and Supportive Services.** At enrollment and at each IRP review, case managers shall screen for childcare, transportation, and other participation barriers and shall authorize needed supportive services under Fla. Stat. § 445.025 (and WIOA sec. 134(d)(2) where the participant is co-enrolled and the need cannot be met through another program) no later than the participant's first scheduled activity. Supportive services shall not be replaced by, or charged as, incentives.

(d) **Early Outreach.** Within two business days after receiving a Notice of Mandatory Attendance (NOMA) or a required appointment notice, case managers shall contact the participant, attempt to resolve any barriers, and document each outreach attempt in OSST before making any noncompliance referral, consistent with CSF Policy 37.

Progress Reviews

Program staff shall conduct and document a progress review at 30, 60, and 90 days after Program Activation, at the midpoint of any approved training program, and upon job loss or training withdrawal. Each review shall assess verified hours, barriers, skills progression, job-search activity, training progress, employment prospects, and whether the IRP requires modification. Each 90-day review shall result in one of the following documented determinations: (1) continuation with documented progress; (2) assignment to a more intensive employment or training intervention; (3) barrier remediation; (4) referral for compliance action where appropriate under Fla. Stat. § 414.065 and CSF Policy 37; or (5) transition to another service strategy.

Participation-based incentives shall not be issued for any period after a required review is overdue until the review is completed; the incentive is then payable if all other requirements were met, so that a participant is not penalized for staff delay. A review that documents no progress requires an updated IRP before further participation-based incentives are issued. Reviews do not affect incentives already earned for training, employment, or retention outcomes, and an incentive is never a substitute for a required review. Incentive payment status shall be reviewed with the participant at each progress review so that barriers affecting participation are identified and addressed.

Employment Retention Rules and Participant Limits

(a) **Retention Clock.** Retention periods are measured from the first day of verified unsubsidized employment. The clock does not reset when the continuity rules below are met.

(b) **Employer Changes, Gaps, and Leave.** Retention is not limited to a single employer. A change of employer, including a change that advances the participant's career, preserves retention if the break between jobs does not exceed 30 calendar days. Approved leave and a temporary layoff of up to 30 calendar days do not break continuity if the participant returns to the same employer. A longer break ends the employment episode: milestones already earned are retained, later retention milestones are measured from the first day of new qualifying employment, and no milestone is paid twice within a participation episode.

(c) **Hours and Multiple Jobs.** For Employment Achievement, participants may qualify based on unsubsidized full-time employment (30 hours) or part-time (20 hours) employment that results in case closure due to income.

(d) **Self-Employment and Variable Hours.** Self-employment qualifies when verified by business records, tax filings, or bank deposits showing hours worked and earnings. Variable schedules are averaged over the preceding 30 calendar days.

(e) **Participant Limits.** Unless this subsection states otherwise, each milestone is payable once per participant per participation episode. Training Enrollment is payable once per approved training program, for not more than two approved programs per participant per program year. Measurable Skill Gain and Credential Attainment are each limited to two payments per participant per program year, counted by the date of the documented gain or credential issuance. Re-Engagement is limited to one payment (two installments) per participant per program year unless an exception is approved. The First, Second, and Third Month milestones are payable once per participation episode and not more than twice per participant per program year. Sustained Participation (Months 4 through 12) is payable once for each qualifying month, up to nine times per participation episode; Wage Progression is payable once per employment episode; and Durable TCA Exit is payable once per participation episode. A participant who re-enrolls after case closure begins a new participation episode but may not receive Program Activation again within 12 months after the prior payment. A milestone that spans more than one program year is counted in the program year of its achievement event: the credential issuance date, the documented gain date, the employment start date for Employment Achievement, or the verification date for retention milestones.

Milestone Definitions and Measurement Rules

The following definitions and rules apply to the incentive milestones in Table 2.

(a) Month of Enrollment. A month of enrollment is a consecutive 30-calendar-day period beginning on the Program Activation date. For the First, Second, and Third Month milestones, and for each month under the Sustained Participation (Months 4 through 12) milestone, the required hours are the countable hours required by the IRP (prorated for a partial month), verified in OSST under the Work Verification Plan.

(b) Absences, Good Cause, and Accommodations. Absences excused under the program's good-cause standards, approved reasonable accommodations, and participation under an approved alternate requirement plan count toward participation requirements as provided in the IRP and the Work Verification Plan, and shall be documented in OSST. A participant shall not be disqualified from a participation milestone solely because of an excused absence or a documented barrier for which a needed supportive service was not yet in place.

(c) Training Enrollment. Satisfied by attendance at all scheduled training sessions during the first 14 calendar days of an approved training program. Daily attendance is not implied; only scheduled sessions count.

(d) Targeted Occupation. The higher Credential Attainment and Training-Related Employment amounts apply when the credential qualifies the participant for, or the employment is in, an occupation on the targeted occupations list approved by the SFWIB for LWDA 23 and in effect on the date the credential is issued or the date of hire. The case file shall identify the list entry relied upon.

Earnings and Self-Sufficiency Provisions

The following provisions support the local performance metrics for Participants With Increased Earnings (second quarter after exit) and Reduction in Public Assistance (fourth quarter after exit), and apply to CAP participants whether or not they are co-enrolled in WIOA.

(a) CLIFF Plan Before Employment Incentives. The participant shall be offered a benefits-management plan prepared with the CLIFF Navigator, or another approved tool that demonstrates the future financial impacts of changes in income and benefits, consistent with Fla. Stat. § 445.0281, before the Employment Achievement, Training-Related Employment, or 30-Day Employment Retention incentive is issued. A completed plan, or the participant's written declination, shall be documented in the case file before issuance. A declination does not forfeit the incentive.

(b) Self-Sufficiency Threshold, Installments, and Wage Progression. The self-sufficiency wage threshold shall be determined using the following methodology, which the CAP Incentives Procedures shall implement and which CSSF shall review annually on a stated update date: (1) household size; (2) county of residence; (3) the participant's verified hourly wage and expected weekly hours; (4) the result of the CLIFF Navigator or other approved local standard, including a documented benefits-impact assessment of expected changes in income and benefits; and (5) treatment of variable schedules and self-employment under the Employment Retention Rules and Participant Limits subsection. The CAP Incentives Procedures shall also set the minimum percentage increase over the verified starting wage or average weekly earnings required for the Wage Progression milestone. The Self-Sufficiency Wage Supplement installments and Wage Progression are in addition to the retention incentives, are not chargeable to WIOA funds, and are subject to the Effective Date and Classification Condition.

(c) **Benefit Counseling and Tracking.** When a participant reports employment or receives an incentive, staff shall counsel the participant on how incentive payments and increased earnings may affect SNAP, housing assistance, other public benefits, and taxes, using the CLIFF Navigator where available, in the same conversation required by CSF Policy 37, and shall document the counseling. Program management shall track each CAP participant's SNAP and TANF status through the fourth quarter after exit using Employ Florida, OSST, and DCF recipient data.

(d) **Employment, Wage, and Case-Closure Verification.** For each employment-based milestone, staff shall record whether the employment is expected to appear in Unemployment Insurance wage records and, where it is not (for example, self-employment, cash-paid, out-of-state, or federal employment), shall document the alternative verification relied upon. Wage Progression shall be verified by pay records or wage data, and Durable TCA Exit by DCF recipient data confirming the closure reason and that the case remained closed for six months.

Phased Implementation, Measurement, and Evaluation

(a) **Phased Rollout.** As approved by the Executive Director, CSSF shall implement the incentive categories in phases across American Job Centers, so that results can be compared between centers that have implemented a category and centers that have not yet done so.

(b) **Baselines.** Before each phase begins, program management shall establish baselines for orientation-to-first-activity conversion; 30-day verified participation; average weekly verified hours; training completion and credential attainment; 90-, 180-, and 365-day retention; wage progression; TANF and SNAP receipt in the fourth quarter after exit; and returns to TCA within 12 months.

(c) **Reporting and Cost per Outcome.** Program management shall report to the Executive Director quarterly, by milestone, center, and provider, on outcomes compared with baseline and on cost per verified participant-month, cost per employment, cost per 180-day retained employment, cost per case leaving TCA, and public-assistance reduction net of incentive cost.

(d) **Annual Amount Review.** At least annually, program management shall review milestone amounts against results and available TANF funding and recommend adjustments to the SFWIB or its designated committee, so that the largest share of potential payments rewards outcome milestones. Early engagement incentives shall remain smaller than long-term employment and wage outcomes. A milestone that shows no measurable effect on outcomes may be reduced or discontinued as provided in the Limitations section.

(e) **Separation from Official Measures.** These local measures are distinct from the official TANF work participation rate and from the WIOA performance indicators.

Incentive Checks and Balances

The following controls apply to all CAP incentives and, in particular, to the monthly Sustained Participation milestone.

(a) **Classification Gate for Recurring Payments.** Because Sustained Participation is payable monthly, it is a separate category under the Effective Date and Classification Condition. The written determination must specifically address recurring monthly payments, including whether payments continuing beyond four months constitute assistance under 45 CFR § 260.31 and the resulting effect on the 48-month time limit, TANF Data Report elements, and child-support assignment. The monthly category shall not be issued until that determination is

retained in the policy file. Other approved categories may be implemented once each has been determined to be non-assistance.

(b) Work Participation Integrity. A monthly or other participation-based incentive shall be issued only for hours verified in OSST under the Work Verification Plan; self-report alone is not sufficient. Program management shall reconcile incentive payments against OSST work-activity hours at least monthly and before the affected period is reported, and shall correct any discrepancy. Hours shall not be recorded, rounded, or reclassified in order to qualify a participant for an incentive.

(c) Fiscal Modeling and Cost Limits. Before each implementation phase and annually, program management shall model projected expenditures across all incentive categories, including monthly Sustained Participation at full compliance ($225 per participant), and shall confirm available TANF funding. Any increase in an incentive amount or addition of a category shall be accompanied by a funding check and, where practicable, an offsetting adjustment elsewhere in Table 2. If projected or actual expenditures exceed the amount authorized by the Executive Director, the Executive Director may suspend or reduce an incentive category as provided in the Limitations section. The model shall be retained in the policy file.

(d) Uniform Amounts and Supportive Services. Incentive amounts shall be uniform for every participant eligible for a milestone; no participant-specific or risk-based amounts may be set without written approval of the Executive Director following legal review. Supportive services, including childcare and transportation, shall not be provided in place of, funded as, or conditioned on an incentive and shall be in place no later than the participant's first scheduled activity.

(e) Gaming and Duplicate-Payment Controls. Staff shall not delay, accelerate, or otherwise manipulate case closure, re-enrollment, IRP updates, or activity assignments to create or avoid an incentive payment. Supervisors shall review each monthly payment request for compliance with this policy before authorization, and program management shall review payment patterns by center, provider, and case manager at least quarterly and refer anomalies for corrective action.

(f) Evaluation of Monthly Payments. In the first implementation phase, CSSF may implement monthly Sustained Participation at selected American Job Centers only and compare verified participation in months 4 through 12, retention of participation after month three, and cost per additional compliant month against centers that have not implemented it. Results shall be reported to the Executive Director under the Phased Implementation, Measurement, and Evaluation subsection, and the amount and frequency of the payment shall be adjusted based on results.

Service Delivery Standards and Participant Information

Subject to operational capacity, program staff shall:

(a) contact new referrals within two business days;
(b) complete orientation and initial planning within five business days, where practicable;
(c) offer job-ready participants a documented employer referral within 10 business days;
(d) escalate unresolved participation barriers to a supervisor, and;
(e) issue approved participation-based incentives (Program Activation, Participation Requirement, Sustained Participation, and Re-Engagement installments) within five business days, and all other approved incentives within 10 business days, after complete verification is received. Each participant shall receive a one-page, plain-language incentive schedule at orientation, and again when the participant enters training or employment, stating what earns each incentive and when payment is made. At least monthly, program staff shall notify each

participant, by the participant's preferred method (text, email, or mail), of the hours verified, the next incentive for which the participant is eligible, and the expected payment date.

WIOA Needs-Related Payments for Co-Enrolled CAP Participants

A CAP participant who is co-enrolled in WIOA Title I Adult or Dislocated Worker services may receive a needs-related payment (NRP) only as provided in this subsection. An NRP is a WIOA supportive service. It is not a CAP incentive, is not a milestone under Table 2 or Appendix B, and is determined, calculated, approved, paid, and recorded solely under WIOA sec. 134(d)(3), 20 CFR §§ 680.930–680.970, and CSF Policy 109. NRPs are charged to WIOA Title I funds only; CAP incentives remain funded from TANF funds as provided above.

Participant Eligibility

- The participant must be actively enrolled in CAP, opened in OSST in Mandatory or Transitional status, and in good standing with CAP. For the employment-retention milestones, the Self-Sufficiency Wage Supplement, Wage Progression, and Durable TCA Exit, a participant who has left Temporary Cash Assistance remains eligible while the participant's CAP record remains open in Transitional status and the participant is receiving voluntary transitional case management or other transitional services under Fla. Stat. §§ 445.028 and 445.0281. That transitional authority supports continued engagement but does not itself authorize any incentive.

- The participant must complete an approved milestone and satisfy the milestone-specific conditions in this policy.

- Eligibility is subject to program compliance, verified documentation, approval, funding availability, and the prohibition against duplicate payment for the same milestone.

Approval, Distribution, and Documentation

- Program staff shall verify completion of the required milestone before requesting approval.

- Staff shall complete the approved incentive request form and provide supporting documentation.

- Supervisory review and approval at the American Job Center level shall be obtained before issuance, as required by approved procedures.

- Approved incentives may be distributed by check or ACH; participation-based incentives shall be distributed by ACH or another approved electronic method where the participant has elected it, so that the five-business-day standard can be met. Participants shall acknowledge receipt by signing and dating the appropriate documentation.

- All incentives shall be recorded in OSST. Case notes shall identify the incentive type, amount, date issued, reason for issuance, verification reviewed, and approval information.

- Incentive payments shall be recorded in WFMS using the applicable funding source and service code.

- The applicable benchmark code shall be entered each time an incentive is issued.

- Supporting documentation, approvals, receipts, vouchers, invoices, and payment records shall be maintained in the participant file, as applicable.

- Services and payments funded in whole or in part with WIOA funds, including needs-related payments, shall also be entered in the applicable WIOA case management system (e.g., Employ Florida) in addition to OSST/WFMS, and the case file shall identify the funding source(s) used and the basis for any cost allocation applied.

- Approved participation-based incentives (Program Activation, Participation Requirement, Sustained Participation, and Re-Engagement installments) shall be issued within five business days, and all other approved incentives within 10 business days, after complete verification and documentation are received, and the issue date shall be recorded in OSST.
- Needs-related payments shall be requested on a separate NRP request form, approved under the NRP subsection of this policy, recorded under a separate WIOA service code and funding source in Employ Florida (and in OSST/WFMS as required), and shall not be combined in a single payment or transaction with any CAP incentive.

TANF and WIOA Compliance Assurance

Issuing a CAP incentive is a consequence of demonstrated program compliance, not a substitute for it. This policy does not create, and shall not be construed to create, any independent basis for continued CAP, TANF, or WIOA participation; each incentive must be verified against the compliance requirements below before it is authorized.

TANF Work Participation Compliance

- Before authorizing a milestone tied to a specific period of program participation (Participation Requirement, Sustained Participation, and Re-Engagement), staff must confirm that the participant's countable work-activity hours for that period have been verified and are accurately reflected in OSST consistent with 45 CFR §§ 261.30–261.31, so that CAP records support — rather than conflict with — the data the State reports on the TANF Data Report.

- Employment-retention milestones (30-, 60-, 90-, 180-, and 365-Day), the Self-Sufficiency Wage Supplement, Wage Progression, and Durable TCA Exit are not participation-hour milestones. They require verified employment, the applicable retention period, and continued eligibility under this policy, and they do not require verified TANF work-participation hours. A participant who has left Temporary Cash Assistance is not required to reopen cash assistance or satisfy a mandatory participation requirement to receive an otherwise allowable retention incentive.

- No incentive may be authorized in lieu of, or in a manner that defers or substitutes for, a required Individual Responsibility Plan (IRP) review or an unresolved sanction determination under 45 CFR §§ 261.12–261.14 and Fla. Stat. § 414.065. For participation milestones, non-sanctioned status, and either non-deferred status or participation in an approved alternate requirement plan, must be verified at the time of each issuance, not only at initial CAP enrollment.

- Program management shall periodically reconcile CAP incentive records against OSST work-activity data as part of the State's Work Verification Plan procedures under 45 CFR § 261.62, and shall correct any discrepancy before the affected period is reported.

- CAP incentives are separate from, and are not a substitute for, the Cash Assistance Severance Benefit under CSF Policy 24 (Fla. Stat. § 445.026). Consistent with CSF Policy 37, when a participant reports obtaining employment, staff must present both the applicable CAP incentive and the Cash Assistance Severance Benefit as separate options in the same counseling conversation, and document the participant's choice regarding the Severance Benefit in the case file.

WIOA Performance Compliance

- Before any WIOA-funded service or payment (including a needs-related payment) is issued to a CAP participant, staff must confirm the participant's record in the applicable WIOA case management system (e.g., Employ Florida) reflects current, accurate enrollment, service, and (where applicable) exit data consistent with WIOA sec. 116 and 20 CFR Part 677, so that issuance does not create data inconsistent with the local area's performance-indicator calculations.

- Employment-retention milestones must be understood against Florida's common-exit framework under CSF Policy O115: a WIOA/Wagner-Peyser/TAA participant's exit is a system-generated, retroactive determination triggered by 90 days without a participating service and is distinct from the case-management “case closure” recorded when a participant obtains employment. TANF/Welfare Transition is not part of this common-exit framework and follows its own closure process under CSF Policy 37. For the narrow WIOA Youth case described above where a milestone is independently supportable, its timing must be checked against this 90-day mechanic — not a manually recorded date — so CAP recordkeeping does not distort the measurement window for the second- and fourth-quarter employment and median-earnings indicators under WIOA sec. 116(b)(2)(A).

- A TANF sanction or penalty-period determination does not, by itself, alter a participant's WIOA enrollment, service, or exit status; milestones charged to WIOA funds remain subject solely to WIOA's own eligibility, service, and exit rules unless the participant is independently exited from WIOA services.

VI. LIMITATIONS

Incentives are subject to approved categories, funding availability, and the current CAP Incentive Milestones by Funding Source (Table 2). Under the current milestones, a single participant's scenario total across all incentive milestones is $2,525 on a part-time employment path or $2,875 on a full-time employment path, assuming two Measurable Skill Gain payments; two Credential Attainment payments and the Training-Related Employment payment at the targeted-occupation amounts; nine Sustained Participation (Months 4 through 12) payments; one Re-Engagement payment (both installments); and one Self-Sufficiency Wage Supplement (all three installments), Wage Progression, and Durable TCA Exit payment; this figure is a scenario total provided for fiscal-exposure reference, is not an enforceable maximum, and is not itself an independent authorization — actual payment remains subject to every other limitation in this section.

- An incentive shall not be issued without documentation supporting milestone completion and the approval of the AJC Director.

- Multiple incentives may be issued for separate milestones; duplicate payment for the same milestone is prohibited.

- Deferred TANF participants who are not participating in an alternate requirement plan are not eligible.

- Sanctioned TANF participants are not eligible during the penalty period. Eligibility may resume after the penalty period is served and the Temporary Cash Assistance case reopens if all other requirements are met. The Re-Engagement After Penalty Period milestone is the only incentive earned by reference to a penalty period, and it is payable only after the penalty period has been served.

- Incentives shall not be substituted for support services or charged to a support-service category unless expressly allowed by approved policy, funding rules, and the Incentives Matrix.

- Falsified, altered, insufficient, or unverifiable documentation may result in denial, corrective action, or recovery of funds in accordance with applicable requirements.

- CSSF may modify, suspend, discontinue, or eliminate an incentive category, subject to applicable authority and funding conditions.

- A single incentive milestone may not be paid, in whole or in part, from more than one funding source for the same occurrence; the prohibition on duplicate payment for the same milestone applies across TANF and WIOA funds as well as across contracted providers.

- A WIOA needs-related payment issued under the NRP subsection is not a CAP incentive milestone, is not listed in Table 2, and does not count toward the maximum incentive totals stated in this section.

- A CAP incentive and a needs-related payment are separately authorized, funded, calculated, paid, and recorded. Staff shall assess applicable income and need rules, shall document whether an incentive received affects the participant's documented need for an NRP, and shall not combine the two payments or convert either into the other.

VII. EXCEPTIONS

Exceptions to this policy, or any part thereof, must be approved in writing by the SFWIB Executive Director.

SFWIB GLOBAL TALENT COMPETITIVENESS COUNCIL

DATE: 10/29/2026

AGENDA ITEM NUMBER: 10

AGENDA ITEM SUBJECT: ALLOCATION OF TANF FUNDING TO IMPLEMENT THE CAP INCENTIVE POLICY

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: Staff recommends that the Global Talent Competitiveness Council to recommend to the Board to approve an allocation of $495,000 in Temporary Assistance for Needy Families (TANF) funding to the career centers listed below to implement the Career Advancement Program (CAP) Incentive Policy, as attached.

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

STRATEGIC PROJECT: **Improve service delivery outcomes**

BACKGROUND:

FloridaCommerce released a Notices of Fund Availability (NFAs) to CareerSource South Florida (CSSF) in TANF funding in the amount of $496,221 dollars. This new allocation will enable CSSF to allocate funds to the listed career centers to provide milestone achievement incentives to Career Advancement Program (CAP) participants under the CAP Incentive Policy.

CSSF currently has 288 participants enrolled in the TANF program, including 48 participants in transitional status. The State participation standard is 50 percent for all families and 90 percent for two-parent families. As of August, the All-Family Participation Rate was 4.7 percent and the Two-Parent Family Participation Rate was 6.5 percent. The CAP Incentive Policy is designed to significantly improve TANF (CAP) participation and reduce public assistance.

GLOBAL TALENT COMPETITIVENESS COUNCIL CONSIDERATIONS – CAP INCENTIVE ALLOCATION

Staff proposes to allocate the $495,000 in TANF funding to the following career centers, which will provide milestone achievement incentives to CAP participants:

Career Center	TANF Allocation
Carol City	$52,532
Hialeah	$52,458
Little Havana	$50,249

Career Center	TANF Allocation
North Miami Beach	$62,942
Northside	$83,858
Perrine	$104,489
West Dade	$88,472
Total	**$495,000**

- Funding Source: The funds are TANF funds only, provided through the two FloridaCommerce NFAs. No WIOA funds are used for CAP participant incentives.

- Use of Funds: Funds will be used only for participant milestone achievement incentives, including verified participation, training and employment milestones, job retention, and wage-related outcomes, as defined in the CAP Incentive Policy. The funds are separate from supportive services and may not be used in place of them.

- Compliance Controls: Incentives will be paid only for work activity hours and outcomes verified under the policy.

- Monitoring and Reporting: Staff will model projected expenditures before implementation, track utilization by career center against the allocation, and report participation and cost results to the Council, which may be used to recommend adjustments.

Staff recommends that the Council approve the allocation of $495,000 in TANF funding to the listed career centers to implement the CAP Incentive Policy.

Staff will implement the incentives through the career centers in phases as provided in the policy and will keep the Council informed of utilization and results.

FUNDING: TANF - $495,000

PERFORMANCE: N/A

NO ATTACHMENT

SFWIB GLOBAL TALENT COMPETITIVENESS COUNCIL

DATE: 10/29/2026

AGENDA ITEM NUMBER: 11

AGENDA ITEM SUBJECT: APPRENTICESHIP EMPLOYER WAGE REIMBURSEMENTS

AGENDA ITEM TYPE: **APPROVAL**

RECOMMENDATION: The Global Talent and Competitiveness Council recommends to the Board the approval to allocate an amount not to exceed $140,802.30 in Workforce Innovation and Opportunity Act funding for On-the-Job Training reimbursements for current apprentices enrolled in various Apprenticeship programs, as set forth below.

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

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

BACKGROUND:

The South Florida Workforce Investment Board (SFWIB) in collaboration with Miami Dade College offers employer-driven apprenticeship programs. The partnership has developed multiple apprenticeship programs with several participating employers. These apprenticeship programs will lead to a career pathway that combines coursework, mentoring, on-the-job training (OJT), and paid wages that increase as the apprentices learns new skills and take on more responsibilities. Apprentices will learn key responsibilities and skills required to become proficient in the occupation. Upon program completion, apprentices will receive a Florida Department of Education Registered Apprenticeship Certificate of Completion, recognized by the United States Department of Labor. These current apprentices are enrolled and actively participating in the following programs:

Culinary Specialist (Cook)

This program is designed to prepare participants with a passion for food, people, and a theoretical and practical foundation for a successful career in the culinary industry. Culinary specialists are trained to prepare and serve meals, maintain food service spaces, ensure food safety, and manage inventory and food orders. This program is a career pathway that combines college coursework, mentoring, and on-the-job training. Employer partners include Earl's Restaurant at Miami Worldcenter. The Hialeah Downtown and Northside American Job Centers (AJCs) are assigned to this employer.

Earl's Kitchen Miami Worldcenter Culinary Specialist Apprenticeship			
Project Wage	OJT Hours	40 percent Wage Reimbursement	Total Project Cost @ 1 Apprentice
$17.00	113.28	$6.80	$770.30

Total Project Cost	$770.30

Note: this apprentice dropped out of the program

Earl's Kitchen Miami Worldcenter Culinary Specialist Apprenticeship				
Project Wage	OJT Hours	40 percent Wage Reimbursement	Total Project Cost @ 1 Apprentice	Total Project Cost @ 6 Apprentices
$17.00	1180	$6.80	$8,024.00	$48,144.00
$19.00	820	$7.60	$6,232.00	$37,392.00
			Total Project Cost	$85,536.00

Teacher Assistant

The program is designed to provide 3,000 hours of On-The-Job training (OJT) and 15 credit hours of Related Technical Instruction (RTI). The RTI will be provided by Miami Dade College (MDC) and the OJT portion of the apprenticeship will be provided by local small business early education centers. Upon successful completion of the program, participants will earn the nationally recognized Child Development Associate (CDA) certification. Employer partners include Brighter Days Academy and Miami Dade College Exploration Station. Brighter Days Academy is assigned to the Northside AJC and Miami Dade College Exploration Station is assigned to the North Miami Beach AJC.

Brighter Days Teacher Assistant Apprenticeship				
Project Wage	OJT Hours	40 percent Wage Reimbursement	Training Cost Per Apprentice	Total Project Cost @ 1 Apprentice
$15.25	1000	$6.10	$6,100.00	$6,100.00
			Total Project Cost	$6,100.00

MDC Exploration Station Teacher Assistant Apprenticeship				
Project Wage	OJT Hours	40 percent Wage Reimbursement	Total Project Cost @ 1 Apprentice	Total Project Cost @ 3 Apprentices
$18.19	1000	$7.28	$7,276.00	$21,828.00
$22.14	1000	$8.86	$8,856.00	$26,568.00
			Total Project Cost	$48,396.00

FUNDING: Workforce Innovation and Opportunity Act

PERFORMANCE:

Cook (Culinary Specialist) Program Performance		
Local Workforce Development Area (LWDA) Performance	**SFWIB Funded Apprentice**	**Total Apprentice**
Number of Participants Served	3	3
Number of Participants to Complete Training	3	3
Training Completion Rate	100.00%	100.00%
Number of Participants to be Placed into Jobs	3	3
Employment Rate	100.00%	100.00%
Average Wage	$17.33	$17.33
Avg Net Economic Benefit	$34,660.00	$34,660.00
Return-On-Investment	$2.94	$2.94
Economic Impact	$77,604.00	$77,604.00
State and Federal Performance (Achieved and Projected)		
Indicators of Performance WIOA Adult (AD) & Wagner-Peyser (WP)	**Performance Goal**	**Projected Performance**
Employment Rate 2nd Quarter After Exit-AD	64.50%	155.04%
Employment Rate 4th Quarter After Exit-AD	66.10%	151.29%
Median Earnings 2nd Quarter After Exit-AD	$6,813.00	$9,011.60
Credential Attainment-AD	50.60%	197.63%
Measurable Skill Gains-AD	24.90%	401.61%
Employment Rate 2nd Quarter After Exit-WP	61.70%	162.07%
Employment Rate 4th Quarter After Exit-WP	59.40%	168.35%
Median Earnings 2nd Quarter After Exit -WP	$6,063.00	$9,011.60
Not Met (less than 90% of negotiated)		
Met (90-100% of negotiated)		
Exceeded (greater than 100% of negotiated)		

MDC Exploration Station Teacher Assistant Apprenticeship		
Local Workforce Development Area (LWDA) Performance	**SFWIB Funded Apprentice**	**Total Apprentice**
Number of Participants Served	3	3
Number of Participants to Complete Training	3	3
Training Completion Rate	100.00%	100.00%
Number of Participants to be Placed into Jobs	3	3
Employment Rate	100.00%	100.00%

Average Wage	$20.17	$20.17
Avg Net Economic Benefit	$24,208.00	$24,208.00
Return-On-Investment	$1.50	$1.50
Economic Impact	$72,624.00	$72,624.00

State and Federal Performance (Achieved and Projected)		
Indicators of Performance WIOA Adult (AD) & Wagner-Peyser (WP)	**Performance Goal**	**Projected Performance**
Employment Rate 2nd Quarter After Exit-AD	64.50%	155.04%
Employment Rate 4th Quarter After Exit-AD	66.10%	151.29%
Median Earnings 2nd Quarter After Exit-AD	$6,813.00	$10,488.40
Credential Attainment-AD	50.60%	197.63%
Measurable Skill Gains-AD	24.90%	401.61%
Employment Rate 2nd Quarter After Exit-WP	61.70%	162.07%
Employment Rate 4th Quarter After Exit-WP	59.40%	168.35%
Median Earnings 2nd Quarter After Exit -WP	$6,063.00	$10,488.40
Not Met (less than 90% of negotiated)		
Met (90-100% of negotiated)		
Exceeded (greater than 100% of negotiated)		

NO ATTACHMENT