



November 17, 2021 - 11:45 A.M.

Virtual Zoom Meeting

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[Zoom Link](#)

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Board of Directors
Agenda

- I. Welcome and Introductions Barclay Harless, Chair
- II. Public Comment
- III. Roll Call
- IV. Chair’s Report
- V. CEO Report.....Jennifer Brackney
- VI. Action/Discussion Items
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VII. General Counsel Update Stephanie Marchman, Gray|Robinson

VIII. Other Administrative Matters

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X. Open Discussion

XI. Adjournment

- Finance Committee – December 15, 2021 (10:00 am - 11:00 am)
- Audit Committee – December 15, 2021 (11:00 am - 12:00 pm)
- Compensation Committee – February 3, 2022 (11:00 am - 12:00 pm)
- Workforce Solutions Committee – February 17, 2022 (2:30 pm - 3:00 pm)
- One-Stop Committee – February 17, 2022 (9:00 am - 10:00 am)
- Next Board of Directors Meeting – January 19, 2022 (11:45 am - 12:45 pm)

**All parties are advised that if you decide to appeal any decision made by the Board with respect to any matter considered at the meeting or hearing, you will need a record of the proceedings, and that, for such purpose, you may need to ensure that a verbatim record of the proceedings is made, which record includes the testimony and evidence upon which the appeal is to be based.*

**If you have a disability and need an accommodation in order to participate in this meeting, please contact the executive assistant at 727-608-2551 or admin@careersourcepinellas.com at least two business days in advance of the meeting.*



I. Welcome & Introductions

Barclay Harless, Chair



II. Public Comments



III. Roll Call



IV. Chair's Report

Updates for the Board of CareerSource Pinellas



CAREERSOURCE PINELLAS SUCCESS STORY

We are pleased to share that CareerSource Pinellas has been recognized by Thrive by Five with a 2021 Family Friendly Pinellas Award for our family-friendly employment policies.

This countywide pilot program to recognize family-minded employers lays the groundwork for tomorrow's workforce, promotes a strong workforce today, and builds human capital across generations, to help ensure a prosperous and sustainable Pinellas.

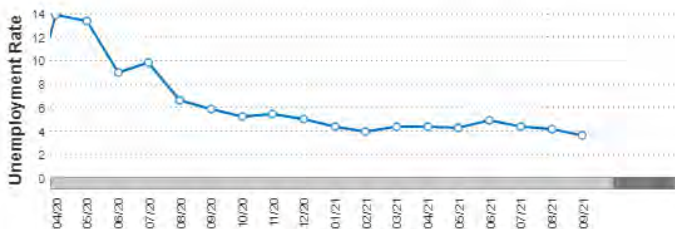
Being distinguished in our community for having employment policies which support our Team Members with young children speaks volumes about the organization's priorities and culture.

We thank our former HR Director, Jaclyn Reilly, for submitting this nomination on behalf of CareerSource Pinellas.

Florida Unemployment: At A Glance

The Pinellas County unemployment rate is 3.6%, which is 1.3% lower than the state unemployment rate of 4.9%. In September, there were 18,825 unemployed residents of Pinellas County of a workforce of 515,219 people.

Unemployment Rate
Pinellas County



Unemployed People
Pinellas County



Program Update: By the Numbers

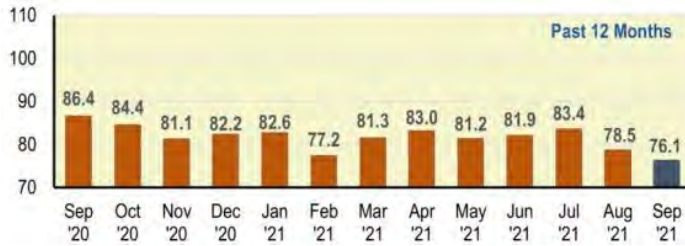
6,684 Individuals at Career Resource Centers

1,303 Employers Served



Florida Consumer Sentiment Index

Consumer confidence among Floridians dropped for a second consecutive month in September to 76.1, its lowest level in almost eight years. The current consumer sentiment is half a point lower than the levels recorded in May 2020, at the beginning of the coronavirus pandemic's impact to Florida's economy.



Compared to beliefs a year ago, Floridians' views of personal financial situations decreased 1.6 points from 72.7 to 71.1. Expectations for personal finances in a year increased 6 points to 97.1. Women and people over 60 generally reported less-favorable opinions.

Legislation to Know

During the 2021 legislative session, HB 1507 made significant changes to workforce development at the state and local levels to improve transparency and accountability.

On Sept. 21, the Governor's Office of Reimagining Education and Career Help presented an update to the House Committee on Secondary Education and Career Development on its implementation.

Job seekers in Pinellas County and across Florida deserve the best in education and employment opportunities so that they may gain long-term self-sufficiency.

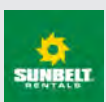


Partner Highlights



On Sept. 30, CareerSource Pinellas partnered with St. Petersburg College to offer a Fall Career Fair at their EpiCenter in Clearwater. The turnout was phenomenal -- approximately 275 job seekers attended, with 28 employers and five training providers on site.

"I wanted to let you know that William started yesterday and is doing awesome!" Melissa Huck – FRS Team
"Probably the best hiring event we've seen in years. Quality candidates and very well put together." Tracy - Vangard





V. CEO Report



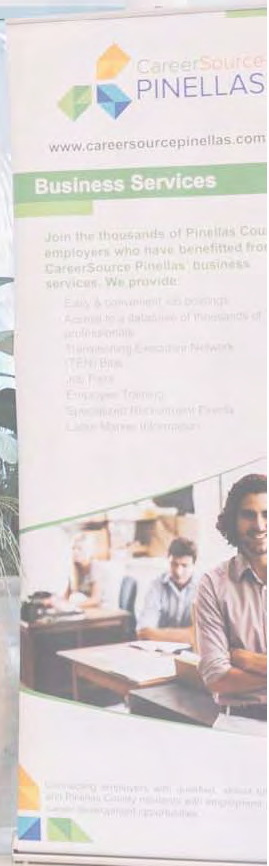
CEO REPORT

BOARD OF DIRECTORS MEETING
WEDNESDAY, NOVEMBER 17, 2021

HIGHLIGHTS & ACCOMPLISHMENTS

**Workforce Development Month & Summit
Legislative Updates – REACH (HB 1507)**

**HR/Finance Update
Programs & Services
Transition in the Works
Performance Measures
Policy Approval**



WORKFORCE DEVELOPMENT MONTH

The screenshot shows a web browser window displaying an article on the Tampa Bay 100 website. The browser's address bar shows the URL: <https://thetampabay100.com/business/2021/09/08/careersource-pi>. The website's header features the Tampa Bay 100 logo with the tagline "Building the Tampa Bay community 100 words at a time" and a navigation menu including Home, Business, Politics, History, Events, Lifestyle, Real Estate, and Sports. The article title is "CareerSource Pinellas celebrates Workforce Development Month" dated September 8, 2021. The main image shows the EpiCenter sign at 13805, which is a joint project of Pinellas County Government, St. Petersburg College, and CareerSource Pinellas. The article text discusses the National Association of Workforce Development Professionals' celebration of September as Workforce Development Month and CareerSource Pinellas' commitment to enhancing the workforce through various programs. On the right side of the page, there is a "COMMUNITY EVENTS" section listing "Ted Lasso Trivia Night" (November 11, 7:00 pm - 9:00 pm), "33rd Annual Sponge Docks Seafood Festival" (November 12, 12:00 pm - November 13, 9:00 pm), and "The State Comedy Showcase" (November 12, 9:00 pm - 10:00 pm). Below the events is a "Submit An Event" button and a "SEARCH" section with a search bar. At the bottom right, there is a "SUBSCRIBE TO THE TAMPA BAY 100" section with a sign-up form for the Tampa Bay 100 newsletter.

THE TAMPA BAY 100
Building the Tampa Bay community 100 words at a time

HOME BUSINESS POLITICS HISTORY EVENTS LIFESTYLE REAL ESTATE SPORTS

Home » Business » CareerSource Pinellas celebrates Workforce Development Month

CareerSource Pinellas celebrates Workforce Development Month
September 8, 2021

13805 EpiCenter
PINELLAS COUNTY GOVERNMENT
ST. PETERSBURG COLLEGE
CAREER SOURCE PINELLAS
LARGO

Image via CareerSource Pinellas.

The National Association of Workforce Development Professionals celebrates September as Workforce Development Month, and CareerSource Pinellas looks forward to highlighting the importance of a skilled workforce and robust talent pipeline to the local economy.

Through professional networking events, skills workshops, career fairs, specialized recruitment, training assistance and more, CareerSource Pinellas enhances lives by making talent a key competitive asset for the region. They also place an emphasis on growing apprenticeship opportunities and collaboration with local businesses.

Targeted industries include health care, manufacturing, financial and professional services, information technology and

COMMUNITY EVENTS

- Ted Lasso Trivia Night**
November 11 @ 7:00 pm - 9:00 pm
- 33rd Annual Sponge Docks Seafood Festival**
November 12 @ 12:00 pm - November 13 @ 9:00 pm
- The State Comedy Showcase**
November 12 @ 9:00 pm - 10:00 pm

[View All Events](#)

[Submit An Event](#)

SEARCH

Type and hit enter...

SUBSCRIBE TO THE TAMPA BAY 100

Sign up to get The Tampa Bay 100 sent to your inbox every other week!

First name

Last name

WORKFORCE DEVELOPMENT SUMMIT

The annual Workforce Development Summit is the pinnacle of learning experiences. It convenes workforce professionals from across the state for strategic dialogues, insights into best practices within the industry and beyond, trend analysis and future-scoping, and the most comprehensive networking that exists in the workforce development arena.



Michelle Binette was nominated by the Leadership Team for the Champion Award. This award is given to a frontline team member who provides services to customers. Michelle Binette is a Coordinator and has been with the organization since 2010. Congratulations Michelle!

2021 FLORIDA VETERANS WORKFORCE SUMMIT

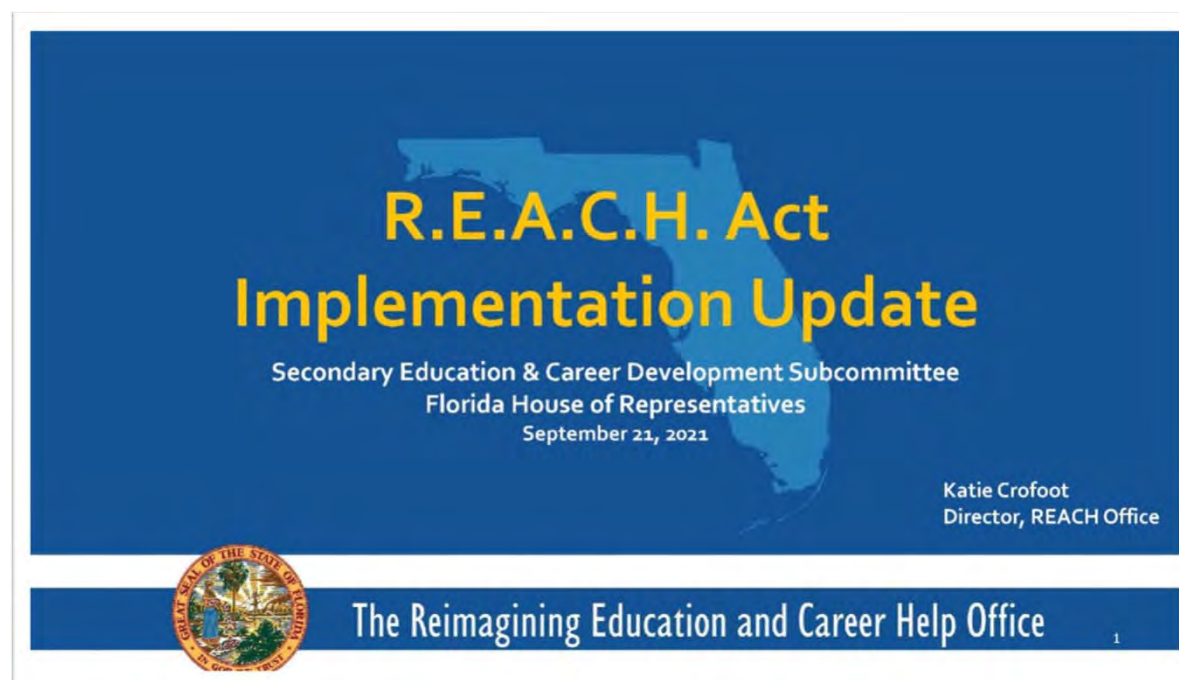
The Veterans Team had the opportunity to attend the 2021 Florida Veterans Workforce Summit. It convenes veteran professionals from across the state for strategic dialogues, insights into best practices within the industry, and offers the opportunity for training and networking.



In attendance from left to right: Top row: Scott Furbay, DVOP, John Sanaxay, DVOP, Melissa Ehrhardt, Business Services Coordinator, Glen Alexander, DVOP Bottom row: Daniel Wright, DVOP, Natalia Dolsak, Veterans Supervisor, and Ahmed Amer, LVER.

LEGISLATIVE UPDATE

HB 1507 Implementation



During the 2021 legislative session, House Bill 1507 made significant changes to workforce development at the state and local levels to improve transparency and accountability.

On September 21, the Governor's Office of Reimagining Education and Career Help presented an update to the House Committee on Secondary Education and Career Development on its implementation.

Reimagining Education & Career Help (REACH)

Vision: Addresses the evolving needs of Florida's economy by increasing the level of collaboration and cooperation among state businesses and education communities while improving training within and equity and access to a more integrated workforce and education system for all Floridians, [FL Statute 14.36](#)

Partners: Executive Office of the Governor, CareerSource Florida, Florida Department of Education, Florida Department of Economic Opportunity, and Florida Department of Children and Families.

REACH Act: What it Does:

- New REACH Office
- Strengthens Partnerships
- Labor Market Estimating Conference
- Credential Review Committee
- No Wrong Door
- Open Doors Grants
- Increased Accountability
 - Money-Back Guarantee
 - Letter Grades
 - Disclosures
 - Performance expectations and reporting for education and public assistance programs
 - Board member – term limits

STRATEGIC PLAN



VISION:

The vision of CareerSource Pinellas is to enhance lives by making talent the region's key competitive asset.

MISSION:

The mission of CareerSource Pinellas is to build the talent pipeline for today and the future by providing easy access to workforce solutions.

RESULTS AND KEY METRICS (2021-2022)



6,684 Individuals visited the Career Resource Centers



1,129 Businesses connected with business services



1,019 Individuals received a referral for employment through Employ Florida



350+ Job seekers attended onsite career fairs and recruiting events



4,412 Individuals attended career and professional workshops



478 Placements in employment through Employ Florida



408 Individuals enrolled in WIOA training programs

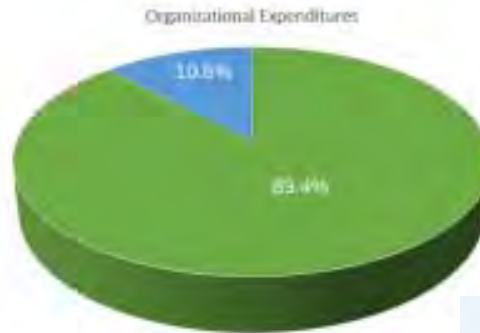
FINANCIAL SNAPSHOT



Local Total: \$2,427,515

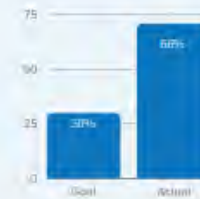
Organizational Expenditures

Of the total \$2,416,174 in workforce expenditures year-to-date, \$257,236 was spent on administration (10.6%).

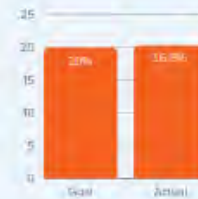


Client Services | Administrative Expenditures

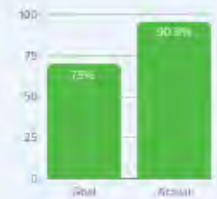
Individual Training Account (ITA)



Paid Work Experience

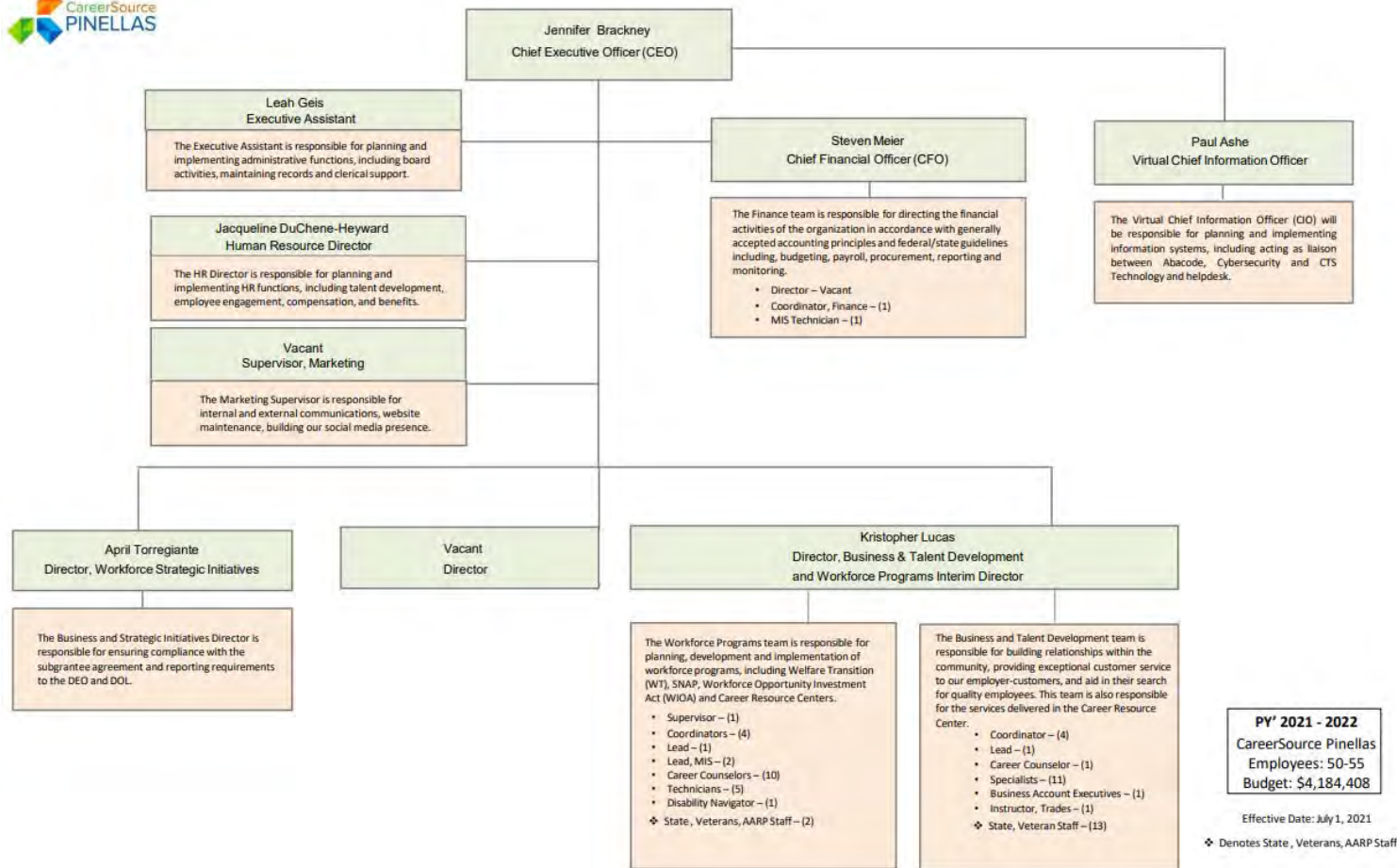


Out of School Youth



HR UPDATES

We currently have a total of 62 employees providing career and business services throughout Pinellas County, including 47 CareerSource Pinellas employees and 15 DEO state-merit employees.

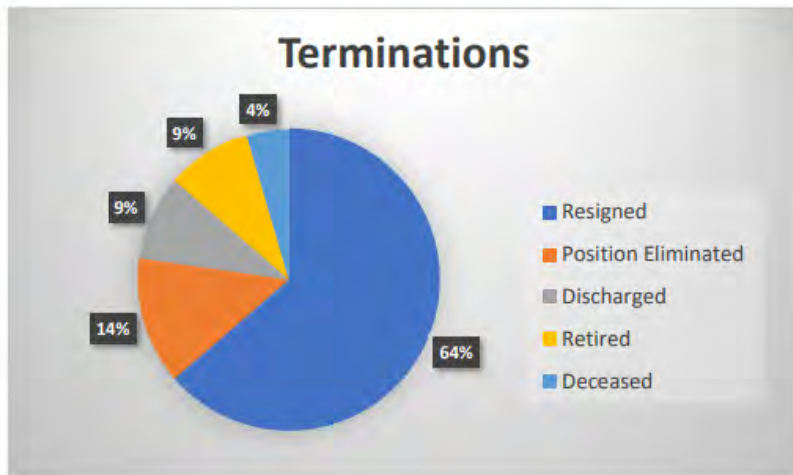


HR UPDATES

During the past 14 months, the majority, 64% of the turnover has been due to resignations. Of the resignations, 50% had active coaching/corrective action. There were two retirements, three positions eliminated due to COVID, two employees were discharged, and one of our team members passed away. We currently have 47 CareerSource Pinellas employees and 15 DEO state-merit employees.



Detailed Turnover Analysis: 07/01/2020 - 08/30/2021



CAREER RESOURCE CENTER WORKSHOPS

We have hosted 129 workshops with over 4,412 individuals attending.

These workshops help individuals develop clarity, and action plans to connect their interests and abilities with career opportunities.

Most workshops are held virtually via Zoom through our partnership with SPC.



This Wednesday: Interview Skills with Debraca Russell, President of Agape Counseling Group

Register Now at <https://bit.ly/34XqOtd>

LINKEDIN WORKSHOP

Tomorrow - how to join groups, research companies and search for jobs. Register Now at <https://web.spcollege.edu/survey/32487>



Professional Skills Workshop tomorrow!

Professional Etiquette:

How to Make a First Impression

Register Now at <https://web.spcollege.edu/survey/32493>

Veterans Job Readiness Workshops

Wednesdays in October
10 AM



FALL CAREER FAIR WITH SPC

August 25: Hosted a Career Fair at Mid-Town.

September 30: Partnered with St. Petersburg College to offer a Fall Career Fair at their EpiCenter in Clearwater.

The turnout was phenomenal -- approximately 350 job seekers attended the events, with 58 employers and five training providers on site.

"I wanted to let you know that William started yesterday and is doing awesome!"

Melissa Huck – FRS Team

"Probably the best hiring event we've seen in years. Quality candidates and very well put together." Tracy - Vangard



HOSTED BY
CareerSource PINELLAS
AND
SPC St. Petersburg College

NOW HIRING AT THE CLEARWATER FALL JOB FAIR!

More than **30 local businesses** are looking to fill immediate job openings.

THURSDAY, SEPT. 30 NOON-4 P.M.
SPC EpiCenter, First Floor
13805 58th St. N., Clearwater

- Meet HR professionals from multiple industries for on-site interviews. Some employers will be hiring on the spot.
- Learn about full- and part-time positions.
- Explore business incentives and opportunities.
- Talk with career service professionals.
- Discover short- and long-term training programs
- Take advantage of these job opportunities to get hired or change your career.

Register today at stpe.co/clwjjobfairsvp. Have questions? Learn more at stpe.co/clwjjobfair.

Sponsored by:
FRSTeam The Concrete Specialist
FIS FOR INDUSTRIAL SERVICES
VPG Vanguard Protex Global Specialty Coatings

Please review SPC's COVID-19 protocols at spcollege.edu/spc-updates before coming to a college campus or site.

CONSTRUCTION
MANUFACTURING
HEALTH
GOVERNMENT
INFORMATION TECHNOLOGY
HOSPITALITY

YOUTHBUILD

We are very proud of the YB Team and the success of this program. It has been offered in partnership with Pinellas County Schools and many other community partners.

YouthBuild Tampa Bay is designed to provide students with the opportunity to learn while they earn.



PAYCHECKS FOR PATRIOTS

CareerSource Pinellas will participate in the 9th Annual Paychecks for Patriots hiring event on Tuesday, November 30.

Over the past eight years, more than 6,756 veteran candidates and military family members have participated in Paychecks for Patriots events. This special statewide hiring fair is a partnership between the Florida Department of Economic Opportunity, the Florida National Guard, the Florida Department of Veterans' Affairs, participating Florida employers, and CareerSource Florida.

The event, being held at the EpiCenter location, will provide many veterans with meaningful employment from businesses who are dedicated to assisting veterans and their families find careers that match their unique skills and aspirations.



THRIVE BY FIVE RECOGNITION

In October, Thrive by Five Pinellas recognized CareerSource Pinellas for our family-friendly employment policies at their Family-Friendly Business Awards Ceremony.

Thrive by Five is a community-based organization committed to preparing children for kindergarten and celebrates organizations in our community who are taking the lead in creating a comprehensive childcare system by implementing these family-friendly policies in their workplaces.

We thank our former HR Director, Jaclyn Reily, for submitting this nomination on behalf of CareerSource Pinellas.



WORKFORCE DEVELOPMENT & ECONOMIC DEVELOPMENT

We welcome and congratulate Dr. Cynthia Johnson to the position of Director of Pinellas County Economic Development.

We are also excited to expand the partnership with the St. Petersburg Area Economic Development Corporation (EDC).

We look forward to working with economic development to expand opportunities to work together on behalf of the residents in Pinellas County.

We are privileged and proud to work with Pinellas Economic Development and St. Petersburg Area EDC in Pinellas County to support businesses and meet their employment needs.



TRANSITIONS IN THE WORKS - IT

- ❑ **Information Technology:** Transition from CTS to LinkTech
- ❑ **Electronic Data Management System:** Transition from CTS ATLAS to Employ Florida
- ❑ **Migrate EDMS:** Migrate data from CTS ATLAS to Employ Florida
- ❑ **Kiosk Greeter System:** Transition from CTS Kiosk to Employ Florida's Virtual One-Stop VOSGreeter Module
- ✓ **Website:** Transitioned from CTS hosted site to Blue Host
- ✓ **CyberSecurity:** Transitioned from CTS to Abacode



TRANSITIONS IN THE WORKS – Programs & Operations

- ❑ **Case Management System:** Transition from ATLAS to Employ Florida
- ❑ **Case Management Process:** Transition from Decentralized to Centralized
- ❑ **Remote Work:** Transition all team members from remote to in-person



TRANSITIONS IN THE WORKS – Performance Measures

❑ Performance Measures: Transition to DEO Policy “limits extending participation”

❑ Performance Measures: Accountability/ownership and goals/metrics at every level

LWDB 14						
Measures	PY2020-2021 4th Quarter Performance	PY2020-2021 % of Performance Goal Met For Q4	PY2020-2021 Performance Goals	PY2021-2022 1st Quarter Performance	PY2021-2022 % of Performance Goal Met For Q1	PY2021-2022 Performance Goals
Adults:						
Employed 2nd Qtr After Exit	94.50	105.00	90.00	94.00	104.44	90.00
Median Wage 2nd Quarter After Exit	\$11,970	171.00	\$7,000	\$11,075	153.82	\$7,200
Employed 4th Qtr After Exit	87.50	102.34	85.50	87.30	102.11	85.50
Credential Attainment Rate	95.50	136.43	70.00	95.30	132.36	72.00
Measurable Skill Gains	76.60	162.98	47.00	67.10	136.94	49.00
Dislocated Workers:						
Employed 2nd Qtr After Exit	90.10	100.11	90.00	91.30	101.44	90.00
Median Wage 2nd Quarter After Exit	\$10,846	154.94	\$7,000	\$11,463	161.45	\$7,100
Employed 4th Qtr After Exit	72.90	85.56	85.20	71.60	84.04	85.20
Credential Attainment Rate	87.60	125.14	70.00	88.60	126.57	70.00
Measurable Skill Gains	88.70	188.72	47.00	80.30	163.88	49.00
Youth:						
Employed 2nd Qtr After Exit	89.80	106.27	84.50	91.70	108.52	84.50
Median Wage 2nd Quarter After Exit	\$4,739	148.09	\$3,200	\$4,472	139.75	\$3,200
Employed 4th Qtr After Exit	86.00	110.26	78.00	88.40	113.33	78.00
Credential Attainment Rate	76.00	88.06	86.30	88.90	103.01	86.30
Measurable Skill Gains	80.30	170.85	47.00	65.10	132.86	49.00
Wagner Peyser:						
Employed 2nd Qtr After Exit	59.50	89.88	66.20	56.40	86.77	65.00
Median Wage 2nd Quarter After Exit	\$5,651	113.02	\$5,000	\$5,610	112.20	\$5,000
Employed 4th Qtr After Exit	61.20	95.33	64.20	58.30	90.81	64.20
Not Met (less than 90% of negotiated)						
Met (90-100% of negotiated)						
Exceeded (greater than 100% of negotiated)						

WIOA: Exit Strategy Communication (Common Exit)

Gustafson, Steven <Steven.Gustafson@deo.myf...>
 To: LWDB Subrecipients Only
 Cc: Penn, Casey; Moore, Keantha B.; Williams, Charles;
 McGrew, Dan
 6/21/2021
 Follow up. Start by Monday, June 21, 2021. Due by Monday, June 21, 2021.
 WIOA Wagner-Peyser TAA: Participant Exit Strategic Guidance (Corrected Version)
 Outlook item

As we draw closer to the end of the quarter and continue to close and exit disengaged participants, we wanted to provide some talking points and information regarding the strategy for effectively implementing the requirements of [Administrative Policy 115: Common Exit](#), and our combined efforts to mitigate the impacts on State and local performance. Below is a timeline and background of the initiative that you may use in communications with your local boards, as necessary. If there are any questions or concerns that were not addressed in this email, nor the previous (attached), please contact me directly at Steven.Gustafson@deo.myflorida.com.

In 2020, the Florida Department of Economic Opportunity (DEO) began reviewing the case duration of participants across multiple workforce programs being administered through Florida’s 24 Local Workforce Development Boards (LWDBs). In some instances, participants reviewed by DEO had remained active in programs for up to seven (7) years. Most egregious case durations appeared to occur in an effort to continue serving the participant until a positive outcome was reached; however, federal guidance stipulates what activities and services may extend a participant’s case. The issue surrounding case duration was also addressed in the U.S. Department of Labor’s (DOL’s) most recent compliance review of Florida.

In 2021, DEO engaged a workgroup consisting ten (10) LWDBs to develop the framework for a Common Exit Administrative Policy designed to standardize participant case closures and refocus Florida’s efforts on actively-engaged jobseekers. The Common Exit Administrative Policy was approved by the State Workforce Development Board on June 9th, 2021. The policy communicated established federal guidance and clarified the necessary operational requirements related to participant case duration and service provision.

In anticipation of the policy’s release, in March of 2021, DEO coordinated with all 24 LWDB Executive Directors to establish a timeline to close and exit participants who did not meet the policy’s requirements for maintaining active participation. DEO provided technical assistance instructing LWDBs to close and exit all participants who were no longer actively engaged in workforce activities. As program performance measured through DOL’s Primary Indicators of Performance are primarily exit based, measures were taken to ensure that the impact was mitigated to the extent possible. In spite of these mitigating efforts, Florida’s performance will be temporarily diminished; however, the actions taken by the DEO and our LWDB partners should enhance our State’s ability to respond to those citizens most in need as we assist with their return to meaningful, sustained employment.

POLICY

DEO/CSF Policy Process:

- Written by DEO/CSF
- Sent for review/comment
- Presented/approved by CSF Board

Administrative Process:


- Red-line DEO/CSP-approved policy
- High-Level Summary

Committee/Board Policy Process:

- Presented/discussed at One-Stop Committee
- Presented/approved by CSP Board

Implementation Policy Process:

- Develop work instruction
- Create Training
- Present to team members
- Follow-up to ensure compliance

		Policy Number WIOA-P-114-14
Administrative Policy with Local Operating Procedures		
Title:	Rapid Response Program Administration	
Program:	Workforce Innovation and Opportunity Act (WIOA)	
Effective:	July 1, 2021	

I. PURPOSE AND SCOPE

This policy notifies Local Workforce Development Board 14s (LWDB 14s) of the minimum Rapid Response requirements and activities mandated by the Workforce Innovation and Opportunity Act (WIOA). This policy provides a framework for LWDB 14s to design and implement a local business engagement strategy that articulates the role of layoff aversion within effective Rapid Response systems.

II. BACKGROUND

WIOA requires states to implement statewide Rapid Response activities to assist adversely affected employers and workers as quickly as possible following the announcement of a permanent closure, layoff, or natural or other disaster resulting in a mass job dislocation.

Rapid Response promotes economic recovery and vitality by developing ongoing comprehensive approaches to identifying, planning for, or responding to layoffs at preventing or minimizing the impacts of layoffs on workers, businesses, and communities. Rapid reemployment is a central tenant of Rapid Response and accomplished by helping affected workers quickly transition to reemployer minimizing the duration of unemployment, or averting layoffs whenever possible.

III. AUTHORITY

[Public Law 113-128, Section 134\(c\)\(2\)](#)

[20 Code of Federal Regulations \(CFR\), Part 639](#)

20 Code of Federal Regulations (CFR), Part 639

Training and Employment Guidance Letter (TEGL) #E-19

IV. POLICIES AND PROCEDURES

Rapid Response provides customer-focused services to both dislocated workers and employers, ensuring immediate access to services for affected workers to expedite reentry into the workforce. WIOA legislation requires Rapid Response and safety, intervention, assistance be provided to workers to avert or minimize the economic disruption of a mass job dislocation event.

A. State Rapid Response Program Office

The Department of Economic Opportunity (DEO) provides direction to the LWDB 14s to ensure consistency in the statewide operations and delivery of Rapid Response services. DEO's State Rapid Response Program Office is responsible for carrying out statewide Rapid Response activities and overseeing Rapid Response activities carried out by the LWDB 14s. Statewide Rapid Response activities are managed by the State Rapid Response Coordinator.

B. Rapid Response Events

The classification of a Rapid Response event is without regard to industry, size of the employer, number of workers potentially affected, or the time between notification and layoff date.

There are four (4) types of Rapid Response events:

- Worker Adjustment and Retraining Notification (WARN) event:** Any employer that provides written notice of a mass layoff or closure with intent to meet the federal WARN requirements.
- Non-WARN event:** Any employer experiencing a mass layoff or closure, even if it is not subject to the federal WARN requirements.
- Trade Adjustment Assistance (TAA) event:** Any employer for which a TAA petition has been filed with the U.S. Department of Labor (DOL), and
- Natural disaster:** Any employer experiencing a mass layoff or closure due to natural or force majeure disaster.

Rapid Response activities assist communities that experience employee closures, mass layoffs, disaster-related mass job dislocations, or TAA petition filings that precipitate substantial economic loss in the number of unemployed individuals. Rapid Response services and activities shall be provided to all employers who experience a mass layoff or closure, regardless of how the LWDB 14s is notified, or became aware of the event.

DEO provides LWDB 14s notification of filed TAA petitions and WARN notices via e-mail to the LWDB 14s Rapid Response Coordinator and other designated recipients as assigned by the LWDB 14s. LWDB 14s may add individuals to the Rapid Response event distribution list by submitting an e-mail with the requested recipient's name and e-mail to WARN@fls.doe.state.fl.us.

1. Worker Adjustment and Retraining Notification Administration

The WARN Act of 1988 requires employers, in certain circumstances, to provide advance notification of layoffs and plant closings in order to provide workers with enough time to seek other employment or retraining opportunities. Employers covered under the WARN Act submit WARN notices to the State Rapid Response Coordinator sixty (60) days in advance of plant closings and/or mass layoffs.

LWDB 14s may assist employers who meet the criteria set forth in the WARN Act of 1988 and required in [20 CFR Part 639](#), with filing WARN Notices by providing the procedures and instructions available in the [Employer's Guide to Advance Notice of Closures and Layoffs](#). WARN filing assistance must be documented in the employer's Employ Florida service plan with employer service code EAT (WARN Notice Assistance).

Upon receipt of a WARN notice, DEO shall provide notification via e-mail to the LWDB 14s where the layoffs are to occur. DEO shall provide a copy of the WARN notice and any known separation details in a notification e-mail to the LWDB 14s within two (2) business days of receipt. If a WARN notice is incomplete, DEO will provide the known details to the LWDB 14s in the form of an advanced, partial layoff notification.

A summary of all WARN information is available from the DEO public website at www.flworkforce.com. The State Rapid Response Program Office is responsible for updating the list and keeping it current within three (3) business days of receiving a WARN notice. The online WARN Summary Report includes:

- Company name and address;
- Total number of affected workers;
- The affected employer's industry;
- WARN notification date;
- Layoff dates; and
- A copy of the WARN notice.

DEO is responsible for inputting WARN information in the state's online labor exchange and case management system, Employ Florida, within two (2) business days of receipt. LWDB 14s may enter non-WARN Rapid Response events by following the instructions provided in the [YUI](#)



SUCCESS STORIES



“My story is an example of how people can move forward even in the midst of chaos. I am happy to have the support of CareerSource Pinellas.”

— Jacky Ward, single mom who received assistance with childcare, transportation, tuition assistance, career counseling and a job search. She now works at HealthCare Support.



“I am so proud of all I have accomplished, and I appreciate the support and guidance from CareerSource Pinellas. Thank you for everything!”

— Keidiria Williams, who came to CareerSource Pinellas looking for childcare assistance but was guided to further her career. She is now an LPN at Bayfront Health.

THANK YOU TO THE CAREERSOURCE PINELLAS TEAM!




www.careersourcepinellas.com

Business Services

Join the thousands of Pinellas County employers who have benefited from CareerSource Pinellas' business services. We provide:

- Job & Career Assistance
- Agency of Staffing & Temporary Employment
- Temporary Business Helpdesk (T2H) Office
- Job Fairs
- Employee Training
- Recruitment, Recruitment & Staffing
- Labor Market Information



Connecting employers with qualified, skilled talent and Pinellas County residents with employment and career development opportunities.



ACTION ITEM 1

Approval of Minutes

In accordance with Article VII, Section 1(H), of the approved WorkNet Pinellas By-Laws: Minutes shall be kept of all Board and Committee meetings. Minutes shall be reviewed and approved at the next CareerSource Pinellas Board or Committee meeting as appropriate.

The official minutes of meetings of the Board and Committees of the Board are public record and shall be open to inspection by the public. They shall be kept on file by the Board Secretary at the administrative office of CareerSource Pinellas as the record of the official actions of the Board of Directors.

The draft minutes from the September 8, 2021, meeting of the Board of Directors have been prepared and are enclosed.

RECOMMENDATION

Approval of the draft minutes, to include any amendments necessary.

**CareerSource Pinellas
Board of Directors Minutes**

Date: Wednesday, September 8, 2021, at 11:45 am.

Location: *Virtual Zoom

Call to Order

Board of Directors Chair, Barclay Harless, called the meeting to order at 11:47 a.m. There was a quorum present with the following board members.

Board Members in Attendance

Andrea Cianek, Barclay Harless, Belinthia Berry, Candida Duff, Commissioner René Flowers, David Fetkenher, Debbie Passerini, Dr. Rebecca Sarlo, Ivonne Alvarez, John Howell, Kenneth Williams, Kevin Knutson, Lisa Cane, Mark Hunt, Michael Jalazo, Patricia Sawyer, Russell Leggette, Scott Thomas, Sheryl Nadler, Zachary White, Chris Owens, Jack Geller, Jody Armstrong

Board Members Not in Attendance

Michael Logal, Amy Van Ness, Celeste Fernandez, Glenn Willocks, Michele Mathews

Board Counsel

Stephanie Marchman

Staff in Attendance

Jennifer Brackney, Steven Meier, Jacqueline DuChene-Heyward, Leah Geis

Public Comments

There were no public comments.

CEO Report

Policy

As we've talked about previously, we are working to update all the strategic and program policies to align with DEO and CareerSource Florida. Essentially, we are taking their policy, customizing it to our areas, and adding any relevant procedures. This will be a process. Today, we will be presenting three policies. There are many more to come ... so stay tuned.

Partnerships & Programs

I am very proud of our ability to build strong partnerships with businesses, education, and with community partners. Most recently, we have been busy working on a regional level to apply for a few grants to bring needed resources to our community. The first is "Get there Faster" issued by CSF, the focus is on veterans and providing training for unemployed and underemployed Floridians. We've reached out to several local manufacturing employers, SPC, Pinellas Technical College, and Pinellas County Economic Development to gather input and support to apply for these grants. We are on a quick turnaround time - due on September 20th. We are also providing support to SPC for the submission of a Florida Jobs Growth Grant. We are partnering with CareerSource Tampa Bay and CareerSource Central Florida to submit a "Good Jobs Challenge" grant at the federal level. Lastly, we have begun conversations with Pinellas Economic Development to explore opportunities for enhanced partnership, including a survey of local employers and job seekers to identify the local needs, gaps, and determine ways to best move forward. I continue to be impressed with the level of commitment, the time, and the support that these organizations provide and, their willingness to work together to bring resources to the region. Last but not least, we are focusing on our team here at CareerSource Pinellas and the organizational

culture. I truly look forward to continuing to work with them and each of you to build a stronger workforce for Pinellas, and Florida as whole.

Organization Chart

There have been a few personnel changes. To accommodate these changes, we’ve adjusted the organizational chart. First, we’ve transitioned marketing to Tucker Hall as we explore options for moving forward. Kris Lucas, the Director of Business and Talent Development has stepped in to take on the duties related to workforce programs. This gives us the opportunity to breakdown the silos that tend to exist within the organization, focus on connecting businesses services and programs, brings a new focus to transparency and accountability, and allows us to better engage with our team members.

As part of our succession planning, we are searching for a senior financial professional. We will be posting the position of Comptroller this week. We’ve also had a few new members join the team.

- Jacqueline DuChene Heyward, HR Director
- Leah Geis, Administrative Assistant
- Melissa Ehrhardt, Coordinator – Business Services

Programmatic Monitoring Results Summary

In April 2020, DEO conducted a program and financial monitoring. As a result, I am so pleased to announce, there were no findings in WIOA. This is an incredible accomplishment; actually, one that doesn’t happen very often. The goal of DEO, especially these days, is to identify concerns. Overall, findings for all other programs Wagner Peyser, SNAP and WT were reduced from 5 findings last year to 3 (PY’20-21). Noncompliance issues were reduced from 8 to 6 (PY’20-21). There were no findings in the financial monitoring, 1 observation and 3 technical assists. DEO has accepted all corrections and all issues have been resolved. We are on the right track, and it shows the hard work the team is doing to ensure we follow policy.

Performance Measures

As you know, our goal is to meet and/or exceed performance measures. However, in light of the recent impact of COVID on employment, we are seeing an impact on performance. These performance indicators are lagging indicators. Which means, the individuals that are showing here in 2nd quarter and 4th quarter after exit had files that closed in June 2020. This is especially important because DEO has made policy changes that impact how staff can extend participation. This policy change and COVID will continue to have an impact on performance as we look at last year, PY’20 and, this year PY’21 performance.

Reimagining Education and Career Help (REACH)

As we discussed previously, House Bill 1507 was signed by the Governor, and went into effect as of July 1, 2021. It is known as REACH – Reimagining Education and Career Help. We continue to work with CareerSource Florida and DEO to implement these changes this program year. You can see that there are already changes impacting training providers. As we move forward, the changes that we expect relate to board member term limits, related-party contracts (\$25,000/\$10,000), transparency (budget/compensation/990), quarterly reports to DEO, letter grades for workforce areas, and a few more items.

Discussion: None

Action Item 1 – Approval of the Minutes – 7.14.21 Board of Directors

The minutes of the July 14, 2021, Board of Directors meeting were presented for approval.

Discussion: None

Motion:	Jack Geller
Second:	Mark Hunt

The minutes were approved as presented. This motion carried unanimously. There was no further discussion.

Action Item 2 – Annual Performance Evaluation

The Board of Directors approves annual performance evaluations for each staff member on a program year basis, from July 1 to June 30.

CareerSource Pinellas is utilizing a rating scale outlining five levels of performance; exceptional, successful, meets, developing, and not meeting performance. In an effort to better align with DEO’s evaluation process and to provide more effective and expanded review options, the recommendation is to continue using the five-level performance rating scale. The PY’2021 – 2022 Performance Evaluation Form is attached for your review.

**WORKNET PINELLAS
STAFF PERFORMANCE EVALUATION**

CAREERSOURCE PINELLAS STAFF PERFORMANCE EVALUATION						Program Year: July 1, 2021 - June 30, 2022
					Job Title:	Supervisor:
	Relative Impact (weight)	Employee's Rating	Supervisors Rating	Final Rating	Points RI x rating	Comments
Soft Skills						
Decision Making	4				0	
Dependability	4				0	
Job Related Skills						
Teamwork / Interpersonal Skills	4				0	
Job Knowledge and Adherence to Policies	4				0	
Quality and Quantity of Work	5				0	
Service Delivery / Communications	4				0	
Goal Attainment (per attached sheet)					0.00	
Total Points	100.00	0.0	0.0		0.00	
Overall Rating					0	

OVERALL EVALUATION COMMENTS

Rating	Level of Performance	Range of Overall Rating (points)	Range of Increase (points)
5	Exceptional Performance	Consistently exceeds the performance expectation of the position.	451-500 5%
4	Successful Performance	Consistently meets and often exceeds the performance expectation of the position.	351-450 4%
3	Meeting Performance	Consistently meets and may occasionally exceed the performance expectation of the position.	251-350 2%-3%
2	Developing Performance	Exhibits inconsistent job performance, but has the capacity to improve to meet the performance expectation of the position.	151-250 1%
1	Not Meeting Performance	Consistently fails to meet the designated performance expectations for the position.	0-149 0%

**WorkNet Pinellas
Staff Performance Evaluation**

Name:		Job Title:		Supervisor:		
Goals - List and evaluate goals set for this position and employee.	Impact	Self-Eval Rating	Supervisor Rating	Final Rating	Points	Comments
PROGRAM PERFORMANCE: Meet and/or exceed primary indicators and program performance goals. Take ownership of areas of responsibility, and seek solutions and raise the bar to achieve excellence.	40				0	
COMPLIANCE AND MONITORING RESULTS: Ensure alignment with policy guidance from USDOL, DEO, CSF, and the Board of Directors. Follow Standard Operating Procedures (SOPs) and Desk Guides consistently, and monitor results and findings. Take ownership of results, and have the integrity to learn from our mistakes.	20				0	
SERVICE WITH INTEGRITY: Honor our role as stewards of the public trust by managing human and financial resources respectfully and responsibly. Earn trust with our customers and strive to deliver the best customer experiences possible.	5				0	
ACCOUNTABILITY AND COMMUNICATION: Champion our culture of accountability and communicate our mission to serve those in our community through our attitudes and work product. Develop robust partnerships and collaborate with other team members to ensure the successful implementation of the goals and key initiatives outlined in the Strategic Plan.	5				0	
ADDITIONAL GOALS: Achieve unique goals specific to your role that affords professional development, and adds value to the business and those around you.	5				0	
Total:		75			0	

By my signature below, I confirm that I have received and reviewed the performance standards and objectives for my CS/IN position, I understand that I will be rated based on a scale that will award either: "5 Exceptional Performance"; "4 Successful Performance"; "3 Meeting Performance"; "2 Developing Performance"; "1 Not Meeting Performance" which requires a written performance improvement plan.

Staff Signature: _____ Date: ____/____/____

Management Signature: _____ Date: ____/____/____

RECOMMENDATION

Approval of the PY'2021 – 2022 annual performance evaluation.

Discussion: None

Motion:	Mark Hunt
Second:	Michael Jalazo

The Board of Directors made a motion to approve of the PY'2021-2022 annual performance evaluation. The motion carried unanimously. There was no further discussion.

ACTION ITEM 3 – Job Family Title Consolidation

In efforts to simplify our Job Title listing and afford flexibility when identifying roles for incoming talent, we seek to consolidate the listing of Job Titles.

First, we propose the HR Business Partner role be transitioned into a Business Partner job title. This allows us the flexibility to add Business Partners to any area of the business, not just the HR function.

Next, we propose the Disability Navigator role be consolidated into a Navigator job title. Again, this affords us the flexibility to add Navigators to any area of the business, including new programs and services targeted towards recovery, rapid response, and apprenticeships.

In our efforts to source for talent, it has come to our attention that the job title Business Account Executive is not an effective label for the role as it relates to our industry. For this reason, we propose that this role be transitioned into a Business Services Representative. Lastly, in an effort to best align our business efforts from both a business services perspective in tandem with our programs and services, we propose that a Chief Operations Officer (COO) job title be added to our roster. We are presenting a revised draft, Job Family Title Listing, for your review and consideration.

RECOMMENDATION

Approval of the revised Job Family Title Consolidation.

Job Title Consolidation

Job Family Titles		
Current Job Title Family	Proposed Job Title Family	Grade Level
Technicians		102
Instructor		103
Specialist		103
Career Counselor		104
Disability Navigator	Navigator	104
Instructor, Trades		105
Business Account Executive	Business Services Representative	105
Lead		105
Coordinator		206
Supervisor		208
HR Business Partner	Business Partner	210
Director		214
CFO/COO	Chief Operations Officer (COO)	219
CEO		221

Grade	Exemption
100s	Non-Exempt
200s	Exempt

*Proposed Revision effective as of July 1, 2021.

Discussion: None

Motion:	Patricia Sawyer
Second:	Scott Thomas

The Board of Directors made a motion to approve of the revised Job Family Title Consolidation. The motion carried unanimously. There was no further discussion.

ACTION ITEM 4 – Policy Approval – WIOA Administrative Policy 102 – Veteran Intake at Career Centers

The Florida Department of Economic Opportunity (DEO) has instituted a new process related to Local Operating Procedures (LOPs) that coincides with the release of new administrative policies. The goal of this new process is to ensure DEO is providing the oversight and support needed for Local Workforce Development Boards (LWDBs) to administer and operate workforce programs in a manner that meets federal and state requirements. The process creates a timeline for introducing new and revising current administrative policies issued by DEO.

The revised Wagner-Peyser (WP) Administrative Policy 102 is presented to the LWDB following this new process. There will be more to follow.

Based on the revision and release of WP Administrative Policy 102, this Administrative Policy with LOPs includes all the DEO administrative policy requirements.

Highlighted Changes:

- Minimum requirements for establishing an initial intake screening process for transitioning service members, veterans, and eligible spouses at Career Centers.
- Provides a template of the Florida Veteran Initial Intake Form.
- Initiates new service code 159 for Initial Intake Screening – DVOP Services and case note requirements.

RECOMMENDATION

Approval of WP Administrative Policy 102 - Veteran Intake at Career Centers with Local Operating Procedures (LOPs).

Discussion: None

Motion:	Mark Hunt
Second:	Michael Jalazo

The Board of Directors made a motion to approve of WP Administrative Policy 102 - Veteran Intake at Career Centers with Local Operating Procedures (LOPs). The motion carried unanimously. There was no further discussion.

ACTION ITEM 5 – Policy Approval - WIOA Administrative Policy 111, Priority of Service for Veterans and Eligible Spouses with Local Operating Procedures

The Florida Department of Economic Opportunity (DEO) has instituted a new process related to Local Operating Procedures (LOPs) that coincides with the release of new administrative policies. The goal of this new process is to ensure DEO is providing the oversight and support needed for Local Workforce Development Boards (LWDBs) to administer and operate workforce programs in a manner that meets federal and state requirements. The process creates a timeline for introducing new and revising current administrative policies issued by DEO.

The revised Workforce Innovation and Opportunity Act (WIOA) Administrative Policy 111 is presented to the LWDB following this new process. There will be more to follow.

Based on the release of WIOA Administrative Policy 111, this Administrative Policy with LOPs includes all the DEO administrative policy requirements.

Highlighted Changes:

- Minimum requirements for implementing priority of service for veterans and eligible spouses for all U.S. Department of Labor (DOL) funded programs and services.
- Defines covered persons (i.e., veterans and eligible spouses)
- Outlines local requirements, including:
 - Identification of covered persons
 - Application and reporting of priority of service
 - Requirement of notices in career resource centers
- Provides a priority of service training template for use by the Local Veterans Employment Representative (LVER) when conducting required annual training for career center staff.

RECOMMENDATION

Approval of WIOA Administrative Policy 111 - Priority of Service for Veterans and Eligible Spouses with Local Operating Procedures (LOPs).

Discussion: Barclay Harless asked Jennifer Brackney if she saw any challenges with meeting the timelines that have been laid out in WIOA Admin Policy 111? Jennifer Brackney stated no, she does not think so as we are staying ahead of our timelines.

Motion:	Commissioner René Flowers
Second:	David Fetkenher

The Board of Directors made a motion to approve of WIOA Administrative Policy 111 - Priority of Service for Veterans and Eligible Spouses with Local Operating Procedures (LOPs). The motion carried unanimously. There was no further discussion.

ACTION ITEM 6 – Policy Approval – JVSG Administrative Policy 112 – Staffing Requirements with Local Operating Procedures

The Florida Department of Economic Opportunity (DEO) has instituted a new process related to Local Operating Procedures (LOPs) that coincides with the release of new administrative policies. The goal of this new process is to ensure DEO is providing the oversight and support needed for Local Workforce Development Boards (LWDBs) to administer and operate workforce programs in a manner that meets federal and state requirements. The process creates a timeline for introducing new and revising current administrative policies issued by DEO.

The Jobs for Veterans’ State Grant (JVSG) Administrative Policy 112 is presented to the LWDB following this new process. There will be more to follow.

Based on the release of JVSG Administrative Policy 112, this Administrative Policy with LOPs includes all the DEO administrative policy requirements.

Highlighted Changes:

- Provides guidance regarding the JVSG and the positions the grant supports.
- Outlines staff supported by JVSG and explains how JVSG staffing designations/levels are determined.
- Specifies process and established timeframes for filling vacant JVSG-funded positions.
- Outlines National Veteran Training Institute (NVTI) requirements for all JVSG-funded staff.

RECOMMENDATION

Approval of JVSG Administrative Policy 112 – Staffing Requirements with Local Operating Procedures (LOPs).

Discussion: None

Motion:	Jack Geller
Second:	Patricia Sawyer

The Board of Directors made a motion to approve of JVSG Administrative Policy 112 – Staffing Requirements with Local Operating Procedures (LOPs). The motion carried unanimously. There was no further discussion.

ACTION ITEM 7 – Renewal of Training Provider – ServiceSource

CareerSource Pinellas enters into individual training provider agreements with each approved training provider. These agreements have previously been administered annually with a two-year renewal period contingent upon Workforce Solutions Committee and Board of Directors approval. This process requires a significant amount of staff time. Training providers are also required to:

- Provide the most recent Florida Education & Training Placement Information Program (FETPIP) Reports to include enrollment, completion, retention, employment rates of students.
- Provide the Training Provider Renewal Application.
- Provide Program Cost details (tuition, books, supplies, and testing fees) and a copy of current catalog and schedule or website link with required information.
- Provide a copy of a valid license from the Commission for Independent Education (CIE).
- Provide a current Liability Insurance certificate with CareerSource Pinellas listed.
- Provide a copy of a completed W-9 form.
- Remain in compliance with performance, financial, and other mandated requirements.

Staff monitors training provider performance and presents this information to the Workforce Solutions Committee on a quarterly basis. Training providers that are determined to have performance issues or other issues are brought to the committee and board throughout the year for review and potential removal.

RECOMMENDATION

Approval to enter into a two-year renewal agreement with ServiceSource FLORIDA Career Institute.

Discussion: None

Motion:	Commissioner René Flowers
Second:	John Howell

The Board of Directors made a motion to approve entering into a two-year renewal agreement with ServiceSource FLORIDA Career Institute. The motion carried unanimously. There was no further discussion.

Other Administrative Matters

None

General Counsel Update – GrayRobinson – Stephanie Marchman

The following is a summary of legal services provided to CareerSource Pinellas since the General Counsel issued her last Legal Services Summary and Litigation Report to the Board of Directors on July 1, 2021:

- Issued memorandum summarizing the action items and requirements of HB 1507; began to prepare revisions to by-laws needed as a result.
- Conducted contract review, including review of the ERISS-SARA contract.
- Provided employee relations guidance to CEO regarding various employment matters, including the performance evaluation process, a possible 360-degree executive review, and employee performance and modified work schedules.
- Began review to determine whether CareerSource Pinellas is covered by Executive Order 11246 and its applicable requirements, including EEO-1 reporting requirements.
- Prepared and provided sunshine/ethics law presentation to the Board.
- Reviewed Board and Committee agenda packets; attended Board and Compensation Committee Meetings.

Pending litigation report:

There is no known pending litigation against CareerSource Pinellas. It should be noted, however, one EEOC Charge of Discrimination is pending, and CareerSource Pinellas recently received a notice that it was not the employer with respect to a second EEOC Charge of Discrimination. Both matters have been reported to the carrier and counsel has been appointed by the carrier for any further handling of these matters, which may or may not involve litigation.

Information Items

Information Item 1 – Organizational Chart

As part of the Compliance Review and the request to continuously review and update the Organizational Chart, please see the attached version updated as of July 1, 2021.

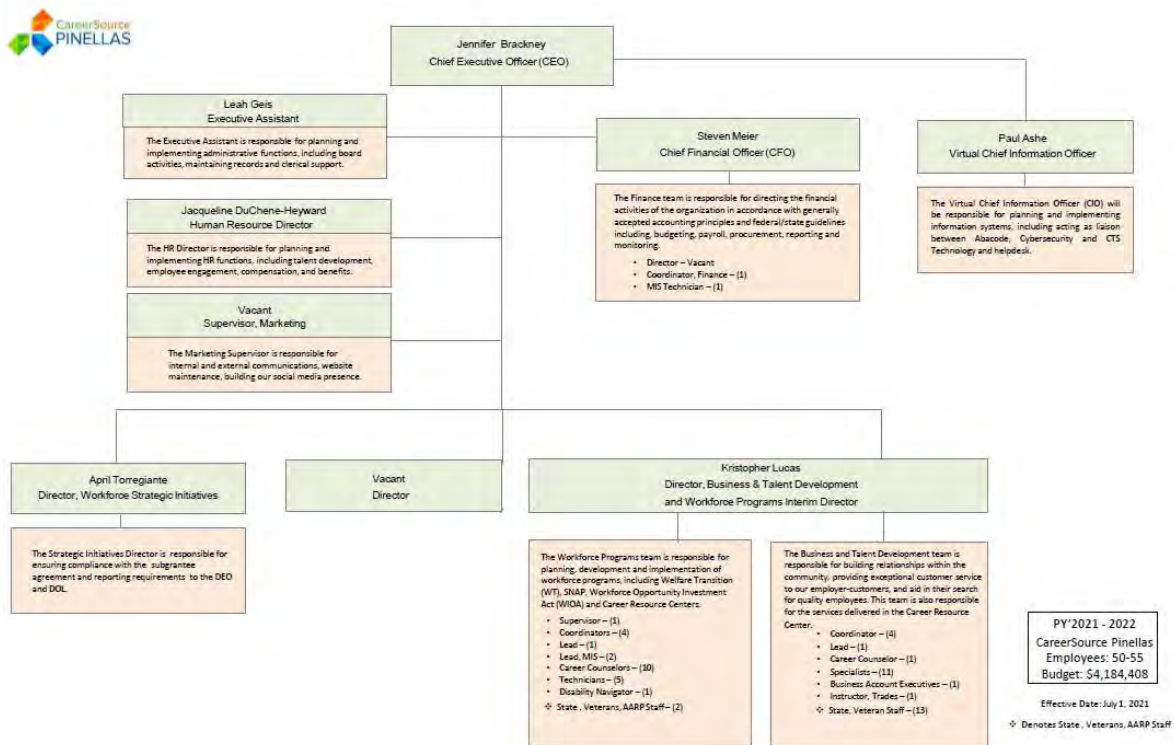
Since March 1, the Finance Department has decreased by one Coordinator. As part of the succession planning efforts within the organization, we will be searching for a senior finance professional to add to the department.

Since the beginning of the current Program Year, the Workforce Programs team has decreased by one Director. The Director of Business and Talent Development has stepped in to serve as the Interim Workforce Programs Director.

The Marketing Coordinator resigned her position with the organization, and at current, Tucker Hall is handling the Marketing function.

Since the beginning of the current Program Year, the .Organization has welcomed the following employees to the CareerSource Pinellas team:

- Leah Geis, Executive Assistant
- Jacqueline DuChene Heyward, Director of Human Resources
- Melissa Ehrhardt, Coordinator



Information Item 2 – DEO Programmatic Monitoring

The Department of Economic Opportunity (DEO) must perform annual monitoring of its subrecipient workforce entities as required by federal and state laws, rules, regulations, and applicable DEO guidance. To accomplish DEO’s monitoring goal, a joint programmatic and financial monitoring review of CareerSource Pinellas’ (“LWDB 14”) workforce programs was conducted by DEO’s Bureau of One-Stop and Program Support (OSPS) and Bureau of Financial Monitoring and Accountability (FMA) staff.

Programmatic and financial management issues identified in the report are generally categorized as Findings, Issues of Noncompliance, and Observations based on a scale of high, medium and low risk probabilities. High, medium, and low risk factors are used to separate those issues that present more of a threat to program operations than others including issues that may potentially impact the fiscal integrity or delivery of services within program operations.

In accordance with [Administrative Policy 104 – Sanctions for Local Workforce Development Boards’ Failure to Meet Federal and State Standards](#), as subrecipients of authorized funds administered by DEO, LWDB 14 is accountable for failing to correct performance, programmatic and financial deficiencies found during compliance monitoring reviews.

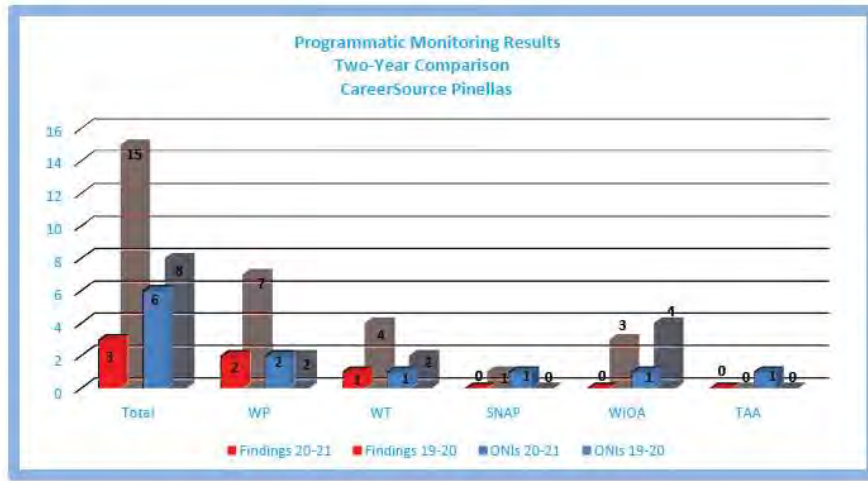
Correcting and eliminating deficiencies maintains credibility in the administration of workforce programs, reduces risk of compliance findings, and reduces the potential for questioned and/or disallowed costs which could lead to recapture of funds by the United States Department of Labor (USDOL) or other federal or state agencies. For additional programmatic and financial monitoring information and resources, click here: [Monitoring Overview](#).

As a result of the monitoring, there were no WIOA Findings. Overall, Findings were reduced from five in PY’19-20 to three in PY’20-21. Other noncompliance issues were further reduced from eight in PY’19-20 to six in PY’20-21. CareerSource Pinellas will continue to use DEO feedback and recommendations alongside the results of internal monitoring to eliminate findings and other noncompliance issues in the future.

PROGRAMMATIC MONITORING RESULTS SUMMARY

N=No. Y=Yes. N/A=Not Applicable.

2020-21 Monitoring Results					
Workforce Program	Issue	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue
WT	A safety plan was missing and the Individual Responsibility Plan (IRP) did not include safety plan elements for a victim of domestic violence.	Y	Y	0	0
	Employment documentation in a participant file did not match information recorded in OSST.	0	0	Y	Y
WT Totals		1	1	1	1
SNAP E&T	A participant was assigned to more than the required 39 hours in job search.	0	0	N	Y
		0	0	0	1
SNAP E&T Totals		0	0	0	1
WIOA Common Issue	Measurable skills gains were not recorded in Employ Florida for several participants.	0	0	Y	Y
		0	0	1	1
WIOA Totals		0	0	1	1
TAA	Training benchmarks were not reviewed and/or documented every 60 days as required. Additionally, training expenditures recorded in Employ Florida under the TAA Application (TRA Payment View) link did not match the invoices in a participant file.	0	0	N	Y
		0	0	0	1
TAA Totals		0	0	0	1
WP	A job order with a wage rate listed below the minimum wage did not have a case note documenting staff’s verification that the employer will pay at least Florida’s minimum wage rate.	Y	Y	0	0
	Permission not documented to create Employ Florida registrations and referrals for a few participants. Additionally, several participant applications were incomplete.	Y	Y	0	0
	A staffing (private employment) agency job order did not contain the phrase “Position offered by no-fee agency”.	0	0	Y	Y
RESEA	Several participants not being managed within 90 days and appears on the “Red Flag Drop-Off” report.	0	0	N	Y
WP Totals		2	2	1	2
Results-All Programs		3	3	3	6



SUMMARY TABLE OF FINANCIAL MONITORING RESULTS

2020-21 Financial Monitoring Results				
Category	Repeat of Prior Year	Reference(s)		
Prior Year Corrective Action Follow-Up	None	No prior year Findings or Issues of Noncompliance.		
Category	Findings	Issues of Non-Compliance	Observations	Technical Assistance Provided
Contracting/Contract Monitoring - (omitted Equal Employment Opportunity provision in contract).			1	
Purchasing/Procurement - (incomplete Stevens Amendment statement regarding dollar amount).				1
Purchasing/Procurement - (omitted documentation of Debarred/suspended party in contract).				1
Subawarding/Subrecipient Monitoring - (omitted Environmental Tobacco Smoke provision in contract).				1
TOTAL	0	0	1	3

Ron DeSantis
GOVERNOR



Dane Eagle
SECRETARY

July 21, 2021

Ms. Jennifer Brackney, CEO
CareerSource Pinellas
EpiCenter
13805 58th Street North, Suite 2-140
Clearwater, Florida 33760

Dear Ms. Brackney:

The Department of Economic Opportunity would like to thank you and CareerSource Pinellas staff for your participation and cooperation in the Program Year (PY) 2020-2021 quality assurance review of your workforce programs. Your Corrective Action Plan for resolving the findings and other noncompliance issues identified in the report has been accepted. Consequently, this correspondence closes the PY 2020-2021 quality assurance review process.

Should you have any questions or require additional information, please contact Ken Williams at (850) 245-7457 or via email at Kenneth.Williams@deo.myflorida.com.

Sincerely,

Charles Williams, Workforce Administrator
Bureau of One-Stop and Program Support

CW/omb

cc: Michelle Dennard
Andrew Collins
Casey Penn
Ken Williams

Information Item 3 – WIOA Primary Indicators Report Q4

Discussion: Barclay Harless asked about the three indicators we are not currently meeting and how they compare to other LWDB nearby. Jennifer Brackney stated we are holding our own and still doing quite well in comparison. She also stated she can share other LWDBs results once they come out after September 15th.


**INFORMATION ITEM 3
WIOA Primary Indicators Report – Quarter 4**

Measures	PY 2020-2021 1st Quarter Performance	PY 2020-2021 % of Performance Goal Met For Q1	PY 2020-2021 2nd Quarter Performance	PY 2020-2021 % of Performance Goal Met For Q2	PY 2020-2021 3rd Quarter Performance	PY 2020-2021 % of Performance Goal Met For Q3	PY 2020-2021 4th Quarter Performance	PY 2020-2021 % of Performance Goal Met for Q4	PY 2020-2021 Performance Goals
Adults:									
Employed 2nd Qtr After Exit	91.90	102.11	91.30	101.44	90.80	100.89	94.50	105.00	90.00
Median Wage 2nd Quarter After Exit	\$11,063	158.33	\$10,770	153.86	\$10,518	150.26	\$11,970	171.00	\$7,000
Employed 4th Qtr After Exit	81.60	107.13	88.70	103.74	88.50	103.51	87.90	102.34	85.50
Credential Attainment Rate	96.80	137.14	97.20	138.86	96.00	137.14	95.90	136.43	70.00
Measurable Skill Gains	68.10	144.69	63.70	135.53	65.40	139.15	76.60	162.98	47.00
Dedicated Workers:									
Employed 2nd Qtr After Exit	78.40	87.11	78.10	86.78	76.60	85.11	90.10	100.11	90.00
Median Wage 2nd Quarter After Exit	\$8,646	125.51	\$9,099	129.90	\$9,572	136.74	\$10,846	154.94	\$7,000
Employed 4th Qtr After Exit	84.00	98.59	77.00	90.38	72.90	85.56	72.90	85.56	85.20
Credential Attainment Rate	89.20	127.43	85.20	121.71	86.40	123.43	87.60	125.14	70.00
Measurable Skill Gains	76.80	163.40	68.90	146.60	69.80	178.30	88.70	188.72	47.00
Youth:									
Employed 2nd Qtr After Exit	82.50	109.47	91.40	108.17	90.80	107.45	89.60	106.17	84.50
Median Wage 2nd Quarter After Exit	\$5,847	182.72	\$5,241	163.78	\$5,184	162.00	\$4,739	148.09	\$3,200
Employed 4th Qtr After Exit	84.70	108.39	86.20	110.51	87.40	112.05	80.00	110.20	78.00
Credential Attainment Rate	81.60	94.55	84.30	97.68	83.40	96.64	76.00	88.06	86.30
Measurable Skill Gains	62.70	133.40	56.20	119.57	59.80	125.53	80.30	170.85	47.00
Wagner Payer:									
Employed 2nd Qtr After Exit	60.80	91.99	66.00	99.70	62.70	93.96	59.50	89.88	66.20
Median Wage 2nd Quarter After Exit	\$5,878	113.56	\$5,276	115.52	\$5,704	114.08	\$5,851	113.02	\$5,000
Employed 4th Qtr After Exit	57.50	89.56	64.30	100.16	61.60	96.26	63.20	95.33	64.20

Not Met (less than 90% of negotiated)
Met (90-100% of negotiated)
Exceeded (greater than 100% of negotiated)

Information Item 4 – Training Provider Spending

- Spent over \$2.2 million for the year ended 6/30/2021.
- 610 participants at an average of \$3,629 per participant.
- Spending with related parties was all within approved levels.



INFORMATION ITEM 4
CareerSource Pinellas
Training Provider Spending
For the period July 1, 2020 – June 30, 2021

Training Provider	Customer Training	Approved Spending (if required)	Remaining	# of Participants	Avg/ Per Part
Academy for Dental Assistants, (Pinellas)	5,215			2	2,608
Access Computer Training, (Hillsborough)	-			-	-
American Manufacturing Skills Initiative (AmSkills)	-			-	-
BizTech Learning Centers, Inc., (Pinellas)	-			-	-
Center for Technology Training	34,495			5	3,829
Central Florida Heat and Frost Insulators J.A.C. (RA)	-			-	-
Computer Coach IT Training Solutions	333,855			83	5,299
Concorde Career Institute, (Hillsborough)	5,000			1	5,000
Connecticut School of Broadcasting, (Hillsborough)	-			-	-
Florida Technical College	5,000			1	5,000
Galen College of Nursing, (Pinellas)	272,107			60	3,535
Gold Coast Professional Schools	379			1	379
Hillsborough Community College	10,000			2	5,000
IEC- Independent Electrical Contractors, FAAC	-			-	-
International Union of Operating Engineers (RA)	-			-	-
Ironworkers (RA)	-			-	-
JATC - Tampa Area Electrical JATC, (Hillsborough), FAAC (RA)	44,977			42	1,071
Jersey College, (Hillsborough)	40,810			10	4,081
Kelser University	24,624			5	4,925
Masonry (RA)	-			-	-
National Aviation Academy	158,640			31	5,117
New Horizon Computer Learning Center, (Hillsborough)	589,109			134	5,143
Pinellas Ex-Offender Re-Entry Coalition *	17,680	90,000	32,320	40	442
Pinellas Technical Education Centers *	76,125	300,000	223,875	41	1,857
Plumbers and Pipefitters and HVAC, local union 123 (RA) *	-	50,000	50,000	-	-
R.V. Training Center	10,000			2	5,000
Rasmussen College	14,650			1	14,650
Refrigeration & Air Conditioning Contractors (RACCA) (RA)	-			-	-
Roadmaster Drivers School, Inc., (Hillsborough)	10,000			2	5,000
Schiller International University, (Pinellas)	-			-	-
Southern Technical Institute, Pinellas Park, (Pinellas)	4,614			4	1,154
St. Petersburg College *	209,007	700,000	490,993	95	3,200
Superior Aviation Gate	3,500			1	3,500
Tampa Truck Driving School, Inc.	40,000			8	5,000
Ultimate Medical Academy (Pinellas) **	191,093	250,000	58,907	35	5,460
Ultimate Medical Academy (Online)	8,900	-		2	4,400
University of South Florida / Innovative Education, BACB	59,275			18	3,293
Veritas Nursing Academy	250			1	250
Weber University	9,529			1	9,529
Total	\$ 2,213,875			610	\$ 3,629

RELATED PARTY CONTRACTS (with multiple components)

	Spending	Amount	Remaining	Component
Pinellas Technical Education Centers *	76,125	300,000	223,875	Training (ITA)
	124,031	130,000	5,969	Leases
	4,200	30,000	25,800	Contract
	204,356	460,000	255,644	
St. Petersburg College *	209,007	700,000	490,993	Training (ITA)
	120,784	130,000	10,000	Leases
	54,400	125,000	70,600	Contracts
	384,191	955,000	671,593	

* Contract required No-Bid board approval
 Note: Amounts shown represent disbursements made to training providers during this period.

Information Item 5 – REACH – Reimagining Education and Career Help Act (House Bill 1507) and Eligible Training Provider Eligibility

The Reimagining Education and Career Help (REACH) Act has been signed into law and is effective July 1, 2021. The REACH Act requires the Department of Economic Opportunity (DEO) to set performance standards for training providers for inclusion on the state’s Eligible Training Provider List (ETPL). This includes consulting with the Department of Education to set minimum performance standards for programs eligible for enrollment by individuals participating in WIOA for program year PY’2021-2022 and adopting rules to implement the requirements of initial and subsequent eligibility criteria for PY’2022-2023.

Beginning PY’2021-2022, existing programs on the state and local ETPLs must meet the minimum performance criteria provided in the attached memorandum for all three measures to be approved for subsequent (continued) eligibility to remain on the state and local ETPL(s).

CareerSource Pinellas will continue to track training provider performance and will adjust the PY’2021-2022 Training Provider Performance Report to include the specified measures for completion, earnings, and employment. Training providers who do not meet the required minimum criteria will be subject to the DEO and CareerSource Pinellas ETPL policy regarding review and removal as an approved training provider.

Ron DeSantis
GOVERNOR



Dane Eagle
SECRETARY

MEMORANDUM

DATE: July 26, 2021
 TO: Local Workforce Development Board Executive Directors
 FROM: Casey Penn, Bureau Chief, Bureau of One-Stop and Program Support
 SUBJECT: Reimagining Education and Career Help Act (House Bill 1507) and Eligible Training Provider Eligibility

The Reimagining Education and Career Help (REACH) Act, has been signed into law and is effective July 1, 2021. The REACH Act requires the Department of Economic Opportunity to set performance standards for training providers for inclusion on the state’s Eligible Training Provider List (ETPL). This includes consulting with the Department of Education to set minimum performance standards for programs eligible for enrollment by individuals participating in WIOA for program year (PY) 2021-2022 and adopting rules to implement the requirements of initial and subsequent eligibility criteria for PY 2022-2023. Rulemaking for initial and subsequent eligibility will be based on input from the state board, local workforce development boards, the Department of Education, and other stakeholders for the Workforce Innovation Opportunity Act (WIOA).

Beginning PY 2021-2022, existing programs on the state and local ETPLs must meet the minimum performance criteria below for all three measures to be approved for subsequent (continued) eligibility to remain on the state and local ETPL(s). A program must have at a minimum 5 participants to determine if they performed successfully, training programs with fewer than 5 participants will remain on the ETPL until there is sufficient data to determine performance outcomes. Local workforce development boards can adopt more stringent performance criteria for programs. However, programs meeting the minimum criteria below may remain on the state ETPL.

Subsequent (Continued) Eligibility Criteria

For PY 2021-2022, the minimum criteria a program must achieve for completion, earnings, and employment rates of eligible participants are as follows:

Measures	Definitions	Performance
Completion Rate	The percentage of participants who successfully complete the education or training activity when an outcome is recorded in Employ Florida.	60%

Florida Department of Economic Opportunity | Caldwell Building | 107 E. Madison Street | Tallahassee, FL 32399
 850.245.7105 | www.FloridaJobs.org
 www.twitter.com/FLDEO | www.facebook.com/FLDEO

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Median Earnings - 2nd Quarter After Exit	The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.	\$4,498
Employment Rate - 4th Quarter After Exit	The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program. For youth, the indicator is the percentage of participants in education or training activities, or in unsubsidized employment.	70%

Methodology

The methodology used in establishing performance criteria evaluated individuals served and outcomes reported in the WIOA primary indicators of performance measures for program years 2018-19 and 2019-20 by provider and program of study. The REACH Act requires that eligibility criteria established by DEO for PY 2021-2022 would not remove greater than 20 percent of providers, the criteria established above falls within this threshold.

Should you have any questions or require additional information, please contact Charles Williams at (850) 245-7424 or via email at Charles.Williams@deo.myflorida.com.

cc: Charles Williams
 Steven Gustafson
 Keantha Moore

Florida Department of Economic Opportunity | Caldwell Building | 107 E. Madison Street | Tallahassee, FL 32309
 850.245.7105 | www.FloridaJobs.org
www.twitter.com/FLDEO | www.facebook.com/FLDEO

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Open Discussion

None

Adjournment

Barclay Harless asked if there was a motion to adjourn the meeting. Scott Thomas motioned to end the meeting and Commissioner René Flowers seconded that motion at 12:19 PM.



ACTION ITEM 2

General Counsel Performance Review

On November 20, 2019, the Board of Directors approved the selection of Gray, Robinson, P.A. for legal counsel services to begin on December 1, 2019, as General Counsel to the Local Workforce Development Board, as well as Counsel to CareerSource Pinellas.

As outlined in the By-Laws, the Ad Hoc CEO/Legal Committee will conduct the annual performance and compensation for the General Counsel. The review addresses the approved General Counsel Performance Goals.

The recommendation from this Committee will be presented to the Board of Directors on November 17, 2021.

Performance Review: The members of the Ad Hoc CEO/Counsel Committee requested that the CEO of CareerSource Pinellas, complete the performance review, adding her comments prior to submitting it to the Ad Hoc Committee for consideration.

The CEO draft Performance Review is enclosed.

RECOMMENDATION

Approval of the General Counsel Performance Review for Stephanie Marchman, Gray|Robinson for the PY'2020-2021.

SECTION 1: Achievement of Goals

PY'2020-2021

July 1, 2020 – June 30, 2021

Description of Goals	General Counsel's Summary of Performance as to each Goal	Exceeded Expectations	Met Expectations	Needs Improvement
Regular attendance at CareerSource Pinellas Board of Directors and Executive Committee meetings.	General counsel or designee attended all Board of Directors meetings and other committee meetings as requested, providing sound legal guidance as needed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Advise on corporate and tax-exempt organization legal issues related to CareerSource Pinellas.	General counsel or designee was available to provide sound legal advice as needed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review draft contracts, agreements, leases, and other legal instruments.	General counsel or designee timely and effectively reviewed, revised and approved over a dozen contracts.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review by-laws, personnel, fiscal, and other policies and/or procedures.	General counsel or designee timely and effectively reviewed by-laws, personnel, fiscal, and other policies and/or procedures as needed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide advice regarding potential employee disciplinary action.	General counsel timely and effectively advised CEO with respect to numerous employee discipline matters.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Assist the Human Resources Department with investigations on labor law and employee relations concerns.	General counsel timely and effectively advised the Human Resources Department with investigations on labor law and employee relations concerns.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Advise on responses to subpoenas, court orders, and Florida Statute Chapter 119 requests for public records.	General counsel or designee timely and effectively responded to subpoenas, court orders, and Florida Statute Chapter 119 requests for public records,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	including provision of Sunshine Law training to the Board of Directors and staff.			
Defend lawsuits, administrative claims, or other legal claims.	General counsel or designee timely and effectively defended all lawsuits, administrative claims, or other legal claims.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide any other legal services needed.	General counsel or designee timely and effectively provided any other legal services needed, including legislative developments affecting Florida's workforce development boards.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Overall responsiveness and quality of legal services provided.	General counsel timely and effectively responded to legal needs of CareerSource Pinellas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Ms. Stephanie Marchman has done an excellent job providing legal counsel. She is responsive, professional and provides timely and effective legal direction. Ms. Marchman has provided several informational presentations to the Board of Directors to ensure alignment with Sunshine and other board-related policies. Ms. Stephanie Marchman has truly been a pleasure to work with.

Action and Approvals	
Performance appraisal reviewed by Board of Directors on:	
Authorized Board Member Signature and Date:	
CEO Signature and Date:	

Stephanie M. Marchman
Attorney at Law
352-376-6400

STEPHANIE.MARCHMAN@GRAY-ROBINSON.COM

MEMORANDUM

TO: CareerSource Pinellas Board of Directors
FROM: Stephanie Marchman, CareerSource Pinellas General Counsel
DATE: January 6, 2021
SUBJECT: Legal Services Summary and Litigation Report

The following is a summary of legal services provided to CareerSource Pinellas since the General Counsel issued her last Legal Services Summary and Litigation Report to the Board of Directors on November 4, 2020:

- Attended Ad Hoc Committee meeting on November 9, 2020 regarding evaluation of the General Counsel's performance.
- Attended Board of Directors meeting on November 18, 2020.
- Provided employee relations guidance to the Chief Executive Officer ("CEO") and Human Resources regarding various employment matters.
- Reviewed and responded to a Charge of Discrimination filed by Florida Department of Economic Opportunity ("DEO") employee Ahmed Amer, including preparation of a preservation letter and position statement, and provided case status to counsel appointed to matter by the carrier, David Harvey. Mr. Harvey submitted the position statement to the EEOC on December 21, 2020 explaining that Mr. Amer is not an employee of CareerSource Pinellas. The Charge is pending before the EEOC.
- Reviewed and responded to a November 23, 2020 demand letter from counsel for former employee Devin Hicks on December 4, 2020. CareerSource Pinellas was notified on December 17, 2020 that Mr. Hicks filed a Charge of Discrimination, which was dismissed by the EEOC on December 30, 2020. Counsel appointed to matter by the carrier, David Harvey, has been provided information related to this matter if litigation is filed against CareerSource Pinellas.

Pending litigation report:

There is no pending litigation against CareerSource Pinellas. It should be noted, however, as reported above, EEOC Charges of Discrimination have been filed by DEO employee Ahmed Amer and former employee Devin Hicks. Both of these matters have been reported to the carrier and counsel has been appointed by the carrier for any further handling of these matters, which may or may not involve litigation.

Stephanie M. Marchman
Attorney at Law
352-376-6400

STEPHANIE.MARCHMAN@GRAY-ROBINSON.COM

MEMORANDUM

TO: CareerSource Pinellas Board of Directors
FROM: Stephanie Marchman, CareerSource Pinellas General Counsel
DATE: March 10, 2021
SUBJECT: Legal Services Summary and Litigation Report

The following is a summary of legal services provided to CareerSource Pinellas since the General Counsel issued her last Legal Services Summary and Litigation Report to the Board of Directors on January 6, 2021:

- Advised Chief Executive Officer (“CEO”) with respect to concerns about an employer participating in the On the Job Training program and applicable contractual requirements of the parties.
- Conducted contract review, including review of the lease agreement with School Board of Pinellas County, Abacode Cybersecurity Agreement, and Memorandum of Understanding with Partners.
- Prepared revisions to telework policy.
- Provided employee relations guidance to the Chief Executive Officer (“CEO”) and Human Resources regarding various employment matters, including application of employee handbook provisions and consideration of an ethics hotline process.
- Responded to audit request.
- Reviewed and responded to pending legislation potentially affecting CareerSource Pinellas.

Pending litigation report:

There is no known pending litigation against CareerSource Pinellas. It should be noted, however, EEOC Charges of Discrimination have been filed by DEO employee Ahmed Amer and former employee Devin Hicks. Both of these matters have been reported to the carrier and counsel has been appointed by the carrier for any further handling of these matters, which may or may not involve litigation.

Stephanie M. Marchman
Attorney at Law
352-376-6400

STEPHANIE.MARCHMAN@GRAY-ROBINSON.COM

MEMORANDUM

TO: CareerSource Pinellas Board of Directors
FROM: Stephanie Marchman, CareerSource Pinellas General Counsel
DATE: May 5, 2021
SUBJECT: Legal Services Summary and Litigation Report

The following is a summary of legal services provided to CareerSource Pinellas since the General Counsel issued her last Legal Services Summary and Litigation Report to the Board of Directors on March 10, 2021:

- Advised Chief Executive Officer (“CEO”) on pending legislation possibly affecting CareerSource Pinellas; provided government consulting services for CareerSource Pinellas during the Florida Legislature’s 2021 legislative session.
- Conducted contract review, including review of the First Amendment to the Abacode Cybersecurity Agreement, Infrastructure Agreement and Memorandum of Understanding with the AARP Foundation, and Job Corps and Gulf Coast Jewish Family Services Agreements.
- Advised CEO with respect to possible revisions to Employee Handbook, including the complaint policy.
- Provided employee relations guidance to CEO, Human Resources, and Board Members regarding various employment matters, including terminations of employment and conducting level 2 background screenings.
- Advised CEO with respect to impending DOL compliance report regarding disallowed costs.
- Advised CEO and Board Members regarding public record and sunshine questions.
- Attended Board and Compensation Committee Meetings.
- Provided public records training to CareerSource Pinellas employees at Town Hall Meeting.

Pending litigation report:

There is no known pending litigation against CareerSource Pinellas. It should be noted, however, EEOC Charges of Discrimination have been filed by DEO employee Ahmed Amer and former employee Devin Hicks. Both of these matters have been reported to the carrier and counsel has been appointed by the carrier for any further handling of these matters, which may or may not involve litigation.

Stephanie M. Marchman
Attorney at Law
352-376-6400

STEPHANIE.MARCHMAN@GRAY-ROBINSON.COM

MEMORANDUM

TO: CareerSource Pinellas Board of Directors
FROM: Stephanie Marchman, CareerSource Pinellas General Counsel
DATE: July 1, 2021
SUBJECT: Legal Services Summary and Litigation Report

The following is a summary of legal services provided to CareerSource Pinellas since the General Counsel issued her last Legal Services Summary and Litigation Report to the Board of Directors on May 5, 2021:

- Reviewed enacted legislation (HB 1507) to determine its impact on CareerSource Pinellas; provided government consulting services for CareerSource Pinellas during the Florida Legislature's 2021 legislative session.
- Conducted contract review, including review of the Job Corps and Gulf Coast Jewish Family Services Agreements for the Pinellas County School location, MOUs and IFAs with partners, Division of Blind Services First Renewal and Amendment of the MOU, engagement letters, Securance LLC First Renewal, Metrix Learning Services Agreement, Green Dot Paycard Program Agreement, Thomas Howell Ferguson proposal package, and DSNAP agreement.
- Provided employee relations guidance to CEO regarding various employment matters, including recent resignations, taking employment action due to criminal background check results, and the general hiring process for CareerSource Pinellas.
- Advised CEO with respect to operational response to incident at South County location.
- Advised CEO regarding sunshine, ethics, public records, and voting matters; prepared sunshine and ethics training for the Board.
- Reviewed Board and Committee agenda packets; attended Board and Compensation Committee Meetings.

Pending litigation report:

There is no known pending litigation against CareerSource Pinellas. It should be noted, however, two EEOC Charges of Discrimination are pending. Both of these matters have been reported to the carrier and counsel has been appointed by the carrier for any further handling of these matters, which may or may not involve litigation.

Stephanie M. Marchman
Attorney at Law
352-376-6400

STEPHANIE.MARCHMAN@GRAY-ROBINSON.COM

MEMORANDUM

TO: CareerSource Pinellas Board of Directors
FROM: Stephanie Marchman, CareerSource Pinellas General Counsel
DATE: November 4, 2020
SUBJECT: Legal Services Summary and Litigation Report

The following is a summary of legal services provided to CareerSource Pinellas since the last Board of Directors meeting on September 16, 2020:

- Provided legal guidance with respect to the Chief Executive Officer (“CEO”) performance evaluation form and process, as well as the ad hoc committee’s recommended merit increase to ensure compliance with the CEO’s employment agreement and state and federal requirements; attended ad hoc committee meeting regarding same.
- Prepared an amendment to the CEO employment agreement to correct a scrivener’s error with respect to the term of the agreement; circulated the amendment to the CEO and Board Chair for execution.
- Provided FLSA guidance related to allowable pay deductions for exempt employees.
- Provided employee relations guidance to the CEO regarding various employment matters.
- Provided legal guidance with respect to policy development framework stakeholder input forms for the new proposed policy and revisions to existing policy 091.
- Prepared the General Counsel performance evaluation and self-assessment; conferred with the CEO regarding her assessment of the General Counsel’s performance.

Pending litigation report:

There is no pending litigation against CareerSource Pinellas.



ACTION ITEM 3

General Counsel Letter of Engagement Renewal

On November 20, 2019, the Board of Directors approved the selection of Gray, Robinson, P.A. for legal counsel services to begin on December 1, 2019, as General Counsel to the Local Workforce Development Board, as well as Counsel to CareerSource Pinellas.

Based on the General Counsel Performance review, the renewal of the Letter of Engagement for a two-year period is allowable. The Letter of Engagement expires on 11/30/2021.

RECOMMENDATION

Approval of the General Counsel Letter of Engagement Renewal for Ms. Stephanie Marchman, Gray|Robinson for a two-year period, effective as of 12/1/2021 through 11/30/2023.

Stephanie M. Marchman
Attorney at Law

352-376-6400

STEPHANIE.MARCHMAN@GRAY-ROBINSON.COM

November 18, 2019

CareerSource Pinellas
c/o Karla Leavelle, Board Chair
13805 58th Street North, Suite 2-140
Clearwater, Florida 33760

Re: Engagement as Outside General Counsel for CareerSource Pinellas

Dear Ms. Leavelle,

We are pleased that you have asked GrayRobinson, P.A. (or “Firm”) to represent you. I appreciate the confidence you have placed in our Firm, and I look forward to working with you.

It has been our experience that things go more smoothly if both our client and we have a clear understanding in writing of the scope of the engagement and the role we have agreed to play. Consequently, our representation is limited to the matter as described below. This engagement letter will also govern all subsequent matters in which we may become involved on your behalf unless a separate arrangement is made that differs materially from the terms of this engagement letter.

I. SCOPE OF SERVICES.

Our firm will serve as General Counsel to the Local Workforce Development Board and CareerSource Pinellas (or “CSP”) as outlined and described in the CSP Request for Proposals issued on September 19, 2019 (the “RFP”) and in the Firm’s responsive Proposal to Provide Legal Services dated October 18, 2019. The Firm will be available to perform all services in the RFP as requested by CSP’s Chief Executive Officer and/or the Board of Directors.

II. TERM OF ENGAGEMENT.

The engagement commences on December 1, 2019, and will continue at the pleasure of CSP; however, this engagement shall terminate twenty-four (24) months from the date that CSP signs this engagement letter unless the engagement is renewed by CSP’s Board of Directors. The engagement may be terminated by CSP at any time and without any liability to CSP, except that the Firm will be compensated for services rendered and expenses incurred through the date of termination as set forth below. The Firm understands that CSP will review its performance not less than every calendar year.

CareerSource Pinellas
November 18, 2019
Page 2

III. COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT FOR COSTS.

A. **Hourly Rate.** The Firm shall be compensated at the hourly rate of \$345 for Senior Partners (25 years or more of legal experience), \$295 for Partners, \$225 for Of Counsel attorneys, \$195 for Associates, and \$95 for Paralegals for the term of the engagement.

Any type of billing or time keeping which allows compensation for time not actually spent by lawyers and paralegals in the Firm is not permitted under this engagement letter. Therefore, it shall be a material breach of these terms of engagement for the Firm to submit for payment any statement for services rendered which either (i) overstates the amount of time actually spent by a lawyer or paralegal of the Firm pursuant to this engagement letter, or (ii) includes time spent by any person not affiliated with the Firm.

Billing and matter management information is subject to the requirements of and restrictions set forth in the RFP.

B. **Other Expenses.** Unless CSP and the Firm agree otherwise, CSP will reimburse the Firm for direct expenses actually incurred by the Firm for or on behalf of CSP for the following:

- Pre-approved transportation, lodging, and meals when traveling out of the metropolitan-Clearwater area (all reimbursement for travel, lodging and meals shall be subject to the same restrictions on type and amount as are imposed by law on CSP staff)
- Courier delivery
- Court reporter fees and transcript expenses
- Court filing fees and process server charges
- Electronic discovery services provided by outside vendors
- Other non-extraordinary, out-of-pocket expenses incurred by the Firm only because of its representation of CSP

Reimbursement for the above expenses will be made only in the exact amounts incurred by the Firm, without any mark-up or multiplier. There will be no reimbursement for any types of expenses not identified above without the written authorization of CSP's Chief Executive Officer or the Board of Directors. Approval by the CSP's Chief Executive Officer or the Board of Directors must be obtained before incurring extraordinary expenses, such as the retention of experts, investigators, or travel out of state.

C. **Monthly Statement of Account.** The Firm will submit a statement of its fees for services rendered and costs incurred to the Chief Executive Officer or her designee. The portion of the statement setting forth the fees for services rendered shall specify for each entry a description of the service performed, the date such was performed, the person performing the service, and the

CareerSource Pinellas
November 18, 2019
Page 3

amount of time expended therefor. The section of the statement setting forth the costs to be reimbursed shall contain an itemization of all such costs, the date each cost was incurred, and the amount of such cost. Upon request, the Firm shall submit appropriate receipts and other evidence of the incurring of the expense.

Each statement of costs and fees shall be deemed to warrant that the statement sets forth only the actual time spent and only the actual costs incurred. CSP shall be entitled to rely on this warranty.

IV. TERMINATION.

Service under this engagement letter is at the pleasure of CSP's Board of Directors. If the Firm's services are terminated, the Firm will be paid for all services rendered and costs incurred to the date of notice of termination, unless the notice of termination specifies a later termination date or requires the completion of work in progress, in which case the Firm will be compensated and reimbursed for such services and costs incurred as are stated in such notice of termination.

V. REPRESENTATIONS AND WARRANTIES.

By execution of this engagement letter, the Firm represents and warrants the following:

- A. The Firm has substantial experience in those areas of law set forth under the Scope of Services.
- B. The Firm will not represent any client if such representation violates or will violate the rules governing conflicts of interest in the Rules Regulating The Florida Bar.
- C. The Firm will advise the Board of Directors or the Chief Executive Officer immediately if representation of a client could adversely affect the judgment or quality of service to be rendered by the Firm in its representation of CSP and/or result in a material or direct conflict of interest.
- D. The lawyers and employees of the Firm have sufficient time for the Firm to fulfill their duties as General Counsel to CSP and are not burdened by professional responsibilities or workload or by personal or other constraints that would interfere in any material respect with the Firm's obligations under this engagement letter.

VI. MISCELLANEOUS.

- A. *Assignment.* The services to be rendered under this engagement letter are personal to the Firm and may not be assigned, either directly or indirectly, to any person or entity who is not a member or employee of the Firm.

CareerSource Pinellas
November 18, 2019
Page 4

B. Amendments. This engagement letter may be amended only by written instrument signed by both the Firm and CSP's Board Chairperson.

C. Independent Contractor Status. In the performance of legal services hereunder, the Firm is an independent contractor. The assigned attorneys and paralegals shall not hold themselves out as employees, agents or servants of CSP. The Firm and assigned attorneys and paralegals do not have the power or authority to bind CSP in any promise, agreement, or representation other than as specifically provided in this engagement letter.

D. CSP Funded by Federal Grants. The Firm acknowledges that CSP is funded entirely or substantially by federal grants. Accordingly, all sums due and payable by CSP to the Firm are subject to ongoing Congressional appropriation and actual funding from the U.S. Department of Labor, the U.S. Department of Health and Human Services, the U.S. Department of Agriculture and the Florida Department of Economic Opportunity. In addition, legal fees paid from federal grant funds are subject to guidelines and limitations in applicable federal laws and regulations including OMB Circular A-87 (2 C.F.R. Part 225) and OMB Circular A-122 (2 C.F.R. Part 230). It is the responsibility of the Firm, and not CSP, its Chief Executive Officer or its Board of Directors, to ensure that any and all legal services are allowable and otherwise appropriate under all such laws, regulations and circulars.

Sincerely,

CAREERSOURCE PINELLAS

By: Local Workforce Development Board of Directors



By: Karla Leavelle, Board Chair

Date: 11.26.19

The terms and conditions hereof are accepted, and the representations, covenants, and warranties herein are confirmed.

GRAYROBINSON, P.A.

By: 
Stephanie M. Marchman

Date: 12/4/2019



ACTION ITEM 4

PY'2021-2022 General Counsel Performance Goals

As outlined in the By-Laws, the Ad Hoc CEO/Legal Committee will conduct the annual review of performance for the General Counsel. The Performance Review provides the annual goals, initiatives, actions to be taken, and metrics.

The PY'2021-2022 General Counsel Performance Goals are attached.

RECOMMENDATION

Approval of the PY'2021-2022 General Counsel Performance Goals.



General Counsel Performance Goals
Board of Directors Assessment
PY'2021-2022

Date Completed:	
Evaluation Period:	

SECTION 1: Achievement of Goals

PY'2021-2022

July 1, 2021 – June 30, 2022

Description of Goals	General Counsel's Summary of Performance as to each Goal	Exceeded Expectations	Met Expectations	Needs Improvement
Regular attendance at CareerSource Pinellas Board of Directors and Executive Committee meetings.	General counsel or designee attended all Board of Directors meetings and other committee meetings as requested, providing sound legal guidance as needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Advise on corporate and tax-exempt organization legal issues related to CareerSource Pinellas.	General counsel or designee was available to provide sound legal advice as needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review draft contracts, agreements, leases, and other legal instruments.	General counsel or designee timely and effectively reviewed, revised and approved over a dozen contracts.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review by-laws, personnel, fiscal, and other policies and/or procedures.	General counsel or designee timely and effectively reviewed by-laws, personnel, fiscal, and other policies and/or procedures as needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide advice regarding potential employee disciplinary action.	General counsel timely and effectively advised CEO with respect to numerous employee discipline matters.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Assist the Human Resources Department with investigations on labor law and employee relations concerns.	General counsel timely and effectively advised the Human Resources Department with investigations on labor law and employee relations concerns.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Advise on responses to subpoenas, court orders, and Florida Statute Chapter 119 requests for public records.	General counsel or designee timely and effectively responded to subpoenas, court orders, and Florida Statute Chapter 119 requests for public records,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	including provision of Sunshine Law training to the Board of Directors and staff.			
Defend lawsuits, administrative claims, or other legal claims.	General counsel or designee timely and effectively defended all lawsuits, administrative claims, or other legal claims.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide any other legal services needed.	General counsel or designee timely and effectively provided any other legal services needed, including legislative developments affecting Florida's workforce development boards.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Overall responsiveness and quality of legal services provided.	General counsel timely and effectively responded to legal needs of CareerSource Pinellas.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Action and Approvals	
Performance appraisal reviewed by Board of Directors on:	
Authorized Board Member Signature and Date:	
CEO Signature and Date:	



ACTION ITEM 5

CEO Performance Review

On November 1, 2019, the Board of Directors approved a three-year employment contract for Jennifer Brackney, as the CEO of CareerSource Pinellas. The Board of Directors also approved the CEO performance review, which provided the annual goals, initiatives, actions to be taken, and metrics.

As outlined in the By-Laws, the Ad Hoc CEO/Legal Committee will conduct the annual review of performance and compensation for the CEO. The review addresses the approved CEO Performance Goals, including Financial Management, Legal Compliance, Strategic Planning, Governance, Accountability and Transparency, Workforce Development Performance, Key Relationships and Partnerships, and Organizational Leadership.

The recommendation from this Committee will be presented to the Board of Directors on November 17, 2021.

Performance Review: The members of the Ad Hoc CEO/Counsel Committee submitted their ratings and comments of the CEO's performance review. Ms. Brackney also included her response to the feedback. The consolidated document is enclosed for your review.

RECOMMENDATION

Approval of the CEO Performance Review for Ms. Jennifer Brackney for the PY'2020-2021.



**CEO Performance Goals
Board of Directors Assessment
PY'2020-2021**

Date Completed:	
Evaluation Period:	July 1, 2020 – June 30, 2021

SECTION 1: Achievement of Goals

PY'2020-2021
July 1, 2020 – June 30, 2021

Descriptions of Goals	Initiatives/*Metrics	Achievements of Goals	Exceeded Expectations	Met Expectations	Needs Improvement
<p>Financial Management: Assure adequate control and accounting of all funds, including developing sound financial practices, to ensure that overall financial performance remains within Board approved budgetary parameters and within minimum and maximum limitations established in applicable laws and regulations.</p>	<p>Initiative: Create greater transparency and accuracy in financial reporting to ensure the planning budget goals are met.</p> <ul style="list-style-type: none"> * Develop, submit, and receive approval from US DOL for an indirect cost rate rather than 10 percent de minimis. Final implementation to be PY'20. * Provide financial reports to the Board, including cost allocation, grant budget/expenditures and training provider reports. * Continue to review, update, and improve usage of the financial management system (i.e., Abila and Microix). * Review current contracts to identify cost savings and to ensure statement of work aligns with activities. * Provide detailed reports to better track and manage program budget vs expenditures by grant/program. 	<p>Provided leadership for the allocation of \$8.4 million in revenue, delivering monthly detailed reports to track and manage budget vs expenditures by grant, in turn creating greater transparency.</p> <p>Worked with the Chief Financial Officer to build a Finance Team focused on assuring the development of adequate controls; developing sound financial practices, and ensuring overall financial performance remains within Board approved parameters.</p> <p>Submitted documentation for a provisional Indirect Cost Rate (13.60%) from US Department of Labor to ensure accurate accounting of indirect activities.</p> <p>Implemented the usage of financial management systems (Abila and Microix) to better track expenditures and enhance the invoicing process.</p> <p>Implemented an online requisition and invoice approval process utilizing Microix.</p>	ML, CF, KK	BH	

<p>Legal Compliance: Manage public records requests and legal issues in a timely manner.</p>	<p>Initiative: Respond to monitoring reviews and audits to ensure activities identified from past practices are addressed.</p> <ul style="list-style-type: none"> * Provide DOL with an outline of changes initiated during the transition as requested. * Implement changes recommended through technical assistance provided by DOL, DEO, CSF and others. <p>Initiative: Endeavor to sell the Science Center</p> <ul style="list-style-type: none"> * Manage program during the process and realign programs after the sale of the Science Center, i.e., observatory, programs, staff, iguana habitat. * Complete closing activities associated with selling the Science Center on November 20, 2019. * If the Science Center sells, provide stewardship of the funds as directed by the Board. * Based on the study conducted of the current one-stop locations move forward with recommendations for future development i.e. Tarpon Springs, Lealman, HEP, etc. 	<p>For more than two years, led the team responding to the USDOL’s Compliance Review; analyzed the 17 findings and 3 areas of concern, rectifying concerns where possible, addressing system issues, complying with regulations, and aligning programs and services with local, state, and federal guidelines. Currently, working with DEO to help mitigate related financial impacts.</p> <p>Supported DEO as they conducted the Programmatic and Financial Monitoring (April 2021) to ensure activities align with local, state, and federal guidance.</p> <p>As a result of the Programmatic monitoring, there were no WIOA Findings. Overall, Findings were reduced from five in PY’19-20 to three in PY’20-21. Other Noncompliance Issues (ONIs) were further reduced from eight in PY’19-20 to six in PY’20-21. There were no Findings identified during the Financial Monitoring. There was one Observation noted, and three instances of technical assistance.</p> <p>Continued to utilize DEO feedback and recommendations alongside the results of internal monitoring to continue to mitigate findings and other noncompliance issues in the future.</p> <p>Taylor Hall Miller Parker, PA conducted independent semi-annual internal monitoring activities, including administration, finance,</p>	<p>ML, BH, CF, KK</p>		
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		<p>customer-related expenditures, programs, work-based learning, subrecipient monitoring and one-stop operator.</p> <p>Powell and Jones, Inc. conducted an Annual Independent Financial Audit (2020) and a Limited Scope Audit of the 401(k) Plan (September 2020).</p> <p>Completed closing activities associated with selling the Science Center of Pinellas County on November 20, 2019, including the realignment of programs and services, and providing stewardship of the funds.</p> <p>Worked closely with the One-Stop Committee to review current one-stop locations, maintaining 42 operational and strategic partnerships to provide services through CareerSource Pinellas including new partnerships with the Lealman Exchange and other community resources.</p>			
<p>Strategic Planning: Engage the board in strategic planning activities to develop organizational goals and create sector strategies for the next 1yr, 3yr and 5 yr.</p>	<p>Initiative: Engage the board in the process of strategic planning with a third-party facilitator, by Q3, with the intent of:</p> <ul style="list-style-type: none"> * Leading the development of a strategic plan that focuses on the review of the organization’s vision, goals, sector strategies, locations, and training programs. * Submit a comprehensive four-year strategic plan to 	<p>Engaged the board in a robust process of developing a Strategic Plan. The 2020-2024 Strategic Plan provides a dynamic blueprint for the sustainability and growth of the region’s talent pipeline, including vision, mission, core values, strategic priorities, goals, and key strategies for CareerSource Pinellas.</p> <p>Led the development of a comprehensive, four-year Local Workforce Development Plan, created through an inclusive approach to</p>	<p>ML, KK</p>	<p>BH, CF</p>	

	DEO by 6/30/2020 based on policy released by DEO in early November 2019.	gathering system stakeholder feedback and input. Renewed Memorandum of Understanding (MOU) with Infrastructure Agreements (IFA) for the 15 required WIOA partners providing \$382,056 in resources to support the operations of the Career Resource Center. These agreements were approved by both the Board of Directors and Board of County Commissioners.			
Governance: Works effectively with the Board, its officers and committees to define their roles and responsibilities. Works with Board Chair to enable the Board to fulfill its governance functions and manages the Board’s due diligence process to assure timely attention to core issues.	Initiative: Facilitate the board and ad hoc committees to bring closure to the action initiated by the Board and/or Board of County Commissioners (BCC). * Review and update the Interlocal Agreement as outlined by USDOL in the Compliance Review. * Review and update the Bylaws as outlined by USDOL in the Compliance Review. * Continue to work with the BCC to take a more active role in the selection of board members. * Establish an ad hoc committee to review and update board policy manual (last updated in 2010).	Facilitated 32 board, committee, and board-related meetings to fulfill governance functions and manage the Board’s due diligence process and assure timely attention to core issues. During the past year, the LWDB reviewed/took action on 124 Items, including 65 Action items and 59 Information Items at the five Local Workforce Board meetings. Improved communication with the Pinellas Board of County Commissioners (BCC) by providing regular performance, program, and detailed budget updates. Worked closely with the Local Workforce Development Board (LWDB) and BCC to review and approve the Interlocal Agreement, Bylaws, and Grantee Subgrantee Agreement.	ML, CF, KK	BH	
Accountability and Transparency: Promotes accountability and transparency by ensuring that this organization’s employment and training	Initiative: Present pertinent program and organizational information on a regular basis to the Board, BCC and other	Successfully navigated change, stabilized operations, fostered an environment of transparency, and realigned teams to support	ML, BH, CF, KK		

programs are in alignment with policy and guidance, and accountable to the Pinellas Board of County Commissioners, the local workforce Board, CareerSource Florida, DEO, local employers, job seekers, and the general public.

- stakeholders.**
- * Procure an organization to assume the role of conducting independent, semi-annual monitoring.
 - * Provide regular program performance updates to the Board and BCC.
 - * Schedule an annual DEO program performance presentation to the Board.
 - * Provide an annual audit and audit presentation to the Board.
 - * Understand the organization’s liabilities and manage internal control procedures through the annual review and presentation of the Internal Controls Questionnaire (ICQ).
 - * Provide quarterly financial updates.

program fundamentals.

Provided regular program performance updates to the LWDB and BCC.

Hosted the annual DEO Program Performance Presentation to the Board of Directors on March 17, 2021 confirming that all performance goals were met or exceeded, including primary indicators, out of school youth, work experience and training. 88.8 percent of funding was expended on direct client services.

Stephanie Marchman, of Gray Robinson, joined the team on December 1, 2019, via a letter of engagement for legal services. Since then, she has been instrumental providing support related to day-to-day operational issues and leading several large initiatives: reviewing and rewriting the Employee Handbook, guiding developing response to COVID-19, reviewing the Grantee Subgrantee Agreement and numerous other contracts, and responding to USDOL Compliance Review-related activities.

Mitigated risk by conducting a review of the organization’s liability by utilizing the Internal Controls Questionnaire (ICQ). The results were presented/approved by the LWDB in November 18, 2020.

Improved internal controls by updating Financial and Procurement Policies and Cost

		<p>Allocation Policy, improving and strengthening the Subrecipient monitoring.</p> <p>Worked with the vCIO to implement the technology objectives focused on these principles: Cybersecurity, Technology Architecture, Financial Responsibility and Operational Responsibility.</p> <p>2021 IT Accomplishments include: implementing Microsoft O365 (Microsoft Cloud); deploying 75 new laptops; deployed two upgraded SonicWall Firewalls; implemented Multi-Factor Authentication; Implemented upgraded high-speed network switches in two locations; re-wired and cleaned-up the network closets; migrated Active Directory to Microsoft Azure; migrating network directories to Microsoft SharePoint; migrated home drives to Microsoft OneDrive; and renegotiated the Abacode contract to reduce cost by \$24,000 over a 3-year period.</p> <p>Implemented 24/7/365 cybersecurity monitoring.</p>			
<p>Workforce Development Performance: Programs: Strategically align workforce development programs to ensure that employment and training services provided by the core programs identified in the WIOA (WIA, Wagner-Peyser, Vocational rehabilitation and</p>	<p>Initiative: Improve services to employers and continue to promote connections with qualified job seekers and work-based training to ensure that services are employer driven and contribute to economic growth and business expansion in our community. Provide access to</p>	<p>Worked with the team to achieve program expectations by meeting/exceeding 15 U.S Department of Labor “Performance Indicators” for the Workforce Investment and Opportunity Act (WIOA) Program Year ending June 30, 2021.</p> <p>Exceeded target metrics of the Continuous Improvement Initiatives Program (CIP), and as a</p>	<p>ML, CF, KK</p>	<p>BH</p>	

<p>Adult Education) are coordinated and complementary so that job seekers acquire skills and credentials that meet employers' needs.</p>	<p>quality training to help job seekers acquire industry recognized credentials for in demand jobs.</p> <ul style="list-style-type: none"> * Promote sector strategy initiatives in health care, manufacturing, financial and professional services, IT, and construction. * Provide WIOA Indicators of Performance updates on a quarterly basis for PY'20. * Provide Monthly Management Report (MMR) updates on a quarterly basis. * Host networking opportunities to connect job seekers and employers, including monthly career fairs at EPI, in-house recruitment, and weekly professional, executive and general networking meetings. * Provide regular business services reports, i.e., RESEA performance, Career Fairs, networking groups, WIOA programs (EWT, OJT, PWE, WARN, REACT) * Negotiate annual, local performance goals with DEO. 	<p>result, qualified for an incentive award of \$351,298 to expand and enhance programs.</p> <p>Boosted operational performance by providing WIOA occupational skills training to 919 individuals placing 392 in employment. Average annual wages, per placement was \$59,592 for Dislocated Workers and \$43,721 for Adults.</p> <p>Streamlined business services providing more than 2,077 local employers with real time assistance, including labor market information, career fairs, internet-based job postings, employee recruitment/screening, employee referrals, career transition and customized services.</p> <p>Enrolled 284 individuals in special project training programs, including the Department of Labor Trade Adjustment Assistance Act (TAA), US Department of Labor YouthBuild, and State or CareerSource Florida-led initiatives.</p> <p>Hosted 138 onsite and virtual career fairs, recruitment and networking events connecting 163 businesses and local organizations with over 1,750 job seekers.</p> <p>Assisted 471 young adults earn their high school diploma and GED, learn on-the-job skills, and develop their career pathway.</p> <p>Participated in the Ticket to Work program to</p>			
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		assist individuals with disability return to work by utilizing career services provided through the Career Resource Center.			
<p>Key Relationships and Partnerships: Identifies key relationships necessary to support an effective organization and assures proper planning, relationship building and communications to develop and maintain these.</p>	<p>Initiative: Facilitate the integration of the organization into the fabric of the community by ensuring the use of effective marketing and communication activities. Listen to stakeholders, customers, volunteers, and others in order to improve services and generate community involvement.</p> <ul style="list-style-type: none"> * Review and update MOUs and IFAs by 11/20/19 to ensure activities with key community partners fully leverage resources and linkages, i.e., Saint Petersburg College, PTC, Pinellas Opportunities Council, Goodwill, and others. * Explore and make recommendations for the development of MOUs with new partners, i.e., Service Source and HEP. * Create a marketing plan and strategy, including marketing, website, success stories and employer highlights. * Continue to reach out to key local employers to rebuild relationships, e.g., Pinellas County Sheriff, Jabil, others. * Establish, maintain, and 	<p>Successfully facilitated the integration of the organization into the fabric of the community by maintaining 42 operational and strategic partnerships, to leverage resources to expand and enhance services.</p> <p>Provided 21,766 individuals with career services, including job search assistance, job referrals, career transition, resume assistance, career workshops and program orientations through the Career Resource Centers.</p> <p>Partnered with Pinellas County to create a Career Resource Center within the Lealman Exchange.</p> <p>Continued to participate in partnership with ten local chambers, St Pete EDC, Pinellas County EDC, Enterprise Florida, Recruitment Networking Group (RNG), BAMA and Tampa Bay Partnership to promote regional workforce opportunities.</p> <p>Created a comprehensive marketing and communications plan to support external communications, optimize social media, improve internal processes and create brand and program awareness supporting the efforts of the vision, mission, and goals of</p>	ML, CF, KK	BH	

	<p>enhance partnership activities through quarterly partner meetings and online customer service training provided by the One-Stop Operator.</p> <ul style="list-style-type: none"> * Participate in partnership/sponsorship opportunities with local chambers and EDC, e.g., EDC of Pinellas, EDC of Greater St. Petersburg, and local chambers. * Partner with the Tampa Bay Partnership to help better understand the work they are doing and to continue the conversation regarding regional workforce opportunities. 	<p>CareerSource Pinellas.</p> <p>Partnered with PERC to host the STARS program, connecting 55 ex-offenders to services, career assistance and resources in the community.</p> <p>Partnered with Pinellas County Schools and local community-based organizations to provide 23 YouthBuild students with the opportunity to complete their high school education, learn construction-related skills, develop leadership skills and work on building or renovating low-income homes.</p> <p>Partnered with Ultimate Medical Academy to leverage skills training to strengthen the pipeline for the healthcare industry by connecting academic and work-based learning.</p> <p>Partnered with SPC to support the Line Workers training program to prepare individuals to join the electric power team.</p> <p>Partnered with SPC to support the Rapid Credentialing Training program and the Florida Job Growth Grant for Information Technology.</p> <p>Partnered with New Horizons to craft innovative training programs tailored to meet the requirements of the regional IT industry and driving results for job seekers.</p> <p>Partnered with community organizations and local stakeholders to connect 290 young adults</p>			
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		<p>with businesses in the region providing these future leaders with valuable work experience, insight on career paths, and/or career planning.</p> <p>Partnered to provide support for the following programs: Archway Partners proposed new development, Seminole Square Apartments in Largo; Pinellas County Schools Career Preparation Programs; Coptic Orthodox Charities' Children and Families Refugee Career Pathway Program; Goodwill Industries-Suncoast, Inc. Second Chance Act: Adult Reentry Education, Employment, Treatment and Recovery Program; ServiceSource Work Incentive Planning and Assistance Program; SPC's Electrical Lineworker Program with Duke Energy Foundation; Tampa Bay Academy of Hope Young Adult Reentry Program; TruMont RN Apprenticeship Program; SPCs Florida Job Growth Grant for Information Technology; and Crisis Center of Tampa Bay/UMA Education, Inc Emergency Medical Technician (EMT) Apprenticeship.</p>			
<p>Organizational Leadership: Effectively manages continuity, change and transition as CSPIN separates from CSTB.</p> <p>Deals effectively with demanding situations and designs and implements effective interventions.</p> <p>Establishes and leads an effective management team.</p>	<p>Initiative: Ensure that procedures and organizational culture reflect integrity and transparency. Lead staff in maintaining a climate of excellence, accountability, and respect.</p> <ul style="list-style-type: none"> Fully staff the organization, including the management 12/30/2019. Begin the development of a succession plan for the 	<p>Successfully navigated change, stabilizing operations, fostering an environment of transparency, and realigning our teams with program fundamentals.</p> <p>Responded to the local economic pandemic by remaining open to the public to provide services to the customers that needed us the most; creatively developed solutions to continue to provide direct services to</p>	<p>ML, CF, KK</p>		<p>BH</p>

	<p>organization by 6/30/19.</p> <ul style="list-style-type: none"> • Implement an annual employee engagement survey which will become the benchmark for appropriate organization changes and activities. • Develop performance goals for each employee. Align annual performance evaluations with program year and determine merit/evaluation stipend. • Review current programs, SOPs, and Desk Guides to ensure alignment with guidance from DOL, DEO and CSF by Q4. 	<p>customers; shifted the business model to a hybrid platform.</p> <p>Supported the Governor’s Return to Work initiative focused on encouraging Floridians to return to the workplace, helping employers attract job seekers, and continuing to fuel economic growth by striving to provide excellence in customer service through the two Comprehensive Career Resource Centers located in Saint Petersburg and Clearwater and two satellite Career Resource Centers located in Tarpons Springs and the Lealman Exchange.</p> <p>Deployed 20 percent of staffing to assist DEO with Reemployment Assistance (RA) by remotely assisting 3,674 individuals with RA-related services.</p> <p>Reviewed, approved, and updated Administrative, Strategic and HR policies, and the Employee Handbook to ensure alignment with US Department of Labor, Department of Economic Opportunity guidelines and standard HR practices.</p> <p>Represented CareerSource Pinellas at various events throughout the year to build relationships and provide awareness of resources and programs.</p> <p>Served as the keynote speaker at Pinellas Technical College’s 2020-2021 Commencement Ceremony celebrating over 200 graduates along</p>			
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		<p>with their family and friends and local leaders who share a passion for lifelong learning.</p> <p>Hosted an informative workshop on Workforce Development at one of Suncoast HR's monthly breakfast meetings to build awareness of resources and programs available at CareerSource Pinellas.</p> <p>Supported the Central Pinellas Chamber of Commerce and local CBS affiliate, 10 Tampa Bay evening anchor, Carolina Leid, for the Chamber's Annual Inspire Awards celebrating individuals who have gone above and beyond to create positive impact.</p> <p>Elected to serve as the Secretary, an officer position, with the Florida Workforce Development Board (FWDA); a membership organization of CEOs representing 23 of the Local Workforce Development Boards in Florida.</p> <p>Continued to serve as a member of the Early Learning Coalition Board of Directors and a member of the Nominating and Finance Committees.</p> <p>Continued to serve as a member of the Board of Directors with Stavros Career Education Board, Pinellas Technical College's Advisory, United Way's Hillsborough/Pinellas Area Board & Joint CI Committee, Saint Petersburg</p>			
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		<p>Women’s Club, and Local Coordinating Board.</p> <p>Selected as a member of the Pinellas County Interview Team to participate in the selection of the Director of Economic Development for Pinellas County.</p> <p>Worked with the Compensation Committee to finalize the evaluation process, review the organization chart, update the compensation review and to continue the process of developing a succession plan.</p> <p>Led a team of workforce professionals to continue our focus on developing an organizational culture that promotes independent ownership, integrity, transparency, excellence, and respect.</p> <p>Continuing to focus on steps and programs to further drive a comprehensive culture transformation. This includes:</p> <ul style="list-style-type: none"> • Introducing meaningful and detailed behavioral and Leadership competencies to all employees creating a foundation from which all people programs are designed and our cultural language is constructed. • Continued focus on developing the Leadership team into strong leaders and thinkers vs. “doers.” • Fostering a culture where we focus on the customer (Internal and External) 			
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and ensure excellence in every interaction by mapping internal and external processes and identifying customer touch points.

- Working to grow an agile organization that promotes business engagement, strengthens meaningful connections across partners, and expands the talent pipeline.

SECTION 2: COMMENTS

Comments from the Committee:

Michael Logal: In one of the toughest years since 2009, Jennifer performed above expectations across the board. The whole organization met the challenge.

Barclay Harless: Over the past three years, CSP has continually risen to the challenges inherent in 2018 and built back with systems, processes and policies that will serve as guardrails for the organization in the future as to not allow past faults. The organization under the CEO's leadership has consistently overcome these core challenges and more, including both cyber-attacks and COVID-19. I personally believe the agency is strong on financial, audit, reporting, and compliance that is required. Our internal focus is strong.

During last years' review, I noted the particular challenges that were on the horizon, including a major shift of focus needed to external partnerships and a rebuilding of the business and educational community's appreciation for our services and resources. I believe some strides have been made. A full-time focus must be applied to our external relationships and community.

Our most critical challenge to that revolves around our organizational leadership. A strong, sufficient organization is closely related to its senior leadership. The agency has had far too many resignations, terminations, and other turnover in the past 18 months. Some of these are of course natural and necessary. But many of these were new hires to senior management, not long term employees.

This challenge will serve as an inhibition to growing, training, and expanding its role in a most critical hour. With the large amount of job openings in just about every craft and industry in our service area, this agency is needed and can do more. It is my assessment that senior management must be improved to ensure the organization is not always inwardly focused.

Comments from the CEO:

I truly appreciate the feedback, insight, and support of the board members during the performance review process, and throughout the year. CareerSource Pinellas has felt the impact of the Great Resignation and the pandemic and, of course, faced a few challenges along the way. However, where there are challenges, there are also opportunities. The vision for CareerSource Pinellas is to enhance lives by making talent a key competitive asset for Pinellas County. Despite the dynamic economic conditions of the past year, we have made significant progress toward that vision in several key areas: expanding sector strategies in industries such as health care, manufacturing, financial and professional services, information technology and construction; growing apprenticeship opportunities; and enhancing collaboration with local businesses.

I am very proud of our senior leadership team, including Steve Meier, CFO, Paul Ashe, vCIO, Kris Lucas, Director, Business and Talent Development/Programs, Jacqueline DuChene Heyward, Director, Human Resources, April Torregiante, Director, Special Projects, and Leah Geis, Administrative Assistant. This team can be counted on every day to work together to ensure the success of this organization.

During Program Year 2020-2021, we worked together to provide financial management for a \$9M budget, ensured legal compliance, upgraded the technology platform and cloud migration, implemented our strategic plan, assisted with facilitating 32 board and committee meetings to fulfill the board governance functions, promoted accountability and transparency throughout the organization, aligned workforce programs to DEO/USDOL policy, provided services to 2,077 businesses and career services to over 21,766 individuals, met and/or exceeded 15 performance measures, developed over 40 key relationships and partnerships at the local, regional, state and federal level, and worked with our front-line team members to ensure that the organizational culture reflects integrity and transparency while maintaining a climate of excellence, accountability, growth, and respect.

In the CEO Performance Goals, I've outlined the strong programmatic and financial results we have achieved on behalf of the workforce system in Pinellas County. With these deliverables in hand, we are launching fresh conversations across workforce sectors about how best to respond to our community's evolving workforce needs. Through strong partnerships, ever-expanding community access and ensuring quality services, we are confident that CareerSource Pinellas will play a critical role in accelerating our region's recovery and continue to help create a bright future for the residents of Pinellas County. We are committed to working together to move forward with resiliency, positivity, and a commitment to our mission and values.

Action and Approvals

Performance appraisal reviewed by Board of Directors on:	
Authorized Board Member Signature and Date:	
CEO Signature and Date:	



ACTION ITEM 6

CEO Compensation Review

On November 1, 2019, the Board of Directors approved a three-year employment contract for Jennifer Brackney, as the CEO of CareerSource Pinellas. The Board of Directors also approved the CEO performance review, which provided the annual goals, initiatives, actions to be taken, and metrics.

Grantee-Subgrantee Agreement

The Grantee-Subgrantee Agreement between Florida Department of Economic Opportunity and CareerSource Pinellas states that:

- No changes to compensation for executive staff of the Board are allowed without documented Board approval and must be in alignment with local policies and procedures. The Board shall ensure that all bonuses, pay raises, and benefits are reasonable and necessary for the successful performance of the award and are a prudent use of federal funds.

Reimagining Education and Career Help Act (HB 1507)

Additionally, during this past regular legislative session, House Bill 1507 (Workforce Related Programs and Services) was passed. The bill took effect on July 1, 2021. In part, the bill made several changes to Section 445.007, Florida Statutes, related to local workforce development boards, that affect the recently revised grantee/subgrantee agreement including issues around reporting of compensation originally required by Executive Order 20-44. This bill adds subsection (13) to Section 445.007 that clarifies and adds additional requirements to the executive order.

- A compensation schedule is due to DEO within 30 days after the end of the board's fiscal year. The schedule will be based on the fiscal year, not the calendar year.
- The list of Board employees to be included in the schedule is expanded to include executives, officers, directors, trustees, key employees, and the highest compensated employees.

- A declaration from the CFO (or designee) attesting to the truthfulness of the information on the schedule is required.
- The schedule must be published on the board's website for a period of three years after its first publication.

2020 and 2021 Salary Cap Information

The Consolidated Appropriations Act, 2021 (Public Law 116-260), signed into law on December 27, 2020, restricts the amount of direct salary that may be paid to an individual under a Federal grant, cooperative agreement, or applicable contract to a rate no greater than Executive Level II of the Federal Executive Pay Scale. **Effective January 2021, the Executive Level II salary level is \$199,300 (formerly \$197,300 in 2020).**

An individual's institutional base salary is not constrained by the legislative provision for a limitation of salary. The rate limitation simply limits the amount that may be awarded and charged to Federal awards. For individuals whose salary rates are in excess of Executive Level II, the non-federal entity may pay the excess from non-federal funds.

Every year, each local workforce development board is required to complete a spreadsheet of executive salaries and Certify by the CEO and CFO that no salaries in excess of the cap have been charged to Federal grants whether directly charged or charged through indirect cost rates. The spreadsheet and certification are submitted to DEO by March 31.

Comprehensive Review

The Compensation Review approved by the Board of Directors on June 5, 2019, outlines the Job Title Families with their assigned Grade Level and associated salary range (Exhibit H). **The Chief Executive Officer (CEO) is a Grade Level 221 with an associated salary range of \$142,149 (minimum), \$184,794 (mid) and \$227,438 (max).**

Executive Staff Salary

The purpose of today's discussion is the approval of the annual performance review and the range for the merit increase/one-time performance stipend of 0%-5% for the CEO.

Employee	Position	Salary Effective:		Increase	
		12/1/2020	12/1/2021	Dollar	Percentage
Jennifer Brackney	CEO	\$188,475.30			0-5%

RECOMMENDATION

Approval of the compensation for Ms. Jennifer Brackney, CEO effective December 1, 2021, through November 30, 2022, for presentation and approval by the Board of Directors on November 17, 2021.



ACTION ITEM 7

PY'2021-2022 CEO Performance Goals

As outlined in the By-Laws, the Ad Hoc CEO/Legal Committee will conduct the annual review of Performance for the CEO. The Performance Review provides the annual goals, initiatives, actions to be taken, and metrics. The CEO Performance Goals are attached.

RECOMMENDATION

Approval of the PY'2021-2022 CEO Performance Goals.



**CEO Performance Goals
Board of Directors Assessment
PY'2021-2022**

Date Completed:	
Evaluation Period:	

SECTION 1: Achievement of Goals

PY'2021-2022
July 1, 2021 – June 30, 2022

Descriptions of Goals	Initiatives/*Metrics	Exceeded Expectations	Met Expectations	Needs Improvement
<p>Financial Management: Assure adequate control and accounting of all funds, including developing sound financial practices, to ensure that overall financial performance remains within Board approved budgetary parameters and within minimum and maximum limitations established in applicable laws and regulations.</p>	<p><u>Initiative:</u> Create greater transparency and accuracy in financial reporting to ensure the planning budget goals are met.</p> <ul style="list-style-type: none"> * Provide financial reports to the Board, including cost allocation, grant budget/expenditures and training provider reports. * Continue to review, update and improve usage of the financial management system i.e. Abila and Microix. * Review current contracts to identify cost savings and to ensure statement of work aligns with activities. * Provide detailed reports to better track and manage program budget vs expenditures by grant/program. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Legal Compliance: Manage public records requests and legal issues in a timely manner.</p>	<p><u>Initiative:</u> Respond to monitoring reviews and audits to ensure activities identified from past practices are addressed.</p> <ul style="list-style-type: none"> * Provide DOL with an outline of changes initiated during the transition as requested. * Implement changes recommended through technical assistance provided by DOL, DEO, CSF and others. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Strategic Planning: Implement the Strategic Plan</p>	<p><u>Initiative:</u> Implement the strategic plan:</p> <ul style="list-style-type: none"> *Leading the implementation of a strategic plan that focuses on the review of the organization's vision, goals, sector strategies, locations, and training programs. *Lead the implementation of the comprehensive four-year strategic plan submitted to DEO on 6/30/2020. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<p>Governance: Works effectively with the Board, its officers and committees to define their roles and responsibilities. Works with Board Chair to enable the Board to fulfill its governance functions and manages the Board's due diligence process to assure timely attention to core issues.</p>	<p>Initiative: Facilitate the board and ad hoc committees to bring closure to the action initiated by the Board and/or Board of County Commissioners.</p> <ul style="list-style-type: none"> * Review and implement the Interlocal Agreement as approved by LWDB and BCC. * Review and implement the Bylaws as approved by the LWDB and BCC. * Continue to work with the BCC to take a more active role in the selection of board members. 			
<p>Accountability and Transparency: Promotes accountability and transparency by ensuring that this organization's employment and training programs are in alignment with policy and guidance, and accountable to the Pinellas Board of County Commissioners, the local workforce Board, CareerSource Florida, DEO, local employers, job seekers, and the general public.</p>	<p>Initiative: Present pertinent program and organizational information on a regular basis to the Board, BOCC and other stakeholders.</p> <ul style="list-style-type: none"> * Procure an organization to assume the role of conducting independent, semi-annual monitoring. * Provide regular program performance updates to the Board and BCC. * Schedule an annual DEO program performance presentation to the Board. * Provide an annual audit and audit presentation to the Board. * Understand the organization's liabilities and manage internal control procedures through the annual review and presentation of the Internal Controls Questionnaire (ICQ). * Provide quarterly financial updates. 			
<p>Workforce Development Performance: Programs: Strategically align workforce development programs to ensure that employment and training services provided by the core programs identified in the WIOA (WIA, Wagner-Peyser, Vocational rehabilitation and Adult Education) are coordinated and complementary so that job seekers acquire skills and credentials that meet employers' needs.</p>	<p>Initiative: Improve services to employers and continue to promote connections with qualified job seekers and work based training to ensure that services are employer driven and contribute to the economic growth and business expansion in our community. Provide access to quality training to help job seekers acquire industry recognized credentials for in demand jobs.</p> <ul style="list-style-type: none"> * Promote sector strategy initiatives in health care, manufacturing, financial and professional services, IT and construction. * Provide WIOA Indicators of Performance updates on a quarterly basis. * Provide Monthly Management Report (MMR) updates on a quarterly basis. * Host networking opportunities to connect job seekers and employers, including monthly career fairs at EPI, in-house recruitment, and weekly professional, executive and general networking meetings. * Provide regular business services reports i.e. RESEA performance, Career Fairs, networking groups, WIOA programs (EWT, OJT, PWE, WARN, REACT) <p>Negotiate annual, local performance goals with DEO.</p>			

<p>Key Relationships and Partnerships: Identifies key relationships necessary to support an effective organization and assures proper planning, relationship building and communications to develop and maintain these.</p>	<p>Initiative: Facilitate the integration of the organization into the fabric of the community by assuring the use of effective marketing and communication activities. Listen to stakeholders, customers, volunteers, and others in order to improve services and generate community involvement.</p> <ul style="list-style-type: none"> * Implement the MOUs and IFAs to ensure activities with key community partners fully leverage resources and linkages. * Explore and make recommendations for the development of MOUs with new partners. * Create a marketing plan and strategy, including marketing, website, success stories and employer highlights. * Continue to reach out to key local employers to rebuild relationships. * Establish, maintain and enhance partnership activities through quarterly partner meetings and online customer service training provided by the One-Stop Operator. * Participate in partnership/sponsorship opportunities with local chambers and EDC i.e. EDC of Pinellas, EDC of Greater St. Petersburg, and local chambers. <p>Partner with the Tampa Bay Partnership to help better understand the work they are doing and to continue the conversation regarding regional workforce opportunities.</p>			
<p>Organizational Leadership: Manages the organization.</p> <p>Deals effectively with demanding situations and designs and implements effective interventions.</p> <p>Establishes and leads an effective management team.</p>	<p>Initiative: Ensure that procedures and organizational culture reflect integrity and transparency. Lead staff in maintaining a climate of excellence, accountability and respect.</p> <ul style="list-style-type: none"> • Fully staff the organization. • Finalize the development of a succession plan for the organization. • Implement an annual employee engagement survey which will become the benchmark for appropriate organization changes and activities. • Develop performance goals for each employee. Align annual performance evaluations with program year and determine merit/evaluation stipend. <p>Review current programs, SOPS, and Desk Guides to ensure alignment with guidance from DOL, DEO and CSF.</p>			

Comments:

Action and Approvals	
Performance appraisal reviewed by Board of Directors on:	
Authorized Board Member Signature and Date:	
CEO Signature and Date:	



ACTION ITEM 8

Annual 401(k) Plan Audit

WorkNet Pinellas, Inc. 401k Plan is required to have an annual audit by an Independent CPA firm. The Audit Committee approved Thomas Howell Ferguson P.A. to perform a limited scope audit of the 2020 financial statements at its April 29, 2021, meeting and the Board of Directors followed up with their approval at the May 19, 2021, meeting.

As permitted under the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974, the plan administrator instructed Thomas Howell Ferguson P.A. to perform a limited scope audit and thus, they did not perform any auditing procedures with respect to any investment information which was certified by Reliance Trust Company. Thomas Howell Ferguson P.A. did perform audit procedures on employee eligibility, employer and employee contributions, employee loans, etc. Their responsibility is to express an opinion on the 2020 financial statements based on conducting the audit in accordance with auditing standards generally accepted in the United States. Because Thomas Howell Ferguson P.A. performed a limited scope audit, they did not express an opinion on the 2020 financial statements.

The attached financial statements were filed with Department of Labor, along with the organization's Form 5500, by the filing deadline of October 15, 2021. If any changes are required to the audit report, an amended audit report will be filed. The Department of Labor allows amended audit reports to be filed without penalty as long as Form 5500 is filed timely.

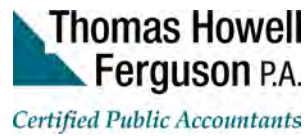
RECOMMENDATION

Approval of the enclosed WorkNet Pinellas, Inc. 401(k) Plan Financial Statements and Supplemental Schedule for the years ended December 31, 2020 and 2019.

Financial Statements
and Supplemental Schedule

WorkNet Pinellas, Inc. 401(k) Plan

*Years ended December 31, 2020 and 2019
with Report of Independent Auditors*



WorkNet Pinellas, Inc. 401(k) Plan

Financial Statements
and Supplemental Schedule

Years ended December 31, 2020 and 2019

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Report of Independent Auditors

Plan Administrator
WorkNet Pinellas, Inc. 401(k) Plan

Report on the Financial Statements

We were engaged to audit the accompanying financial statements of WorkNet Pinellas, Inc. 401(k) Plan (the Plan), which comprise the statement of net assets available for benefits as of December 31, 2020, the related statement of changes in net assets available for benefits for the year then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on conducting the audit in accordance with auditing standards generally accepted in the United States of America. Because of the matter described in the Basis for Disclaimer of Opinion paragraph, however, we were not able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion.

Basis for Disclaimer of Opinion

As permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974, the Plan Administrator instructed us not to perform, and we did not perform, any auditing procedures with respect to the information summarized in Note 8, which was certified by Reliance Trust Company, the Trustee of the Plan, except for comparing such information with the related information included in the 2020 financial statements. We have been informed by the Plan Administrator that the Trustee holds the Plan's investment assets and executes investment transactions. The Plan Administrator has obtained a certification from the Trustee as of and for the year ended December 31, 2020, that the information provided to the Plan Administrator by the Trustee is complete and accurate.

Page Two

Disclaimer of Opinion

Because of the significance of the matter described in the Basis for Disclaimer of Opinion paragraph, we have not been able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion on the 2020 financial statements. Accordingly, we do not express an opinion on the 2020 financial statements.

Other Matter - Supplemental Schedule

The supplemental schedule, Schedule H, Line 4i - Schedule of Assets Held at End of Year as of December 31, 2020, is required by the Department of Labor's (DOL) Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974 and is presented for the purpose of additional analysis and is not a required part of the financial statements. The supplemental schedule is the responsibility of the Plan's management. Because of the significance of the matter described in the Basis for Disclaimer of Opinion paragraph, we do not express an opinion on the supplemental schedule.

Other Matter - Accompanying 2019 Financial Statement

The financial statement of the Plan as of December 31, 2019 was audited by predecessor auditors. As permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974 (ERISA), the plan administrator instructed the predecessor auditors not to perform and they did not perform, any auditing procedures with respect to the information certified by the trustee of the Plan. Their report, dated October 12, 2020, indicated that (a) because of the significance of the information that they did not audit, they were not able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion and accordingly, they did not express an opinion on the financial statements; and (b) the form and content of the information included in the financial statements other than that derived from the information certified by the trustee, were presented in compliance with the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA.

Report on Form and Content in Compliance with DOL Rules and Regulations

The form and content of the information included in the 2020 financial statements and supplemental schedule, other than that derived from the information certified by the Trustee, have been audited by us in accordance with auditing standards generally accepted in the United States of America and, in our opinion, are presented in compliance with the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974.



Tallahassee, Florida
September 22, 2021

WorkNet Pinellas, Inc. 401(k) Plan

Statements of Net Assets Available for Benefits

	December 31,	
	<u>2020</u>	<u>2019</u>
Assets:		
Investments	\$ <u>3,452,677</u>	\$ <u>3,315,401</u>
Receivables:		
Accrued interest receivable	4,951	3,968
Notes receivable from participants	<u>157,074</u>	<u>148,274</u>
Total receivables	<u>162,025</u>	<u>152,242</u>
Total assets	3,614,702	3,467,643
Liabilities:		
Excess contributions payable	<u>8,214</u>	<u>-</u>
Total liabilities	<u>8,214</u>	<u>-</u>
Net assets available for benefits	\$ <u><u>3,606,488</u></u>	\$ <u><u>3,467,643</u></u>

See accompanying notes to the financial statements.

WorkNet Pinellas, Inc. 401(k) Plan

Statement of Changes in Net Assets Available for Benefits

Year ended December 31, 2020

Additions:

Investment income:

Interest and dividend income	\$ 171,897
Net increase in fair value of investments	<u>233,384</u>
	<u>405,281</u>

Interest income on notes receivable from participants	9,297
Other income	<u>1,396</u>
	<u>10,693</u>

Contributions:

Participant	124,922
Employer	<u>153,629</u>
	<u>278,551</u>

Total additions	<u>694,525</u>
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Deductions:

Benefits paid to participants	551,497
Administrative expenses	<u>4,183</u>
Total deductions	<u>555,680</u>

Net increase in net assets available for benefits	138,845
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Net assets available for benefits:

Beginning of year	<u>3,467,643</u>
End of year	<u>\$ 3,606,488</u>

See accompanying notes to the financial statements.

WorkNet Pinellas, Inc. 401(k) Plan

Notes to Financial Statements

Years ended December 31, 2020 and 2019

1. Description of Plan

The following description of WorkNet Pinellas, Inc. 401(K) Plan (the Plan) provides only general information. The Plan has implemented certain requirements by the Coronavirus Aid, Relief, and Economic Security Act (the CARES Act) and the Setting Every Community Up for Retirement Enhancement Act of 2019 (the SECURE Act), which laws change the Plan to, among others, allow certain eligible individuals to receive coronavirus-related relief for loan repayment, suspend required minimum distributions, and delay commencement date for required minimum distributions. Participants should refer to the Plan agreement for a more complete description of the Plan's provisions.

General

The Plan was organized effective July 1, 2004. The plan has been amended throughout the years to comply with tax legislation, most recently amended effective January 1, 2016. The Plan is a defined contribution plan as described in Section 401 of the Internal Revenue Code (the Code) covering all employees. The Plan is subject to the provisions of the Employee Retirement Income Security Act of 1974 (ERISA). WorkNet Pinellas, Inc. (the Organization) has overall responsibility for administering the Plan. The Plan's trustee is responsible for the management and control of the Plan's assets. The Plan's trustee is Reliance Trust Company. The Plan's administrative agent is ADP Retirement Services. Effective January 1, 2021, the Plan moved from ADP Retirement Services to John Hancock Retirement Plan Services (John Hancock).

Eligibility

The Plan covers all employees of the Company with the exception of employees who are not located in one of the WorkNet Pinellas, CareerSource Pinellas, or the CareerSource Tampa Bay offices. Employees of the organization are eligible to participate in the deferral, employer nonelective and matching components of the Plan on the first day of the sixth month of employment. There is no minimum age requirement to participate in the Plan.

WorkNet Pinellas, Inc. 401(k) Plan

Notes to Financial Statements

1. Description of Plan (continued)

Contributions

Each year, participants may authorize the Company to contribute to the Plan up to 100% of their eligible annual compensation, subject to the maximum annual amount permitted under the Internal Revenue Code (IRC). Participants who attain age 50 before the end of the Plan year are eligible to make catch-up contributions. Participants may also make rollover contributions from amounts representing distributions from other qualified plans. Eligible employees may make pretax or post-tax contributions to the Plan. The Company may make nonelective contributions in a discretionary amount as determined by the Company, and such contributions are not contingent on current or retained earnings. During the year ended December 31, 2020, the Company contributed 5% of each eligible employee's salary on a bi-weekly basis. The Company may elect to make contributions in the form of a matching contribution, in relation to the participants' elective salary deferral contributions, subject to IRS limitations. The Company did not elect to make matching contributions for the year ended December 31, 2020. Participants direct the investment of contributions into various investment options offered by the Plan, subject to IRS limitations.

Participant Accounts

Each participant's account is credited with the participant's contribution, the Company's contributions, and Plan earnings.

Participant accounts are charged with an allocation of administrative expenses that are paid by the Plan. Allocations are based on participant earnings, account balances, or specific participant transactions, as defined. The benefit to which a participant is entitled is the benefit that can be provided from the participant's vested account.

Vesting

Participants are immediately fully vested in their contributions plus actual earnings thereon. Vesting in the Company's portion of their accounts and earnings thereon is based on years of continuous service. Participants are fully vested after one year of credited service. Participants become 100% vested upon death or becoming totally and permanently disabled while employed by the Company.

WorkNet Pinellas, Inc. 401(k) Plan

Notes to Financial Statements

1. Description of Plan (continued)

Notes Receivable from Participants

Participants may borrow from their accounts a minimum of \$500 up to a maximum equal to the lesser of \$50,000 or 50% of their vested account balance. Three outstanding loans are allowed at a time. Loan terms range from one to five years and are repaid in equal payroll period installments. The loans are secured by the balance in each participant's account and bear interest at rates 5.25% to 7.5%. The interest rate on any loan to a participant shall be a reasonable interest rate commensurate with current interest rates charged for loans made under similar circumstances by persons in the business of lending money.

Payment of Benefits

Payment of benefits after termination of employment is determined by the participant's account balance. If the vested account balance does not exceed \$5,000, the Plan will distribute the nonforfeitable portion in a lump-sum payment as soon as practicable following the date of termination. If the vested account balance exceeds \$5,000, the Plan permits distribution as of any date following termination of employment with the employer at the election of the participant.

On termination of service due to death, disability or retirement, a participant may elect to receive an amount equal to the value of the participant's vested interest in his or her account in a lumpsum amount.

Forfeitures

Forfeited accounts are used to reduce employer contributions. Forfeitures used to reduce employer contributions totaled \$14,211 during the year ended December 31, 2020.

2. Summary of Significant Accounting Policies

Basis of Accounting

The accompanying financial statements of the Plan are prepared on the accrual basis of accounting.

Payment of Benefits

Benefits are recorded when paid.

WorkNet Pinellas, Inc. 401(k) Plan

Notes to Financial Statements

2. Summary of Significant Accounting Policies (continued)

Use of Estimates

The preparation of financial statements in accordance with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of net assets available for benefits and changes therein. Actual results could differ from those estimates.

Investment Valuation and Income Recognition

Investments are reported at fair value. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. See Note 3 for additional discussion of fair value measurements.

Purchases and sales of securities are recorded on a trade-date basis. Interest income is recorded on the accrual basis. Dividends are recorded when received. Net appreciation (depreciation) includes the Plan's gains and losses on investments bought and sold as well as held during the year.

Notes Receivable from Participants

Notes receivable from participants are measured at their unpaid principal balance plus any accrued but unpaid interest. Interest income is recorded on the accrual basis. Related fees are recorded as administrative expenses and are expensed when they are incurred.

No allowance for credit losses has been recorded as of December 31, 2020 and 2019. If a participant ceases to make loan repayments and the plan administrator deems the participant loan to be in default, the participant loan balance is reduced and a benefit payment is recorded.

Excess Contributions Payable

Amounts payable to participants for contributions in excess of amounts allowed by the IRS are recorded as a liability with a corresponding reduction to contributions.

Expenses

Certain expenses of maintaining the Plan are paid by the Plan, unless otherwise paid by the Company. Expenses that are paid by the Company are excluded from these financial statements. Fees related to the administration of notes receivable from participants and benefit payments are charged directly to the participant's account and are included in administrative expenses. Investment related expenses are included in net appreciation in fair value of investments.

WorkNet Pinellas, Inc. 401(k) Plan

Notes to Financial Statements

2. Summary of Significant Accounting Policies (continued)

Subsequent Events

The Plan has evaluated subsequent events through September 22, 2021, the date the financial statements were available to be issued. During the period from December 31, 2020 to September 22, 2021, the Plan did not have any material recognizable subsequent events.

3. Fair Value Measurements

The framework for measuring fair value provides a fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value. The hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical assets or liabilities (level 1) and the lowest priority to unobservable inputs (level 3). The three levels of the fair value hierarchy under FASB ASC 820 are described as follows:

Level 1 Inputs to the valuation methodology are unadjusted quoted prices for identical assets or liabilities in active markets that the Plan has the ability to access.

Level 2 Inputs to the valuation methodology include:

- quoted prices for similar assets or liabilities in active markets;
- quoted prices for identical or similar assets or liabilities in inactive markets;
- inputs other than quoted prices that are observable for the asset or liability; and
- inputs that are derived principally from or corroborated by observable market data by correlation or other means.

If the asset or liability has a specified (contractual) term, the level 2 input must be observable for substantially the full term of the asset or liability.

Level 3 Inputs to the valuation methodology are unobservable and significant to the fair value measurement.

The asset or liability's fair value measurement level within the fair value hierarchy is based on the lowest level of any input that is significant to the fair value measurement. Valuation techniques used need to maximize the use of observable inputs and minimize the use of unobservable inputs.

Following is a description of the valuation methodologies used for assets measured at fair value. There have been no changes in the methodologies used at December 31, 2020 and 2019.

WorkNet Pinellas, Inc. 401(k) Plan

Notes to Financial Statements

3. Fair Value Measurements (continued)

Mutual funds: Valued at the daily closing price as reported by the fund. Mutual funds held by the Plan are open-end mutual funds that are registered with the Securities and Exchange Commission. These funds are required to publish their daily net asset value (NAV) and to transact at that price. The mutual funds held by the Plan are deemed to be actively traded.

Collective trust funds: Valued at the unit price reported by the sponsoring trust company. The underlying investments owned by the funds can include money market funds, stable value funds, fixed-income securities registered investment companies, common stocks, corporate bonds, U.S. Government securities, other collective trust funds, or guaranteed insurance contracts priced by the sponsoring insurance company using applicable interest rates and contract provisions. The unit price is based on the fair value of these underlying investments owned, less any accrual of fees and expenses borne by the fund, and divided by the number of units outstanding. The unit price is readily determinable and quoted on the active private market on which participants can transact daily with no redemption restrictions on these investments.

The following table sets forth by level, within the fair value hierarchy, the Plan's investments at fair value as of December 31, 2020 and 2019:

Investments at Fair Value as of December 31, 2020				
	<u>Level 1</u>	<u>Level 2</u>	<u>Level 3</u>	<u>Total</u>
Mutual funds	\$ 2,486,080	\$ -	\$ -	\$ 2,486,080
Collective trust funds	-	966,597	-	966,597
Total investments at fair value	<u>\$ 2,486,080</u>	<u>\$ 966,597</u>	<u>\$ -</u>	<u>\$ 3,452,677</u>

Investments at Fair Value as of December 31, 2019				
	<u>Level 1</u>	<u>Level 2</u>	<u>Level 3</u>	<u>Total</u>
Mutual funds	\$ 2,283,280	\$ -	\$ -	\$ 2,283,280
Collective trust funds	-	1,032,121	-	1,032,121
Total investments at fair value	<u>\$ 2,283,280</u>	<u>\$ 1,032,121</u>	<u>\$ -</u>	<u>\$ 3,315,401</u>

4. Plan Termination

Although it has not expressed any intent to do so, the Company has the right under the Plan to discontinue its contribution at any time and to terminate the Plan subject to the provisions of ERISA. In the event of Plan termination, participants would become 100% vested in their entire account.

WorkNet Pinellas, Inc. 401(k) Plan

Notes to Financial Statements

5. Tax Status

The Plan is placing reliance on an opinion letter dated July 8, 2014 received from the IRS on the prototype plan indicating that the Plan is qualified under Section 401 of the IRC and is therefore not subject to tax under current income tax law. The prototype plan has been amended since receiving the opinion letter. However, the Plan administrator believes that the Plan is designed, and is currently being operated, in compliance with the applicable requirements of the IRC and, therefore, believes that the Plan is qualified, and the related trust is tax-exempt.

6. Accounting for Uncertainty in Income

Accounting principles generally accepted in the United States of America require plan management to evaluate tax positions taken by the Plan and recognize a tax liability if the Plan has taken an uncertain position that more likely than not would not be sustained upon examination by the IRS. The plan administrator has analyzed the tax positions taken by the Plan, and has concluded that as of December 31, 2020, there are no uncertain tax positions taken or expected to be taken that would require recognition of a liability (or asset) or disclosure in the financial statements. The Plan is subject to routine audits by taxing jurisdictions; however, there are currently no audits for any tax periods in progress. The plan administrator believes it is no longer subject to income tax examinations for years prior to 2016.

7. Risks and Uncertainties

The Plan invests in various investment securities. Investment securities are exposed to various risks such as interest rate, market, and credit risks. Due to the level of risk associated with certain investment securities, it is at least reasonably possible that changes in the values of investment securities will occur in the near term and that such changes could materially affect participants' account balances and the amounts reported in the statements of net assets available for benefits.

8. Information Certified by Reliance Trust Company

Certain information related to investments and notes receivable from participants disclosed in the accompanying financial statements and supplemental schedule, including investments and notes receivable from participants held at December 31, 2020, and net appreciation in fair value of investments and interest and dividends for the year ended December 31, 2020, was obtained or derived from information supplied to the plan administrator and certified as complete and accurate by Reliance Trust Company, the trustee of the Plan.

The plan administrator has elected the method of compliance as permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA. Accordingly, as permitted under such election, the plan administrator instructed the Plan's independent auditors not to perform any auditing procedures with respect to the information certified by Reliance Trust Company, the Plan's trustee, except for comparing such information certified by the custodian to information included in the Plan's financial statements and supplemental schedule.

WorkNet Pinellas, Inc. 401(k) Plan

Notes to Financial Statements

9. Related Party Transactions and Party In Interest Transactions

Certain Plan investments are managed by Reliance Trust Company. Reliance Trust Company is the trustee of the Plan and therefore these transactions qualify as party-in-interest transactions. Fees paid by the Plan to the trustee for administrative services amounted to \$4,183 for year ended December 31, 2020.

10. Reconciliation of Financial Statements to the Form 5500

The following is a reconciliation of net assets available for benefits per the financial statements at December 31, 2020, to the Form 5500:

	December 31, <u>2020</u>
Net assets available for benefits per the financial statements	\$ 3,606,488
Accrued interest receivable	(4,951)
Deemed distributions - 2019	<u>(11,747)</u>
Net assets available for benefits per the Form 5500	<u>\$ 3,589,790</u>

The following is a reconciliation of the change in net assets available for benefits per the financial statements for the year ended December 31, 2020, to the Form 5500:

Change in net assets available for benefits per the financial statements	\$ 138,845
Accrued interest receivable	(4,951)
Deemed distributions - 2019	11,747
Other activity reflected in the Form 5500 not in the trust report	<u>435</u>
Net increase in net assets available for benefits per the Form 5500	<u>\$ 146,076</u>

Supplemental Schedule

WorkNet Pinellas, Inc. 401(k) Plan

Schedule H, Line 4i - Schedule of Assets Held at End of Year

December 31, 2020

	<u>Fair Value</u>
Reliance Trust Company*	
Investments in Registered Investment Companies	
Amercent One Choice 2045 A	\$ 142,639
T. Rowe Price Mid-Cap Value - R	301,630
Nuveen Mid Cap Grth Opps A	244,507
Victory Integrity SM Cap Val A	219,661
PGIM High Yield - A	5,039
PIMCO Income Fund - A	36,813
Thornburg Inv Inc BLD R4	31,783
PIMCO Real Return Fund - A	23,586
Inv Develop Markets - A	28,760
AMC Disciplined Core Value A	209,139
Amercent One Choice 2055 A	80,926
Amercent One Choice 2050 A	111,278
George Putnam Balanced M	91,010
Amercent One Choice 2030 A	42,798
Franklin SM Cap Grth A	64,286
Invesco Opp Intl Growth - A	6,683
Pioneer Bond Fund - A	28,244
Amercent One Choice Retire A	139,162
Amercent One Choice 2025 A	75,219
Invesco Global A	135,723
Alger Capital Appr Instit - I	155,500
Franklin Utilities Fund A1	14,489
Amercent One Choice 2040 A	87,211
T. Rowe Price Intl Value Eq Adv	715
Amercent One Choice 2035 A	191,455
DWS Real Est Sec A	13,564
MFS Intl New Discovery R3	4,260
Total Investments in Registered Investment Companies	<u>\$ 2,486,080</u>
Common/Collective Trusts	
Invesco Stable Asset	\$ 649,579
State St US LG CP Active NL J	35,751
State St Intl Idx Seclend VIII	63,572
State St Russ SC Idx VIII	16,356
State St S&P 500 Idx IX	174,421
State St S&P MD CP Idx NL J	12,321
State St Mod Str Bal SLS VII	1,190
State St Agg Str Bal SLS VII	13,407
Total Common/Collective Trusts	<u>\$ 966,597</u>
Total investments held at end of year	<u>\$ 3,452,677</u>
Notes receivable from participants (interest rates 5.25% - 7.50%)	<u>\$ 157,074</u>

*Indicates a party in interest.

Historical cost is not required to be presented as all investments are participant-directed.

The above information has been certified by Reliance Trust Company as complete and accurate.

See report of independent auditors.

Plan Administrator
WorkNet Pinellas, Inc. 401(k) Plan

We are pleased to present this report related to our audit of the financial statements of the WorkNet Pinellas, Inc. 401(k) (the Plan) as of and for the year ended December 31, 2020. This report summarizes certain matters required by professional standards to be communicated to you in your oversight responsibility for the Plan's financial reporting process.

Generally accepted auditing standards (AU-C 260, *The Auditor's Communication with Those Charged with Governance*) require the auditor to promote effective two-way communication between the auditor and those charged with governance. Consistent with this requirement, the following summarizes our responsibilities regarding the financial statement audit as well as observations arising from our audit that are significant and relevant to your responsibility to oversee the financial reporting process.

<u>Area</u>	<u>Comments</u>
Our Responsibilities With Regard to the Financial Statement Audit	Our responsibilities under auditing standards generally accepted in the United States of America have been described to you in our arrangement letter dated June 8, 2021. Our audit of the financial statements does not relieve management or those charged with governance of their responsibilities, which are also described in that letter.
Overview of the Planned Scope and Timing of the Financial Statement Audit	We discussed with members of the Plan's management various matters about which generally accepted auditing standards require communication. These include matters concerning two-way communication, our independence, the audit planning process, the concept of materiality in planning and executing the audit, our approach to internal control relevant to the audit, and the timing of the audit.

Area	Comments
Accounting Policies and Practices	Adoption of, or Change in, Accounting Policies <p>Management has the ultimate responsibility for the appropriateness of the accounting policies used by the Plan. The Plan did not adopt any significant new accounting policies, nor have there been any changes in existing significant accounting policies during the current period.</p> Significant or Unusual Transactions <p>We did not identify any significant or unusual transactions or significant accounting policies in controversial or emerging areas for which there is a lack of authoritative guidance or consensus.</p>
Management's Judgments and Accounting Estimates	<p>The preparation of financial statements often requires management to make estimates and assumptions that affect amounts recorded and disclosed in the financial statements. During our procedures, we did not become aware of any significant estimates that had a material effect on the financial statements. However, the Plan Administrator and management should evaluate financial activity throughout the year for changes in operations that could involve estimates, and in such cases work with management to identify and monitor the processes used to determine and account for such estimates.</p>
Audit Adjustments	<p>Audit adjustments proposed by us and recorded by the Plan are shown on the attached Exhibit A.</p>
Uncorrected Misstatements	<p>There were no uncorrected misstatements that management determined to be immaterial.</p>

Area	Comments
Departure from the Auditor's Standard Report	<p>As permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974, the Plan Administrator instructed us not to perform, and we did not perform, any auditing procedures with respect to the information summarized in Note 8, which was certified by Ascensus, the Trustee of the Plan, except for comparing such information with the related information included in the financial statements. We have been informed by the Plan Administrator that the Trustee holds the Plan's investment assets and executes investment transactions. The Plan Administrator has obtained a certification from the Trustee as of December 31, 2020 and 2019, and for the year ended December 31, 2020, that the information provided to the Plan Administrator by the Trustee is complete and accurate. Because of the significance of this matter, we have not been able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion. Accordingly, we do not express an opinion on the financial statements and have issued a disclaimer of opinion in the related report of independent auditors.</p> <p>The supplemental schedules are required by the Department of Labor's (DOL) Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974 and are presented for the purpose of additional analysis and is not a required part of the financial statements. The supplemental schedules are the responsibility of the Plan's management. We do not express an opinion on the supplemental schedules and have included an Other Matter paragraph in the related report of independent auditors.</p>

Area	Comments
Other Information in Documents Containing Audited Financial Statements	Our responsibility for other information in documents containing the Plan's audited financial statements is to read the information and consider whether its content or manner of its presentation is materially inconsistent with the financial information covered by our auditor's report or whether it contains a material misstatement of fact. We read the Plan's Form 5500 filing for consistency with information in the financial statements. We are not aware of other documents that contain the audited financial statements. We did not identify material inconsistencies with the audited financial statements, other than appropriate reconciling items with the Form 5500 as disclosed in the notes to the financial statements.
Supplemental Schedule	With respect to the supplemental schedule accompanying the financial statements, we made certain inquiries of management and evaluated the form, content and methods of preparing the information to determine that the information complies with the United States Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974, the method of preparing it had not changed from the prior period, and the information is appropriate and complete. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the financial statements, or to the financial statements themselves.
Disagreements With Management	We encountered no disagreements with management over the application of significant accounting principles, the basis for management's judgments on any significant matters, the scope of the audit, or significant disclosures to be included in the financial statements.

Area	Comments
Consultations With Other Accountants	We are not aware of any consultations management had with other accountants about accounting or auditing matters.
Significant Issues Discussed With Management	No significant issues arising from the audit were discussed with or the subject of correspondence with management.
Significant Difficulties Encountered in Performing the Audit	We did not encounter any significant difficulties in dealing with management during the audit. We received full cooperation and appreciate the assistance provided by the Plan's financial and accounting personnel.
Letter(s) Communicating Significant Deficiencies and Material Weaknesses in Internal Control Over Financial Reporting	We did not identify any such matters requiring communication to management during our audit of the financial statements
Significant Written Communications Between Management and Our Firm	See Exhibit B for a copy of the representation letter provided to us by the Plan's management.

This report is intended solely for the information and use of the Plan Administrator and management, and is not intended to be, and should not be, used by anyone other than these specified parties. It will be our pleasure to respond to any questions you have about this report. We appreciate the opportunity to continue to be of service to the WorkNet Pinellas, Inc. 401(k) Plan.

Thomas Howell Ferguson P.A.

Tallahassee, Florida
September 22, 2021

WorkNet Pinellas, Inc. 401(k) Plan

Year End: December 31, 2020

Journal Entries: Adjusting

Date: 1/1/2020 To 12/31/2020

Number	Date	Name	Account No	Reference	Annotation	Debit	Credit	Recurrence	Misstatement
AJE#1	12/31/2020	Employee Contributions	30001	4204		7,230.00			
AJE#1	12/31/2020	Excess Contributions Payable	30002THF	4204			7,230.00		
		To adjust for corrective distributions noted during compliance testing at [4204].							Factual
						7,230.00	7,230.00		
		Net Income (Loss)	138,845.00						

September 22, 2021

Thomas Howell Ferguson P.A.
2615 Centennial Boulevard, Suite 200
Tallahassee, Florida 32308

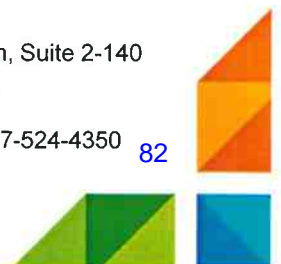
This representation letter is provided in connection with your audit of the financial statements of WorkNet Pinellas, Inc. 401(k) Plan (the Plan), which comprise the statements of net assets available for benefits as of December 31, 2020 and 2019, the related statement of changes in net assets available for benefits for the year ended December 31, 2020; and the related notes to the financial statements.

We have determined that the Plan Trustee, Reliance Trust Company (Reliance), qualifies to issue a certification of the Plan's asset activity under Section 2520.103-5 of the Department of Labor's (DOL) Rules and Regulations. Therefore, as permitted by Regulation 2520.103-8 of the DOL's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974 (ERISA), we have instructed you not to perform any auditing procedures with respect to asset information certified or provided by Reliance, the Trustee, other than comparing that information with the related information included in the financial statements and supplemental schedule. Because of the significance of the information that you did not audit, we understand that you will not express an opinion on the financial statements and supplemental schedule as a whole.

We confirm, to the best of our knowledge and belief, that as of the date of this letter:

Financial Statements

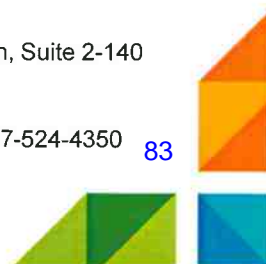
1. We have fulfilled our responsibilities, as set out in the terms of the audit arrangement letter dated June 8, 2021 for the preparation and fair presentation of the financial statements referred to above in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP).
2. We acknowledge our responsibility for the design, implementation and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.
3. We acknowledge our responsibility for the design, implementation and maintenance of internal control to prevent and detect fraud.



4. We are responsible for making the accounting estimates included in the financial statements. Significant assumptions used by us in making accounting estimates, including those measured at fair value, are reasonable and reflect our judgment based on our knowledge and experience about past and current events, and our assumptions about conditions we expect to exist and courses of action we expect to take.
5. In that regard, we are responsible for the estimation methods and assumptions used in measuring assets and liabilities reported or disclosed at fair value, including information obtained from brokers, pricing services or other third parties. The methods and significant assumptions used to determine fair values of the financial instruments are as follows:
 - *Mutual funds*: Valued at the daily closing price as reported by the fund. Mutual funds held by the Plan are open-end mutual funds that are registered with the Securities and Exchange Commission. These funds are required to publish their daily net asset value (NAV) and to transact at that price. The mutual funds held by the Plan are deemed to be actively traded.
 - *Common collective trusts*: Valued based on the closing market price reported on the active market on which the underlying investments are traded.

Our valuation methodologies have been consistently applied from period to period. The methods and assumptions used result in a measure of fair value appropriate for financial statement measurement and disclosure purposes.

6. All significant estimates and material concentrations known to management that are required to be disclosed in accordance with the Risks and Uncertainties Topic of the Financial Accounting Standards Board (FASB) Accounting Standards Codification (ASC) have been properly recorded and/or disclosed in the financial statements. Significant estimates are estimates at the statement of net assets available for benefits date that could change materially within the next year. Concentrations refer to the nature and type of investments held by the Plan, or markets in which events could occur that would significantly disrupt normal finances within the next year.
7. Related-party relationships and transactions have been appropriately accounted for and disclosed in accordance with the requirements of U.S. GAAP.
8. Transactions with parties in interest, as defined in ERISA Section 3(14) and regulations thereunder, including sales, purchases, loans, transfers, leasing arrangements and guarantees, and amounts receivable from or payable to related parties have been appropriately accounted for and disclosed.
9. All events subsequent to the date of the financial statements, and for which U.S. GAAP requires adjustment or disclosure, have been adjusted or disclosed.



10. The effects of all known actual or possible litigation and claims have been accounted for and disclosed in accordance with U.S. GAAP.
11. We have no intention to terminate the Plan.
12. We have properly reported and disclosed amendments to the Plan instrument, if any.
13. With respect to financial statement preparation services performed in the course of the audit:
 - a. We have made all management decisions and performed all management functions;
 - b. We assigned an appropriate individual to oversee the services;
 - c. We evaluated the adequacy and results of the services performed, and made an informed judgment on the results of the services performed;
 - d. We have accepted responsibility for the results of the services; and
 - e. We have accepted responsibility for all significant judgments and decisions that were made.
14. We have no knowledge of any uncorrected misstatements in the financial statements.

Supplementary Information

15. With respect to the supplemental schedule:
 - a. We acknowledge our responsibility for the presentation of such information.
 - b. We believe such information, including its form and content, is fairly presented in accordance with the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.
 - c. The methods of measurement or presentation have not changed from those used in the prior period.
 - d. There are no underlying significant assumptions or interpretations regarding the measurement or presentation of such information.
 - e. We will only present the supplemental schedule together with the audited financial statements and auditor's report thereon and will not separate the supplementary information from the audited financial statements and auditor's report thereon in any document that contains such information.



Information Provided

16. We have provided you with:

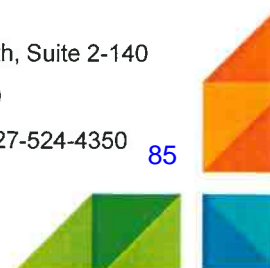
- a. Access to all information of which we are aware that is relevant to the preparation and fair presentation of the financial statements such as records, documentation and other matters;
- b. Additional information that you have requested from us for the purpose of the audit;
- c. Unrestricted access to persons within the Plan from whom you determined it necessary to obtain audit evidence;
- d. The currently effective version of the Plan document, the trust agreement or insurance contracts, and all related amendments. The Plan was effective as of 07/01/2004.
- e. All correspondence, filings, reports and determinations with the Internal Revenue Service (IRS) and the DOL relating to the Plan's compliance with ERISA and the maintenance of its tax-exempt status; and
- f. All Plan financial records and related data. In that regard, the payroll information we provided you covered all employees that were eligible to participate in the Plan.

17. All transactions have been recorded in the accounting records and are reflected in the financial statements.

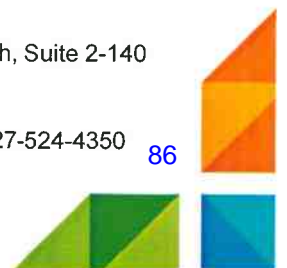
18. We have disclosed to you the results of our assessment of risk that the financial statements may be materially misstated as a result of fraud.

19. We have no knowledge of allegations of fraud or suspected fraud affecting the Plan involving:

- a. Management.
- b. Employees who have significant roles in internal control.
- c. Others where the fraud could have a material effect on the financial statements.



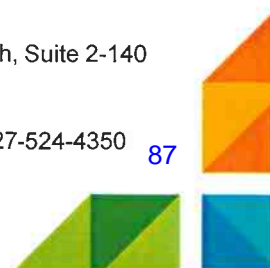
20. We have no knowledge of any allegations of fraud or suspected fraud affecting the Plan received in communications from employees, former employees, participants, regulators, beneficiaries, service providers, third-party administrators or others.
21. We are not aware of any pending or threatened litigation and claims whose effects should be considered when preparing the financial statements, and neither we nor the Plan Sponsor, or others acting on behalf of the Plan, have consulted a lawyer concerning litigation and claims or other matters affecting the Plan.
22. We have disclosed to you the identity of the Plan's related parties and parties in interest and all the related-party and party-in-interest relationships and transactions of which we are aware.
23. We are aware of no significant deficiencies, including material weaknesses, in the design or operation of internal controls that could adversely affect the Plan's ability to record, process, summarize and report financial data.
24. We have no plans or intentions that may materially affect the carrying value or classification of assets or liabilities.
25. The Plan has satisfactory title to all owned assets that are recorded at fair value, and all liens, encumbrances or security interests have been properly disclosed.
26. Financial instruments with off-balance-sheet risk have been properly disclosed.
27. Concentrations of credit risk have been properly disclosed.
28. We have answered your questions about the Plan's tax compliance to the best of our knowledge and belief.
29. There have been no communications, whether written or oral, from regulatory agencies concerning noncompliance or deficiencies in the operation of the Plan.
30. We have complied with (a) all aspects of debt and other contractual agreements, including provisions of the Plan, that would have a material effect on the financial statements in the event of noncompliance, (b) the fidelity bonding requirements of ERISA, (c) all participant eligibility and coverage requirements of the Plan, ERISA and the Internal Revenue Code (IRC), and (d) the filing requirements of appropriate agencies.
31. We have complied with the DOL's regulations concerning the timely remittance of participants' contributions to trusts containing assets for the Plan.



32. We have disclosed to you all known instances of noncompliance or suspected noncompliance with laws and regulations.
33. The IRS has determined and informed the Plan Sponsor, by a letter dated 07/08/2014, that the Plan is qualified and the trust established under the Plan is tax-exempt under the appropriate sections of the IRC. We have operated the Plan and trust in a manner that did not jeopardize this tax status.
34. We have reviewed the complementary user entity control considerations of the Service Organization Controls (SOC 1) Report for ADP's Retirement Services 401K/Qualified Plan and Participant Recordkeeping Operations Services System and Reliance Trust Company (and corresponding Gap Letter) for the periods ended December 31, 2020 and September 30, 2020, respectively, and we believe all applicable controls are properly designed and implemented and operating effectively.
35. There are no:
 - a. Non-exempt (prohibited) party-in-interest transactions that were not disclosed in the financial statements or supplemental schedule.
 - b. Notes receivable from participants or other receivables or investments in default or considered to be uncollectible that were not disclosed in the financial statements or supplemental schedule.
 - c. Reportable transactions that were not disclosed in the supplemental schedule.
36. During the course of your audit, you may have accumulated records containing data that should be reflected in our books and records. All such data have been so reflected. Accordingly, copies of such records in your possession are no longer needed by us.

A handwritten signature in black ink, appearing to read "St Meier", is written over a horizontal line.

Steven Meier, CPA
Chief Financial Officer





ACTION ITEM 9

Department of Economic Opportunity 2021-2022 Internal Control Questionnaire and Assessment

The Internal Control Questionnaire and Assessment (ICQ) was developed by the Department of Economic Opportunity (DEO), Bureau of Financial Monitoring and Accountability, as a self-assessment tool to help evaluate whether a system of sound internal control exists within the Local Workforce Development Board (LWDB).

The self-assessment ratings and responses should reflect the controls in place or identify areas where additional or compensating controls could be enhanced. Based on the Grantee-Subgrantee Agreement, the ICQ is required to be completed and certified by the Executive Director and Board Chair or their designee and submitted to DEO by September 30. However, DEO extended the deadline to November to allow the CareerSource Pinellas Audit Committee and Board to review and approve the ICQ at their October and November meetings, respectively. Some of the new controls implemented during the last year were as follows:

- Implemented many IT strategic initiatives that strengthened access and physical controls over IT processes
- Hired external firm to perform semi-annual internal monitoring
- Improved and strengthened Sub-recipient monitoring
- Elimination of supportive service cards
- Renewed 24/7/365 cyber-security monitoring

RECOMMENDATION

Approval of the enclosed 2021-2022 Internal Control Questionnaire and Assessment.

2021-22 Internal Control Questionnaire and Assessment

Bureau of Financial Monitoring and Accountability
Florida Department of Economic Opportunity

August 20, 2021

107 East Madison Street
Caldwell Building
Tallahassee, Florida 32399
www.floridajobs.org



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OVERVIEW

Introduction and Purpose

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

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

Definition and Objectives of Internal Controls

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

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

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

Need for Internal Controls

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

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

The non-Federal entity must:

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

What Internal Controls Cannot Do

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

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

Five Components of Internal Control

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

Makeup of the ICQ

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

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

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

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

Completing the Document

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

Certification of Self-Assessment of Internal Controls

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

CONTROL ENVIRONMENT

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
Principle 1. The organization demonstrates a commitment to integrity and ethical values.							
1.	The LWDB's management and board of directors' commitment to integrity and ethical behavior is consistently and effectively communicated throughout the LWDB, both in words and deeds.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The LWDB's management and board of directors are committed to integrity and ethical behavior is consistently and effectively communicated throughout the LWDB, both in words and deeds.
2.	The LWDB has a code of conduct and/or ethics policy that has been communicated to all staff, board members, and outsourced service providers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The LWDB has a code of ethics and code of conduct that has been clearly communicated to all staff, board members, and outsourced service providers. It clearly defines expectations and standards that align with management's beliefs. The code of conduct (p42) and code of ethics (p47) is included the LWDB's employee handbook. The employee handbook is signed by each employee as evidence that they understand the policies, rules, and regulations of the LWDB.</p> <p>On an annual basis, all board members complete/acknowledge and sign an Ethics and Transparency Policy Acknowledgement, a Board of Directors Statement of Commitment</p>

						<p>and a Conflict of Interest Disclosure Policy Acknowledgement and, if applicable, a Conflict of Interest Disclosure Statement. In addition, each board member is required to complete an annual financial disclosure from the Pinellas County Supervisor of Elections.</p> <p>The LWDB adopted the CareerSource Florida Ethics and Transparency Policy on September 26, 2018.</p>
3.	<p>When the LWDB hires employees from outside of the organization the person is trained or made aware of the importance of high ethics and sound internal controls.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><input checked="" type="checkbox"/> When hiring from outside the organization the person is trained and made aware of the importance of high ethics and sound internal controls. The code of conduct and code of ethics is included the LWDB's employee handbook. The employee handbook is signed by every new hire as evidence that they understand the policies, rules and regulations of the LWDB.</p> <p>In addition, standard operating procedures address internal controls. In Program Year 2021, an all-employee Ethics training was required of all Team Members with three different modules covering topics</p>

								including Diversity, Harassment, and Ethics.
Principle 2. The board of directors demonstrates independence from management and exercises oversight of the development and performance of internal controls.								
4.	The board of directors define, maintain, and periodically evaluate the skills and expertise needed among its members to enable them to question and scrutinize management’s activities and present alternate views.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<p>The structure of the Board of Directors is maintained in accordance with Federal and State regulations. All members are nominated and appointed by the Pinellas County Board of Commissioners. Members are reviewed based on their qualifications to ensure there are a variety of skill sets. The composition of the Board, as well as the various committees, allows for members to present alternative views.</p> <p>The Chairperson of each committee is a board member. The members ensure the workforce system is demand-driven by providing valuable feedback on the local economy and the community as a whole. Each board member provides first-hand knowledge of employment needs in their industry.</p>
5.	The board of directors and/or audit committee maintains a direct line of communication with the board’s external auditors and internal monitors.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		The LWDB’s external auditors directly communicate both verbally and in writing to the Audit Committee. In

							<p>addition, the external auditor provides a presentation to the Board of Directors of the overall financial statement audit. The 2019-2020 Independent Auditors Report was presented and approved at the Audit Committee and at the full Board of Directors meeting on March 17, 2021.</p>
6.	<p>The board of directors establishes the expectations and evaluates the performance of the chief executive officer or equivalent role.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>As outlined in the By-Laws, the Ad Hoc CEO/Legal Committee conducted the annual review of performance and compensation for the CEO on October 8, 2020. The review addressed the approved CEO Performance Goals, including Financial Management, Legal Compliance, Strategic Planning, Governance, Accountability and Transparency, Workforce Development Performance, Key Relationships and Partnerships, and Organizational Leadership.</p> <p>The Board of Directors approved the 2019-2020 Performance Review of the CEO at the November 18, 2020 Board meeting.</p>
<p>Principle 3. Management establishes, with board oversight, structures, reporting lines, and appropriate authorities and responsibilities in the pursuit of objectives.</p>							

7.	<p>Management reviews and modifies the organizational structure of the LWDB in light of anticipated changing conditions or revised priorities.</p> <p>Provide the date of last review.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Management reviews and modifies the organizational structure of the LWDB in light of anticipated changes or revised priorities, operational changes and/or financial resources. The organization chart was presented at the Compensation Committee and the July 14, 2021, Board of Directors meeting. The organizational structure is designed to provide a proper decision-making framework. The structure groups, divides and coordinates the tasks required to achieve the LWDB's identified goals. The organizational structure makes best use of available resources while maintaining adequate controls to ensure compliance with federal and state rules and regulations and other applicable requirements.</p>
8.	<p>Specific lines of authority and responsibility are established to ensure compliance with federal and state laws and regulations.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The LWDB has established specific lines of authority and responsibility to ensure compliance with federal and state laws and regulations. Roles and responsibilities are articulated in job descriptions and work plans. LWDB has also established appointees for Regional Security Officer(s), purchased property and equipment custodian, DEO personnel liaison, public records coordinator, and Ethics Officer, in</p>

							accordance with the Grantee-Subgrantee Agreement.
9.	The LWDB management understands the importance of internal controls, including the division of responsibility.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Internal controls are the mechanisms, rules, and procedures implemented by the LWDB to ensure the integrity of financial and accounting information, promote accountability and prevent fraud. Besides complying with laws and regulations, internal controls and division of responsibility help improve operational efficiency by improving the accuracy and timeliness of financial reporting.</p> <p>Wherever practical, segregation of duties is assigned to minimize the occurrence of errors or fraud by ensuring that no employee has the ability to both perpetuate and conceal errors or fraud in the normal course of duties.</p>
Principle 4. The organization demonstrates a commitment to attract, develop, and retain competent individuals in alignment with objectives.							
10.	The LWDB provides training opportunities or continuing education to develop and retain sufficient and competent personnel.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Executive Leadership Team evaluates training opportunities and continuing education periodically to develop and retain competent personnel. The DEO offers various training programs, and staff training records are tracked in an access

							<p>database that is monitored on an ongoing basis.</p> <p>LWDB met or exceeded the DEO requirements of 15 hours in PY 2020-2021. Leadership continues to focus on training and creating professional development opportunities for staff. In addition, key Finance personnel attend Financial Officers Group (FOG) meetings and applicable webinars throughout the year. Finance personnel at a director level or above attend training on annual basis and complete the appropriate CPE credits to maintain their CPA license. Operations Director monitors staff activities, and recently oversaw TAA Training that was disseminated to rest of the staff. HR Director attends monthly networking meetings to maintain SPHR and SHRM-SCP certifications.</p>
11.	The LWDB has succession plans for senior management and contingency plans for assignments of responsibilities important for internal controls.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Organization understands the importance of a succession plan and contingency plan for assignment of responsibilities. Talent Acquisition Strategies are focused on Motivation-Based Interviewing to ensure the organization is identifying the right

							<p>talent. The Board of Directors will appoint an interim CEO in the event this position is vacated unexpectedly. We are currently hiring a Comptroller to support the CFO role. If the CFO were to vacate the position, the Comptroller could step in to bridge the gap until a CFO is hired. A proactive and systematic process has been utilized to identify those positions considered to be at the core of the organization. The organization will re-evaluate this business structure on an ongoing basis. A Comprehensive Review of organizations structure, salary, and positions will be conducted in PY'2021-2022. The Comprehensive Review was approved by the Board of Directors in June 2019.</p>
12.	For all employees, the LWDB regularly evaluates the performance of the employee and shares the results with the employee.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>A job description exists for each position. Job descriptions continue to be reviewed on an ongoing basis. Upon hire, each employee is required to review their job description. During February 2019, a Comprehensive Compensation Review was conducted by an outside consultant. This review included a review of all active positions and recommendations for continued, discontinued, and merged position</p>

							<p>titles; a review of external Compensation Survey Reports and analysis of CareerSource ranges for each position; review of compensation versus other Florida CareerSource compensation structures; development of a new pay structure to include Min-Mid-Max for each Grade and the spread between Grades; and an analysis of employee impact and cost implementation. The Compensation Review was presented and adopted by the LWDB on June 5, 2019. Job descriptions continue to be reviewed on an ongoing basis.</p> <p>Employees are evaluated on an annual basis corresponding to the program year. In addition, management initiates frequent, ongoing performance discussions in real time, and utilizes reports from EF to manage and monitor performance.</p>
<p>Principle 5. The organization holds individuals accountable for their internal control responsibilities in the pursuit of objectives.</p>							
13.	<p>The LWDB has mechanisms in place to ensure that all required information is timely published to the website in a manner easily accessed by the public in compliance with laws, regulations, and provisions of grant agreements. NEW QUESTION</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>A staff member has been assigned to this role. Local trackers serve as internal controls to ensure compliance along with periodic review and inventory of the website, and independent internal monitoring.</p>

							However, as we move forward, we will review the effectiveness of this process, and may align this role with the administrative assistant.
14.	The LWDB's structure and tone at the top helps establish and enforce individual accountability for performance of internal control responsibilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The LWDB's structure and tone at the top helps establish and enforce individual accountability for performance of internal controls has been amplified throughout the organization. This is reinforced through regular communication, review of performance goals vs actual, and review of internal activities and controls.</p> <p>The LWDB hired an outside firm to conduct internal monitoring on a semi-annual basis. The Executive Leadership Team developed a matrix that lists all findings and observations from the internal monitoring in order to follow-up and resolve these on a timely basis. In addition, internal training is developed and presented based upon the results of the reviews in an effort to prevent the issues from reoccurring. Procedures have been put in place for communicating with DEO and other organizations.</p>

15.	The LWDB has policies, processes and controls in place to evaluate and promote accountability of outsourced service providers (and other business partners) and their internal control responsibilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Subrecipient service providers are monitored on an annual basis as required by Federal Grant Guidelines and the Organization’s Compliance Monitoring Policies and Procedures. In addition, the LWDB has assigned dedicated board staff to be a liaison with our largest subrecipient and will have monthly progress meetings for 2021-2022.</p> <p>Also, vendors are monitored and reviewed to ensure compliance with deliverables. The respective agreement is used as a tool for monitoring.</p>

RISK ASSESSMENT

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
Principle 6. The organization specifies with sufficient clarity to enable the identification and assessment of risks relating to objectives.							
16.	Management establishes a materiality threshold for each of its major objectives and identifies risk at each location where the LWDB conducts activities.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Management reviews and identifies risk at each location where the LWDB conducts activities.

					<p>In addition, we will also use the results of internal monitoring to assess the risks within the organization. Where appropriate, key controls will be implemented, communicated to the appropriate staff and periodically monitored.</p> <p>Additionally, the four pillars of a risk intelligent culture are reinforced including risk competence, motivation, relationships, and organizations. Risk Competence – desirable behaviors are those that proactively share best practices and consulting with others when in doubt and detrimental behaviors are reluctance to learn from past mistakes and following the herd. Motivation -desirable behaviors include admitting to making mistakes and taking personal accountability for managing risk and detrimental behaviors are those that reward taking excessive risk. Relationships – desirable behaviors are open and honest dialogue regarding risks and constructive response to challenge and detrimental behaviors are yielding to inappropriate pressures from others. Organization – desirable behaviors are following risk management policies and</p>
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							processes and involving others in risk decisions and detrimental behaviors are reticence to escalate risks appropriately and cutting corners.
17.	Management uses operational objectives as a basis for allocating the resources needed to achieve desired operational and financial performance.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Periodic programmatic, budget and program meetings are conducted where performance and available funding is discussed. If needed, resources are re-allocated in order to meet desired operational and financial performance. To assist, the LWDB is revising their internal reporting to better highlight the information needed to make decisions. Metrics will be developed to monitor the performance. Corrective actions and/or reallocation of resources is enacted as appropriate.
18.	The LWDB sets entity-wide financial reporting controls and assesses the risks that those controls will not prevent material misstatements, errors, or omissions in the financial statements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Segregation of duties have been implemented where appropriate. In addition, a financial package has been developed and distributed that contains, a monthly review of actual versus budgets, actuals versus prior years, grant spending, etc. Also, regular meetings, at minimum, with department stakeholders are implemented to review

							<p>spending, budgets and grant status. Additionally, the CEO makes quarterly financial presentations to the Board of County Commissioners. On a monthly basis, balance sheet reconciliations are prepared for all balance sheet accounts, an audit is performed by an outside CPA firm annually and the LWDB is subject to an annual financial monitoring from DEO. In addition, an outside firm was hired to perform internal monitoring on both program and finance procedures on a semi-annual basis.</p>
<p>Principle 7. The organization identifies risks to the achievement of its objectives across the entity and analyzes risks as a basis for determining how the risks should be managed.</p>							
19.	<p>Management ensures that risk identification considers internal and external factors and the potential impact on the achievement of objectives.</p> <p>What measures are being taken to address the risk of cybersecurity in the organization?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Finance and Administrative: The LWDB has a finance and administrative team that supports risk identification and considers internal and external factors and the potential impact on the achievement of objectives.</p> <p>IT: The LWDB has contracted with an outside vendor to perform 24/7/365 cyber-security monitoring. In addition, the LWDB has hired a vCIO to strategically manage the organization's IT infrastructure, outside IT vendor, project management for email, software</p>

							and hardware upgrades and cybersecurity monitoring. Also, the LWDB contracted with an outside organization to perform Security Awareness Training during 2020 and is renewing contract to have additional Security Awareness Training for all staff for an additional year.
20.	The LWDB adequately and effectively manages risks to the organization and has designed internal controls in order to mitigate the known risks. What new controls, if any, have been implemented since the prior year and which organizational risks do, they mitigate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	During 2020-2021, with the oversight of the vCIO, the LWDB migrated to Office 365 for email, implemented multi-factor authentication, transitioned applications to the Cloud, upgraded employee workstations and rolled out Microsoft Azure and InTune.
21.	The LWDB's risk identification/assessment is broad and includes both internal and external business partners and outsourced service providers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The LWDB has established performance indicators for key objectives and monitors those indicators on a regular basis as well as communicates policies to business partners and service providers via formal and/or informal meetings, as needed. In addition, it ensures that all contracts with outsourced service providers contain confidentiality agreements, conflict of interest certifications and that the provider abides by all laws and norms when conducting business as an agent of the

							<p>LWDB. The LWDB continues to evaluate options to gauge risks, manage change, and hold staff accountable to organizational standards, policies, and procedures. The goal is to create a risk intelligent culture within the organization.</p> <p>A risk assessment has been conducted for the subrecipients for 2021-2022. As a result, a dedicated staff person has been assigned to oversee subrecipients and to hold monthly progress meetings to ensure that the subrecipient is proceeding with achieving performance objectives delineated in their contract.</p>
Principle 8. The organization considers the potential for fraud in assessing risks to the achievement of objectives.							
22.	The LWDB periodically performs an assessment of each of its operating locations' exposure to fraudulent activity and how the operations could be impacted.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The LWDB continuously evaluates areas of exposure to fraudulent activity. There are periodic Leadership Team meetings to evaluate potential exposures. In addition, semi-annual internal monitoring performed by an outside firm will be utilized as a means of identifying potential risk areas. In addition, the organization has strengthened monitoring of its subrecipients and the LWDB eliminated the use of prepaid visa cards.</p>

							<p>The LWDB has a performed risk assessment for the subrecipients for 2021-2022. As a result, a dedicated staff person has been assigned to oversee subrecipients and host monthly progress meetings to ensure that the subrecipient is proceeding with achieving performance objectives delineated in their contract.</p> <p>The LWDB also strengthened IT controls by performing the following:</p> <ul style="list-style-type: none"> • Implemented Microsoft 365 • Deployed 75 new laptops • Upgraded 2 SonicWall Firewalls • Implemented Multi-Factor Authentication • Upgraded high-speed switches at its locations • Re-wired and cleaned up network closets • Migrated Active Directory to Microsoft Azure • Migrated network directories to Microsoft SharePoint • Migrated employee home drives to Microsoft OneDrive
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23.	<p>The LWDB’s assessment of fraud risks considers opportunities for unauthorized acquisition, use and disposal of assets, altering the reporting records, or committing other inappropriate acts.</p> <p>Provide a narrative of the system/process for safeguarding cash on hand, such as prepaid program items (i.e. gas cards, visa cards) against unauthorized use/distribution.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The CEO and key Executive Leadership Team members, including the CFO, Programs Operations Director, and HR Director, evaluate all major business operations and objectives. From a financial standpoint, the goal is to utilize existing financial software and other technology to adequately and timely record all transactions. Overall, the organization continuously evaluates areas of exposure to identify fraudulent activity. Leaderships Team meetings are also used as a forum to discuss areas of potential impact. In addition, bi-annual internal monitoring is utilized as a means of identifying potential risk areas. In addition, the LWDB requires two signatures on all checks, does not allow wire transfers and eliminated the use of prepaid visa cards during 2021.</p>
<p>Principle 9. The organization identifies and assesses changes that could significantly impact the system of internal controls.</p>							
24.	<p>The LWDB has mechanisms in place to identify and react to risks presented by changes in government, regulatory, economic, operating, or other conditions that could affect the achievement of the goals and objectives.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Any legislative, regulatory, or changes in accounting principles are reviewed and mandatory training implemented within the quarter of the change. USDOL/ETA advisories and DEO communiques which impact the Organization are tracked and</p>

							<p>disseminated to the Leadership Team during scheduled meetings. Also, the CFO attends various webinars on upcoming changes in financial accounting standards. The LWDB went through a strategic planning process where management, board members and key stakeholders identified key objectives of the organization which included a SWOT analysis to identify organizational strengths, weaknesses, opportunities, and threats. Finance conducts monthly/quarterly financial reviews with program stakeholders to review costs and trends.</p>
25.	<p>The most significant risks affecting the LWDB have been identified and controls are designed and implemented that mitigate risks.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>1) Business Interruption: A natural disaster could impact the area and operations making it impossible go into the office or causing serve damage to inventory or equipment.</p> <p>2) Talent Development: Ensuring all team members are in positions that align with their skills set. Where there is a misalignment, it is important to provide training, such as project</p>

							<p>management, and leadership training and/or to realign the employee with a position that better matches their skills set and interest.</p> <p>3) Accountability: Ensuring that everyone in the organizations understands the performance measures that guide the organization. These performance measures are outlined by USDOL and DEO. Every team member is responsible for ensuring interaction with every individual every day reinforces a positive customer experience and helps achieve these objectives/goals.</p> <p>4) Risk Intelligence Culture: Getting risk culture right is fundamental to controlling risk effectively within the organization. It is, above all, about actual behavior – what you do, not just what you say. It is creating a culture where everyone understands the organization’s approach to</p>
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							<p>risk, takes personal responsibility to manage risk in everything that they do, and encourages others to follow their example.</p> <p>In this regard, it is necessary to continue to reinforce commonality of purpose, values and ethics; adopt universal application of policy and processes; create a learning organization; provide timely, transparent and honest communications; ensure individual and collective responsibility; have an expectation of challenge; create and follow a clear organizational structure; and to provide training.</p>
26.	Considering the most significant risks, have controls been designed and implemented that mitigate risks associated with each.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>1. Business Interruption. Pinellas County has recently updated their Disaster Recovery Plan. LWDB 14 will review this plan and adopt the tenants of the plan for implementation within the organization.</p>

								<p>2. Accountability. To continue to reinforce the need to take ownership of results (our own contributions and those of the team) and to be accountable for results. To continue to review performance measures established by DEO/USDOL and to ensure each member understand their role, and how they contribute to the overall success of the organization.</p> <p>3. Talent Development. A comprehensive review of salaries, job descriptions, duties and responsibilities will be conducted by a third-party vendor. Based on this review, adjustments may be made to better align people with positions within the organization. Additionally, we will research the concept of contracting with a vendor to manage activities related to career and workforce services.</p> <p>4. Risk Intelligence Culture: LWDB will continue to reinforce the management philosophy and mission, specify the values that guide operations,</p>
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							have a clear organizational structure, provide performance measures/metrics, and provide training. To expect all employees to look upstream and downstream for all potential impacts of actions and decisions and to be responsible for bringing solutions forward.
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CONTROL ACTIVITIES

<i>Self-Assessment of Policies, Procedures, and Processes</i>				
<i>Weak</i>		<i>Strong</i>		
1	2	3	4	5

Comments/Explanations

Principle 10. The organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.

27.	The LWDB has a written business continuity plan which includes contingencies for business processes, assets, human resources and business partners, and is periodically evaluated and updated to ensure continuity of operations to achieve program objectives. NEW QUESTION	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	LWDB 14 follows the Local Workforce Development Plan approved by DEO which includes relevant information regarding business processes, assets, human resources, business partners, operations, and program objectives. However, as we move forward, it will be important to review this Plan, and further identify and detail specific contingencies necessary to ensure continuity of operations to achieve program objectives.
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CONTROL ACTIVITIES

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
28.	<p>Controls employed by the LWDB include authorizations, approvals, comparisons, physical counts, reconciliations, supervisory controls and allowable use of funds.</p> <p>What type of training is provided to program and administration staff to ensure the allowable use of funds?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Finance has strengthened the controls related to monthly balance sheet reconciliations, development of a monthly financial package, monthly/quarterly financial reviews with internal stakeholders and fully implemented online purchase order and approval process. Periodic budget meetings are conducted with program directors to discuss status of all open grants.</p>
29.	<p>The LWDB periodically (e.g., quarterly, semiannually) reviews system privileges and access controls to the different applications and databases within the IT infrastructure to determine whether system privileges and access controls are appropriate.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>LWDB uses two Regional Security Officers (RSO) to ensure a thorough overview of system access and privileges. The RSO conduct a full update of system privileges and access semi-annually and upon guidance/request of DEO and all other governing authorities. RSO meet with the Executive Leadership Team monthly to ensure proper connectivity and oversight. In addition, the LWDB has procedures in place ensure proper addition/removal of access in the required 24-hour period of employment commencement/termination. As we move forward, it will be important to review the RSO responsibilities, to</p>

CONTROL ACTIVITIES

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
							support the risk culture, and provide detailed, written reports.
Principle 11. The organization selects and develops general control activities over technology to support the achievement of objectives.							
30.	Management selects and develops control activities that are designed and implemented to restrict technology access rights to authorized users commensurate with their job responsibilities and to protect the entity’s assets from external threats.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	IT provides access based upon direction provided by supervisory level staff, HR directs email to key personnel to remove system access, as applicable. There is a process for approval when employees request email, groups, or any other changes to the information technology process. In addition, we contract with an outside firm to perform 24/7/365 cybersecurity monitoring of our network.
31.	Management has identified the appropriate technology controls that address the risks of using applications hosted by third parties.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	LWDB contracts with a professional, IT vendor to ensure the appropriate technology controls are in place to address the risks of using applications hosted by third parties.

CONTROL ACTIVITIES

		Self-Assessment of Policies, Procedures, and Processes					Comments/Explanations
		Weak		Strong			
		1	2	3	4	5	
32.	The LWDB has considered the protection of personally identifiable information (PII), as defined in section 501.171(1)(g)1, F.S., of its employees, participants/clients and vendors, and have designed and implemented policies that mitigate the associated risks.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy on handling and protection of personally identifiable information and sensitive information applies to all CareerSource employees, DEO staff located in CareerSource offices, training vendors, program coordinators and partners that have access to PII and/or sensitive information shall be protected through a combination of measures including operational safeguards (policy and training), privacy-specific safeguards (procedures for collection and handling such information) and security controls (role-based access control, passwords, use of encrypted emails, etc.) In addition, the LWDB ensures that confidential information is kept under lock and key and access is limited to only those employees who need the information to perform the functions of their job. Also, the LWDB does not keep any credit card information of any person or company. Any personal information of participants is kept solely for programmatic purposes and access is limited to only those employees who need it to perform their jobs. Physical safeguards have been

CONTROL ACTIVITIES

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
							installed during 2021, whereby locks were installed on the doors of the CEO, CFO, HR Director and Finance Coordinator.
Principle 12. The organization deploys control activities through policies that establish what is expected and procedures that put policies into action.							
33.	The LWDB has policies and procedures addressing proper segregation of duties between the authorization, custody, and recordkeeping for the following tasks, if applicable: Prepaid Program Items (Participant Support Costs), Cash/Receivables, Equipment, Payables/Disbursements, Procurement/Contracting, and Payroll/Human Resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The CFO regularly evaluates all current processes and modifies as appropriate to ensure that there is adequate segregation of duties provided between performance, review and record keeping of all tasks. As mentioned previously, the LWDB has eliminated the use of prepaid visa cards.
34.	The LWDB has written procedures that minimize the time elapsing between the receipt of advanced funds and disbursement of funds as required by 2 CFR 200.305(b)(1). NEW QUESTION	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The LWDB's Financial Policies and Procedures address cash advance procedures which minimizes the time between the receipt of the funds and the disbursement of funds.

CONTROL ACTIVITIES

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
35.	The LWDB has processes to ensure the timely submission of required reporting (i.e., financial reports, performance reports, audit reports, internal monitoring reviews, or timely resolution of audit findings). NEW QUESTION	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Currently, local trackers and calendar reminders serve as internal controls to help manage this process. However, as we move forward, we will evaluate this approach to ensure there is a robust system in place to ensure the timely submission of required reporting.
36.	The LWDB has a records retention policy and has implemented internal controls to ensure all records are retained, safeguarded, and accessible, demonstrating compliance with laws, regulations, and provisions of contracts and grant agreements. NEW QUESTION	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The LWDB maintains a records retention policy ensuring the accessibility, retention and safeguarding of records according to required laws and regulations.

INFORMATION AND COMMUNICATION

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
Principle 13. The organization obtains or generates and uses relevant, quality information to support the functioning of internal controls.							
37.	Federal, state, or grant program rules or regulations are reviewed by one or more of the following: governing board, audit, finance or other type committee.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	New policies and procedures are reviewed, on an as needed basis, with the relevant

INFORMATION AND COMMUNICATION

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
	How often are these reviewed?						committee before being approved by the Board of Directors.
38.	The LWDB considers both internal and external sources of data when identifying relevant information to use in the operation of internal controls.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The LWDB understands the importance of relevant data (internal and external) in the decision-making process and the underlying factors of the data having a predictive value, feedback value and being timely.
39.	The LWDB's has controls in place to ensure costs are accurately recorded and allocated to the benefiting federal/state fund or grant.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The accounting system provides for separate identification of federal grant and nonfederal transactions as each transaction is recorded in a specific fund. The fund identifies the funding source, i.e., WIOA, USDOL, etc. In addition, the funds for which pooled costs have been allocated are transparent to the benefiting fund. Adequate source documentation exists to support amounts and items reported. We will continue to monitor and review to ensure controls are in place to accurately record and allocate costs.
Principle 14. The organization internally communicates information, including objectives and responsibilities for internal controls, necessary to support the functioning of internal controls.							

INFORMATION AND COMMUNICATION

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
40.	<p>Communication exists between management and the board of directors so that both have information needed to fulfill their roles with respect to the LWDB's objectives.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>LWDB meetings occur every other month. Each meeting will include minutes and action items from all the respective committees. Additionally, the LWDB approved the organization's Strategic Plan and annually reviews and approves the Audited Financial Statements and IRS Form 990. Included in the meetings are the activities, objectives, and goals of each of the respective committees.</p> <p>From July 1, 2020, through June 30, 2021, there were five Board meetings that consisted of 65 action items and an additional 59 informational items. In addition, there were 26 committee meetings during the same period.</p>
41.	<p>There is a process to quickly disseminate critical information throughout the LWDB when necessary.</p> <p>Provide a description of the dissemination process.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>There has been a concerted effort to centralize communication within the organization. Email is used to quickly disseminate critical information throughout the LWDB, when necessary, by applicable staff. We continue to review the communication process to ensure all options for communication have been explored and provide a distribution forum</p>

INFORMATION AND COMMUNICATION

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
							<p>that quickly disseminates critical information. Some examples of means by which information is distributed throughout the LWDB are CEO bi-weekly emails in conjunction with HR Happenings, periodic staff town halls, Workforce News publications and the Chair's report.</p> <p>In addition, the Program Director conducts weekly meetings where upward communication is encouraged. Upward communication can increase workplace productivity and employee satisfaction. Upward communication is a process where employees can communicate with management to provide feedback complaints, suggestions regarding day-to-date operations within the organization.</p>
42.	Management has a process for the development, approval and implementation of policy updates and communicates those updates to staff.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Policy received from CareerSource Florida and DEO go through a review process. Since most CSF policies are comprehensive and go through a robust review and approval process. The philosophy is to simply customize policy to LWDB 14, adding any specific local</p>

INFORMATION AND COMMUNICATION

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
							operation procedures, presenting to the One-Stop Committee, and then, presenting to the Board of Directors for review and final approval. Thereafter, policy updates are used to create training that is deployed to all applicable staff, managers, and senior leadership. Training acknowledgement and ongoing quality checks ensure new policy adherence. As we move forward, it is important to focus on a smooth transition from approval of policy, finalizing written work instruction, providing training, and ensuring regular follow-up to ensure compliance.
Principle 15. The organization communicates with external parties regarding matters affecting the functioning of internal controls.							
43.	The LWDB has a means for anyone to report suspected improprieties regarding fraud; errors in financial reporting, procurement, and contracting; improper use or disposition of equipment; and misrepresentation or false statements. Describe the process of how someone could report improprieties. Who receives/processes/investigates, etc.?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The LWDB Board Chair, Vice Chair, and Chief Executive Officer are available to report improprieties along with the opportunity to make confidential calls with any issues that may arise. A member of the Senior Leadership Team is the designated Equal Employment Opportunity (EEO) officer. The most recent monitoring of the company's EEO process was conducted in April 2019;

INFORMATION AND COMMUNICATION

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
							there were no findings. In addition, the employee handbook contains a whistleblower policy and compliant policy. Additionally, any member of the Executive Leadership Team, including the HR Director, are available to discuss any concerns. The means for anyone with in LWDB 14 to report suspected improprieties regarding fraud; errors in financial reporting, procurement, and contracting; improper use or disposition of equipment; and misrepresentation or false statements has been reviewed with the Board of Directors and General Counsel to ensure there are comprehensive, robust avenues and processes available for reporting.
44.	The LWDB has processes in place to communicate relevant and timely information to external parties.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Depending on the audience, channels of communication are held via email, phone call, Zoom or face to face meeting.

INFORMATION AND COMMUNICATION

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
45.	The LWDB has processes in place to communicate the results of reports provided by the following external parties: Independent Auditor, DEO Bureau of Financial Monitoring and Accountability (FMA), DEO Bureau of One-Stop and Program Support, DEO Office of Inspector General, Florida Auditor General, and Federal Awarding Agencies (USDOL, USDHHS, and USDA) to the Board of Directors.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Various committees exist whereby staff disseminates this information. Specific Finance and Audit Committees handle financial and audit related communications. One-Stop Committee would receive program/resource center level information. In addition, Committee level information is also shared with and approved by the Board. Also, independent audit reports, annual Form 990 and other reports are available on the LWDB's website.

MONITORING ACTIVITIES

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

MONITORING ACTIVITIES

		Self-Assessment of Policies, Procedures, and Processes					Comments/Explanations
		Weak		Strong			
		1	2	3	4	5	
46.	<p>The LWDB periodically evaluates its business processes such as cash management, comparison of budget to actual results, repayment or reprogramming of interest earnings, draw down of funds, procurement, and contracting activities.</p> <p>Describe the process of how funding decisions are determined. What are the criteria, who initiates/approves, etc.?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Business processes over cash management, budget to actual results, draw down of funds, procurement and contracting activities are reviewed on an on-going basis to ensure control activities are properly designed, effective and implemented. Controls are reviewed annually by DEO monitors and procedures are modified as needed.
47.	<p>The LWDB considers the level of staffing, training and skills of people performing the monitoring given the environment and monitoring activities which include observations, inquiries and inspection of source documents.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The LWDB procured an outside firm to perform internal monitoring for all programs and administrative functions on a semi-annual basis.
48.	<p>LWDB management periodically visits all career center locations in its region (including subrecipients) to ensure the policies and procedures are being followed and functioning as intended.</p> <p>When was the most recent visit performed, by whom, and who were the results communicated to?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>CareerSource Pinellas program Directors visit the Career Center locations periodically to meet with staff and for training.</p> <p>The One-Stop Operator conducted a formal visit in October 2019. The results of this visit were shared with the Executive Leadership Team. Since then, on an at least weekly basis,</p>

MONITORING ACTIVITIES

		<i>Self-Assessment of Policies, Procedures, and Processes</i>					Comments/Explanations
		<i>Weak</i>		<i>Strong</i>			
		1	2	3	4	5	
							<p>the Director of Talent and Business Development and/or Program Coordinators visits the one-stop centers. The purpose of these visits is to ensure policies and procedures are being followed.</p> <p>Subrecipient monitoring is conducted annually to ensure compliance with requirements. The last subrecipient monitoring occurred during the first quarter of 2021 and we have begun planning for 2021-2022 activities. In addition, we have implemented monthly meetings with our largest subrecipient to monitor progress towards goals and objectives.</p>
<p>Principle 17. The organization evaluates and communicates internal control deficiencies in a timely manner to those parties responsible for taking corrective action, including senior management and the board of directors, as appropriate.</p>							
49.	The LWDB management takes adequate and timely actions to correct deficiencies identified by the external auditors, financial and programmatic monitoring, or internal reviews.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If deficiencies or observations are reported by the external auditor, internal monitors, financial and/or programmatic monitoring, a plan of action and implementation deadline is established.

MONITORING ACTIVITIES

		Self-Assessment of Policies, Procedures, and Processes					Comments/Explanations
		Weak		Strong			
		1	2	3	4	5	
50.	<p>The LWDB monitors all subrecipients to ensure that federal funds provided are expended only for allowable activities, goods, and services and communicates the monitoring results to the LWDB's board of directors.</p> <p>Are subrecipient monitoring activities outsourced to a third party? If so, provide the name of the party that performs the subrecipient monitoring activities.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Desk and/or on-site monitoring reviews are performed annually by LWDB staff for the LWDB's two subrecipients. The results of those monitoring reviews are communicated, as appropriate, and any significant issues, if any are shared with the LWDB Board of Directors. The LWDB shared the results of the most recently completed subrecipient monitoring reviews with the Audit Committee on October 27, 2021, and Board of Directors on November 17, 2021.</p>

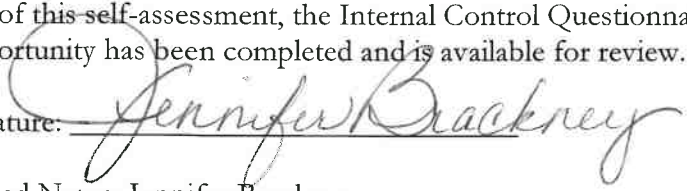
ATTACHMENT A

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

Local Workforce Development Board Number: 14

To be completed by the Executive Director:

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

Signature: 


Printed Name: Jennifer Brackney

Title: Chief Executive Officer

Date: October 27, 2021

To be completed by the Board Chair or their designee:

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

Signature: 

Printed Name: Barclay Harless

Title: Board Chair

Date: October 27, 2021

Please scan and upload to SharePoint an executed copy of this certification on or before **September 30, 2021**.
***Requested an extension to November 17, 2021, due to the date of receipt of the ICQ and the next available meeting date of the Board of Directors.**



ACTION ITEM 10

Executive Compensation

The Grantee-Subgrantee Agreement between Florida Department of Economic Opportunity and CareerSource Pinellas states that:

No changes to compensation for executive staff of the Board are allowed without documented Board approval and must be in alignment with local policies and procedures. The Board shall ensure that all bonuses, pay raises, and benefits are reasonable and necessary for the successful performance of the award and are a prudent use of federal funds.

The purpose of this requirement is full and open disclosure that the Board is specifically aware of the compensation for executive staff. At the May 19, 2021, Board meeting, the Board approved the Annual Evaluation process and the range for either merit increases or one-time performance stipends of 0%-5%. All employees' merit increases or performance stipends were within the approved range including the organization's Chief Financial Officer, Steve Meier, who is considered part of the executive staff.

Employee	Position	Salary Effective:		Increase	
		7/1/2020	7/1/2021	Dollar	Percentage
Steve Meier	CFO	\$ 131,250.34	\$ 137,812.74	\$ 6,562.40	5.0%

RECOMMENDATION

Approval of the Chief Financial Officer's salary of \$137,812.74, effective July 1, 2021, to comply with the requirements of DEO's Grantee-Subgrantee agreement.



ACTION ITEM 11

CareerSource Pinellas One-Stop Operator and Workforce Services

CareerSource Pinellas continues to navigate change as the organization maintains ongoing efforts to raise the bar and reinforce a culture of integrity, accountability, and transparency.

CareerSource Pinellas would like to initiate the process for exploring available, alternative options for managing day-to-day operations of multiple Career Resource Centers in Pinellas County, Florida and for delivering a broad range of federally mandated workforce services to employers and job seeking customers in the region in accordance with the federal Workforce Innovation and Opportunity Act (WIOA) and other governing laws and rules.

Background: CareerSource Pinellas currently provides direct services as approved by CareerSource Florida. CareerSource Pinellas is the employer of record for 47 employees and manages the DEO state merit and veteran staff. The entity currently contracted to serve as the one-stop operator is Kaiser Group, Inc. dba Dynamic Works.

The primary objective is to provide a high quality, integrated workforce services program using a model of operation that is responsive to the needs of employers and residents of Pinellas County. At present, CareerSource Pinellas has five career center locations strategically located in Pinellas County. Currently, two of the three Career Resource Centers are considered full-service centers. The full-service locations include the integrated employment and career development system coordinated and structured by CareerSource Pinellas. Currently, satellite career center services consist of case management services, walk-in services, and delivery of other basic services (resume writing, job search, etc.).

The Career Resource Centers have two primary customers: employers and job seekers. The Career Resource Centers also provide job seeker customers with training and employment opportunities using an integrated case management system for the delivery of workforce services to customers eligible under Welfare Transition (WT); Workforce Innovation and Opportunity Act (WIOA); Supplemental Nutrition Assistance Program (SNAP); Trade Adjustment Assistance, (TAA); Wagner-Peyser (WP); Veteran; and Reemployment Services and Eligibility Assessment (RESEA) programs.

CareerSource Pinellas is also designated as the administrative entity and grant recipient for federal workforce investment programs in Pinellas County, Florida.

RECOMMENDATION

To initiate the process for exploring available, alternative options for managing day-to-day operations of multiple Career Resource Centers in Pinellas County, Florida and delivering a broad range of federally mandated workforce services to employers and job seeking customers in the region in accordance with the federal Workforce Innovation and Opportunity Act (WIOA) and other governing laws and rules.



ACTION ITEM 12

Vendor Selection

IT Services

The Board approved the issuance of a Request for Proposal (RFP) for a qualified IT Services Vendor. CareerSource Pinellas followed standard procurement processes and solicited proposals from qualified and experienced entities to provide IT Services. Each proposal was reviewed by the CareerSource Pinellas review team. Paul Ashe, the vCIO, was part of the evaluation team.

Results of review:

Proposer	Overall Score	First Year Cost
Link Tech Computer Services, LLC	92.0	243,000
Network People, Inc.	86.6	280,865
Plexos Group, LLC	74.8	270,000
BleuStream Corp	72.0	159,000
Ricoh-USA, Inc.	62.8	112,725
Newgentek LLC	54.8	429,219

The incumbent firm, Complete Technology Systems, did not submit a proposal. Their current charge is \$23,242, monthly, or \$278,903, annually. The evaluation team requested the two highest scoring vendors, Link Tech Computer Services and Network People, to submit a project plan to onboard CareerSource Pinellas if selected as a vendor.

Based on overall score, knowledge of our network, previous experience performing projects for CareerSource Pinellas offers, proximity to our locations, total cost, onboarding project plan, and understanding of our IT needs, we recommend contracting with Link Tech Computer Services, LLC.

RECOMMENDATION

Approval to enter into contract negotiations and award a contract for the provision of IT Services with Link Tech Computer Services, LLC, for a one-year term commencing January 1, 2022, with up to three one-year renewals. The annual contract amount in the first year will not exceed \$225,000, with 5% maximum annual cost-of-living adjustments, plus \$18,000 for one-time onboarding fees.



ACTION ITEM 13

Contract Amendment

Virtual Chief Information Officer

The Board approved the hiring of a virtual Chief Information Officer (CIO) to act as the central point of contact for information technology services at the July 15, 2020, Board meeting. Securance, LLC, was hired effective July 30, 2020, for a period of one year unless terminated or extended by mutual written agreement by both parties. The contract was extended through June 30, 2022. The current amount available for this program year is \$67,750. However, through September 30, 2021, expenses have been \$38,850. The migration of shared drives and home drives to SharePoint and One Drive has resulted in more time than expected to manage the project. As a result, funds will be extinguished over the next couple of months. With selection and transition to a new IT provider, it is important to have the CIO available to manage this transition.

2020 IT Accomplishments

- Procured, provisioned, and distributed 75 new laptop computers
- Migrated ATLAS, Email (O365), and anti-virus to the cloud
- Reduced monthly network monitoring cost by 40%

2021 IT Strategic Goals

- Install new and improved firewalls
- Procure and install new network switches
- Continue cloud migration by moving file services
- Proactively work with CSP business leaders to provide IT solutions
- Issue RFP for IT services and manage transition to new manage service provider

RECOMMENDATION

Approval to amend contract for Securance LLC, for an additional amount of \$45,000, with total not to exceed \$106,600 through June 30, 2022.



ACTION ITEM 14

Fiscal Year 2021 – 2022: Budget Modification No. 1

REVENUE:

Total budgeted revenues estimated to increase from \$9,220,310 to \$9,665,948 for an overall increase of \$445,638,424; or 4.8%.

Workforce Innovation and Opportunity Act (WIOA) Programs (Total decrease of \$63,936:

- Changes in actual amounts carried over to 2021-2022 from June 30, 2021:
 - COVID Dislocated Worker grant - \$39,000
 - Apprenticeship Expansion grant - \$20,000
 - Apprenticeship Navigator grant - \$12,000
- Rapid Response grant - \$116,000
 - New grant awarded from DEO
- Budgeted WIOA Supplemental Grant (\$250,000) consistent with prior years. Per DEO, there will not be any Supplemental Grants this fiscal year.

Welfare Transition:

- Increased in Welfare Transition - \$531,574
 - Increased funding from DEO and increased amount carried over to 2021-2022

Employment Services

- Recovery Navigator - \$102,000
 - New grant awarded from DEO

YouthBuild – Department of Labor

- Decrease in spending due to COVID; grant ends May 2022

EXPENSES:

Total budgeted expenses estimated to increase from \$9,120,785 to \$9,566,422 for an overall increase of \$445,638.

Personnel Expenses

- Personnel Expenses expected to decrease \$328,000, or 7.8% from original budget
 - Changes in the mix of the hiring positions that were in the original budget



ACTION ITEM 14 cont.

Fiscal Year 2021 – 2022: Budget Modification No. 1

Program Expenses

- Outreach/Marketing increasing \$25,000
 - Employer outreach associated with Rapid Response grant
- On-the-Job Training (OJT) increasing \$451,000
 - Represents Welfare Transition Summer PAYS Youth program for spending that already occurred during 2021 and anticipated spending for 2022 program.
- Dislocated Worker Grant (DWG) Work Experience increase of \$41,000
 - Increase due to carry over funding from 2020-2021
- Apprenticeships increase of \$14,000 grant - \$1,350,000
 - Increase due to carry over funding from 2020-2021
- Customer Training increasing \$20,000
 - Training associated with Recovery Navigator grant

Professional Fees

- Governmental Relations Fees increased \$10,000
- Professional Services increasing \$25,000
 - Represents increased Tucker Hall (PR/Marketing expenses)
- Contract Labor increased \$148,000
 - Virtual Chief Information Officer - \$68,000; due to higher involvement with 2021 strategic initiatives and transition to new IT service provider
 - Manpower - \$17,000; contract-to-hire position for administrative assistant
 - Compensation Review - \$37,500 (estimated); approved at Compensation Committee
 - Summer PAYS teachers for both 2021 and 2022 programs - \$38,000

Occupancy

- Increased repairs and maintenance (\$17,000) represents painting of St. Petersburg career center

License, Dues and Other Fees

- Increased Staff Training/Education (\$19,575) represents renewal of annual cyber training for staff

RECOMMENDATION

Approval to amendment revenue budgets and resultant modifications to the expenditures budgets.



CareerSource Pinellas
2021-2022 Planning Budget
Budgeted Revenues - Budget Modification #1

Funding Streams	Approved Budget for 2021- 2022	Proposed Modifications	Proposed Budget Modification #1 2021-2022
Workforce Innovation & Opportunity Act			
Adult	1,350,000		1,350,000
Dislocated Worker	1,700,000		1,700,000
Youth	1,050,000		1,050,000
WIOA Supplemental	250,000	(250,000)	-
SFY 19-20 Performance Incentives	254,596		254,596
COVID Dislocated Worker Grant	250,000	39,251	289,251
Rapid Response	-	115,710	115,710
Apprenticeship Expansion	67,500	19,516	87,016
Apprenticeship Navigator	41,000	12,143	53,143
Soft Skills	15,000	(556)	14,444
Total WIOA	4,978,096	(63,936)	4,914,160
Employment Services			
Wagner-Peyser	650,000		650,000
Local Veterans	33,000		33,000
Disabled Veterans	120,000		120,000
RESEA	335,000		335,000
Recovery Navigator	-	102,000	102,000
Total Employment Services	1,138,000	102,000	1,240,000
Welfare Transition	2,153,714	531,574	2,685,288
Supplemental Nutrition Assistance Program	280,000	-	280,000
Trade Adjustment Assistance			
TAA Training	120,000	-	120,000
TAA Case Management and Administration	66,000	-	66,000
Total TAA	186,000	-	186,000
TOTAL DEO	8,735,810	569,638	9,305,448
Youthbuild - Department of Labor	350,000	(125,000)	225,000
Other Revenue			
Ticket to Work	108,000	-	108,000
Tobacco Free Florida	11,500	-	11,500
Career Fair Sponsorships	3,000	-	3,000
Interest	12,000	-	12,000
TOTAL NON-DEO	484,500	(125,000)	359,500
TOTAL 2021-2022 BUDGETED REVENUE	9,220,310	444,638	9,664,948



CareerSource Pinellas
2021-2022 Planning Budget
For the Year Ended June 30, 2022

	G/L	Approved 2021-2022 Planning Budget	Proposed Changes	Proposed 2021-2022 Budget Modification I
Revenue				
Operating Revenue				
Grant Revenue				
Grant Revenue - Federal	3000	9,085,810	444,638	9,530,448
Grant Revenue - State	3001	-	-	-
Grant Revenue - Local	3002	-	-	-
Total Grant Revenue		9,085,810	444,638	9,530,448
Contributions				
Corporate Revenue	3100	11,500	-	11,500
Sponsorship Revenue	3101	3,000	-	3,000
Donations	3102	-	1,000	1,000
Total Contributions		14,500	1,000	15,500
Program Revenue				
Ticket to Work Revenue	3103	108,000	-	108,000
Total Program Revenue		108,000	-	108,000
Investment Income				
Interest/Dividends	3200	12,000	-	12,000
Total Investment Income		12,000	-	12,000
Other Income				
Other Revenues	3300	-	-	-
Gain <Loss> on Sale/Disposal	5703	-	-	-
Total Other Income		-	-	-
Total Operating Revenue		9,220,310	445,638	9,665,948
Total Revenue		9,220,310	445,638	9,665,948
Expenditures				
Personnel Expenses				
Salary Expense	5000	2,998,039	(215,870)	2,782,169
Salary Expense - Benefit Stipend	5005	670,925	(60,827)	610,098
Payroll Taxes	5050	297,819	(20,716)	277,103
Fringe Benefits (ER Paid)	5060	40,428	-	40,428
Retirement	5090	177,197	(31,050)	146,147
Total Personnel Expenses		4,184,408	(328,463)	3,855,945
Program Expenses				
Operating Supplies	5303	1,750	-	1,750
Food and Beverages	5310	1,200	1,000	2,200
Communications	5500	97,944	-	97,944
Outreach/Marketing	5520	30,650	25,000	55,650
Service Provider Contract	8000	500,000	-	500,000
One-Stop Operator	8100	42,000	-	42,000
Internal Monitoring	8200	65,000	-	65,000
OJT	8300	60,000	451,312	511,312



CareerSource Pinellas
2021-2022 Planning Budget
For the Year Ended June 30, 2022

	G/L	Approved 2021-2022 Planning Budget	Proposed Changes	Proposed 2021-2022 Budget Modification I
EWT	8310	-	-	-
Paid-Work Experience	8320	90,000	-	90,000
DW Work Experience	8325	90,000	40,897	130,897
Apprenticeships	8330	36,000	14,000	50,000
Contracted Workforce Services	8335	67,200	-	67,200
Youth Stipends	8340	42,000	(3,939)	38,061
Other Customer Support Services	8341	24,120	-	24,120
Customer Training	8342	2,146,305	20,000	2,166,305
Customer Supportive Services	8343	81,000	-	81,000
Licensures	8344	-	-	-
Training Related Material	8345	111,840	-	111,840
Fees/exams/certifications	8346	40,540	-	40,540
Total Program Expenses		3,527,549	548,270	4,075,819
Professional Fees				
Accounting/Audit Fees	5100	42,500	-	42,500
Legal Fees	5101	60,000	-	60,000
Legal Fees (Lobbying)	5105	-	10,000	10,000
Professional Service	5104	46,480	25,462	71,942
Contract Labor	5170	64,600	148,443	213,043
Contract IT Services	5171	331,400	-	331,400
Cybersecurity - IT	5172	41,643	-	41,643
Total Professional Fees		586,623	183,905	770,528
Supplies				
Office Supplies	5302	18,540	1,300	19,840
Postage/Shipping	5307	6,240	-	6,240
Document Shredding	5308	950	-	950
Total Supplies		25,730	1,300	27,030
Insurance				
Insurance - Commercial Property	5400	5,300	-	5,300
Insurance - General Liability	5401	69,087	-	69,087
Insurance - Workers Comp	5403	54,211	-	54,211
Insurance - Auto	5404	7,600	-	7,600
Insurance - Claims	5405	-	-	-
Total Insurance		136,198	-	136,198
Occupancy				
Office Rent/Lease	5200	257,397	-	257,397
Other Leases	5201	9,000	-	9,000
Utilities	5202	33,100	-	33,100
Repairs & Maintenance	5203	3,360	16,950	20,310
Security	5204	468	-	468
Janitorial Expense	5205	44,310	-	44,310
Pest Control	5206	2,316	-	2,316
Total Occupancy		349,951	16,950	366,901



CareerSource Pinellas
2021-2022 Planning Budget
For the Year Ended June 30, 2022

	G/L	Approved 2021-2022 Planning Budget	Proposed Changes	Proposed 2021-2022 Budget Modification I
Office Equipment				
Equipment Rent/Lease	5300	36,396	-	36,396
Copy Machine Usage/Maintenance	5301	9,660	-	9,660
Comp Software/License/Maintenance	5304	86,977	-	86,977
Equipment < \$5,000	5305	22,000	-	22,000
Other	5207	-	-	-
Total Office Equipment		155,033	-	155,033
Travel and Meetings				
Travel - Mileage	5540	13,080	4,100	17,180
Travel - Out of Town	5541	34,200	-	34,200
Meetings/Conferences	5560	13,600	-	13,600
Total Travel and Meetings		60,880	4,100	64,980
Licenses, Dues and Other Fees				
Staff Training/Education	5052	8,800	19,575	28,375
Other Employee expenses	5055	-	-	-
Recruitment	5095	3,000	-	3,000
Payroll Processing Fees	5103	9,530	-	9,530
License/Dues & Other Fees	5581	36,104	-	36,104
FSA Administrative Expenses	5582	600	-	600
401k Administrative Fees	5583	5,400	-	5,400
HRIS Administrative Fees	5584	5,400	-	5,400
Total Licenses, Dues and Other Fees		68,834	19,575	88,409
Amortization and Depreciation				
Depreciation Expense	5901	22,769	-	22,769
Amortization Expense	5902	-	-	-
Total Amortization and Depreciation		22,769	-	22,769
Miscellaneous				
Bank Fees	5102	480	-	480
Other Expense	5700	-	-	-
Vehicle Expenses	5701	2,330	-	2,330
Penalties\Disallowed Expenses	5710	-	-	-
Interest Expense	5900	-	-	-
Total Miscellaneous		2,810	-	2,810
Total Expenditures		9,120,785	445,638	9,566,422
Net Revenue over (under) Expenditures		99,525	-	99,526



ACTION ITEM 15

Contract Amendment with Gray|Robinson Governmental Relations Services

BACKGROUND

There has been a considerable amount of legislative activity regarding workforce-related programs and services.

Representation during upcoming legislative sessions continues to be a priority with a partner taking a laser-focused approach on behalf of CareerSource Pinellas and our region's unique position.

The Board approved the recommendation to amend the current contract with Gray|Robinson to include governmental relations at the March 17, 2021, meeting. Chris Carmody, Gray|Robinson, has substantial experience handling governmental relations matters. Mr. Carmody is the governmental relations partner that played an instrumental role which helped navigate through the channels, read through each bill to highlight areas of concern, and met with key legislators and staff to represent CareerSource Pinellas.

By continuing to work with Mr. Carmody, we will have a voice in the discussions; one that is both focused on CareerSource Pinellas and the region while partnering on behalf of the workforce system in Florida.

Governmental relations is not an allowable activity with grant funds. It is allowable to utilize private/unrestricted funds for this purpose. The current contract was for a flat fee of \$25,000 broken out into five monthly payments through August 31, 2021. Through the end of August 2021, the organization expended \$20,225 for government relations services.

RECOMMENDATION

Approval to amend the existing contract with Gray|Robinson Government Relations Services for an amount not to exceed \$25,000 and re-engage and expand the scope of services to include Governmental Relations for CareerSource Pinellas through June 30, 2022.



ACTION ITEM 16

Request for Proposal

Youth Work-Based Training

Request for Proposals (RFP) for work-based training for youth. Youth work-based training will serve Pinellas eligible youth who are in-school youth, ages 16-19 years old, and/or out of school youth ages 18-24 years old. Eligibility may be determined as Workforce Innovation and Opportunity Act (WIOA) Youth and/or Temporary Assistance for Needy Families (TANF). The work-based training and learning activities will take place from March 2022 through July 2022.

Work-based learning serves as a bridge between academics and real-world application of knowledge and skills. Students are expected to learn a concept and apply the concept in an authentic real-world way. These real-world projects may be focused on a community need, a challenge from a local business or industry, or a nonprofit organization. The overarching idea is that the true learning occurs when students “do something” or apply the connects they are learning an authentic “real-world” manner.

Generally, work-based learning is structure on a continuum that incudes awareness, exploration, and preparation experiences, combined with an individual’s interests, aspirations, and goals. The continuum includes supporting activities and career-specific work-based learning activities.

RECOMMENDATION

Approval of the issuances of a Request for Proposals for Youth Work-Based Training.



ACTION ITEM 17

Policy Approval - WIOA Administrative Policy 091, Local Workforce Development Board Composition and Certification with Local Operating Procedures

The Florida Department of Economic Opportunity (DEO) has instituted a new process related to Local Operating Procedures (LOPs) that coincides with the release of new administrative policies. The goal of this new process is to ensure DEO is providing the oversight and support needed for Local Workforce Development Boards (LWDBs) to administer and operate workforce programs in a manner that meets federal and state requirements. The process creates a timeline for introducing new and revising current administrative policies issued by DEO.

The revised WIOA Administrative Policy 091 is presented to the LWDB following this new process. There will be more to follow.

Based on the re-issuance of WIOA Administrative Policy 091, this Administrative Policy with LOPs includes all the DEO administrative policy requirements.

Highlighted changes to align with the requirements of the Reimagining Education and Career Help (REACH) Act:

- References updated LWDB Chairperson requirements linked to Administrative Policy 110, concerning Board Governance.
- Limits LWDB Board members to service terms of no more than eight (8) consecutive years for service terms commencing after July 1, 2021, with the exception of government entity representatives.
- Redefines "For Cause" to include gross mismanagement and waste.

RECOMMENDATION

Approval of WIOA Administrative Policy 091 - Local Workforce Development Board Composition and Certification with Local Operating Procedures (LOPs).



Administrative Policy with Local Operating Procedures

Policy Number
WIOA-B-091-14

Title:	Local Workforce Development Board Composition and Certification
Program:	Workforce Innovation and Opportunity Act (WIOA)
Effective:	July 1, 2021
Revised:	TBD

I. PURPOSE AND SCOPE

The purpose of this policy is to provide Local Workforce Development Board 14 (LWDB 14) with the requirements for LWDB membership composition under the Workforce Innovation and Opportunity Act (WIOA) and Chapter 445, Florida Statutes (F.S.), and the process for certification of LWDBs.

II. BACKGROUND

Each local workforce development area in the state must establish a local workforce development board to carry out the functions specified for the local board under WIOA sec. 107(d) for such area. The CareerSource Florida Board of Directors, in consultation with the Department of Economic Opportunity, will ensure LWDBs have a membership consistent with the requirements of federal and state law and have developed a plan consistent with the state’s workforce development plan.

III. AUTHORITY

[Public Law 113-128, Workforce Innovation and Opportunity Act](#), Sections 106 and 107

[20 Code of Federal Regulations 679.320](#)

[Sections 445.004 and 445.007, F.S.](#)

IV. POLICIES AND PROCEDURES

Outlined below are the policies and procedures for certifying LWDB 14 and ensuring the composition of and appointment of members to LWDB 14 are consistent with the provisions of federal and state requirements.

A. LWDB Membership and Composition

The Governor, in partnership with the CareerSource Florida Board of Directors, has established criteria for use by Chief Local Elected Officials (CLEOs) for appointment of members of LWDB 14 in accordance with WIOA sec. 107(b)(2). The composition of LWDB 14 must meet the following criteria:

1. Business

A majority of LWDB 14's members will represent businesses in the local area as individuals who:

- a. Are owners of a business, chief executives or operating officers of businesses, or other business executives or employers with optimum policymaking or hiring authority;
- b. Represent businesses, including small businesses, or organizations representing businesses that provide employment opportunities that, at a minimum, include high-quality, work-relevant training and development in in-demand industry sectors or occupations in the local area (at least two representatives of small businesses must be included); and
- c. Are appointed from individuals nominated by local business organizations and business trade associations.

2. Labor/Apprenticeships

Not less than 20 percent of the members will be representatives of the workforce within the local area who:

- a. Include at least two representatives of labor organizations nominated by local labor federations. For a local area in which no employees are represented by such organizations, at least two other representatives of employees will be included.
- b. Include at least one representative of a labor organization or a training director from a joint labor-management apprenticeship program. If no such joint program exists in the area, at least one representative of an apprenticeship program in the area, if such a program exists.
- c. May include representatives of community-based organizations that have demonstrated experience and expertise in addressing the employment needs of individuals with barriers to employment, including organizations that serve veterans or provide/support competitive integrated employment for individuals with disabilities.

- d. May include representatives of organizations that have demonstrated experience and expertise in addressing the employment, training, or education needs of eligible youth, including representatives or organizations that serve out-of-school youth.

3. Education

LWDB 14 will include representatives of entities administering education and training activities in the local area who:

- a. Include a representative of eligible providers administering adult education and literacy activities under Title II of WIOA.
- b. Include a representative of institutions of higher education providing workforce investment activities (including community colleges).
- c. Include a private education provider, if a public education or training provider is represented on the LWDB. The CareerSource Florida Board of Directors may waive this requirement if requested by LWDB 14 if it is demonstrated that such representative does not exist in the local area.
- d. May include representatives of local educational agencies and of community- based organizations with demonstrated experience and expertise in addressing the education or training needs of individuals with barriers to employment.

When there is more than one institution in each of the types of educational entities listed above, nominations are solicited from representatives of each of these entities.

If LWDB 14 requests to waive the requirement for private education provider, representation on the board will demonstrate that such a provider does not exist in the local area. LWDB 14 will describe, in a locally defined process, how private education providers will be identified and efforts to include those representatives on the local board. If through the local process LWDB 14 finds that a private education provider representative of an entity administering education and training activities in the local area does not exist, LWDB 14 will submit a request to waive the requirement to LWDBGovernance@deo.myflorida.com. The request will include a copy of the local process and the results of LWDB 14's efforts in its request.

4. Governmental/Economic/Community Development

LWDB 14 will include representatives of economic and community development as well as governmental entities serving the local area who:

- a. Represent economic and community development entities serving the local area.
- b. Represent Vocational Rehabilitation serving the local area.

- c. May represent agencies or entities serving the local area relating to transportation, housing, and public assistance.
- d. May represent philanthropic organizations serving the local area.

5. Other Entity Representation

LWDB 14 may include other individuals or representatives of entities determined by the Chief Elected Official in the local area to be appropriate.

Unlike the state board, members of the local board may be appointed as representatives of more than one entity if the individual meets all the criteria for representation.

B. LWDB Chairperson

The LWDB 14 chairperson is elected by the members of LWDB 14 and must be one of the business representatives on the local board. LWDB 14 chairperson requirements can be found in Administrative Policy 110 – Local Workforce Development Area and Board Governance.

C. Standing Committees

LWDB 14 may designate and direct the activities of standing committees to provide information and to assist LWDB 14 in carrying out its required activities, as further prescribed in WIOA sec. 107(b)(4).

D. Authority of Board Members

Members of the board who represent organizations, agencies, or other entities must be individuals with optimum policymaking authority within the organizations, agencies or entities.

E. Board Member Recruiting, Vetting and Nominating

LWDB 14, in consultation with the CLEO, will develop and implement written processes and procedures for recruiting, vetting and nominating LWDB 14 members. The qualifications of LWDB 14 members must be documented, align with the requirements of WIOA, and be compliant with all federal and state laws, rules and regulations, and applicable state policies. Documentation supporting the recruitment, vetting and nomination process, including names of nominating organizations and names of all candidates and their qualifications, must be retained for not less than five years.

In addition to criteria outlined in Section A. of this policy, the members of the board shall represent diverse geographic areas within the local area. The importance of minority and gender representation must be considered when making appointments to the local board.

F. Appointment of Board Members

The CLEO in a local area is authorized to appoint the members of the local board who meet the criteria outlined in **Section A.** of this policy. The CLEO may not delegate the responsibility of appointing members to LWDB 14, to the executive director or to staff. When a local area includes more than one unit of local government, the CLEOs of such units may execute an agreement that specifies the respective roles of the individual CLEOs regarding:

- a. The selection, appointment, removal or reappointment of the members of the local board from the individuals nominated or recommended to be such members; and
- b. Carrying out any other responsibilities assigned to such officials in accordance with WIOA.

If after a reasonable effort the CLEOs are unable to reach agreement, the Governor may appoint the members of the local board from individuals so nominated or recommended.

Upon appointment to the local board, members must be educated about and acknowledge state and local conflict-of-interest policies.

LWDB 14 will adopt and abide by a conflict-of-interest policy that ensures compliance with federal and state laws, rules and regulations and applicable state policies.

G. Board Member Vacancies, Term Limits and Removal

LWDB 14 members who no longer hold the position or status that made them eligible appointees must resign or be removed by the CLEO. Local workforce development board vacancies will be filled within a reasonable amount of time, but no more than 12 months from the vacancy occurrence. This process may be described in the LWDB 14 bylaws or in a local operating procedure.

LWDB 14 members shall serve staggered terms and may not serve for more than eight (8) consecutive years unless the member is a representative of a government entity. Service in a term of office which commenced before July 1, 2021, does not count toward the 8-year limitation.

The Governor¹ and CLEO² may remove members of LWDB 14, and its Executive Director or the designated person responsible for operational and administrative functions for the board for cause.

H. Certification of Local Workforce Development Boards

1. Certification

Once every two years, one LWDB must be certified for each local area in the state, based on the criteria described in WIOA sec. 107(b). For a second or subsequent certification, certification must also be based on the extent to which the local area ensures workforce investment activities

¹ [Chapter 445.007\(2\)\(b\), F.S.](#)

² [Chapter 445.007\(2\)\(c\), F.S.](#)

carried out in the local area enabled the local area to meet the corresponding performance accountability measures and achieve fiscal integrity as defined in WIOA sec. 106(e)(2).

The CareerSource Florida Board of Directors shall recertify LWDB 14 every two years. DEO, in consultation with the CareerSource Florida Board of Directors, will issue instructions to LWDB 14 for certification. LWDB 14 will submit certification documents to DEO. Upon satisfactory review of LWDB 14's certification documents, DEO will provide a recommendation on certification to the CareerSource Florida Board of Directors. At the appropriate time intervals, instructions will be issued to LWDB 14 about the certification process, to include documentation requirements.

2. Failure to Achieve Certification

Failure of LWDB 14 to achieve certification shall result in appointment and certification of a new local board for the local area pursuant to WIOA sec. 107(c)(1). Administrative Policy 104 – Sanctions for Local Workforce Development Boards' Failure to Meet Federal and State Standards details the actions the CareerSource Florida Board of Directors and DEO may take if LWDB 14 fails to meet this standard.

I. Decertification of Local Workforce Development Boards

The Governor may decertify LWDB 14 in accordance with WIOA Sec. 107(c)(3), as further prescribed in Administrative Policy 104, Sanctions for Local Workforce Development Boards' Failure to Meet Federal and State Standards.

V. DEFINITIONS

- 1. Small business** is defined by the [Small Business Administration](#).
- 2. Economic agency** is defined as including a local planning or zoning commission or board, a community development agency, or another local agency or institution responsible for regulating, promoting, or assisting in local economic development.
- 3. For cause** includes, but is not limited to, engaging in fraud or other criminal acts, incapacity, unfitness, neglect of duty, official incompetence and irresponsibility, misfeasance, malfeasance, nonfeasance, gross mismanagement, waste, or lack of performance.
- 4. Person with optimum policy-making authority** is an individual who can reasonably be expected to speak affirmatively on behalf of the entity he or she represents and to commit that entity to a chosen course of action.

VI. REVISION HISTORY

Date	Description
	Revised and Approved by the CareerSource Pinellas Board of Directors.
07/14/2021	Approved by the CareerSource Pinellas Board of Directors.
07/01/2021	Revised and issued by the Florida Department of Economic Opportunity to incorporate the requirements of the Reimagining Education and Career Help Act of 2021 (House Bill 1507).
01/07/2021	Issued by the Florida Department of Economic Opportunity.
12/03/2020	Revised and approved by CareerSource Florida Board of Directors.
02/20/2020	Revised and approved by CareerSource Florida Board of Directors.
06/08/2016	Issued by the Florida Department of Economic Opportunity. This administrative policy supersedes and replaces FG-OSPS-073, Regional Workforce Board Composition, Certification and Decertification, issued June 29, 2013.



ACTION ITEM 18

Policy Approval - TAA Administrative Policy 101, Trade Adjustment Assistance Training and Other Activities Funding with Local Operating Procedures

The Florida Department of Economic Opportunity (DEO) has instituted a new process related to Local Operating Procedures (LOPs) that coincides with the release of new administrative policies. The goal of this new process is to ensure DEO is providing the oversight and support needed for Local Workforce Development Boards (LWDBs) to administer and operate workforce programs in a manner that meets federal and state requirements. The process creates a timeline for introducing new and revising current administrative policies issued by DEO.

The Trade Adjustment Assistance (TAA) Administrative Policy 101 is presented to the LWDB following this new process. There will be more to follow.

Based on the release of TAA Administrative Policy 101, this Administrative Policy with LOPs includes all the DEO administrative policy requirements.

Highlights:

- Communicates the requirements for TAA training and other activities, and the procedures associated with training, case management, job search and relocation, and administrative funds.

RECOMMENDATION

Approval of WIOA Administrative Policy 101 – Trade Adjustment Assistance and Other Activities Funding with Local Operating Procedures (LOPs).



Administrative Policy with Local Operating Procedures

**Policy Number
TAA-P-101-14**

Title:	Trade Adjustment Assistance Training and Other Activities Funding
Program:	Trade Adjustment Assistance (TAA)
Effective:	July 1, 2021

I. PURPOSE AND SCOPE

The purpose of this policy is to provide to Local Workforce Development Board 14 (LWDB 14) the requirements for Trade Adjustment Assistance (TAA) Training and Other Activities (TaOA) funding.

II. BACKGROUND

The Trade Act of 1974 established the Trade Adjustment Assistance for Workers Program, herein known as the TAA program, to assist workers who have been laid off or whose jobs have been threatened because of foreign trade or competition (trade-affected workers). The TAA program has been amended several times in the last forty years, most significantly in 2002, 2009, 2011 and 2015. The 2015 amendment, known as the Trade Adjustment Assistance Reauthorization Act of 2015 (TAARA 2015), reauthorized the TAA program and is the most current. Trade-affected workers may be covered and eligible to apply for TAA benefits and services under either the 2002, 2009, 2011 or 2015 amendments.

To be eligible for TAA benefits, a group of two or more workers must establish that they were separated from their employment either because their jobs moved outside the United States or because of an increase in directly competitive imports. To establish eligibility, a group of workers (or their representative) must file a petition with the United States Department of Labor (USDOL). Upon receipt of the petition, USDOL conducts an investigation to verify the role of foreign trade in the workers' job losses. If USDOL determines that the workers meet TAA requirements, it will issue a certification which renders the workers eligible to apply to a local career center for individual services and benefits, to include: training, employment and case management services, job search and relocation allowances, Trade Readjustment Allowance (TRA), Reemployment Trade

Trade Adjustment Assistance (RTAA), and the Health Coverage Tax Credit (HCTC).

The TAA program is funded by a federal entitlement grant. Funds are allocated to the states via the USDOL Office of Trade Adjustment Assistance's grant allocation formula that considers past and anticipated program usage. States may expend training and reemployment service funds in the year of allocation or in either of the next two fiscal years. Fund allocations to LWDB 14 are made available through a Notice of Grant Award/Funding Availability that specifies which cost object the issued funds support.

The TAA program operates through three types of grants: Training and Other Activities, Trade Readjustment Allowances, and Reemployment Trade Adjustment Assistance. This policy covers the administration of funding allocated to LWDB 14 for Training and Other Activities. The Trade Readjustment Allowances and Reemployment Trade Adjustment Assistance are funded by a separate uncapped grant administered by the Florida Department of Economic Opportunity (DEO) and are not allocated to LWDB 14. The Health Coverage Tax Credit is a federal tax credit that pays seventy-two-point five (72.5) percent of qualified health care insurance premiums for trade-affected workers and their families. This TAA program benefit is administered by the Internal Revenue Service.

III. **AUTHORITY**

[Trade Adjustment Assistance Act of 1974, as amended](#)

[Trade Adjustment Assistance Reform Act \(TAARA\) of 2002](#)

[Trade and Globalization Adjustment Assistance Act \(TGAAA\) of 2009](#)

[Trade Adjustment Assistance Extension Act \(TAAEA\) of 2011](#)

[Trade Adjustment Assistance Reauthorization Act \(TAARA\) of 2015](#)

[20 Code of Federal Regulations \(CFR\) Part 617](#)

[20 Code of Federal Regulations \(CFR\) Part 618](#)

[41 Code of Federal Regulations \(CFR\) Chapters 300-304 Federal Travel](#)

[Regulation \(FTR\) Training and Employment Guidance Letter \(TEGL\) 05-15](#)

[TEGL 15-12](#)

[TEGL 22-08](#)

[TEGL 18-20](#)

IV. POLICIES AND PROCEDURES

LWDB 14 ensures that TaOA funds are used as the first option to support allowable expenses for trade-affected workers eligible for and receiving services under TAA, including those who are co-enrolled in the Workforce Innovation and Opportunity Act Dislocated Worker program. TaOA funds allocated to LWDB 14 fall into four cost categories: Training, Case Management, Job Search and Relocation, and Administrative funds.

A. Training Funds

Training funds are primarily used to directly fund training expenditures for eligible TAA participants. TAA participants who lack the education and skills to return to suitable employment may be eligible for training. If the results of the comprehensive assessment reveal that the TAA participant requires training, and the participant is interested in training, the TAA Coordinator must provide individual counseling to determine suitable training, offer information on available training programs, and provide guidance on how to apply for such training. Eligible trade-affected workers request training services through the appropriate LWDB. The Trade Act requires that LWDB 14 must approve training for a trade-affected worker if the following six (6) program criteria are met:

- a) There is no suitable employment available for the worker;
- b) The worker would benefit from appropriate training;
- c) There is a reasonable expectation of employment following completion of such training;
- d) Training is reasonably available to the worker from either governmental agencies or private sources;
- e) The worker is assessed and qualified to undertake and complete such training; and
- f) The training is suitable for the worker (based upon the worker's capabilities, background and experience) and available at a reasonable cost.

Once approved and documented in the participant's Employ Florida TAA Program Application, training may be paid on the participant's behalf directly to the service provider or through a voucher system using TAA program funds at the local level. There is no federal or state limit on the amount of program funding that can be expended on training for a trade-affected worker so long as the cost is determined to be reasonable. Reasonable means that the costs of the training are not unreasonably high in comparison with the average cost of training of other workers in similar occupations at other providers. LWDB 14 may expend program funds on the following TAA training services (and all allowable benefits that accompany the services): classroom training, registered apprenticeship, on-the-job training, and customized training.

Examples of allowable costs accommodating training services include, but are not limited to: books, required supplies, course fees, registration fees, travel and subsistence costs for training outside the local commuting area, and other items or services deemed necessary by the training institution for the completion of training.

1. Employ Florida Reporting

The TAA Coordinator must report training expenditures for TAA participants in the State's online labor exchange and case management system, Employ Florida at the point of invoice. The point of invoice is the receipt date of the invoice. Electronically received invoices are date stamped via e-mail. Therefore, the received date and the invoice date shall be the same. Mailed invoiced should be stamped on the day of receipt. Therefore, the received date, stamped date, and invoice date shall be the same. As such, LWDB 14 must establish procedures that ensure the LWDB 14's financial team and the TAA Coordinator receive access to invoices for TAA training expenditures and report those expenditures at the same time. The TAA Coordinator reports TAA training expenditures in Employ Florida under the participant's TRA Payments subsection of the TAA program application. LWDB 14 financial team reports TAA training expenditures in the Subrecipient Enterprise Resource Application (SERA).

LWDB 14 is required to report TAA-approved training costs in Employ Florida under the participant's TRA Payments subsection of the TAA application. TAA participant data is reported quarterly to USDOL through the Participant Individual Record Layout (PIRL). The TAA program has performance measures that seek to ensure data accuracy and gauge the program's effectiveness. Quarterly, DEO receives a report card from USDOL referred to as the Trade Adjustment Assistance Data Integrity (TAADI) report. The TAADI is a standardized review of high-quality data that is essential to evaluating the program's effectiveness and monitoring service delivery. The TAADI report requires cross validation between participant data and fiscal data. This process ensures expenditure data recorded in the PIRL, as reported within Employ Florida, align with corresponding data on the state's TAA financial report, Employment and Training Administration (ETA) Form 9130.

B. Case Management Funds

States are required to use at least five (5) percent of their program allocation to provide case management and employment services to TAA participants, except for those covered under TAARA of 2002. Under TAARA of 2002, case management funds may not be used to support employment services for participants certified under this amendment. Workforce Innovation and Opportunity Act (WIOA) and/or Wagner-Peyser funds must be utilized to support employment services for TAA participants covered under TAARA of 2002.

In accordance with Section 235 of the Trade Act of 1974 P.L. 93-618, as amended¹⁵⁸ LWDB 14 offers and documents the following eight (8) employment services to trade-affected workers:

- a) Comprehensive assessments;
- b) Specialized assessments;
- c) Provision of labor market information;
- d) Individual career counseling;
- e) Development of an Individual Employment Plan;
- f) Information on training and financial aid;
- g) Information on the availability of supportive services; and
- h) Short-term pre-vocational services.

The following list of activities are also considered to be case management and are allowable uses of case management funds:

- a) Outreach related to the public education and promotion of the TAA program's eligibility, benefits, and services to potentially trade-affected employers;
- b) Conducting Rapid Response TAA informational sessions;
- c) Entering data into Employ Florida, including entering service codes and case notes;
- d) Establishing and updating training benchmarks;
- e) Developing and tracking training plans (including verifying satisfactory participation);
- f) Monitoring TAA participant files;
- g) Developing, updating, and monitoring IEPs to include removing employment barriers;
- h) Costs associated with training TAA and LWDB 14 staff on the TAA program, including activities and services available to TAA participants;
- i) Maintaining and enhancing tools and equipment (including electronic equipment) that would improve case management services;
- j) As a mandatory workforce program partner, program-related supplies, equipment, travel, postage, utilities, rental, and maintenance of office space for the TAA Coordinator;
- k) Indirect costs associated with the program; and
- l) Any other staff costs related to case management.

1. TAA Coordinators

As outlined in Training and Employment Guidance Letter (TEGL) No. 01-10, the TAA program operates in accordance with merit principles established under the Wagner-Peyser Act. Under this guidance, DEO, as the State Workforce Agency is required to use TAA funds to hire merit-staff employees to provide case management and employment services to trade-affected workers, and apply to these personnel the standards for a merit system of personnel administration in accordance with Office of Personnel Management regulations at 5 CFR Part 900, subpart F.

To ensure case management and employment services are provided by state personnel, LWDB 14 is required to designate at least one merit-staff employee under their functional supervision as the TAA Coordinator. The TAA Coordinator

is primarily funded by Wagner-Peyser to provide TAA services to trade-affected workers. The case management cost category supports direct charges for the TAA Coordinator salary and benefits.

C. Job Search and Relocation Allowances

LWDB 14 may receive funding to provide job search and relocation allowances. This funding should be used for TAA participants who have no reasonable expectation of securing suitable employment within the state-defined commuting area (see DEO memorandum, [State Definition of Trade Adjustment Assistance Commuting Area](#)).

Job search allowance is a support service that may be used to subsidize transportation and subsistence (lodging and meals) costs related to job search activities outside the state-defined commuting area. The amount payable is ninety (90) percent of the total costs for transportation and ninety (90) percent of the total costs for subsistence. Costs for transportation are determined by the prevailing amount authorized under U.S. General Services Administration's (GSA) privately-owned vehicle mileage reimbursement rates. Costs for subsistence payments are determined by the federal per diem rate as defined by GSA. Reimbursement for these expenses may not exceed \$1,250 for any worker.

Relocation allowance is a support service that may be used to subsidize the moving costs of TAA participants who have secured permanent employment outside of the state-defined commuting area. The amount payable is ninety (90) percent of the reasonable and necessary expenses of moving the participant, their family, and their household items. Relocating TAA participants may also be eligible for a lump sum equivalent to three times their weekly wage, up to a maximum of \$1,250. Under TAARA of 2002, TAAEA of 2011 and TAARA of 2015, participants can receive an allowance equal to ninety (90) percent of each of their job search and relocation expenses, up to a maximum of \$1,250 for each benefit. Under TGAAA of 2009, participants may receive up to \$1,500 for each benefit.

Job search and relocation funds shall be requested by LWDB 14 on an as-needed basis. LWDB 14 may request job search and relocation funds by emailing the request to the State Trade Program Office at TAA@deo.myflorida.com. The State Trade Coordinator will review all requests and route to the DEO Bureau of Financial Management for approval DEO's Bureau of Financial Management.

D. Administrative Funds

Administrative funding is limited to ten (10) percent of the state's total allocation. Administrative funding is used primarily to support state-level administration of the TAA program including Trade Readjustment Allowances and Reemployment Trade Adjustment Assistance. Funds for the Trade Readjustment Allowances and Reemployment Trade Adjustment Assistance are issued directly to DEO by ⁶⁰USDOL and are not issued to LWDB 14.

E. Initial Allocation Funding Methodology

At the beginning of each state program year (PY), DEO will automatically carry over the remaining allocation from the previous PY. If LWDB 14 does not have carry over funds, and a TAA petition is certified in the service area, LWDB 14 may request an initial allocation by emailing the request to the State Trade Program Office at TAA@deo.myflorida.com. The State Trade Coordinator will review requests and route to the DEO Bureau of Financial Management for approval. It is recommended that if LWDB 14 has recently certified petitions, they should submit the request to DEO after the TAA informational session with the trade-affected workers has been held. This will allow LWDB 14 to submit a request for funds that considers:

- a) The number of trade-affected workers;
- b) Estimated participant levels (based upon the workers who indicated an interest in receiving TAA services and benefits in the informational session or one-on-one meeting); and
- c) The projected cost of training.

LWDB 14 is expected to expend these funds within the period defined in the Notice of Grant Award/Fund Availability. LWDB 14 will ensure these funds are used in addition to, and not to offset, any funds LWDB 14 receives under Wagner-Peyser, WIOA or any other program.

F. Supplemental Funds

After LWDB 14 expends initial allocations for the PY, LWDB 14 may request additional TAA program funds by emailing the request to the to the State Trade Program Office at TAA@deo.myflorida.com. The State Trade Coordinator will review requests and route to the DEO Bureau of Financial Management for approval. For supplemental funding requests, it is recommended that LWDB 14's Chief Financial Officer review and approve each submission.

G. State and Local Monitoring

Services and activities provided under TAA must be monitored annually for compliance with TAA requirements by DEO. DEO will monitor the requirements outlined in this policy and local operating procedures. If necessary and the documents are not easily located in Employ Florida, then DEO shall request documents from LWDB 14 during a monitoring review. Additionally, LWDB 14 has established local monitoring policies and procedures that include, at minimum:

- a) Roles of the TAA Coordinator and LWDB 14 financial staff; and
- b) Local operating and monitoring procedures for implementation of this policy.

V. DEFINITIONS

TAA Coordinator - A merit-staff employee designated by LWDB 14 to determine TAA eligibility and to provide TAA case management and employment services with the goal of leading participants to suitable employment.

Petition - A request submitted to USDOL to certify an employer as adversely impacted by global trade or competition.

Reemployment Trade Adjustment Assistance (RTAA) - A wage subsidy for trade-affected workers 50 years of age or older who return to work paying less than their trade-impacted employment.

Subsistence - A monetary allowance to offset the costs of housing and meals when a participant must attend a training facility outside his or her normal commuting area.

Suitable Employment - Work of a substantially equal or higher skill level than the trade-affected worker’s past trade-affected employment, with wages no less than 80 percent of the trade-affected worker’s average weekly wage from the trade-affected employment.

TAA Participant - Any trade-affected worker who completes the initial TAA application and is enrolled in the TAA program by the TAA Coordinator by receiving a staff-assisted service.

Trade-Affected Worker - An individual who has been totally or partially separated from employment in a firm or subdivision of a firm that has been certified under TAA.

Trade Readjustment Allowance (TRA) - An income support payment for trade-affected workers who have exhausted Unemployment Compensation while attending TAA-approved full-time training or, if waived from training, while conducting work search.

VI. REVISION HISTORY

Date	Description
06/09/2021	Approved by CareerSource Florida Board of Directors.
06/18/2021	Issued by Florida Department of Economic Opportunity.
	Approved by the CareerSource Pinellas Board of Directors.



ACTION ITEM 19

Policy Approval - WIOA Administrative Policy 110, Local Workforce Development Area and Board Governance with Local Operating Procedures

The Florida Department of Economic Opportunity (DEO) has instituted a new process related to Local Operating Procedures (LOPs) that coincides with the release of new administrative policies. The goal of this new process is to ensure DEO is providing the oversight and support needed for Local Workforce Development Boards (LWDBs) to administer and operate workforce programs in a manner that meets federal and state requirements. The process creates a timeline for introducing new and revising current administrative policies issued by DEO.

The revised WIOA Administrative Policy 110 is presented to the LWDB following this new process. There will be more to follow.

Based on the re-issuance of WIOA Administrative Policy 110, this Administrative Policy with LOPs includes all the DEO administrative policy requirements.

Highlighted changes to align with the requirements of the Reimagining Education and Career Help (REACH) Act:

- Limits the maximum number of terms of the LWDB Chairperson to no more than two (2) terms as Chair.
- References new term limit requirements linked to Administrative Policy 091, concerning Board Composition and Certification.
- Adds a section outlining WIOA Sunshine Provision, Public Disclosure and Transparency.
- Redefines "For Cause" to include gross mismanagement and waste.

RECOMMENDATION

Approval of revised WIOA Administrative Policy 110 - Local Workforce Development Area and Board Governance with Local Operating Procedures (LOPs).



**Policy
Number
WIOA-B-110-14**

Administrative Policy with Local Operating Procedures

Title:	Local Workforce Development Area and Board Governance
Program:	Workforce Innovation and Opportunity Act
Effective:	July 1, 2021
Revised:	TBD

I. PURPOSE AND SCOPE

The purpose of this policy is to provide guidance to Chief Local Elected Official (CLEOs), Fiscal Agents, Local Workforce Development Board 14 (LWDB 14), LWDB 14 Chairperson, LWDB 14 Executive Director, LWDB 14 staff, and workforce system partners on the requirements for local workforce development area (“local area”) and LWDB 14 governance. This policy outlines key roles, responsibilities, and requirements of the entities/individuals that make up the workforce development system within the local area.

This policy also identifies and describes required agreements to ensure the local area serves as a jurisdiction for the administration of workforce development activities and expenditure of Workforce Innovation and Opportunity Act (WIOA) adult, dislocated worker, and youth funds allocated to LWDB 14 by the state.

II. BACKGROUND

WIOA envisions a workforce development system that focuses on the needs of job seekers and businesses; and anticipates and responds to the needs of local and regional economies.

WIOA requires LWDB 14 and CLEOs to design and govern the system regionally, align workforce policies and services with regional economies and support service delivery strategies tailored to those needs. The local area serves as a jurisdiction for the administration of workforce development activities which requires the CLEO to play an active role in both the strategic planning and ongoing operation of the local system. Agreements between the CLEO and the entities responsible for the local workforce development system

will address how the local area functions and how administrative tasks will be carried out within the local area.

III. AUTHORITY

[Public Law 113-128, Workforce Innovation and Opportunity Act](#), Sections 106 and 107

[20 Code of Federal Regulations 679.310](#)

[20 Code of Federal Regulations 679.320](#)

[20 Code of Federal Regulations 679.370](#)

[Sections 445.004 and 445.007, F.S.](#)

[Chapter 119, F. S.](#)

[Chapter 286, F.S.](#)

[CSF Strategic Policy 2020.02.20.A.1 – Board Governance and Leadership](#)

[CSF Strategic Policy 2018.09.26.A.1 – Ethics and Transparency Policy](#)

IV. POLICIES AND PROCEDURES

A. Roles and Responsibilities

1. Chief Local Elected Official (CLEO)

Pursuant to WIOA sec. 3(9), the CLEO is the chief elected executive officer of a unit of general local government in a local area and, in a case in which a local area includes more than one unit of general local government, the representative(s) under the agreement (interlocal, consortium, and other agreements as described in **Section IV.E.1.** of this policy) that specifies the respective roles.

The CLEOs responsibilities include:

- a) Requesting local area designation (as prescribed in [Administrative Policy 94 – Local Workforce Development Area Designation](#));
- b) Appointing members to LWDB 14;
- c) Requesting LWDB 14 certification (as prescribed in [Administrative Policy 091– Local Workforce Development Board Composition and Certification](#));
- d) In coordination with the local board, establishing by-laws;
- e) Designating a fiscal agent (if not serving as grant recipient);

- f) Remaining liable for any misuse of WIOA grant funds by the local area;
- g) In coordination with the local board and/or staff to the board, negotiating and reaching agreement on LWDB 14 performance measures with the state;
- h) Negotiating with LWDB 14 and required partners to maintain the workforce delivery system through the Memorandum of Understanding (as prescribed in [Administrative Policy 106 - Memorandums of Understanding and Infrastructure Funding Agreements](#)); and
- i) Partnering with LWDB 14 and planning region, if appropriate, to develop and submit the WIOA local plan and regional plan.

The CLEO may delegate the listed administrative functions except:

- a) Appointment of members to LWDB 14.
- b) Designation of a fiscal agent (designation of a fiscal agent does not relieve the CLEO or Governor of liability for misuse of grant funds – [20 CFR 679.420](#)).

The CLEO may remove a member of LWDB 14, the executive director of LWDB 14, or the designated person responsible for the operational and administrative function of LWDB 14 for cause.¹

2. Fiscal Agent

The fiscal agent is the entity designated by the CLEO to perform accounting and funds management on behalf of the CLEO. The duties of the fiscal agent may include but are not limited to:

- a) Receiving funds;
- b) Ensuring sustained fiscal integrity and accountability for expenditures of funds in accordance with Office of Management and Budget (OMB) circulars, WIOA, corresponding federal regulations, state law, and state policies;
- c) Responding to audit financial findings;
- d) Maintaining proper accounting records and documentation;
- e) Preparing financial reports; and,
- f) Providing technical assistance to sub-recipients regarding fiscal issues.

Although the appropriate role of the fiscal agent should be limited to accounting and funds management functions rather than policy or service delivery, there may be circumstances in which the fiscal agent may be LWDB 14, the procured one-stop operator or the workforce services provider and/or youth service provider.

¹ Section 445.007(2)(c)

At the direction of LWDB 14, the fiscal agent may have the following additional functions:

- a) Procure contracts or obtain written agreements;
- b) Conduct financial monitoring of service providers; and
- c) Ensure an independent audit is conducted of all employment and training programs.

3. Local Workforce Development Board

LWDB 14 is appointed by the CLEO in the local area in accordance with state criteria established under WIOA sec. 107(b) and certified by the Governor every two years in accordance with WIOA sec. 107(c)(2). The state's criteria for LWDB certification is found in [Administrative Policy 091 – Local Workforce Development Board Composition and Certification](#).

LWDB 14 provides strategic and operational oversight, assists in achievement of the state's strategic and operational vision and goals, and maximizes and continues to improve quality of services, customer satisfaction, and effectiveness of services provided. LWDB 14 responsibilities include, but are not limited to:

- a) Developing and submitting local and, if applicable, regional plans;
- b) Conducting workforce research and regional labor market analysis;
- c) Convening local workforce development system stakeholders to assist in the development of the local plan and identify expertise and resources to leverage support for workforce development activities;
- d) Leading efforts to engage a diverse range of employers and other entities in the region;
- e) Leading efforts to develop and implement career pathways;
- f) Leading efforts in the local area to identify and promote proven and promising strategies and initiatives for meeting the needs of employers, workers, and jobseekers;
- g) Conducting oversight of the WIOA adult, dislocated worker, and youth programs and the entire workforce delivery system, ensure the appropriate use and management of WIOA funds, and ensure the appropriate use, management, and investment of funds to maximize performance outcomes;
- h) Negotiating and reaching agreement on local performance measures with the CLEO and the state;
- i) In partnership with the CLEO, establishing bylaws and codes of conduct for LWDB 14 members, LWDB 14 CEO and staff to the LWDB 14; and;
- j) Establishing additional monitoring and reporting requirements if one entity fulfills multiple functions to ensure the entity is compliant with WIOA, final rules and regulations, OMB circulars, and the state's [167](#) conflict of interest policy.

A full list of LWDB functions can be found in WIOA sec. 107(d) and [20 CFR679.370](#).

4. Local Workforce Development Board Chairperson

The LWDB 14 chairperson is elected by the members of LWDB 14 and must be one of the business representatives on the board. The LWDB 14 chairperson shall serve a term of no more than two years and may not serve more than two terms as chair. At a minimum, the state will review the LWDB 14 chairperson's term requirements during LWDB 14's certification process as described in [Administrative Policy 091 – Local Workforce Development Board Composition and Certification](#). The Department of Economic Opportunity (DEO) will review LWDB 14's composition during its annual programmatic monitoring, which may include a review of the LWDB 14 chairperson's term(s).

The LWDB 14 chairperson's duties may include but are not limited to:

- a) Leading the board to develop a guiding vision that aligns with the state's priorities;
- b) Acting as the lead strategic convener to promote and broker effective relationships between CLEOs and economic development, education, and workforce partners in the local area;
- c) Leading an executive committee to guide the work of the board, and ensure that committees or task forces have necessary leadership and membership to perform the work of the board; and
- d) Leading the agenda setting process for the year and guide meetings to ensure both tactical and strategic work is completed in all meetings.

5. Local Workforce Development Board Executive Director

LWDB 14 may hire a qualified executive director and staff to assist in ensuring the functions of the local board are achieved. LWDB 14 must ensure the individual or entity designated as the executive director has the requisite knowledge, skills, and abilities to meet identified benchmarks and to assist in effectively and ethically carrying out the functions of LWDB 14 which may include, but is not limited to:

- a) Coordinating with the CLEOs regarding the identification and nomination of members to LWDB 14 and ensuring membership is compliant with WIOA and Florida Statutes;
- b) Organizing board meetings and ensuring meetings are held according to LWDB 14's bylaws and Florida's sunshine laws;
- c) Developing and submitting the local and regional workforce development plan;

- d) Conducting oversight of the WIOA adult, dislocated worker, youth programs and the entire one-stop delivery system, including development of policies and monitoring the administration of the programs;
- e) Negotiating and reaching agreement on local performance measures;
- f) Negotiating with CLEO and required partners for the Memorandum of Understanding (as prescribed in [Administrative Policy 106 - Memorandums of Understanding and Infrastructure Funding Agreements](#));
- g) In compliance with local board procurement policy, provide oversight of the competitive procurement process for procuring or awarding contracts for providers of youth program services, providers of workforce services (if applicable), and the one-stop operator as required in paragraph (l) of 20 CFR 679.370;
- h) Developing a budget for activities of LWDB 14; and
- i) Certifying the one-stop career centers. One-stop certification requirements may be found in [Administrative Policy 93 – One-Stop Career Center Certification Requirements](#)

B. One Entity Performing Multiple Functions

WIOA establishes clear roles and responsibilities for each entity or organization involved in the workforce delivery system. LWDB 14 should make every effort to ensure that roles and duties of workforce delivery system entities are clearly delineated. This includes efforts to designate or procure the functions of the fiscal agent, staff to LWDB 14, one-stop operator, direct provider of workforce services, and provider of youth program services.

One entity may perform multiple functions if appropriate firewalls and internal controls are in place. Local entities or organizations often function simultaneously in a variety of roles, including fiscal agent, board staff, one-stop operator, provider of career services, and provider of youth services. **See Section IV.B.3.** of this policy for agreement requirements for one entity (not LWDB 14) performing multiple functions.

See Section IV. C. 1. for requirements for LWDB 14 serving multiple functions.

C. Local Workforce Development Boards as Direct Providers of Workforce Services

Ideally, entities providing workforce services are procured through LWDB 14, which is responsible for monitoring and overseeing the contracts, as well as services performed through the contract. LWDB 14 is designed to oversee the workforce delivery system and its services. Chapter 445.007(6), F.S. allows LWDB 14 to be designated as the one-stop operator

and direct provider of services (except training services), with the agreement of the CLEO and governor based on the criteria established by the state workforce development board.

LWDB 14 seeks to provide workforce services, except training services, will follow the requirements established in [Administrative Policy 083 – Direct Provider of Workforce Services](#).

Before LWDB 14 may be designated as the one-stop operator, LWDB 14 must still follow criteria established in [Administrative Policy 097 – One-Stop Operator Procurement](#).

1. Local Workforce Development Boards Serving Multiple Functions

Should LWDB 14 serve multiple functions, it must be able to demonstrate that roles, responsibilities, and duties of each function are clearly defined and delineated in locally established processes and procedures that clearly detail:

- a) How functions are sufficiently separated;
- b) Descriptions of the steps the local area has taken to mitigate risks that could lead to impropriety;
- c) Firewalls (physical, technological, policies, etc.) created to ensure such risks are mitigated; and
- d) Oversight and monitoring procedures.

These processes and procedures must be included in the LWDB 14's WIOA Local Plan.

D. Temporary Assumption of Duties for Procured and Contracted Services

While LWDB 14 may provide workforce services and assume the role of one-stop operator, many LWDBs procure and contract with providers for these services. In certain critical circumstances, (e.g., sudden termination of contract or failed procurement), the local board may be faced with needing to temporarily assume the role(s) of one-stop operator, direct provider of workforce and/or youth program services. When this happens, LWDB 14 may request to temporarily assume the responsibilities that were being provided by a contracted vendor or services being sought when the procurement failed. Requests for boards to act as a one-stop operator and provider of workforce and/or youth program services on a time-limited basis must be approved by the CLEO and submitted to DEO. The request must include the duration for which the board will act as a one-stop operator and provider of services. DEO will make a recommendation to the state workforce development board.

1. Sudden Termination of Contract

If the circumstance arises that LWDB 14 or LWDB 14 staff need to temporarily serve in multiple roles due to sudden (unexpected) termination of a contract, a new competitive solicitation must be reissued timely. A new entity must assume the applicable role on or before the end of the temporary designation.

In the event of a sudden termination of contract, LWDB 14 must submit a formal request to serve in the capacity of the role in which the contract was terminated.

LWDB 14 will:

- a) Submit a request to serve in the role in which the contract was terminated;
- b) Provide documentation of the original contract and the termination notification, which should include the reason for termination;
- c) Provide an explanation and an organizational chart showing who will be responsible for assuming the role(s) temporarily. The explanation and organizational chart must clearly illustrate how the following will be enforced to minimize potential risks associated with the temporary designation.
 1. Separation of duties; (including but not limited to the temporary removal of duties from certain areas/individuals to allow assumption of the temporary role);
 2. Firewalls; (including but not limited to restriction from access to any information that may lead to impropriety); and
 3. Conflict of interest requirements.
- d) The length of time in which LWDB 14 seeks to temporarily serve in the role in which the contract was terminated, not to exceed one year from the date of request.

LWDB 14 will submit formal requests for temporary designation to CareerSource Florida and DEO via email at LWDBGovernance@deo.myflorida.com.

2. Failed Procurement

If the circumstance arises that LWDB 14 or LWDB 14 staff need to serve in multiple roles due to failed procurement, LWDB 14 will:

- a) Submit, in writing, the request to serve in the role sought through the failed procurement and provide the following:
 1. A copy of the competitive solicitation;
 2. Proof of the announcement medium used (e.g., newspaper, social media, website, email notification to potential bidders), including documentation showing how long the announcement was posted; and
 3. The length of time LWDB 14 seeks to temporarily serve in the role.

- b) An explanation and an organizational chart showing who will temporarily be responsible for assuming the role(s). The explanation and organizational chart will clearly illustrate how the following will be enforced to minimize potential risks associated with the temporary designation.
 1. Separation of duties; (including but not limited to the temporary removal of duties from certain areas/individuals to allow assumption of the temporary role);
 2. Firewalls; (including but not limited to restriction from access to any information that may lead to impropriety); and
 3. Conflict of interest requirements.

- c) LWDB 14 will review the previously issued competitive solicitation and identify any elements that led to the failed procurement (e.g., unrealistic compensation for requested services, duties outside the scope of the role for which services are being sought);
- d) Update and reissue the competitive solicitation (within one month of being granted temporary authority to serve in the role in which the procurement was not successful);
- e) Once an entity is selected, notify DEO of the selection upon final approval by LWDB 14; and
- f) Onboard the selected entity of the new solicitation on or before the end of the temporary designation.

The individual or entity contracted to fulfill the role of the LWDB 14 executive director **must not** be the one-stop operator or the provider of workforce and/or youth program services.

Formal requests for temporary designation will be sent to CareerSourceFlorida and DEO via email at LWDBGovernance@deo.myflorida.com.

3. Local Workforce Development Area Multi-Function Agreement

For circumstances in which an entity or organization, other than the local workforce development board, has been selected or otherwise designated to perform more than one function, the required contract or written agreement must include a clause to clarify how the entity will carry out its responsibilities while demonstrating compliance with WIOA and corresponding regulations, relevant OMB circulars, and the state's conflict of interest policy. The written clause in the contract or agreement must include, at a minimum, the following requirements:

- a) Definition of roles and responsibilities/duties per function (e.g., fiscal agent, one-stop operator, and/or procured provider of workforce or youth program services);
- b) Description of the separation of staff duties under each role, including deliverables for each separate function;
- c) Description of how budget authority is separated, including separate line-item budgets for each function; and
- d) Description of how staff duties will be completed while demonstrating compliance with WIOA and corresponding regulations, OMB circulars, and the state's conflict of interest policy, including how conflict of interest will be minimized;
- e) Description of the roles and responsibilities within the organization, including an organizational chart, and sustainability if a function is removed; and
- f) Description of how fiscal monitoring will occur if the fiscal agent is performing multiple functions.

The written clauses in the agreement are intended to limit conflicts of interest or the appearance of conflicts of interest, minimize fiscal risk, and develop appropriate firewalls within a single entity performing multiple functions.

E. Governance Agreements

Implementation of a local workforce development system pursuant to WIOA requires that the CLEOs play an active role in both strategic planning and ongoing operation of the local system. When a local area includes more than one unit of general local government, the chief elected officials of such units may execute a written agreement that specifies the respective roles and liability of the individual chief elected officials. Chief local elected officials are liable in their official capacity but not personally liable for the misuse of WIOA funds.

1. Interlocal, Consortium and Other Agreements

The purpose of having interlocal, consortium or other governing agreements is to ensure the decisions that are delegated to CLEO(s), or a consortium, reflect the agreement of all the chief elected officials in all jurisdictions of a local area and consistent with requirements established in s 163.01, F.S. These agreements are between the chief elected officials of each jurisdiction within the local area and must contain signatures of the representative(s) authorized to enter into such agreements.

The interlocal or consortium agreement will clearly state the level of agreement to be reached amongst the governmental entities involved and identify the roles and responsibilities of the CLEOs within the local area. At a minimum, applicable agreements will address:

- a) **Identification of local workforce development area** - The agreement will clearly identify the units of local government which are covered by the agreement and which make up the local area.
- b) **Designation and responsibilities of the CLEO** - The parties to the interlocal agreement should identify the county commissioners and/or mayors to serve as the CLEO(s) of the local area for the purposes of approving local and, if appropriate, regional plans; establishing policy; authorizing WIOA expenditures; establishing contracts; paying for services outside of the local area; or paying costs associated with monitoring or audit findings or sanctions.

Areas where a consortium is serving in the capacity to perform the duties and functions of the CLEO will describe the duties/responsibilities of the consortium, members that make up the consortium, and the authority of its members in an agreement signed by the applicable elected officials or their authorized designee.

- c) **Establishment, appointment, and operation of the LWDB** - The agreement should include an agreed upon process for establishing and appointing LWDB 14 members, including:
 - 1. Membership of LWDB 14 that is consistent with WIOA and state guidance; and
 - 2. How the needs of all geographical areas in all jurisdictions will be represented within the local area.
- d) **Designation and responsibilities of the fiscal agent** - The fiscal agent is the entity designated to perform accounting and funds management on behalf of the CLEO. The agreement will identify the entity performing these duties.

- e) **Process for CLEOs to provide input** - The agreement will include a process for all CLEOs to provide input for the purposes of reaching a consensus on critical decisions that may impact the local workforce development system.
- f) **Liability** - Under WIOA, CLEOs are liable for misspent funds, disallowed costs, funds spent fraudulently, and potential sanctions for nonperformance. Therefore, it is recommended that CLEOs within a local area agree on how liability will be addressed. The following questions can be used to guide such discussions:
1. How will sanctions related to performance be shared among the jurisdictions within the local area?
 2. How will the issue of disallowed costs or misspent funds that cannot be covered by federal grant funds be addressed?
- g) **Performance Accountability** - Generally, performance accountability is addressed in the WIOA local plan. However, CLEOs should agree on an approach to performance accountability. The following questions may be used to guide such discussions:
1. Who will be responsible for negotiating local performance measures with the state (the Executive Director / staff to the board, local board)?
 2. Will the local area have any performance criteria in addition to federal and state criteria? How will performance be administratively tracked locally?
 3. Will performance-related incentives be shared among the jurisdictions within the local area?
- h) **Dispute Resolution Process** - The governing agreement should include provisions for resolving disputes. Below are possible issues to address in the agreement relative to dispute resolution:
1. What types of disputes arise to the level of needing a dispute resolution process?
 2. What type of dispute resolution process should be used (mediation, arbitration, consultation with state, etc.)?
- i) **Other Agreement Provisions (Miscellaneous)**
1. Duration of the agreement; and
 2. Process for modification or termination of agreement.

2. By-laws

By-laws are the provisions by which the local area is governed and

LWDB 14 and its operations are managed. They provide consistency and clarification on the roles and responsibilities of the various representatives governing the local workforce development system. LWDB 14 ensures that its bylaws are up-to-date and in alignment with requirements of WIOA and state policy. At a minimum, the following are reflected in the local area's bylaws.

- a) **Purpose and Responsibilities (Functions)** – Describes the purpose of LWDB 14 (e.g., to set policy and establish oversight of the workforce development system). Describe the functions or the responsibilities of LWDB 14 (e.g., the local board has the responsibility to provide strategic and operational oversight, assists in achievement of the State's strategic and operational vision and goals, and maximizes and continues to improve quality of services, customer satisfaction, and effectiveness of services provided). A list of the board's responsibilities can be found in **Section IV.A.3.** of this policy.
- b) **Membership** – Includes the processes and procedures for the following:
 1. Recruiting, nominating, vetting and appointing board members;
 2. Filling LWDB 14 member vacancies; and
 3. Resignation, reasons for disqualification, removal, and reappointment of board members.

Board membership and composition requirements can be found in [Administrative Policy 091 - Local Workforce Development Board Composition and Certification](#).

- c) **Authority of LWBD** – Includes the power and authorities of LWDB 14, including authority to recommend, select, and hire an Executive Director to perform operational and administrative functions of the board.
- d) **Duties and Terms of the Members** – Describes the duties and term limits of the board members. Board member term limit requirements can be found in [Administrative Policy 091 – Local Workforce Development Board Composition and Certification](#).
- e) **Officers** – Describes the authority of its officers, including terms of office, and board officer duties.
- f) **Committees** – Describes the types of committees (e.g., executive committee, finance committee, nominating committee, etc.) as well as their authorities, responsibilities, terms of committee members and chairpersons who have the authority to appoint committee members, and who may sit on the committee.

LWDB 14 prohibits any LWDB 14 staff from serving as members of a committee or subcommittee.

- g) **Meetings and Minutes**– Describes frequency of meetings and describes how regular board and committee meetings are planned and conducted. LWDB 14 also describes the process and requirements for calling special and emergency meetings, what constitutes an emergency meeting or special meeting, and who is authorized to call such meetings. This includes but is not limited to the requirement to provide the schedule to the board members and the public.
1. **Record Keeping** – LWDB 14 describes how meeting minutes will be scribed/recorded, retain records of board members who are present/absent, and record official acts of the board including the number of votes of members (yeas, nays, and abstentions). Meeting minutes are made available publicly on LWDB 14's website.
 2. **Voting, Board Actions, and Conflict of Interest** – Includes voting and quorum requirements, records official acts of the board including the number of votes of members (yeas, nays, and abstentions). Abstentions due to conflict of interest must be recorded, include the name of the abstaining member, and the reason for abstention.

Strategic Policy [2012.05.24.A.2 - State and Local Workforce Development Board Contracting Conflict of Interest Policy](#) provides guidelines for approving contracts in which a conflict of interest may exist.

LWDB 14 adheres to requirements in the Grantee-Subgrantee Agreement for board member conflicts of interest disclosures and applicable requirements. This includes but is not limited to the requirement to adopt and abide by a conflict of interest policy that ensures compliance with state and federal law, regulations and policies.

While it is preferable that the elements outlined in **Section IV. E.** of this policy be contained in comprehensive documents as described, it is acceptable that the items identified in this section be contained in separate agreements (memoranda of understanding, governing policies and procedures, etc.), as long as the requirements of this section are clearly met.

F. WIOA Sunshine Provision, Public Disclosures and Transparency

The WIOA “sunshine provision” requires LWDB 14 to conduct business in an open manner and make available, on a regular basis through electronic means and open meetings, information about the activities of LWDB 14. 177

In addition to the sunshine provision under WIOA, LWDBs 14 complies and adheres to the transparency and public disclosure requirements in 445.007, F.S., as well as requirements detailed in the Grantee-Subgrantee Agreement. In accordance with federal and state requirements, the following items will be posted to LWDB 14's website:

- a) Local Plans – information about the local plan or modification of the local plan before submission.
- b) Board Members – list of current board members, company, entity that the board member is employed by or owns, and their terms of service.
- c) Selection of One-Stop Operators
- d) Minutes of formal meetings
- e) By-laws
- f) All of the requirements found in the Board Governance, Responsibilities and Transparency section of the [Grantee-Subgrantee Agreement](#)
- g) All public disclosure requirements found in 445.007, F.S., which include:
 1. Compensation disclosures - the amount and nature of compensation paid to all executives, officers, directors, trustees, key employees, and the highest compensated employees as defined for purposes of the Internal Revenue Service (IRS) Form 990 (Return of Organization Exempt from Income Tax). Compensation includes but is not limited to salary, bonuses, present value of vested benefits, including but not limited to, retirement, accrued leave and paid time off, cashed-in leave, cash equivalents, severance pay, pension plan accruals and contributions, deferred compensation, real property gifts, and any other liability owed to such persons.

LWDB 14 will, within 30 days after the end of the fiscal year, provide compensation disclosures to DEO using Exhibit E - Total Compensation for Executive Leadership form found in the Grantee-Subgrantee Agreement.

2. Written declaration from the Chief Financial Officer (CFO) – The CFO or his or her designee must provide a written declaration that he or she has read the compensation disclosure documents and that the facts stated in it are true. The written declaration must accompany the applicable document(s).
3. LWDB 14's IRS Form 990 – Annually, LWDB 14 publishes its most recent IRS form 990 within 60 calendar days after it is filed with the IRS and remain posted for three years after it is filed.¹⁷⁸

4. Statements of Financial Interest – LWDB 14’s website informs the public that disclosures or statements of financial interest (consistent with requirements in s.112.3144 or s.112.3145, whichever is appropriate) for each LWDB 14 member and executive director or designated person responsible for the operational and administrative functions of LWDB 14, have been filed with the Commission on Ethics and provide information on how each disclosure or statement may be reviewed. The notice to the public must remain on the website throughout the term of office or employment of the filer and until one year after the term on LWDB 14 or employment ends.
5. Contracts – All contracts between a local board and a member of the local board, relative of a local board member, an organization or individual represented on the local board, or an employee of the local board approved on or after July 1, 2021, must be published on LWDB 14’s website within 10 days after approval by the local board or the department, whichever is later. Such contracts must remain on the website for at least one year after termination of the contract.

LWDB 14 members and staff will maintain integrity, accountability and transparency in decisions and actions that earn and protect the public trust in compliance with Strategic Policy 2018.09.26.A.1 - Ethics and Transparency Policy. This includes taking all necessary steps to avoid the appearance of conflicts of interest.

LWDB 14 is subject to open government and confidentiality requirements in Chapters 119 and 286, Florida Statutes (F.S).²

G. New Board Member Orientation and Annual Training

Members appointed to LWDB 14 are required to participate in orientation and annual training to ensure they understand the purpose of their participation on LWDB 14. The purpose of orientation and training is to provide LWDB 14 members with information that empowers them to effectively serve as a board member. LWDB 14 takes all reasonable steps necessary to encourage attendance by the CLEO at board member orientation and training.

² LWDB 14 is subject to Chapters 119 and 286, F.S. LWDB 14 is responsible for responding to public records requests and subpoenas. LWDB 14 is responsible for ensuring that its staff and agents have a working knowledge of Chapter 119, F.S. LWDB 14 agrees to appoint a public records coordinator for the purpose of ensuring that all public records matters are handled appropriately.

1. New LWDB Member Orientation

All new board members, within six months of appointment, complete a new board member orientation. The board has developed board member orientation for board members, which will cover at a minimum:

- a) Overview of WIOA;
- b) Overview of the workforce development system and structure;
- c) The state's workforce development system goals and strategies;
- d) The purpose of LWDB 14;
- e) LWDB 14 composition, including required members and areas of representation;
- f) Roles and responsibilities of the CLEO, fiscal agent, LWDB 14, LWDB 14 chairperson, and LWDB 14 executive director and staff;
- g) Required partners and programs;
- h) How the workforce system is funded;
- i) Performance requirements;
- j) Sunshine law requirements; and
- k) Conflict of interest policy and disclosure of potential conflicts of interest.

2. Annual Training Requirements

Board members will complete an annual refresher training to remind them of the purpose of their appointment as a member to LWDB 14. The annual training includes at a minimum:

- a) The state's workforce development goals and strategies;
- b) The purpose of LWDB 14;
- c) Roles and responsibilities of the CLEO, fiscal agent, LWDB 14, LWDB 14 chairperson, and LWDB 14 executive director and staff;
- d) How the workforce system is funded;
- e) Performance requirements;
- f) Sunshine law requirements; and
- g) Conflict of interest policy.

New member orientation and refresher training may be offered in-person and/or virtually at the local area's discretion. LWDB 14 retains and provides to DEO, upon request, attendance records of participants and the dates of completion. New board members completing the board member orientation are not required to complete the annual refresher training in the same year they become a new member.

H. State and Local Monitoring

At the local level, LWDB 14 conducts oversight of the procurement process and resulting contracts and agreements to ensure all aspects of written agreements and contracts are compliant with federal and state laws and

regulations. Additionally, LWDB 14 ensures that governing agreements are upheld. In instances where LWDB 14 is also the one-stop operator, LWDB 14 follows the monitoring requirements outlined in [Administrative Policy 97 – One-Stop Operator Procurement](#). LWDB 14 monitors compliance with this policy.

DEO will perform programmatic and fiscal monitoring and will review the local area's agreements and contracts during the annual monitoring review for compliance with federal and state laws and regulations. Findings and other noncompliance issues will be handled through the state's monitoring resolution process.

V. DEFINITIONS

1. **Board Chairperson** is a business representative among the board members who is elected by the board.
2. **Chief Local Elected Official (CLEO) (CEO in WIOA sec. 3(9))**
 - a) A chief elected executive officer of a unit of general local government in a local area; and
 - b) In a case in which a local area includes more than one unit of general local government, the individuals designated under the agreement described in Section 107(c)(1)(B).
3. **Executive Director** is an individual hired or designated by LWDB 14 to perform the operational and administrative functions of the board.
4. **Fiscal Agent** is the entity designated to perform accounting and funds management on behalf of the CLEO.
5. **For cause** includes but is not limited to, engaging in fraud or other criminal acts, incapacity, unfitness, neglect of duty, official incompetence or irresponsibility, misfeasance, malfeasance, nonfeasance, gross mismanagement, waste, or lack of performance.
6. **Governance Agreements (i.e., Interlocal, Consortium, and other governing agreements)** are written agreements designed to ensure that decisions to CLEO(s), or a consortium, reflect the agreement of all the chief elected officials in all jurisdictions of a local area. Including, how the local board is governed, roles and responsibilities of members, liabilities, etc.
7. **Local Workforce Development Area (LWDA)** is a geographical area that serves as the jurisdiction for the administration of workforce development activities and has been granted such designation by meeting criteria as prescribed in [Administrative Policy 94 – Local Workforce Development Designation](#).

8. **Local Workforce Development Board (LWDB) 14** is a board established under WIOA sec. 107, to set policy for the local workforce development system.

VI. REVISION HISTORY

Date	Description
	Revised and approved by CareerSource Pinellas Board of Directors.
07/14/2021	Approved by the CareerSource Pinellas Board of Directors.
07/01/2021	Revised and issued by the Florida Department of Economic Opportunity to incorporate the requirements of the Reimagining Education and Career Help Act of 2021 (House Bill 1507).
03/04/2021	Issued by the Florida Department of Economic Opportunity.
02/18/2021	Approved by CareerSource Florida Board of Directors.

VII. RESOURCES

[WIOA Fact Sheet: Governance and Leadership](#)



ACTION ITEM 20

Policy Approval - WIOA Administrative Policy 113, Disaster Recovery Dislocated Worker Grants with Local Operating Procedures

The Florida Department of Economic Opportunity (DEO) has instituted a new process related to Local Operating Procedures (LOPs) that coincides with the release of new administrative policies. The goal of this new process is to ensure DEO is providing the oversight and support needed for Local Workforce Development Boards (LWDBs) to administer and operate workforce programs in a manner that meets federal and state requirements. The process creates a timeline for introducing new and revising current administrative policies issued by DEO.

The Workforce Innovation and Opportunity Act (WIOA) Administrative Policy 113 is presented to the LWDB following this new process. There will be more to follow.

Based on the release of WIOA Administrative Policy 113, this Administrative Policy with LOPs includes all the DEO administrative policy requirements.

Highlights:

- Provides guidance to LWDBs, LWDB executive directors and management, LWDB and One-Stop staff, and other workforce system partners on the requirements for the administration of Disaster Recovery Dislocated Worker Grants.
- Outlines requirements for funding and eligibility, activities and services, performance and outcomes, worksite coordination, and monitoring.

RECOMMENDATION

Approval of WIOA Administrative Policy 113 – Disaster Recovery Dislocated Worker Grants with Local Operating Procedures (LOPs).



Administrative Policy with Local Operating Procedures

Policy Number
WIOA-P-113-14

Title:	Disaster Recovery Dislocated Worker Grants
Program:	Workforce Innovation and Opportunity Act
Effective:	July 1, 2021

I. PURPOSE AND SCOPE

The purpose of this policy is to provide Local Workforce Development Board 14 (LWDB 14) with the minimum requirements for administering Disaster Recovery Dislocated Worker Grants (DWGs).

II. BACKGROUND

Disaster Recovery DWGs, authorized by the Workforce Innovation and Opportunity Act (WIOA), temporarily expand the service capacity of training and employment programs to respond to large, unexpected economic events which cause significant job losses. DWGs provide funding and resources to states and local areas to quickly reemploy laid-off workers by offering training and career services to help laid-off workers regain employment.

Disaster Recovery DWGs may be issued to the state after a federal agency¹ makes a major emergency or natural disaster declaration. These grants can be used to provide disaster- recovery assistance to areas included in the declaration. Such assistance may include temporary disaster-relief jobs in addition to training and career services.

III. AUTHORITIES

- [Public Law \(WIOA\) Sections 3\(15\); 170\(a\) and \(d\); 134; 181; 184; 185; 188; 189.](#)
- [20 Code of Federal Regulations \(CFR\) 687](#)
- [Training and Employment Guidance Letter \(TEGL\) 12-19, Change 1](#)
- [TEGL 19-16](#)

¹ Typically, the Federal Emergency Management Agency (FEMA) issues the declarations.

IV. POLICIES AND PROCEDURES

Disaster Recovery DWGs are meant to address situations beyond those that are the focus of WIOA formula funds. Disaster Recovery DWGs enable areas impacted by a disaster to employ workers in jobs assisting in recovery and humanitarian efforts, as well as to provide training opportunities that support customers in accessing employment.

When an emergency or disaster has met the criteria for disaster grant funding, the Florida Department of Economic Opportunity (DEO) will coordinate with the impacted local area(s) to assess the need for clean-up and humanitarian efforts, ascertain the availability of eligible individuals to perform the disaster relief work, and provide technical assistance on the application process and operational considerations.

If a need for disaster grant funding is identified, DEO will work with impacted local areas interested in participating to submit either:

- a) An emergency application within 15 days of the disaster declaration using an abbreviated format to facilitate rapid implementation of services (followed by a full application within 60 calendar days of award notification if funding is approved); or
- b) A full application within 60 calendar days of the disaster declaration which must include a narrative describing the project and services, a list of worksites in each county, job titles for the temporary positions being created, and line-item budget for each participating county.

A. Funding of Disaster Recovery DWGs

The United States Department of Labor (DOL) issues its funding decision within 45 calendar days of receipt of a valid application. If the application is approved, DEO will notify LWDB 14 of their sub-grant award amounts, if identified as participating.

DEO distributes funds to LWDB 14 if the area has been affected by a federal disaster/major emergency declaration, based on identified needs and availability of funds. DEO is responsible for ensuring that funds are expended in compliance with grant requirements and for de-obligating and re-obligating funds to meet ongoing needs.

Funds are released to LWDB 14 through Notices of Grant Award/Fund Availability (NFAs) which describe special grant conditions. An NFA may include grant conditions that restrict the application of some of the provisions of this Policy. Disaster grants are issued incrementally. A maximum funding level will be approved, but a lesser amount will be initially disbursed. Requests for additional funds must be submitted when needed and must be supported by enrollments, completion of work goals, and expenditures.

As participating local areas require additional funding to continue operating, DEO may temporarily or permanently reduce another area's maximum funding level or allocation amount to optimize utilization of the grant resources statewide.

B. Participant Eligibility

LWDB 14 ensures that individuals receiving services funded by a Disaster Recovery DWG meet at least one of the following eligibility requirements:

- a) Temporarily or permanently laid off because of the disaster;
- b) A dislocated worker as defined in WIOA section 3(15);
- c) A long-term unemployed individual; or
- d) A self-employed individual who became unemployed or significantly underemployed as a result of the disaster.

Note: A long-term unemployed individual for Disaster Recovery DWGs is defined as an individual who has been unemployed for six (6) out of the last 13 weeks. An individual is considered unemployed if they were not employed during the weeks in question and were available for work.

LWDB 14 documents eligibility² in the participant's Employ Florida program application, including, but not limited to the participant's:

- a) Citizenship or right to work³;
- b) Compliance with the Selective Service Act; and
- c) One of the four grant-specific eligibility requirements listed above.

Examples of documentation demonstrating dislocated worker status include:

- a) Letter of separation from employer
- b) Verification of Reemployment Assistance (RA) or other forms of unemployment assistance
- c) Paystubs or other payroll records showing the last day of employment
- d) Self-Attestation may be accepted as an exception and must not be used as a regular method of determining eligibility. When self-attestation is accepted due to its being the only verification method, LWDB 14 will describe efforts made to obtain other, independent documentation.

Circumstances surrounding the disaster may make documentation of eligibility difficult to obtain during the initial stages, however, LWDB 14 is required to obtain complete eligibility verification within six (6) months of the participant's enrollment or the grant closeout date, whichever occurs first. LWDB 14 will maintain a written local policy which describes the circumstances under which self-attestation will be accepted in lieu of full documentation of eligibility. The policy must also describe when and how LWDB 14 will review the files of participants whose eligibility is based on self-attestation.

² [TEGL 23-19](#) provides guidance on data validation to ensure the accuracy of annual reports, safeguard data [186](#) integrity, and promote the timely resolution of data anomalies and inaccuracies.

³ A copy of the completed I-9 must be maintained in the file of a participant placed into a temporary disaster-relief position.

The timeframe for such review may be based on the situations following a disaster but must not exceed six (6) months or extend beyond the grant closeout date.

If, during the reverification review of participants enrolled through self-attestation LWDB 14 discovers that it served an ineligible participant, the participant must be terminated from the program and a case note must be recorded in Employ Florida comprising the review process and subsequent determination of ineligibility. This situation will not result in a disallowed cost.

Self-employed individuals must submit documentation to establish their self-employment prior to the disaster and unemployment/underemployment due to the declared disaster through the following:

- a) Self-Attestation describing the impact of the disaster, supported by one of more of the following:
 - i. Federal tax return and/or evidence of payment of estimated taxes to the Internal Revenue Service (IRS)
 - ii. Evidence of business closure
 - iii. Business ledger
 - iv. Business license
 - v. Customer/client verification

- b) Self-attestation may be accepted as an exception if other documents are not available (and are subject to re-verification). When self-attestation is accepted due to its being the only verification method, LWDB 14 will describe efforts made to obtain other, independent documentation.

To verify that an individual was unemployed six (6) out of the last 13 weeks, the following documentation may be used:

- a) Self-attestation supported by wage records for the quarter in which the WIOA application is taken (and previous quarter if relevant)⁴.
- b) Self-attestation may be accepted as an exception if other documents are not available (and are subject to re-verification). When self-attestation is accepted due to its being the only verification method, LWDB 14 will describe efforts made to obtain other, independent documentation.

Note: If wage records indicate that there may be a discrepancy between the self-attestation and the reported earnings, LWDB 14 will follow up to resolve the discrepancy.

⁴ Probative wage records will not be available at the time of application and must be verified the following quarter(s).

C. Veteran and Eligible Spouse Priority of Service

Covered persons (veterans and eligible spouses) determined eligible for services under a Disaster Recovery DWG must receive priority over non-covered persons in accordance with Administrative Policy 111: Priority of Service for Veterans and Eligible Spouses.

D. Disaster Recovery DWG Allowable Activities

In most cases, Disaster Recovery DWG projects must include a temporary disaster relief employment component⁵. Participants may be enrolled into temporary disaster relief employment, as well as career and training services, concurrently, sequentially, or as stand-alone services. However, certain Disaster Recovery DWGs may limit the availability of certain activities as specified within the accompanying NFA.

Prioritization of types of services must be determined in coordination with local emergency planning and recovery agencies.

1. Temporary disaster relief jobs

Disaster-relief employment is temporary employment of eligible individuals for the purposes described in WIOA Section 170(b)(1)(B) and (d), 20 CFR 687.180(b) and (c), and TEGL 12-19. LWDB 14 will demonstrate that disaster-relief employment created under a Disaster Recovery DWG aligns with the categories of humanitarian assistance or cleanup activities. Post-disaster response and recovery activities address needs associated with mass care/sheltering, public health and health care, (re)housing, debris/infrastructure removal and repair, support to business owners, emotional/psychological support, public health and health care, and mitigation⁶ activities.

Humanitarian assistance provided by temporary disaster-relief workers generally includes actions designed to alleviate suffering and maintain human dignity in the immediate aftermath⁷ of disasters. The humanitarian assistance provided by disaster-relief workers must relate directly to needs created by the disaster and economic consequences due to the disaster. Disaster-relief positions that deliver humanitarian assistance to address humanitarian needs cannot be used to fund the actual humanitarian aid. For example, funding could be used to support food delivery workers at food shelters but not the food itself.

⁵ Note that Disaster Recovery DWGs due to the relocation of evacuees from a disaster-affected area do not require a temporary disaster-relief employment component.

⁶ Allowable mitigation activities are those that are directed at correcting existing damage. Activities that are in preparation for future disasters are not allowed.

⁷ The immediate aftermath involves time and causality. With every declared disaster, there will be physical damage which results in the dislocation of individuals, families, and businesses, as well as economic and emotional damage. Temporary disaster-relief workers may be provided to help deal with these crises since they are the immediate consequence of the disaster for the time necessary to help affected individuals recover.

Eligible participants may be enrolled into temporary disaster-relief jobs under a Disaster Recovery DWG for up to 12 months or 2,080 hours, unless DOL approves an extension for up to an additional 12 months through a grant modification.

Participants must be paid the higher of the comparable rate of pay for individuals employed in similar occupations by the same employer, and no less than the federal or state minimum wage. In accordance with WIOA Section 181(a)(1)(A), generally, participants must be compensated at the same rates, including periodic increases, as employees who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills.

Where applicable, fringe benefits should be paid in accordance with the policies of the worksite employer. If other employees of the worksite employer are doing similar work and receiving hazard pay, disaster-relief temporary workers can also be paid hazard pay rates for their work⁸.

2. Training and career services

Training and career services, as described in local policies and procedures, may be offered to eligible participants to help them obtain (re)employment that leads to self-sufficiency when they are unlikely to return to their prior employment. These services may include, for example, job search/job readiness activities, literacy instruction including English as a second language, occupational skills training and/or work-based training for career pathways that lead to high-demand jobs in high-growth industries.

Participants must meet eligibility requirements and/or prerequisites detailed in WIOA section 134(c)(2) and (3), 20 CFR 680 and other DOL guidance for accessing specific services. An Individual Employability Plan must detail the need for training services as well as certain individualized career services, such as work experiences, literacy/GED prep/ESOL, short-term prevocational services, out-of-area job searches/relocation.

3. Supportive services

Supportive services are allowable to enable a participant's involvement in grant activities. Supportive services for a Disaster Recovery DWG must align with the LWDB 14's supportive service policy and be consistent with WIOA and state requirements⁹. Transportation, childcare, and dependent care are examples of allowable supportive services, as are tools, protective clothing, etc.

In order to be ready to respond to natural disasters/major emergencies, LWDB 14 includes in their local policies and procedures supportive services that may be unique to potential disaster/emergency situations. For example, there may be a need for insect repellent for individuals conducting cleanup of damaged public property—a supportive services that LWDB 14 might not provide under

⁸ Overtime is allowable.

⁹ See 20 CFR 680.900, *et seq.*, and CareerSource Florida [Administrative Policy AP-109, Supportive Services and Needs Related Payments](#).

normal circumstances¹⁰. Additionally, LWDB 14 describes in their policies and procedures how they will deal with extraordinary circumstances that may arise due to a declared disaster.¹¹

Needs-Related Payments (NRP) may be made to those individuals enrolled in training services who do not qualify for or have exhausted benefits under RA or Disaster Unemployment Assistance (DUA). WIOA section 134(d)(3)(B) limits the availability of NRP for dislocated workers as follows: “a dislocated worker who has ceased to qualify for unemployment compensation may be eligible to receive needs-related payments under this paragraph only if such worker was enrolled in training services— (i) by the end of the 13th week after the most recent layoff that resulted in a determination of the worker’s eligibility for employment and training activities for dislocated workers under this subtitle; or (ii) if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months.” LWDB 14 addresses how they may facilitate providing NRPs to dislocated workers who need training to become re-employed.

Note: Individuals who receive wages from disaster-relief temporary jobs are not eligible for NRPs.

4. Program outputs and performance outcomes

With the issuance of TEGL 12-19, Change 1, DOL is requiring states to describe measurable goals with milestones and timelines when DEO submits full applications¹² and modification requests¹³.

LWDB 14 provides measurable goals with milestones and timelines in the following areas:

- a) Planned number of participants to be served in temporary disaster-relief employment
- b) Planned worksite employers with description of worksites, tasks, length of time needed, and number of workers needed¹⁴ (and, for modifications, percentage of work completed)

¹⁰ The COVID-19 pandemic saw a need for personal protective equipment, as well as electronic tablets and access to the Internet for remote temporary disaster-relief positions.

¹¹ In response to the COVID-19 pandemic, DOL informed DWG grantees that it might permit exceptions to allow grantees to pay relocation and lodging costs for medical personnel as described in the [COVID-19 DOL Frequently Asked Questions](#) (FAQs), even if such costs are typically not covered by state or local policy. A request for this limited exception must be included in an application for a COVID-19 DWG or in a grantee’s modification request. It must include enough justification and be approved by the Grant Officer before a grantee begins paying relocation and lodging expenses as described in the COVID-19 DOL FAQs. Note that the relocated workers must meet the eligibility requirements described above.

¹² A full application is due within 60 to 90 days from the Disaster Declaration date.

¹³ Modification requests are submitted to request additional funds or to make substantive changes.

¹⁴ For example, City of XX Parks & Recreation, debris cleanup for 12 city parks, anticipated time frame 12 months, number of workers: 12 laborers and two supervisors.

- c) Planned number of participants to be enrolled in training, including on-the-job training, targeted industries and occupations, anticipated length of training
- d) Planned number of participants to be enrolled in work experiences, types of work experience sites, anticipated length of activity
- e) Planned number of participants to receive supportive services, types of supportive services
- f) Planned number of participants to be placed in employment upon completion of grant activities
- g) Planned other outcomes, such as continuation in training/other WIOA services after the grant ends, credential attainment

LWDB 14 will provide information to DEO to describe their planned levels of service and planned expenditures. Progress is tracked monthly through a review of participant data in Employ Florida and financial information entered in DEO's financial management systems. LWDB 14 will also use provided planned worksite information and submit monthly updates to DEO. Such information is to be submitted via the DWG@deo.myflorida.com mailbox.

For participants who only receive disaster relief employment, the same performance data collection requirements apply as for other DWG participants. However, participants who receive only disaster relief employment are not included in the primary indicators of performance unless they receive other allowable career and training services provided through the grant or through co-enrollment in another WIOA core or partner program that shares a common exit with DWG in the state's common exit policy.

However, performance outcomes are measured for individuals enrolled in training and/or career services through the grant or through co-enrollment in another WIOA or partner program that shares a common exit. Consequently, LWDB 14 is responsible for performance outcomes for any Disaster Recovery DWG-funded participant who receives career or training services through workforce-funded activities.

LWDB 14 is responsible for the placement of Disaster Recovery DWG participants into suitable, unsubsidized employment and must conduct quarterly follow-up through the 4th quarter after exit to document post-exit outcomes in the participant's Employ Florida WIOA Program Application.

E. Disaster-Relief Worksites

Disaster-relief worksites must be in the geographic area covered by the qualifying event and within LWDB 14's jurisdiction. WIOA requires that cleanup activities respond to the impacts of the disaster. LWDB 14 will give the highest priority to clean-up of the disaster area's most severely damaged public facilities and to the cleanup and the provision of humanitarian assistance to economically disadvantaged portions of the disaster area. The administration of grant funds must be in coordination with projects administered by emergency management and disaster recovery agencies.

Note: The provision of disaster-relief activities that focus on prevention and planning for future disasters is not an allowable activity for a temporary disaster-relief worker.

1. There is no limitation on what type of entity may be a worksite employer¹⁵.

Typically, disaster-recovery worksites are governmental agencies and community/faith-based organizations (CBO). Private, for-profit worksites may also be approved to host eligible temporary disaster-relief workers under the following conditions:

- a) LWDB 14's policies and procedures establish a priority of disaster-relief activities in coordination with the county's disaster-recovery team¹⁶ that identifies the need for and use of private for-profit worksites, as applicable;
- b) The delivery of temporary disaster-relief activities through a private for-profit worksite is coordinated through a governmental entity or CBO; and
- c) The funding of temporary disaster-relief positions shall not duplicate or supplant other funding.

2. Work on private properties is authorized under the following circumstances:

- a) The specific work on private properties has been approved by DOL;
- b) The work is necessary to remove health and safety hazards to the larger community located on private lands or around homes or other structures and only to return them to a safe and habitable level and not to improve them¹⁷;
- c) The work is intended to address or alleviate specific economic or employment-related impacts of the disaster, such as clean-up work needed for disaster-affected employers to resume operations¹⁸;
- d) Priority is to be given to older individuals and individuals with disabilities; and
- e) Funds may not be used to cover the cost of materials to do repairs.

LWDB 14 will establish policies and procedures to implement disaster-recovery work on private properties that include the following provisions:

- a) How work on private properties falls within LWDB 14's priority of disaster-relief activities;
- b) How LWDB 14 ensures that priority is given to the homes of older individuals, individuals with disabilities. A second priority is for the homes of low-income individuals;

¹⁵ Under previous guidance, only governmental and nonprofit entities were allowable worksites.

¹⁶ In some communities, groups are sanctioned by the County Emergency Operations Center, and any number or type of non-profits could be the county's proxy for disaster relief activities. (This may include the Red Cross, Salvation Army, United Way, faith-based groups and others.)

¹⁷ For example, fallen trees on private properties that become a hazard to the community or debris fields from storm adjacent to a navigable waterway and at risk of clogging the waterway water could be removed.

¹⁸ If the cost of repairs to a damaged structure is to be covered by insurance, only stabilizing activities may take place, such as placement of tarps on roofs, removal of damaged sheetrock and insulation, etc.

- c) Submission to DEO of requests to have temporary disaster-relief workers work on private properties for DEO to seek DOL approval; and
- d) DOL approves the worksite/temporary-relief job.

3. Coordination with FEMA and non-duplication of funds

Disaster-relief activities must be coordinated with the appropriate local emergency management agencies to avoid duplication of benefits¹⁹ and ensure that grant activities appropriately respond to the affected community's needs after a disaster. LWDB 14 will also coordinate with federal agencies responding to the disaster either through direct contact or through state or local agencies working with the federal agencies.

As FEMA and Disaster Recovery DWG funds can pay for similar services, the best way to ensure that LWDB 14 is not duplicating FEMA funding is to obtain a written statement from the county, city and/or non-profit as to what services and/or funding FEMA is or will be supplying to the entity and what disaster-recovery services will be provided by disaster-relief temporary workers. This will provide documentation to show that Disaster Recovery DWG funds are not duplicated with FEMA funded services/activities. The written statement should include a brief description of what staff, equipment, supplies, etc., are being paid through FEMA vs. Disaster Recovery DWG sources. When a Disaster Recovery DWG funded disaster-relief temporary job participant works at a site which is later approved for FEMA reimbursement, and it is time for FEMA to reimburse the costs of the project, the wages of the temporary job participants must be deducted from the cost of the project before FEMA reimburses 75% of the cost of the project to the local government.

LWDB 14 has established policies and procedures that describe how LWDB 14 assesses the availability of other resources, such as assistance from FEMA, private insurance, etc. to ensure non-duplication of funds and recover grant funds when other funds become available for the same activities. The established policies and procedures also address a plan to recover grant funds expended for activities or services for which other funds become available from FEMA, public or private insurance, or other available resources.

Note: Disaster Recovery DWG funds may not be used to match FEMA funds.

4. Use of equipment for temporary disaster-relief workers

Generally, Disaster Recovery DWG funds may not be used to purchase equipment²⁰. [Administrative Policy 87 Prior Approval Administrative Policy for Local Workforce Development Boards](#) requires prior approval by DEO before funds awarded to LWDB 14 may be used to purchase equipment for such cases which may be subject to exception.

¹⁹ Duplication occurs when a beneficiary receives assistance from multiple sources for a total that exceeds the need.¹⁹³

²⁰ Equipment means tangible [personal property](#) (including information technology systems) having a useful life of more than one year and a per-unit [acquisition cost](#) which equals or exceeds the lesser of the capitalization level established by the [non-Federal entity](#) for financial statement purposes, or \$5,000. 2 CFR 200.33.

If equipment needed for the temporary disaster-relief worker to complete their assigned task is not available from the worksite employer, such equipment may be rented, as allowed by LWDB 14's policies and procedures²¹. Equipment rental expenses must be detailed as a separate line item in the budget(s) submitted by LWDB 14 to DEO.

5. Prioritizing Disaster-Relief Worksites

LWDB 14 is prepared to deploy the most appropriate temporary disaster-relief jobs based on the criteria listed in TEGL 12-19, as well as through consultation with local government, community and faith-based organizations, economic development, and industry stakeholders, etc. Priorities for the types of disaster-relief jobs are based on an assessment of the following factors:

- a) Physical impact on public properties
- b) Human impact on the elderly, people with disabilities, low-income and other special needs populations
- c) Impact on organizations that are needed to respond to the disaster or emergency (governmental, community and faith-based)
- d) Impact on local businesses, industry sectors, and the overall economic health of the area

6. Approval and Tracking of Worksites

LWDB 14 is responsible for approving temporary disaster-recovery worksites and job duties for temporary disaster-relief workers. Worksite and job description information must be maintained and reported to DEO according to a schedule and in a format provided by DEO for each Disaster Recovery DWG. Worksite files must include:

- a) The worksite agreement between LWDB 14 and the employer including non-duplication requirements (see subsection 3 above);
- b) Approved job descriptions;
- c) Evidence of appropriate OSHA/safety training;
- d) Evidence that supervisor orientation²² has taken place;
- e) Description of supplies and equipment needed and responsibility for providing such²³; and
- f) Copies of payroll records.

Note: If a staffing agency is the employer of record, the agreement must describe how the staffing agency will be engaged with the worksite employer and the temporary disaster-relief employees. The agreement needs to clearly identify the roles and responsibilities of each party, including who is responsible for day-to-day supervision, safety instruction, providing documentation of hours

²¹ Note that if the cost of the equipment rental increases the cost per temporary disaster-relief worker so that it exceeds \$20,000, DEO may need to obtain approval for the increased cost from DOL.

²² Worksite supervisor orientation includes allowable activities, timekeeping, discipline, etc.

²³ The worksite file identifies the supplies and equipment that will be needed for the temporary disaster-relief employee(s) to fulfill their job duties. As supplies are provided to individual participants, these are recorded as supportive services in Employ Florida.

worked, and wages paid, and compliance with labor standards in work-based activities described in WIOA section 181(b).

7. Employer of Record

Each temporary disaster-relief worker must have an employer of record²⁴. The employer of record is responsible for maintaining all personnel and payroll records related to the employment of temporary disaster-relief workers, including employer and employee withholdings, and other benefits, if applicable²⁵. The employer of record may be responsible for unemployment claims filed by temporary disaster-relief workers when their assignment ends.

Note: The employer of record is required to secure workers' compensation for temporary disaster-relief workers and ensure that the workers receive adequate OSHA/security training. In any event, LWDB 14 is responsible for ensuring and maintaining documentation that worker orientation and OSHA/safety training has occurred.

DEO may procure a contract with a staffing agency to be the employer of record for temporary disaster-relief workers. Such a contract is available to LWDB 14, but LWDB 14 may make their own arrangements for selecting an employer of record for their Disaster Recovery DWG. LWDB 14 may issue purchase orders with the DEO-procured staffing agency for the placement of temporary workers in a Disaster Recovery DWG project pursuant to DEO's contract with the staffing agency.

F. Monitoring

LWDB 14 will adopt local policies and procedures to implement and monitor the state and federal requirements.

Each worksite must be monitored by LWDB 14 as part of its formal programmatic and fiscal monitoring plan. The formal monitoring must be conducted by an independent person or entity not engaged in worksite development/management or case management. The worksite monitor must engage with worksite supervisors and temporary disaster-relief workers on-site²⁶. Monitoring visits must be documented in a written report and address corrective actions, as needed.

If at any time, LWDB 14 becomes aware of temporary disaster-relief workers being employed in activities that are not disaster-relief activities, immediate action must be taken to remedy the finding and/or terminate the agreement.

²⁴ LWDB 14, a staffing agency, or another entity may be the employer of record.

²⁵ Payroll records can be electronic or physical.

²⁶ A virtual meeting via video and audio conferencing must be conducted when on-site visits are not safe.

V. RESOURCES

[COVID-19 Frequently Asked Questions – WIOA Dislocated Worker Program](#)

[National Dislocated Worker Grants – WIOA Desk Reference](#)

[National Voluntary Organizations Active in Disaster Resource Center](#)

VI. REVISION HISTORY

Date	Description
6/9/2021	Approved by CareerSource Florida Board of Directors.
6/10/2021	Issued by Florida Department of Economic Opportunity.
	Approved by CareerSource Board of Directors.



ACTION ITEM 21

Policy Approval - WIOA Administrative Policy 114, Rapid Response Program Administration with Local Operating Procedures

The Florida Department of Economic Opportunity (DEO) has instituted a new process related to Local Operating Procedures (LOPs) that coincides with the release of new administrative policies. The goal of this new process is to ensure DEO is providing the oversight and support needed for Local Workforce Development Boards (LWDBs) to administer and operate workforce programs in a manner that meets federal and state requirements. The process creates a timeline for introducing new and revising current administrative policies issued by DEO.

The Workforce Innovation and Opportunity Act (WIOA) Administrative Policy 114 is presented to the LWDB following this new process. There will be more to follow.

Based on the release of WIOA Administrative Policy 114, this Administrative Policy with LOPs includes all the DEO administrative policy requirements.

Highlights:

- Provides notification of the minimum Rapid Response requirements and activities mandated by WIOA.
- Outlines the framework for LWDB 14 to design and implement a local business engagement strategy and articulates the role of layoff aversion within effective Rapid Response systems.

RECOMMENDATION

Approval of WIOA Administrative Policy 114 – Rapid Response Program Administration with Local Operating Procedures (LOPs).



Administrative Policy with Local Operating Procedures

**Policy Number
WIOA-P-114-14**

Title:	Rapid Response Program Administration
Program:	Workforce Innovation and Opportunity Act (WIOA)
Effective:	July 1, 2021

I. PURPOSE AND SCOPE

This policy notifies Local Workforce Development Board 14 (LWDB 14) of the minimum Rapid Response requirements and activities mandated by the Workforce Innovation and Opportunity Act (WIOA). This policy provides a framework for LWDB 14 to design and implement a local business engagement strategy and articulates the role of layoff aversion within effective Rapid Response systems.

II. BACKGROUND

WIOA requires states to implement statewide Rapid Response activities to assist adversely affected employers and workers as quickly as possible following the announcement of a permanent closure, layoff, or natural or other disaster resulting in a mass job dislocation.

Rapid Response promotes economic recovery and vitality by developing ongoing, comprehensive approaches to identifying, planning for, or responding to layoffs and preventing or minimizing the impacts of layoffs on workers, businesses, and communities. Rapid reemployment is a central tenant of Rapid Response and is accomplished by helping affected workers quickly transition to reemployment, minimizing the duration of unemployment, or averting layoffs whenever possible.

III. AUTHORITY

[Public Law 113-128, Section 134\(c\)\(2\)](#)

[20 Code of Federal Regulations \(CFR\), Part 639](#)

[20 Code of Federal Regulations \(CFR\), Part 682](#)

[Training and Employment Guidance Letter \(TEGL\) 19-16](#)

IV. POLICIES AND PROCEDURES

Rapid Response provides customer-focused services to both dislocated workers and employers, ensuring immediate access to services for affected workers to expedite reentry into the workforce. WIOA legislation requires Rapid Response and early intervention assistance be provided to workers to avert or minimize the economic disruption of a mass job dislocation event.

A. State Rapid Response Program Office

The Department of Economic Opportunity (DEO) provides direction to LWDB 14 to ensure consistency in the statewide operations and delivery of Rapid Response services. DEO's [State Rapid Response Program Office](#) is responsible for carrying out statewide Rapid Response activities and overseeing Rapid Response activities carried out by LWDB 14. State-level Rapid Response activities are managed by the State Rapid Response Coordinator.

B. Rapid Response Events

The classification of a Rapid Response event is without regard to industry, size of the employer, number of workers potentially affected, or the time between notification and layoff date.

There are four (4) types of Rapid Response events:

- a) [Worker Adjustment and Retraining Notification](#) (WARN) event: Any employer that provides written notice of a mass layoff or closure with intent to meet the federal WARN requirements;
- b) Non-WARN event: Any employer experiencing a mass layoff or closure, even if it is not subject to the federal WARN requirements;
- c) [Trade Adjustment Assistance](#) (TAA) event: Any employer for which a TAA petition has been filed with the U.S. Department of Labor (USDOL); and
- d) Natural disasters: Any employer experiencing a mass layoff or closure due to natural or force majeure disasters.

Rapid Response activities assist communities that experience employer closures, mass layoffs, disaster-related mass job dislocations, or TAA petition filings that precipitate substantial increases in the number of unemployed individuals. Rapid Response services and activities shall be provided to all employers who experience a mass layoff or closure, regardless of how LWDB 14 was notified, or became aware of, the event.

DEO provides LWDB 14 notification of filed TAA petitions and WARN notices via e-mail to LWDB 14's Rapid Response Coordinator and other designated recipients as assigned by LWDB 14. LWDB 14 may add individuals to the Rapid Response event distribution list by submitting an e-mail with the requested recipient's name and e-mail to WARN@deo.myflorida.com.

1. Worker Adjustment and Retraining Notification Administration

The [WARN](#) Act of 1988 requires employers, in certain circumstances, to provide advance notification of layoffs and plant closings in order to provide workers with enough time to seek other employment or retraining opportunities. Employers covered under the WARN Act submit WARN notices to the State Rapid Response Coordinator sixty (60) days in advance of plant closings and/or mass layoffs.

LWDB 14 may assist employers who meet the criteria set forth in the WARN Act of 1988 and required in [20 CFR Part 639](#), with filing WARN Notices by providing the procedures and instructions available in the [Employer's Guide to Advance Notice of Closings and Layoffs](#). WARN filing assistance must be documented in the employer's Employ Florida service plan with employer service code E47 WARN Notice Assistance.

Upon receipt of a WARN notice, DEO shall provide notification via e-mail to LWDB 14 where the layoffs are to occur. DEO shall provide a copy of the WARN notice and any known separation details in a notification e-mail to LWDB 14 within two (2) business days of receipt. If a WARN notice is incomplete, DEO will provide the known details to LWDB 14 in the form of an advanced, partial layoff notification.

A summary of all WARN information is available from the DEO public website at www.floridajobs.org. The State Rapid Response Program Office is responsible for updating the list and keeping it current within three (3) business days of receiving a WARN notice. The online WARN Summary Report includes:

- a) Company name and address;
- b) Total number of affected workers;
- c) The affected employer's industry;
- d) WARN notification date;
- e) Layoff dates; and
- f) A copy of the WARN notice.

DEO is responsible for inputting WARN information in the state's online labor exchange and case management system, Employ Florida, within two (2) business days of receipt. LWDB 14 may enter non-WARN Rapid Response events by following the instructions provided in the [Virtual One-Stop® VOS Sapphire Administration System User Guide](#). 200

The use of the WARN1234 numbering sequence for Rapid Response events is reserved for DEO use only.

2. Non-WARN Events

To serve businesses that are not covered by the WARN Act or a TAA petition, LWDB 14 actively works with local business services teams to identify potential Rapid Response events in the local area. The business services team and Rapid Response Coordinator utilize local economic development resources, local Small Business Development Center network offices, and other resources and technology to identify potential Rapid Response events.

3. Trade Adjustment Assistance Petition Filings

The Trade Act of 1974 established the [Trade Adjustment Assistance for Workers Program](#), referred to herein as the TAA Program, to assist workers who have been laid off or whose jobs have been threatened because of foreign trade or competition (trade-affected workers). To establish eligibility, a group of two workers (or their representative) must file a petition with USDOL. Upon receipt of the petition, USDOL investigates to verify the role of foreign trade or competition in the workers' job losses, reduction in hours, or reduction in wages.

In accordance with WIOA, the filing of a TAA petition requires LWDB 14 to deliver Rapid Response services to the affected workers. TAA petitions filed with USDOL are provided to the State Rapid Response Coordinator by the [USDOL Office of Trade Adjustment Assistance](#) (OTAA). The State Rapid Response Program Office shall provide a copy of the TAA Petition and any known separation details in a notification e-mail to LWDB 14, who is responsible for the employers within their service area, within two (2) business days of receipt.

4. Natural and Other Disasters

The Rapid Response Coordinator responds to natural disasters and coordinates with the State Rapid Response Coordinator and other local government divisions and organizations to provide Rapid Response services to natural disaster- affected workers. Workers separated due to natural or force majeure disasters must be screened for the eligibility requirements included in the WIOA Dislocated Workers program, per [WIOA § 3 \(15\)\(C\)](#) stating "unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters".

The Rapid Response Coordinator has the flexibility to institute agendas and programs that respond to known, regional disasters such as flooding, hurricanes, freezes, wildfires, heat waves, drought, shelter-in-place orders,

evacuations, and health crises. Exceptions to recognized disasters are sudden geological processes, tornadoes, hailstorms, and mass criminal or terrorist events.

C. Rapid Response Team

LWDB 14 is responsible for the day-to-day coordination of Rapid Response services to businesses and workers that are experiencing layoffs or closures. LWDB 14 will designate a full-time Rapid Response Coordinator as the primary point of contact for Rapid Response. The Rapid Response Coordinator is responsible for:

- a) Communicating with DEO and the State Rapid Response Coordinator;
- b) Serving as lead contact for affected employers and dislocated workers;
- c) Leading LWDB 14's Rapid Response team; and
- d) Ensuring Rapid Response activities are reported accurately and timely in Employ Florida.

LWDB 14 may designate a Business Services Representative (BSR) as the Rapid Response Coordinator or, at a minimum, develop a local integration strategy that includes BSRs as early as possible in the process. Including the BSR at the earliest stage in the process is an effective strategy to foster talent transfer. Effective strategies may include, but are not limited to, offering customized hiring events for the affected workers and earlier identification of grant funds and training opportunities.

LWDB 14's Rapid Response team is comprised of individuals that provide information, resources, and services to assist affected employers and workers. The team may include, but is not limited to:

- a) Business Services Representatives;
- b) TAA Coordinators;
- c) Department of Children and Families (DCF) case managers;
- d) Division of Vocational Rehabilitation (DVR) Business Outreach Specialists;
- e) WIOA case managers;
- f) Supplemental Nutrition Assistance Program (SNAP) staff;
- g) Temporary Assistance for Needy Families (TANF) staff; and/or
- h) Local Veteran Employment Representatives (LVERs).

Note: Disabled Veteran Outreach Program (DVOP) specialists funded through the Jobs for Veterans' State Grant may participate in Rapid Response events only when it has been predetermined that the dislocated workers include veterans who may be eligible for DVOP services as described in [Administrative Policy 102: Veteran Initial Intake Process at Career Centers](#).²⁰²

D. Initial Contact

Once the Rapid Response event has been identified, the Rapid Response Coordinator will establish contact with the employer and act as the single point of contact for arranging and scheduling all Rapid Response activities. Upon determination of a Rapid Response event, the Rapid Response Coordinator must contact the affected employer within two (2) business days to discuss the following:

- a) The employer's schedule for the layoff;
- b) The types of services the employer would be interested in hosting on-site or remotely;
- c) General information on the skills and abilities of the affected workers;
- d) The spaces where employee meetings or other services may take place, including virtual accommodations and other accommodations for disabilities;
- e) The spaces where employees may safely meet to receive services following a natural disaster; and,
- f) The duration of Rapid Response assistance to workers, and the ability for workers to receive services during regular work hours.

E. Rapid Response Services

As part of LWDB 14's Rapid Response service delivery system and pursuant to [20 C.F.R. 682.330](#), the following services are made available, as needed, to affected employers and workers:

- a) Immediate and on-site contact with the employer, representatives of the affected workers which includes an assessment of and a plan to address:
 - i. Layoff plans and schedules of the employer;
 - ii. Background and probable assistance required for the affected workers;
 - iii. Reemployment prospects for workers; and
 - iv. Available resources to meet the short and long-term assistance needs of the affected workers.
 - v. Investigation of possible trade-impact.
- b) The provision of information about and access to [Reemployment Assistance](#) (RA) benefits and programs, such as Short-Time Compensation (STC), comprehensive career center services, and employment and training activities, including information on the TAA program, Pell Grants, the GI Bill, and other resources.
- c) The delivery of other available services and resources including workshops and classes, and job fairs, to support reemployment efforts of affected workers;
- d) The provision of emergency assistance adapted to the mass layoff;

- e) Delivery of services to worker groups for which a petition for TAA has been filed; and
- f) The provision of limited, additional assistance to local areas that experience Rapid Response events when such events exceed the capacity of the local area to respond with existing resources.

The above list represents the minimum services that are readily available and will be offered with the end goal of rapid reemployment. WIOA requires states and local areas conduct layoff aversion activities. However, it is left to the discretion of the LWDB 14 Rapid Response program to determine which layoff aversion strategies and activities are applicable in each potential layoff situation. Pursuant to [20 C.F.R. 682.340](#), LWDB 14 may devise Rapid Response strategies or conduct activities that are intended to minimize the negative impacts of dislocation on workers, businesses, and communities, to ensure rapid reemployment for workers affected by Rapid Response events.

F. Workforce Innovation and Opportunity Act Dislocated Worker Program

The Rapid Response Program is a prelude to the [Workforce Innovation and Opportunity Act](#) (WIOA) Dislocated Worker Program. The WIOA Dislocated Worker Program provides transitional services designed to assist in the early stages of a layoff. These services are offered in recognition that Dislocated Workers have various levels of need. Some workers only require minimal assistance to successfully return to the workforce, while others may need more.

G. Layoff Aversion

Locally driven layoff aversion strategies and activities are a required component of Rapid Response. A layoff aversion strategy helps employers retain a skilled workforce and/or provides workers rapid transition to new employment. The implementation of local layoff aversion strategies removes or minimizes periods of unemployment for workers adversely affected by layoffs. Layoff aversion is a central component of a high-performing business engagement strategy, requiring a shared responsibility among numerous partners at the state, regional, and local levels.

The intent of layoff aversion is to provide business solutions to companies that want to save jobs. To save jobs, the rapid response team must be able to identify an at-risk company well in advance of layoffs, obtain executive level commitment to work together, assess the needs of the company and deliver solutions to address risk factors. LWDB 14 will work with community partners and businesses to implement a mechanism to determine at-risk employers.

LWDB 14 determines which strategies and activities are applicable in each situation. The LWDB 14 Rapid Response program has the flexibility to institute agendas and programs that respond to workforce challenges. Layoff aversion

strategies include, but are not limited to:

- a) Ongoing engagement, partnership, and relationship-building activities with businesses in the community, in order to create an environment for successful layoff aversion efforts and to enable the provision of assistance to affected workers in obtaining reemployment as soon as possible;
- b) Assisting employers in managing reductions in force, which may include early identification of firms at risk of layoffs, assessment of the needs of and options for at-risk firms, and the delivery of services to address these needs;
- c) Funding feasibility studies to determine if a company's operations may be sustained through a buyout or other means to avoid or minimize layoffs;
- d) Developing, funding, and managing incumbent worker training programs or other worker upskilling approaches as part of a layoff aversion strategy or activity;
- e) Connecting companies to state Short-Time Compensation or other programs designed to prevent layoffs or to quickly reemploy dislocated workers, employer loan programs for employee skill upgrading; and other Federal, state and local resources as necessary to address other business needs;
- f) Establishing linkages with economic development activities at the Federal, State and local levels, including Federal Department of Commerce programs and available State and local business retention and expansion activities;
- g) Partnering or contracting with business-focused organizations to assess risks to companies, propose strategies to address those risks, implement services, and measure impacts of services delivered;
- h) Conducting analyses of the suppliers of an affected company to assess their risks and vulnerabilities from a potential closing or shift in production of their major customer;
- i) Engaging in proactive measures to identify opportunities for potential economic transition and training needs in growing industry sectors or expanding businesses; and
- j) Coordinate with local government divisions and organization, and local non-profit organizations, to plan for and respond to natural and other disasters; and
- k) Connecting businesses and workers to short-term, on-the-job, or customized training programs and apprenticeships before or after layoff to help facilitate rapid reemployment.

H. Incumbent Worker Training

The Incumbent Worker Training (IWT) program provides reimbursement grants to businesses that pay for preapproved, direct, training-related costs to upgrade the skills of their current employees. The IWT program is used to help avert potential layoffs of employees, or to increase the skill levels of employees so they may be promoted within the company and create backfill opportunities for

the employers.

When appropriate, Business Services Representatives shall provide IWT program information and resources to employers during meetings, interviews, and other engagements. For more information regarding IWT, please refer to the [CareerSource Florida Incumbent Worker Training Program Guidelines](#).

I. Short-Time Compensation Program

The provision of information and access to RA benefits and programs, such as [Short-Time Compensation](#) (STC) are required activities under Rapid Response. The STC Program is a voluntary employer program designed to help employers maintain their staff by reducing the weekly working hours during temporary slowdowns instead of temporarily laying off workers.

Employers who wish to participate in the Short-Time Compensation Program must apply to be a part of the program before being able to offer it to their workforce. To apply for the Short-Time Compensation Program, employers must apply through the DEO [website](#). Applying for STC for employees is exclusively online. The process to apply for the STC Program in Florida requires furnishing requested documents as well as information on the affected employees as outlined in [Chapter 443, Section 1116](#) of the Florida Statutes.

J. Reporting Requirements

As LWDB 14 initiates contact with the employers that have experienced a Rapid Response event, they are required to document the visits and services provided by entering, at minimum, employer service code E42: Rapid Response/Dislocated Workers Assistance in the employer's Employ Florida service plan. Employers who decline or refuse Rapid Response services must be documented by a case note in the employer's case note tab. Supporting evidence of the employer's refusal or declining of services must be retained for source documentation. Instructions for LWDB 14 staff regarding the reporting of Employ Florida employer service codes and case notes are available in the [Employ Florida Virtual One-Stop® User Guide for Staff](#), Section 16: Manage Employers.

When feasible, affected employees should be registered in the state's online labor exchange and case management system, Employ Florida. Rapid Response activities provided to affected employees must be reported in the affected employee's Employ Florida Wagner-Peyser, TAA or WIOA program application(s), as applicable dependent upon which application is active at the time of service delivery, in accordance with the [Employ Florida Service Code Guide](#) and the [Employ Florida Virtual One-Stop® User Guide for Staff](#).

K. Monitoring

Rapid Response services and activities must be monitored annually for compliance with requirements by USDOL and DEO. DEO monitors the requirements outlined in this policy and LWDB 14's local operating procedures. LWDB 14 has established local monitoring policies and procedures that include, at minimum:

- a) Roles and duties of the Rapid Response Coordinator;
- b) Roles and duties of all other LWDB 14 supporting staff; and
- c) Local monitoring procedures for implementation of this policy.

V. DEFINITIONS

Incumbent Worker Training (IWT) program: This program, funded by the WIOA, was created for the purpose of providing grant funding for continuing education and training of incumbent employees at existing Florida businesses. The program provides reimbursement grants to businesses that pay for preapproved, direct, training-related costs.

TAA Coordinator: A merit-staff employee designated by LWDB 14 to determine TAA eligibility and to provide TAA case management and employment services with the goal of leading participants to suitable employment.

Fringe Benefits: Fringe benefits include, but are not limited to, health insurance, retirement benefits under defined benefit pension plans as defined in subsection 35 of s. 1002 of the Employee Retirement Income Security Act of 1974, 29 U.S.C., contributions under a defined contribution plan as defined in s. 414(i) of the Internal Revenue Code, paid vacation and holidays, and sick leave.

Mass Layoff: Layoffs affecting 50 or more workers or layoffs when a WARN notice has been filed, regardless of the number of workers affected by the layoff announced.

Petition: A request submitted to USDOL to certify an employer as adversely affected by global trade or competition.

Trade-Affected Worker: An individual who has been totally or partially separated from employment in a firm or subdivision of a firm that has been certified under TAA.

Worker Adjustment and Retraining Notification (WARN) Act: A federal act that helps ensure advance notice in cases of qualified plant closings and mass layoffs per 20 CFR Part 639.

Workforce Innovation and Opportunity Act (WIOA): A federal act that provides direction and guidance for the workforce system in every state. The law prioritizes a market-driven approach to talent development that prepares people seeking employment for the jobs of today and of the future. WIOA is a transformative law designed to strengthen our nation's public workforce system, helping job seekers, particularly those with barriers to employment, access the education, training, and support services they need to obtain and advance in quality jobs and careers, and to help businesses hire and retain the skilled workers they need to succeed in a global economy.

VI. RESOURCES

[Rapid Response Services for Businesses Fact Sheet](#)

[Short-Time Compensation Fact Sheet](#)

[Workforce GPS Business Engagement Collaborative Community](#)

[State Rapid Response Program](#)

[State Rapid Response Program Resources](#)

[State Worker Adjustment and Retraining Notification Database](#)

[U.S. Department of Labor Employment and Training Administration Rapid Response Services](#)

[Workforce GPS Rapid Response Process Flow Chart](#)

VII. REVISION HISTORY

Date	Description
06/09/2021	Approved by CareerSource Florida Board of Directors.
06/10/2021	Issued by Florida Department of Economic Opportunity.
	Approved by CareerSource Pinellas Board of Directors.



ACTION ITEM 22

Policy Approval - WIOA Administrative Policy 115, Common Exit with Local Operating Procedures

The Florida Department of Economic Opportunity (DEO) has instituted a new process related to Local Operating Procedures (LOPs) that coincides with the release of new administrative policies. The goal of this new process is to ensure DEO is providing the oversight and support needed for Local Workforce Development Boards (LWDBs) to administer and operate workforce programs in a manner that meets federal and state requirements. The process creates a timeline for introducing new and revising current administrative policies issued by DEO.

The Workforce Innovation and Opportunity Act (WIOA) Administrative Policy 115 is presented to the LWDB following this new process. There will be more to follow.


Based on the release of WIOA Administrative Policy 115, this Administrative Policy with LOPs includes all the DEO administrative policy requirements.

Highlights:

- Provides guidance on the minimum requirements for the common exit of program participants for WIOA, Wagner-Peyser (WP), and Trade Adjustment Assistance (TAA) programs, and procedural guidance for the associated processes.
- Defines processes intended to ensure efficient and effective integrated service delivery, track coordination of services, and align performance reporting.

RECOMMENDATION

Approval of WIOA Administrative Policy 115 – Common Exit with Local Operating Procedures (LOPs).

		Policy Number WIOA-P-115-14
Administrative Policy with Local Operating Procedures		
Title:	Common Exit	
Program:	Workforce Innovation and Opportunity Act, Wagner-Peyser and Trade Adjustment Assistance	
Effective:	July 1, 2021	

I. PURPOSE AND SCOPE

The purpose of this policy is to provide Local Workforce Development Board 14 (LWDB 14) the minimum requirements for the common exit of program participants for the Workforce Innovation and Opportunity Act (WIOA), Wagner-Peyser (WP) and Trade Adjustment Assistance (TAA) programs, and procedural guidance for the associated processes.

II. BACKGROUND

WIOA establishes performance accountability indicators, aligns performance-related definitions, ensures comparable data collection, and integrates performance reporting requirements to assess the effectiveness of states in achieving positive outcomes for individuals served by the workforce development system.

In accordance with [Training and Employment Guidance Letter \(TEGL\) 10-16, Change 1](#), states are encouraged to implement a common exit policy. Common exit is intended to ensure a more efficient and effective integrated service delivery system, track the coordination of services, and align performance reporting.

III. AUTHORITY

[20 Code of Federal Regulations \(CFR\) Part 677](#)

[TEGL 10-16, Change 1](#)

[TEGL 14-18](#)

[TEGL 19-16](#)

[TEGL 21-16](#)

IV. POLICIES AND PROCEDURES

Florida has an established common exit policy implemented through its online case management and labor exchange system, Employ Florida. This policy requires that an individual who is participating in any program covered by the common exit policy will not exit (and be counted in performance) until the individual is no longer being served by any program to which the policy applies.

Florida's common exit policy is applicable to the following programs:

- a) WIOA Title I – Adult, Dislocated Worker, Youth
 - i. National Dislocated Worker Grants (NDWG)
- b) WIOA Title III – Wagner-Peyser
 - i. Jobs for Veterans' State Grant (JVSG)
 - ii. Migrant and Seasonal Farmworkers (MSFW)
- c) Trade Adjustment Assistance

Program performance measures, including four of the six WIOA Primary Indicators of Performance, as defined in [TEGL 10-16, Change 1](#), are associated with the participant's exit; therefore, accurate documentation and reporting of exit dates, as well as the services which impact the participant's exit, is critical.

A. Reportable Individual

Reportable individuals register in Employ Florida and may access self-service system functionalities and receive information-only services or activities. Reportable individuals are tracked and reported in performance reports but do not impact program performance and may not be used to impose sanctions. Reportable individuals are not considered participants in a program, so they do not exit and are instead closed as never enrolled. The date of closure for reporting purposes is determined as follows:

- a) Individual does not become a participant.
- b) Individual is served with only self-service and/or information-only services.
- c) 90 days elapsed since being identified as a reportable individual, and the individual has not received additional self-service or information-only services or activity during the 90-day time frame.

Once the above criteria have been met, the date of closure is applied retroactively to the last day of receipt of self-service and/or information-only services or activities. This methodology is used to ensure reportable individuals do not remain in the system indefinitely.

B. Participant

A reportable individual becomes a participant when he/she has met program enrollment requirements for eligibility and received a staff-assisted participating service. The participation date is the date the individual receives the first participating service (and is enrolled in the appropriate program). Participating services that establish (trigger) or extend participation are identified in the [Employ Florida Service Code Guide](#).

Note: WIOA Youth are not considered participants until they have received the following:

- a) Objective assessment;
- b) Individual Service Strategy (ISS); and
- c) At least one of the 14 Youth Program Elements as described in
 - i. [20 CFR Part 681.460](#).

C. Extending Participation

Every participating service provided to a participant, once recorded, establishes a new exit date and extends participation for 90 days. Self-service, information-only services or activities, and follow-up services do not delay, postpone, or affect the date of exit. The management of participant services includes regular, direct contact with the participant on all aspects of their workforce development needs.

Direct contact is considered to have occurred when LWDB 14 staff and the participant have exchanged information, or the participant has agreed to the service being provided by LWDB 14 staff. LWDB 14 staff should ensure that direct contact is made at a minimum of every 30 days with the participant to maintain the highest level of individual service. Determined on an individual basis and/or by local operating procedures, more frequent contact may be required. Indirect contact attempts, such as sending workshop flyers or job leads by mail or email or leaving telephone messages without receiving a response, do not constitute direct contact for the purpose of providing a service or keeping an activity open.

Direct contact may be performed in-person or remotely and may be conducted by mail, telephone, email, or other documented means of contact. Such contact should result in a participating service being provided to the participant. Contact where the participant does not engage will not be considered direct and must not result in a participating service being recorded in Employ Florida. An offer to provide a service or a scheduled appointment to provide a service must only be entered as a case note or non-participating service, as appropriate.

D. Participant Transfer

Participants may relocate from one LWDB to another and continue to receive workforce services without interruption. For WIOA Title I and TAA participants, the Florida Department of Economic Opportunity Bureau of One-Stop and Program Support is responsible for approving the transfer of cases from one LWDB to another in Employ Florida.

Prior to WIOA Title I or TAA participants being transferred in Employ Florida, authorized representatives from both LWDBs must agree to the transfer in writing. This requirement may be met by retaining copies of emails detailing the transfer agreement. Receiving LWDBs should ensure they have received any participant files or documents stored outside of Employ Florida prior to the agreement of transfer.

When a case is transferred from one LWDB to another, the receiving LWDB must accept responsibility for the outcomes and performance associated with that participant. In addition, both LWDBs must maintain documentation on file indicating that the completed transfer was agreed upon. The receiving LWDB will be responsible for ensuring the case file is in good standing and bear responsibility for monitoring issues following the date of accepted transfer. In order to ensure seamless, high-quality service to the participant, transfers will require close coordination within the network of LWDBs. The coordination will include, but not be limited to:

- a) Confirmation of reason for transfer to another LWDB (e.g., relocation, customer request);
- b) Dialogue between LWDB where customer is enrolled and receiving LWDB prior to transfer;
- c) Review of the participant's case file by the transferring LWDB prior to transfer;
- d) Review of the participant's case file by the receiving LWDB prior to approving transfer;
- e) Discussion and resolution of any identified issues between LWDBs;
- f) Requesting guidance from DEO via email at WIOA@deo.myflorida.com for customers files and Employ Florida services that are not in good standing and cannot be resolved between LWDBs.

Note: LWDBs may not decline to accept transferring customers without consulting DEO.

To complete a WIOA Title I or TAA participant transfer, the transferring LWDB must close all open Employ Florida activities and plans, and submit the following to PRA@deo.myflorida.com:

- The LWDB and office the participant is being transferred from;
- The LWDB, office and staff member the participant is being transferred to;
- Documentation of the agreed upon transfer from both LWDB's (email);
and
- The participant's State ID and Employ Florida Program Application ID.

Note: WIOA Title III (Wagner-Peyser) cases do not require transfer. However, before providing staff-assisted services, staff must update the participant's Employ Florida Wagner-Peyser Program Application and individual registration to their respective LWDB.

E. Case Closure

When staff have determined a participant no longer requires services because he/she has entered employment or education, become disabled or otherwise incapable of working, or the participant voluntarily opts out of service, the participant's case should be formally closed in Employ Florida. This will immediately stop the addition of any other program services and prompt staff to gather any employment data.

Case closure is a case management feature of Employ Florida and should not be confused with a participant exit, which is federally defined and structured. The decision to close the case should be documented accordingly by staff in case notes. While a participant's case may be closed because the participant entered employment or education, the participant may not be ready for exit and follow-up services. Ideally, each participant should remain a program participant long enough to be stable in a job or post-secondary education.

Prior to closing a participant's case, staff must:

- a) Ensure the Individual Employment Plan/Service Strategy (IEP/SS) Plan has been closed out. (see the [Virtual One-Stop User Guide for Staff, Section 4: Individuals - Case Management](#) for further guidance);
- b) Ensure all services have been closed;
- c) Enter any credential(s) earned during the program, including the type, verification and credential date to the Closure Information tab or Credential Section. (see the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA](#) for further guidance);
- d) Make sure any Measurable Skill Gains attained during the program have been added to the participant's Measurable Skill Gains (MSG) ribbon or, individuals below postsecondary education level literacy/numeracy gains or to the Educational Functioning Level for MSG ribbon (see the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA](#) for further guidance); and
- e) Add any unsubsidized or On-the-Job Training (OJT) employment entered during the program or at closure to the Add Employment ribbon (see the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA](#) for further guidance).

Note: LWDB 14 may delete case closures for participants who request or demonstrate a need for continued services if the participant has not exited. For participants who have exited, the case closure may not be deleted if 90 days has lapsed, and a new program application in Employ Florida will be required for the participant.

F. Follow-Up Services

For WIOA Adult and Dislocated Worker programs, follow-up services may begin immediately following placement into unsubsidized employment if no future services (other than follow-up services) are scheduled or expected. For the WIOA Youth program, follow-up services may begin immediately following the last date of service if no future services (other than follow-up services) are scheduled or expected.

Follow-up services do not cause the exit date to change, delay exit or trigger re-enrollment in the program. LWDB 14 will provide and document WIOA follow-up services in Employ Florida unless the participant refuses services. If a participant refuses follow-up services, staff must document the refusal with a case note in Employ Florida. Guidance regarding the recording of follow-up services in Employ Florida is available in the [Virtual OneStop® User Guide for Staff, Section 6: Programs - WIOA](#). Employ Florida follow-up service codes are outlined in the [Employ Florida Service Code Guide](#).

Note: Follow-up services are not required for TAA or Wagner-Peyser participants, or any WIOA Title I participant exited due to a global exclusion, as described in [Section IV.G.2](#) of this policy.

G. Exits

Individuals who are participating in more than one program covered under the common exit policy will have a single common exit date. The participant's exit occurs when he/she has:

- a) Not received services for at least 90 calendar days from any programs to which the common exit policy applies; and
- b) No future services scheduled, except for self-service, information-only activities, or follow-up services.

The participant's exit date cannot be determined until 90 days have elapsed since the participant last received a participating service and no services are scheduled for the future. The exit date is applied retroactively to the last service date. There are two (2) different types of exits:

1. System Exit

System (soft) exit occurs automatically after participants receive no staff-assisted services for 90 days in either WIOA Title I, WP, or TAA programs. Exit will occur automatically based on actual or projected end dates of reported participating services/activities. For WIOA and TAA, case notes should support the last date of staff-assisted services provided with activity end dates that accurately reflect the actual last service provided.

In some cases, WIOA and/or TAA activities may be completed but the participant continues to receive WP services, which will extend program exit. Exit is often triggered by completion of training, successful transition into employment, or loss of contact. The completion of training and successful transition into employment must be documented in services with corresponding activity end dates. However, if the participant is not engaged in open WIOA activities, loss of contact must only be documented in a case note. WIOA participants who are exited due to a loss of contact must follow the closure guidelines in [Section IV.E](#) of this policy.

2. Manual Exit

Manual (hard) exits are not allowed unless the participant falls into one of the WIOA Title I global exclusion scenarios. Otherwise, participants must be soft exited from the system to be closed out after 90 days of receiving no staff-assisted services.

Participants may be excluded from the Primary Indicators of Performance Measures, at the time of closure, for any of the following global exclusions that precludes the participant from entering employment or participating in services:

- a) **Institutionalized:** The participant exits the program because he or she has become incarcerated in a correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center while receiving services as a participant.
- b) **Health/Medical:** The participant exits the program because of a medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
- c) **Deceased:** The participant is deceased.
- d) **Reservist called to Active Duty:** The participant exits the program because the participant is a member of the National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days.
- e) **Foster Care (WIOA Youth Only):** The participant is in the foster care system, as defined in 45 CFR 1355.20(a) and exits the program because the participant has moved from the local workforce development area as part of such a program or system.

Note: If a participant is exited due to a global exclusion and it is due to a medical reason or disability, staff must collect information in a separate file and not disclose in case notes the details pertaining to the reason for exit. The exclusionary/neutral exit reasons that could disclose medical or disability-related information are:

- a) Health/medical issues; and
- b) Residing in an institution or facility providing 24-hour support, such as prison or hospital.

LWDB 14 staff should submit requests to create a manual closure through global exclusion in writing to LWDB 14's Management Information Systems Technician (MIS), or an individual designated by LWDB 14 as the approving authority for global exclusions. LWDB 14 staff should state the reason for the request and provide the name and state identification number of the participant in order to receive approval from the approving authority to create a closure and exclusion on behalf of LWDB 14.

If the approval to create the closure and exclusion is granted, then the requesting staff member is solely responsible for ensuring that all the necessary and required documentation has been secured and uploaded to Employ Florida for verification purposes. The approving authority must review all the necessary documentation before the hard exit and exclusion is created. LWDB 14 will reference the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA, 6-133](#) for further guidance.

H. Mismanagement of Exits

The participant's exit must not be prolonged by staff extending service dates, removing exits, or opening new services unless it is demonstrated and documented in Employ Florida that the participant has unmet needs and is actively being served. Additionally, Employ Florida service codes that are not training or work experience services must not be future dated to extend participation. Attempts to re-engage a participant do not constitute a participating service for the purpose of providing a service or keeping an activity open. These contacts must instead be documented by case notes or by the appropriate non-participating service. Prolonging exit due to the inability to contact a participant is inappropriate.

The following actions do not constitute a service nor direct contact with a participant for the purpose of extending participation:

- a) Leaving voicemail messages for the participant;
- b) Speaking with relatives of the participant who are not the participant's guardian(s);
- c) Scheduled services or an offer to provide services;
- d) Sending flyers, letters or postcards;
- e) Speaking with the participant's parole officer;

- f) Casual, unscheduled conversations with the participant in public;
- g) Having the participant bring in time sheets and/or attendance records for payment without providing meaningful guidance, service or conducting a review of the participant's IEP; and
- h) Contacts to obtain employment status, educational progress, need for additional services or income support payments without providing meaningful guidance, service or conducting a review of the participant's IEP.

I. State and Local Monitoring

DEO will monitor the requirements outlined in this policy and local operating procedures. Additionally, LWDB 14 has established local monitoring policies and procedures that include, at minimum:

- a) Roles of the participant and LWDB 14 staff; and
- b) Local monitoring procedures for implementation of this policy.

V. DEFINITIONS

Common Exit - Occurs when a participant has not received services (excluding self-service, information-only service or activities, or follow-up services) from any program covered by the common exit policy for at least 90 days, and no future services are planned. The common exit date for all program in which the participant is enrolled will be the end date of the last participating service the participant received.

Management Information Systems Technician - An individual designated by LWDB 14 and provided elevated system privileges by the Local Employ Florida Administrator to assist with maintaining security protocols and data validation in the State's labor exchange and case management system, Employ Florida.

Non-Participating Service - A service that does not commence or extend program participation. Supportive services, self-service, information-only services, administrative, follow-up services, and locally defined services are non-participation services. (Exception: for WIOA Youth, supportive services are a participation service).

Participant - An individual who is determined eligible to participate in the program and receives a service funded by the program in either a physical location (CareerSource Florida Network Career Center or affiliate site) or remotely through electronic technologies

Participation Date - The first day, following a determination of eligibility, (if required), that the individual begins receiving a staff-assisted participating service funded by the program.

Participating Service - A program-funded, staff-assisted service provided to an eligible applicant, other than supportive services, self-service, information-only services, administrative, local defined, or follow-up services. (Exception: for WIOA Youth, supportive services are a participating service).

Reportable Individual - A jobseeker who engages with the workforce system on an initial level through non-participation services and may not have met program requirements for eligibility or participation.

VI. REVISION HISTORY

Date	Description
	Approved by CareerSource Pinellas Board of Directors.
06/15/2021	Issued by Florida Department of Economic Opportunity.
06/09/2021	Approved by CareerSource Florida Board of Directors.

VII. RESOURCES

[Workforce GPS Performance Reporting Community](#)

[USDOL WIOA Technical Assistance Resources and Tools](#)



ACTION ITEM 23

Policy Approval - TAA Administrative Policy 116, Trade Adjustment Assistance and Workforce Innovation and Opportunity Act Dislocated Worker Co-enrollment with Local Operating Procedures

The Florida Department of Economic Opportunity (DEO) has instituted a new process related to Local Operating Procedures (LOPs) that coincides with the release of new administrative policies. The goal of this new process is to ensure DEO is providing the oversight and support needed for Local Workforce Development Boards (LWDBs) to administer and operate workforce programs in a manner that meets federal and state requirements. The process creates a timeline for introducing new and revising current administrative policies issued by DEO.

The Trade Adjustment Assistance (TAA) and Workforce Innovation and Opportunity Act (WIOA) Administrative Policy 116 is presented to the LWDB following this new process. There will be more to follow.

Based on the release of TAA Administrative Policy 116, this Administrative Policy with LOPs includes all the DEO administrative policy requirements.

Highlights:

- Communicates the requirement to co-enroll eligible trade-affected workers in the WIOA Dislocated Worker program, as well as the TAA program, and the associated procedures.
- Defines processes intended to improve performance outcomes, decrease enrollment times, and increase access to supportive services leading to training completion, credential attainment and obtaining suitable employment.

RECOMMENDATION

Approval of WIOA Administrative Policy 116 – Trade Adjustment Assistance and Workforce Innovation and Opportunity Act Dislocated Worker Co-enrollment with Local Operating Procedures (LOPs).



Administrative Policy with Local Operating Procedures

**Policy Number
TAA-P-116-14**

Title:	Trade Adjustment Assistance and Workforce Innovation and Opportunity Act Dislocated Worker Co-enrollment
Program:	Trade Adjustment Assistance (TAA) and Workforce Innovation and Opportunity Act (WIOA)
Effective:	July 1, 2021

I. PURPOSE AND SCOPE

This policy communicates the requirement to co-enroll eligible trade-affected workers in the Workforce Innovation and Opportunity Act (WIOA) Dislocated Worker program, as well as the Trade Adjustment Assistance (TAA) program, and the associated procedures.

II. BACKGROUND

The Trade Act of 1974 established the TAA program to assist workers who have been laid off or whose jobs, wages, or hours have been threatened because of foreign trade or competition. To establish eligibility, a group of two or more workers, the trade-affected employer, a union representative, or the TAA Coordinator must file a Trade Act petition with the United States Department of Labor (DOL) [Office of Trade Adjustment Assistance](#).

The WIOA Dislocated Worker program offers employment, training, case management, supportive, and follow-up services for eligible workers. Eligible workers are unemployed through no fault of their own or have received an official layoff notice. Trade-affected workers are dislocated workers under WIOA. The services provided to Florida's participants must be seamless and effective in ensuring access to the benefits and services required to return to suitable employment. To ensure the best use of workforce program funds in producing outcomes that benefit Florida's dislocated workers, all eligible trade-affected workers shall be co-enrolled to receive WIOA Dislocated Worker services.

Trade-affected, dislocated workers may be co-enrolled with other partner programs such as WIOA Adult. However, [Training and Employment Guidance Letter \(TEGL\) 01-19](#) encourages co-enrollment between the TAA and WIOA Dislocated Worker programs because the programs are complimentary in nature, provide an additional funding source for dislocated worker services, and an analysis conducted by DOL indicated that TAA participants who were co-enrolled with the WIOA Dislocated Worker program consistently displayed superior results compared to those that were not co-enrolled. These results include significantly improved performance outcomes, earlier intervention such as reduced time to participant training enrollment, and increased access to supportive services facilitating training completion, credential attainment, and obtaining suitable employment. DOL studies indicated co-enrollment leads to higher employment rates second and fourth quarter post-program exit and higher wages post- program exit.

III. AUTHORITY

[Trade Adjustment Assistance Act of 1974, as amended](#)

[Workforce Innovation and Opportunity Act of 2014, Public Law 113-128, Sections 101\(d\)\(2\), 101\(d\)\(8\) and 168\(A\)\(1\)](#)

[Training and Employment Guidance Letter No. 19-16](#)

[TEGL 05-15](#)

[TEGL 01-19](#)

[TEGL 4-20](#)

IV. POLICIES AND PROCEDURES

A. Co-Enrollment

Co-enrollment occurs when an eligible participant is enrolled in more than one workforce program. Co-enrollment supports and optimizes the participant's success. In accordance with federal requirements, co-enrollment includes the simultaneous enrollment in the WIOA Dislocated Worker program and the TAA programs. Co-enrollment across funding streams helps leverage limited resources to meet the needs of all participants working towards suitable employment. When eligible, all trade-affected workers will be co-enrolled with WIOA Dislocated Worker.

Co-enrollment necessitates a high level of communication and coordination amongst program staff to maximize effectiveness and avoid the duplication of services. Local Workforce Development Board 14 (LWDB 14) has developed a local co-enrollment procedure documenting the seamless delivery of services [222](#)

to co-enrolled participants. Local procedures shall be readily available for state or federal review.

Local co-enrollment guidance shall address the following:

- The participant's flow through both programs
- Coordinating and sharing assessments and assessment results
- Reporting assessments in Employ Florida
- Coordinating case management services
- Reporting case management services in Employ Florida
- Training services and documenting six TAA training criteria
- Reporting all training costs
- WIOA supportive services
- Post-training employment, financial aid, or pre-vocational services
- WIOA follow-up services
- Common exit procedures

Co-enrollment requires that the WIOA Dislocated Worker program fund a minimum of one service. The service will be collaboratively selected by the TAA Coordinator and the participant, in communication with the WIOA staff member, to maximize the utility of benefits and services for participants. For example, the WIOA service may be a career assessment, a supportive service not authorized by TAA, a workshop including resume writing, interviewing and other employment skills, a specialized assessment such as the Test for Adult Basic Education (TABE), or a follow-up service not authorized by TAA. The service or services used to commence participation for WIOA are left to LWDB 14's discretion.

Statewide co-enrollment performance outcomes are captured by the quarterly Trade Adjustment Assistance Data Integrity (TAADI) report which requires a minimum of seventy-five percent of all TAA participants be co-enrolled in the WIOA Dislocated Worker program. LWDB 14 co-enrollment levels will be provided on a quarterly basis through the Department of Economic Opportunity (DEO) [Monthly Management Report](#) to track and address regional co-enrollment efforts.

B. Eligibility

Co-enrollment between TAA and WIOA Dislocated Worker must occur for individuals who are determined eligible for both programs. Most trade-affected workers meet the definition of a Dislocated Worker as defined by [Category 1 of WIOA Section 3\(15\)](#). The eligibility requirements for the WIOA Dislocated Worker Program are:

- Registered for selective service,
- National citizen, resident alien, refugee, parolee, or individual authorized by the Office of Attorney General to work in the country,
- Have been terminated, laid off, or notified of layoff,
- Facility was closed or the employer has made a general announcement that the facility will close,
- Be eligible for or have exhausted Unemployment Compensation Benefits or has worked long enough to establish an attachment to the labor market and be unlikely to return to his/her previous occupation or job,
- Are self-employed individuals, farmers, ranchers, and fishermen who are unemployed due to economic conditions or a natural disaster, and;
- Are an unemployed displaced homemaker who was dependent on the income of another family member and is no longer receiving that support.

There may be select cases where a trade-affected worker may not be eligible for WIOA Dislocated Worker services. If a worker is found not eligible for WIOA (e.g., not registered with selective service) the Right to Decline Dislocated Worker Benefits & Services Form must be signed in Employ Florida documenting that the participant was considered but not eligible for co-enrollment. The DOL target measure for co-enrollment performance is seventy-five percent. The target allows for circumstances that may preclude TAA participants from being co-enrolled in WIOA Dislocated Worker.

It is recommended that WIOA conduct orientation in coordination with the TAA informational session required for certified Trade Act petitions as outlined in [Administrative Policy 108: TAA Employment and Case Management Services](#). Co-enrollment of trade-affected workers provides earlier intervention, and orientation may occur prior to certification of the Trade Act petition. If a trade-affected worker is determined eligible for TAA, they must be considered for WIOA Dislocated Worker eligibility as part of the TAA-funded training approval process. Throughout co-enrollment, the TAA Coordinator will maintain responsibility for the provision of the training services and primary case management, while WIOA must provide a minimum of one service or activities that meets the needs of the participant as determined by both workforce program partners and the participant. All steps, courses, workshops, certifications, etc. towards suitable employment, whether provided by TAA or WIOA, shall be documented in the participant's Individual Employment Plan. LWDB 14 shall cross-train staff to build collaborative, informed partnerships and streamline co-enrollment.

For workers who are eligible for WIOA programs and are awaiting the result of a Trade Act petition investigation by DOL, the provision of services should not be delayed while the DOL is conducting their investigation. WIOA Dislocated Worker may fund initial assessment(s) of the participant for later consideration by the TAA Coordinator. As indicated by DOL's studies, enrollment of

dislocated workers into the WIOA Dislocated Worker program will reduce the time between their layoff and return to suitable employment.

After DOL certifies the petition and the participant is enrolled in the TAA program, then TAA shall be the primary funder of training and provide the required TAA case management services. Prior to approval of WIOA Dislocated Worker program funded training, WIOA Case Managers must coordinate with the TAA Coordinator to determine that the training meets the six criteria for the approval of TAA training found under 20 CFR 617.22 and [Administrative Policy 107: Training Services](#) to ensure the seamless transition from WIOA-funded training to TAA-funded training. Once the participant is engaged in TAA-funded training, he or she may continue to be enrolled in WIOA services that meet their needs as determined by the WIOA Case Manager and approved by the TAA Coordinator.

C. Case Management

The TAA Coordinator will take primary responsibility for case management while the participant is completing his or her TAA-funded training. To ensure case management and employment services between WIOA Case Managers and the TAA Coordinator is seamless, a coordinated service strategy shall be built into the Individual Employment Plan. During this process, the participant should not experience being frequently passed between various case managers.

Throughout participation, the TAA Coordinator must communicate regularly with the WIOA Case Manager to provide updates on the needs of the participant, measurable skills gains, credential attainment, and the need for any appropriate supportive service(s). Upon completion of the TAA-funded training, the TAA Coordinator and the appropriate career center staff should assist the participant with job placement into suitable employment. WIOA Dislocated Worker may support resume writing, financial literacy, computer literacy, interviewing skill development, and other workshops or pre-vocational skills to obtain suitable employment. Upon gaining suitable employment and common program exit of the applications in Employ Florida, all programs will receive credit for the placement and associated outcomes.

D. Rapid Response

[Rapid Response](#) encompasses the strategies and activities necessary to plan for and respond to announcements of a business closure, layoff, or mass job dislocations. In accordance with [20 C.F.R. 682.330](#), Rapid Response delivers services to enable dislocated workers to transition to new employment as quickly as possible. Rapid Response promotes economic recovery by providing layoff aversion services to employers, responding to layoffs and dislocations of any size, and minimizing the impact on workers, businesses, and communities [Section 221\(a\)\(2\)\(A\)](#) of the Trade Act requires that Rapid Response services are delivered to all affected workers covered by a Trade Act petition. However, Rapid Response services are triggered by separation. Rapid Response is timely, and it does not require the Trade Act petition be officially certified by the DOL to proceed. Rapid Response services must be coordinated during the TAA information session to ensure that all individuals receiving TAA

services have received Rapid Response services. Regarding Rapid Response sessions strictly for trade-affected workers, the TAA Coordinator may conduct the session or is highly encouraged to attend the session. Documentation that trade-affected workers received Rapid Response services must be present in the worker's Employ Florida profile. Rapid Response services are required, and do not constitute co-enrollment between WIOA and TAA, regardless of who administers the service.

To ensure that the coordination is informed and timely, WIOA Dislocated Worker Case Managers and the TAA Coordinator must be regularly updated on local layoffs, local market changes, local natural disaster and other emergency events, and all Rapid Response activities taking place in the respective area, including when Trade Act petitions are [filed](#). This shall be completed by LWDB 14 sharing and/or publishing all scheduled Rapid Response activities in the region. LWDB 14 may post Rapid Response events on their website, post event information on social media, or send out regular e-mails announcing every Rapid Response event. LWDB 14 shall ensure the appropriate staff are receiving Worker Adjustment and Retraining Notification e-mails. If there is a change in staff, then LWDB 14 is responsible for submitting a request to the [State Trade and Rapid Response Program Coordinator](#).

E. Eligible Training Provider List

TAA participants enrolled into the WIOA Dislocated Worker program prior to the certification of a Trade Act petition are required to use LWDB 14's Eligible Training Provider List (ETPL) for selection of training providers and programs. If the eligibility status for TAA is understood at the time of the co-enrollment, then the ETPL is not required.

It is recommended that providers be on the Eligible Training Provider List (ETPL) for the approval of a TAA-training application. Training providers not on the ETPL may be utilized if it may be confirmed that the training institution is accredited and that there is a reasonable expectation of employment following the successful completion of such training. TAA does not require that a provider be added to the ETPL for the approval of training.

LWDB 14 must verify providers not listed on the ETPL are accredited and have met the requirements of the Commission for Independent Education to operate a non-public postsecondary school or college in the state of Florida by using the [Florida Department of Education website](#).

It is encouraged that providers on the ETPL offering comparable training within the local area be given strong consideration over providers not on the ETPL, as these providers have been verified as offering training programs aligned with LWDB 14's in-demand occupations and sectors. However, LWDB 14 is not authorized to restrict TAA-funded training exclusively to providers from the ETPL.

F. Funds

WIOA and TAA program funds must be managed in a coordinated manner. Duplication of payment for training costs is prohibited. The TAA program is the primary source of assistance for co-enrolled participants. If a TAA participant requires assistance not authorized under the TAA program or program funds are unavailable or insufficient, then assistance shall be made available through workforce partner programs.

Under certain circumstances, TAA participants may receive WIOA-funded training that would otherwise be provided under the TAA program. The most common circumstance is when a worker has been laid off while a Trade Act petition is awaiting determination from DOL. To facilitate early intervention, WIOA funds must be used for training in the short-term, until the TAA program determines the worker's individual eligibility and approves the training. In the event of a negative eligibility determination, and the petition is denied, the worker may continue as a WIOA participant.

When WIOA training funds have already been expended for a TAA program participant prior to the Trade Act petition certification, then WIOA cannot be reimbursed for funds. Upon the receipt of a Trade Act petition certification, the WIOA participant's training may be modified by the TAA program to allow a worker additional training under the TAA program to satisfy retraining needs as indicated in an Individual Employment Plan. The TAA program participant will remain co-enrolled in WIOA until common program exit.

G. On-the-Job Training

Under WIOA Title I, up to seventy-five percent of the cost of On-the-Job training may be paid for by WIOA. The TAA program may reimburse employers up to fifty percent and, on a case-by-case basis, WIOA may reimburse employers up to an additional twenty-five percent, for a total of seventy-five percent of the individual's wages. The LWDB 14 policy allows the flexibility to reach the seventy-five percent rate for all co-enrolled participants.

H. Reporting

Upon receiving a new participant covered by the requirements of this policy, LWDB 14 will utilize the Common Intake Form (Combined Enrollment) feature in Florida's online labor exchange and case management system, Employ Florida, to create the applications and reduce duplicate efforts. Additional information for the

Common Intake Form is available in [Section 3: Manage Individuals of the Employ Florida Virtual OneStop® User Guide for Staff](#).

In accordance with each workforce program's individual reporting requirements, all program activities, service codes, case notes, attachments, and costs will be reported in Employ Florida per the [Employ Florida Service Code Guide](#) and the [Employ Florida Virtual OneStop® User Guide for Staff](#). Upon obtaining suitable employment, participants will exit both applications using a common exit date.

V. STATE AND LOCAL MONITORING

Federal law requires the services and activities provided under TAA are monitored annually for compliance with TAA program requirements. The Department of Economic Opportunity will conduct monitoring for the requirements outlined in this policy and local operating procedures. Additionally, LWDB 14 has established local monitoring policies and procedures that include, at minimum:

- Roles of the TAA participant and LWDB 14 staff; and
- Local monitoring procedures, deliverables, and monitoring schedules for implementation of this and all Administrative Policies.

VI. DEFINITIONS

Affected Worker List - A list of trade-affected workers, typically provided by the trade-impacted employer, who were separated or threatened with separations during the period beginning one year before the petition was filed and ending two years after the date of the certification.

Dislocated Worker - An adversely affected individual that has been terminated, laid off, or notified of layoff, and is eligible for or has exhausted Unemployment Compensation benefits, and is unlikely to return to his or her previous occupation.

Individual Employment Plan - A negotiated agreement between the TAA participant and the TAA program detailing what the TAA participant will do to return to suitable employment and what the TAA program will do to support his/her efforts. An Individual Employment Plan is required for participants who lack the skills to secure suitable employment in the existing labor market and will be entering training. The plan must precede the approval of any training, or waiver of training requirement, as outlined in [DEO Memorandum: Trade Adjustment Assistance Individual Employment Plan Reporting](#). If any relevant barriers that may hinder the participant's ability to successfully complete training or obtain employment were identified during the comprehensive assessment, then the steps, objectives, and/or WIOA supportive services necessary to complete training must be included in the participant's plan.

Layoff Aversion - Strategies and activities, including those provided in §682.320, §682.330, and §682.340, to prevent or minimize the duration of unemployment resulting from layoffs.

TAA Coordinator - A merit-staff employee designated by LWDB 14 to determine TAA eligibility and to provide TAA case management and employment services with the goal of leading participants to suitable employment.

Petition - A request submitted to DOL to certify an employer as adversely impacted by global trade or competition.

Suitable Employment - Work of a substantially equal or higher skill level than the trade-affected worker's past trade-affected employment, with wages no less than 80 percent of the trade-affected worker's average weekly wage from the trade-affected employment.

TAA Participant - Any trade-affected worker who completes the initial TAA application and is enrolled in the TAA program by the TAA Coordinator by receiving a staff-assisted service.

Trade Adjustment Assistance Data Integrity (TAADI) Report - The TAA program has sixteen performance measures that seek to ensure data accuracy and gauge the program's effectiveness. Quarterly, DEO receives a report card from DOL known as the Trade Adjustment Assistance Data Integrity report. It is a standardized review of high-quality data that is essential to evaluating the program's effectiveness and monitoring service delivery.

Trade-Affected Worker - An adversely affected individual who has been totally or partially separated from trade-affected employment in a firm or subdivision of a firm that has been certified under TAA.

On-the-Job Training - Training provided by employers to incumbent workers. This is an integrated training and layoff aversion strategy that often results in up-skilling, retention, and higher wages.

Worker Adjustment and Retraining Notification (WARN) Act - A federal act that helps ensure advance notice in cases of qualified plant closings and mass layoffs per [20 CFR Part 639](#).

Workforce Innovation and Opportunity Act (WIOA) - A [federal act](#) that provides direction and guidance for the workforce system in every state. The law prioritizes a market-driven approach to talent development that prepares people seeking employment for the jobs of today and of the future. WIOA is a transformative law designed to strengthen our nation's public workforce system, helping job seekers, particularly those with barriers to employment, access the education, training, and support services they need to obtain and advance in quality jobs and careers, and to help businesses hire and retain the skilled workers they need to succeed in a global economy.

VII. REVISION HISTORY

Date	Description
6/09/2021	Approved by CareerSource Florida Board of Directors.
6/18/2021	Issued by Florida Department of Economic Opportunity.
	Approved by the CareerSource Pinellas Board of Directors.



ACTION ITEM 24

Policy Approval - JVSG Administrative Policy 117, Employment and Advocacy Services with Local Operating Procedures

The Florida Department of Economic Opportunity (DEO) has instituted a new process related to Local Operating Procedures (LOPs) that coincides with the release of new administrative policies. The goal of this new process is to ensure DEO is providing the oversight and support needed for Local Workforce Development Boards (LWDBs) to administer and operate workforce programs in a manner that meets federal and state requirements. The process creates a timeline for introducing new and revising current administrative policies issued by DEO.

The Jobs for Veterans' State Grant (JVSG) Administrative Policy 117 is presented to the LWDB following this new process. There will be more to follow.

Based on the release of JVSG Administrative Policy 117, this Administrative Policy with LOPs includes all the DEO administrative policy requirements.

Highlights:

- Provides guidance on the minimum requirements for delivery of employment and advocacy services to participants of the JVSG program.
- Defines multiple duties and responsibilities of Disabled Veteran Outreach Program Specialists (DVOPs) and Local Veterans' Employment Representatives (LVERs).
- Policy rescinds DEO Memorandum Disabled Veterans Outreach Program (DVOP) Specialist and Individualized Career Services (ICS) Codes, issued April 1, 2019.

RECOMMENDATION

Approval of JVSG Administrative Policy 117 – Employment and Advocacy Services with Local Operating Procedures (LOPs).



Administrative Policy with Local Operating Procedures

Policy Number
JVSG-P-117-14

Title:	Employment and Advocacy Services
Program:	Jobs for Veterans State Grant
Effective:	August 20, 2021

I. PURPOSE AND SCOPE

The purpose of this policy is to provide Local Workforce Development Board 14 (LWDB 14) the minimum requirements for providing employment and advocacy services to participants of the Jobs for Veterans' State Grant (JVSG) program.

II. BACKGROUND

With funding from the U.S. Department of Labor Veterans Employment and Training Service (DOL VETS), the Florida Department of Economic Opportunity (DEO) assigns JVSG-funded Disabled Veterans Outreach Program (DVOP) specialists, Local Veterans' Employment Representatives (LVERs), and Consolidated Positions (CP)¹ to LWDB 14.

Florida's JVSG program prepares veterans, transitioning service members, and eligible spouses for meaningful careers. DVOP specialists provide individualized career services to eligible veterans and persons experiencing significant barriers to employment, with an emphasis on assisting veterans who are economically or educationally disadvantaged. LVER staff conduct outreach to employers and business associations to engage in advocacy efforts with hiring executives to develop employment opportunities for veterans and encourage the hiring of veterans. CP staff serve in a dual role as both DVOP specialist and LVER.

III. AUTHORITY

[38 United States Code \(U.S.C.\), Chapter 41](#)

¹ All requirements established in this policy for DVOP specialists and LVER staff are applicable to CP staff and must be adhered to when performing the respective role of the DVOP specialist or LVER.

[38 U.S.C., Chapter 42](#)

[Veterans Program Letter \(VPL\) 07-09](#)

[VPL 07-10](#)

[VPL 03-14](#)

[VPL 03-14, Change 1](#)

[VPL 03-14, Change 2](#)

[VPL 07-14](#)

[VPL 03-19](#)

IV. POLICIES AND PROCEDURES

Upon determination of a jobseeker's eligibility as prescribed in [Administrative Policy 102: Veteran Intake at Career Centers](#); DVOP specialists and LVER staff must facilitate employment services to eligible persons as described in this policy.

A. Disabled Veterans Outreach Program Specialists

In accordance with [Title 38, U.S.C. 4103A](#), DVOP specialists facilitate individualized career services to eligible persons through the case management framework². The purpose of individualized career services is to provide eligible veterans and spouses the necessary information and customized support for obtaining sustained employment. Case management assists participants by evaluating the individual's service level needs, establishing an employment plan, delivering services, and providing consistent contact through a proactive and structured framework. DVOP specialists must emphasize a customer-focused approach, which recognizes that the eligible persons they serve are individuals who may require services that are tailored to their specific needs, situations, and goals.

B. Career Services and Employ Florida Reporting

Services provided to eligible individuals must be recorded in the State's online labor exchange and case management system, Employ Florida. DVOP specialists must facilitate the creation, or update, of the eligible person's individual registration and Wagner-Peyser Program Application in accordance with Section 3: Manage Individuals and Section 4: Programs – Wagner Peyser of the [Virtual OneStop® User Guide for Staff](#).

² The minimum service requirements of the case management framework are the provision of an objective assessment, the joint development of a written IEP, and consistent contact.

Note: Veterans who are participating in the U.S. Department of Veterans Affairs' Veteran Readiness and Employment (VR&E) Chapter 31 Program and/or the U.S. Department of Labor's Homeless Veteran Reintegration Program (HVRP) must be recorded as such in the Veteran page of the Wagner-Peyser Program Application by clicking the respective radio button, and for HVRP participants, by selecting the appropriate HVRP Program Grantee.

DVOP specialists must enroll eligible persons into the JVSG sub-program by entering a JVSG eligibility date on the Intro page of the Wagner-Peyser Program Application. Once the eligible person's individual registration and Wagner-Peyser Program Application has been created, DVOP specialists must document employment services in the participant's Employ Florida Wagner-Peyser program application by recording the service code which corresponds to the service provided, as follows:

Service Code	Service Code Description	Individualized Career Service
V01	JVSG - Objective Assessment ³	Yes
V02	JVSG - Specialized Assessments	Yes
V03	JVSG - Individual Career Counseling	Yes
V04	JVSG - Individual Employment Plan Update	Yes
V05	JVSG - Short-term Prevocational Services	Yes
V06	JVSG - Coordination of Wraparound	No
V07	JVSG - Work Experience	Yes
V08	JVSG - Workforce Preparation Activities	Yes
V09	JVSG - Consistent Contact	No
V10	JVSG - DVOP Outreach Engagement	No
V11	JVSG - Work Readiness Case Conference	No
205	Individual Employment Plan	Yes
500	Referred to Job Over 150 Days	No
114	Staff-Assisted Job Search	No

Note: There may be other services that are provided, but the services indicated in the table above are the primary services to be administered by DVOP specialists to assist eligible persons. All services recorded, including those not listed in the chart above, must be recorded under the JVSG customer group in the veteran or eligible person's Wagner-Peyser Service Plan.

³ The Objective Assessment must be the initial service provided to the eligible person to initiate JVSG participation.

1. Objective Assessment

DVOP specialists must conduct an objective assessment for eligible persons to determine the appropriate service level and path to obtain employment. The objective assessment is performed using in-depth interviewing and evaluation to identify barriers and appropriate employment goals. The objective assessment must be the first service provided to the veteran by the DVOP specialist. Additional DVOP specialist service codes are contingent on the objective assessment being present in the participant's program application; meaning, no other services may be recorded until the objective assessment has been recorded successfully.

The objective assessment will serve as the foundation and justification for all services and should guide the development of the participant's Individual Employment Plan (IEP). The assessment must include a detailed examination of the participant's qualifications, skills, and capabilities and explore any relevant barriers that may hinder the participant's ability to secure sustainable employment. This examination may include, but is not limited to, a review of the JVSG participant's:

- a. Attitude towards work
- b. Current labor market opportunities
- c. Educational background
- d. Emotional and physical health (including disabilities)⁴
- e. Employment history
- f. Financial situation
- g. Justice involvement
- h. Transportation
- i. Motivation
- j. Wrap-around service needs

All elements of the objective assessment must be completed using the Employ Florida Objective Assessment Summary. Staff must also include an overall note (located on the Objective Assessment Summary General tab) that includes the following:

- i. The Significant Barrier to Employment (SBE) or Special Population Group which affirms the participants eligibility for DVOP specialist services; and
- ii. A summary of the assessment's findings, to include the participant's barriers to employment, occupational skills, and education.

⁴ Specific details about participant physical and emotional health must not be documented in Employ Florida, nor stored in the participant's electronic or hard-copy case file.

Instructions on how to administer an objective assessment through the Objective Assessment Summary are available in the [Virtual OneStop® User Guide for Staff, Section 4: Individuals - Case Management](#). The objective assessment must be recorded in Employ Florida using service code V01 (JVSG - Objective Assessment) and include the required documentation that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

Note: If an objective assessment has already been completed by another DVOP specialist or partner program staff, the DVOP specialist may reaffirm the results from that assessment. If any elements of the Employ Florida Objective Assessment Summary are missing, the DVOP specialist must administer the missing elements. If the objective assessment completed by partner program staff was not completed using the Employ Florida Objective Assessment Summary, the DVOP specialist must create a new objective assessment using the Employ Florida Objective Assessment Summary.

2. Specialized Assessments

Specialized assessments help establish a participant's skill level and service needs. The DVOP specialist may use a multi-faceted approach to the specialized assessment process by referring the participant to, and receiving the results of, an assessment which examines one or more of the following categories:

- a. Basic literacy in math, reading, or writing
- b. English language proficiency
- c. Interests and aptitude
- d. Occupational skill levels
- e. Transferable skills

The results of the assessment must be used to inform the participant of career and/or training opportunities. Without assessment results, a mere referral does not constitute a specialized assessment. Specialized assessments may also be provided through the Workforce Innovation and Opportunity Act (WIOA) program, which will require the DVOP specialist to assist the participant with scheduling the assessment(s). When referring participants to WIOA for specialized assessments, this service must be recorded using service code 211 (Referral to WIOA). The case note should indicate how the DVOP specialist helped facilitate the referral along with the results from the specific assessment referred to.

DVOP specialists may assist participants who qualify for, or are already receiving, Department of Veteran Affairs (VA) education benefits, with completing the CareerScope® specialized assessment at: <https://va.careerscope.net/qibill>. CareerScope® is a no-cost, online assessment tool that measures the participant's interests and skill levels and helps determine suitable career paths. The tool also recommends

courses or training programs that can help the participant become more marketable in the selected occupations.

Note: DVOP specialists may administer additional specialized assessments beyond CareerScope® in accordance with LWDB 14 policy and procedures.

The results of the specialized assessment must be recorded in Employ Florida using service code V02 (JVSG - Specialized Assessment) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

3. Individual Career Counseling

Individual career counseling may be provided by the DVOP specialist following the objective assessment to assist the participant in making informed educational, training, and occupational choices and may include the following:

- a. Assisting in developing a participant's knowledge of educational and occupational opportunities, and/or the steps involved in career planning;
- b. Assisting in developing career goals by using sound information including appropriate assessments and career explorations that focus on the talents, knowledge, transferable skills, interests, values, and aptitudes of the participant;
- c. Interpreting the local job market(s) and providing the steps necessary for the participant to obtain and retain employment in an occupation of the participant's interest;
- d. Providing specific information about job duties, working conditions, and hiring requirements of occupational areas of interest; and
- e. Helping a participant explore and select occupational skills for training opportunities.

Individual career counseling must be recorded in Employ Florida using service code V03 (JVSG - Individual Career Counseling) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

4. Individual Employment Plan

The IEP is a negotiated agreement between the participant and the program detailing what the participant will do to obtain/return to employment and what the program will do to support the participant's efforts. The IEP must include a clear employment goal and outline the steps necessary (objectives) to achieve the goal. The IEP must address any barriers that may prohibit the participant from achieving the goal.

a. Developing the Individual Employment Plan

The IEP must be created using the Employ Florida IEP/Service Strategy wizard⁵. Instructions on how to create an IEP using the Employ Florida IEP/Service Strategy wizard are available in the [Virtual OneStop® User Guide for Staff, Section 4: Individuals - Case Management](#). The Employ Florida system will automatically generate a service code 205 (Individual Employment Plan) upon initial creation. The IEP should be signed by the participant and must be retained in the participant's file. No case note is required if the plan is developed in accordance with this policy.

Employ Florida only allows for one IEP per participant. If the participant has an existing IEP in Employ Florida, the DVOP specialist must determine if the IEP is still active and work with the program partner who created the existing IEP to determine if the plan should be closed or will require joint coordination. An IEP that is coordinated across multiple programs requires constant communication between the DVOP specialist and partner program staff to maximize the effectiveness of the plan and prevent the duplication of services.

b. Establishing an Employment Goal and Objectives

The IEP must have one employment goal that drives the plan. The employment goal must contain three (3) dates: date established, review date⁶, and anticipated completion date. Once established, IEP goal and objective dates must not be altered in Employ Florida. The description of the employment goal should be written in a manner that is succinct and pertinent. Additional details regarding the employment goal must be included in the Goal Details text box. The term of a goal can be identified as long-term (12+ months), intermediate (3-12 months), or short-term (0-3 months).

The objectives of the IEP break down the larger goal into comprehensive steps that assist the participant in reaching the employment goal. Effective objectives identify individual tasks to be completed and must include the date the objective was established and review dates for completion.

DVOP specialists must adjust their Employ Florida IEP alert subscription to notify when a goal or objective is nearing the review date by following the instructions in the [Virtual OneStop® User Guide for Staff, Section 31: Manage Communications](#).

⁵ HVRP participants that have an existing employment plan developed by the HVRP grantee that meets the criteria set forth in this policy are not required to create a duplicate plan with the DVOP specialist. The DVOP specialist must coordinate with the HVRP case manager to maximize the effectiveness of the plan and prevent the duplication of services.

⁶ At minimum, review dates should be established within 15-days from the anticipated competition date.

An effective IEP should use the S.M.A.R.T. principle to create specific, measurable, attainable, relevant, and time-bound goals and objectives, as described below:

- i. **Specific** goals are easy to comprehend and clearly indicate what the participant intends to do. Specific objectives are the action steps outlining exactly what the participant should do in order to achieve the goal.
- ii. **Measurable** goals have benchmarks allowing participants to see progress towards successfully achieving the goal. Goals are measurable by establishing objectives to show progress.
- iii. **Attainable** goals and objectives can be realistically expected to be completed within the timeframe given.
- iv. **Relevant** goals and objectives must be relevant to what the participant is trying to achieve. A relevant goal is based on the participant's work history, education, training, special skills, interests, and aptitudes.
- v. **Time-bound** goals and objectives should be limited to a defined period and include a specific timeline for each step of the process.

c. **Reviewing and Updating the Individual Employment Plan**

The IEP must be treated as a living document and reviewed with the participant by the DVOP specialist on a regular basis. At a minimum, the IEP must be reviewed with the participant every 30 days to ensure the participant's progress in completing objectives. The IEP must be amended, as appropriate, when additional needs are identified, or objectives are achieved.

Once created, the goal and objective(s) must not be altered. Objectives that no longer align with the participant's employment goal, or have exceeded the anticipated completion dates, must be closed to reflect unsuccessful completion and include an accompanying case note in the summary section of the respective objective indicating the reason for change or unsuccessful completion (e.g., unexpected emergency, relocation, change in career path, etc.). Once the objective has been closed, a new objective may be created to replace the unsuccessful objective with consent and collaboration from the participant. When new objectives are added, the IEP should be reviewed and signed by the participant and the DVOP specialist.

Updates to the IEP must be recorded by service code V04 (JVSG - Individual Employment Plan Update) and include a case note that describes the update made to the employment plan (e.g., objective added/completed, additions to goal/objective description, etc.).

Note: In the event that a DVOP specialist vacates their position or is dismissed, LWDB 14 has established a local policy outlining the procedure to transfer the departing DVOP specialist's JVSG participants to another DVOP specialist or career center staff member that ensures the continued uninterrupted provision of services.

5. Short-Term Prevocational Services

DVOP specialists may provide short-term prevocational services to help participants attain and maintain sustained employment. Short-term prevocational skills include communication and interviewing skills, punctuality, study skills, professional conduct, and basic computer literacy and competencies. Short-term prevocational services also include providing counseling on workplace expectations, professional conduct, and personal maintenance, when appropriate.

The provision of short-term prevocational services must be recorded in Employ Florida using service code V05 (JVSG - Short-term Prevocational Services) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

6. Coordination of Wraparound Services

In order to effectively provide a wholistic level of service, the DVOP specialist must develop a comprehensive network of partner/community resources to provide participants the necessary wraparound services required for overcoming barriers. The resource network may include, but not be limited to:

- a. [American Legion](#)
- b. Community leaders
- c. [Department of Veterans Affairs](#)
- d. [Disabled American Veterans](#)
- e. Faith-based organizations
- f. [Food banks](#)
- g. [Goodwill](#)
- h. Homeless Shelters
- i. [Homeless Veterans Reintegration Program](#)
- j. [Housing Urban Development - Veterans Affairs Supportive Housing](#)
- k. [Iraq and Afghanistan Veterans of America](#)
- l. [Legal Assistance](#)
- m. [Marine Corps League](#)
- n. [Salvation Army](#)
- o. [Supportive Services for Veteran Families](#)
- p. [Veteran Readiness and Employment Program \(Chapter 31\)](#)
- q. [Veteran Service Officers](#)
- r. [Veterans of Foreign Wars](#)
- s. [Vocational Rehabilitation](#)

Once the resource network has been established, the DVOP specialist must do more than refer the participant to local resources or community partners; they must take an active role in assisting the participant access the resources requested (e.g., providing a direct referral, scheduling an appointment, assisting to prepare necessary documentation, and conducting consistent contact to determine the outcome of the referral). The DVOP specialist must coordinate wraparound services to assist the participant in overcoming any barriers specified in the objective assessment as doing so will demonstrate the program's value and its commitment to the participant's success.

The coordination of wraparound services must be recorded by service code V06 (JVSG - Coordination of Wraparound Services) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

Note: It is encouraged that local management have DVOP specialists maintain referral outcome records to establish best practices and overall resources gained from the referral activities. These records should be reviewed on a quarterly basis to ensure referral activities are productive.

7. Work Experience

DVOP specialists may place JVSG participants in work experience opportunities through the Workforce Innovation and Opportunity Act (WIOA) or other programs to provide work-based opportunities to practice and enhance the skills and knowledge gained from their military service, program of study, or industry training program.

Work experience is a structured learning experience that takes place in a workplace for a limited period and may be paid or unpaid. Work experience must include academic and occupational education concurrently or sequentially. Work experience opportunities include, but are not limited to:

- a. Apprenticeships;
- b. Department of Defense SkillBridge Program;
- c. Internships;
- d. Job shadowing;
- e. Pre-apprenticeship programs;
- f. Transitional jobs; and
- g. Veterans Affairs Work Study Program.

A work experience should be related to the participant's employment goal. The assessment process and development of the IEP will help to identify appropriate worksites for each participant. The objective assessment process may identify concerns or issues that should be addressed prior to or concurrently with a work experience.

Work experience opportunities may be provided through the WIOA program, which will require the DVOP specialist to assist the participant with preparing documentation for program eligibility and scheduling necessary orientations and appointments. When referring participants to WIOA for work experience opportunities, service code 211 (Referral to WIOA) must be recorded. The case note should indicate how the DVOP specialist helped facilitate enrollment in the work experience opportunity.

LWDB 14 has established local policies and procedures which streamline and encourage the referral of JVSG participants to WIOA work experience opportunities and other relevant services. LWDB 14 is encouraged to build policies and procedures which emphasize the referral of VR&E (Chapter 31) veterans to work experience opportunities.

Note: Veterans referred to WIOA-funded workforce experience opportunities and other relevant services, who are determined eligible, receive priority of service in accordance with [Administrative Policy 111: Priority of Service for Veterans and Eligible Spouses](#) and [Administrative Policy 105: Priority of Service \(WIOA\)](#).

The enrollment of a JVSG participant in a work experience opportunity with the assistance of a DVOP specialist must be recorded using service code V07 (JVSG - Work Experience) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

8. Workforce Preparation Activities

DVOP specialists may provide participants workforce preparation activities to increase a participant's employability and help prepare them for the workforce. Workforce preparation activities refer to skills and competencies that are not only useful in the workplace but are fundamental life skills. These preparations may be in the form of activities, programs, and/or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills including competencies in:

- a. Adjusting to civilian work environment;
- b. Critical thinking;
- c. Digital skills;
- d. Skills necessary for successful transition into and completion of post- secondary education, training, or civilian employment;
- e. Utilizing resources; and
- f. Working with others.

The provision of workforce preparation activities must be recorded by service code V08 (JVSG - Workforce Preparation Activities) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

9. Consistent Contact

Regular, consistent contact between the DVOP specialist and the participant, including meetings and updates, both pre-and post-employment, is the foundation of quality case management. Consistent contact is based on the participant's individual needs and situation per the written plan and case notes. Consistent contact may be conducted remotely or in-person; however, no pre-employment contacts should be made without reference to the IEP's goal and objectives. The purpose of pre-employment consistent contact is to ensure all parties are accountable for achieving the objectives and goal of the jointly developed IEP.

When the participant successfully obtains employment, the DVOP specialist must provide post-employment consistent contact for 90 days to ensure sustained employment. Post-employment consistent contact must be performed on a biweekly basis the first month following employment and on a monthly basis thereafter.

Successful consistent contact must involve direct contact with the participant; contact attempts which are not successful do not constitute a successful consistent contact service activity. Direct contact is considered to have occurred when the DVOP specialist and the participant have exchanged information, or the participant has agreed to the service being provided. Contact attempts should be made through various means (i.e., phone, email), and conducted at different times of the day. DVOP specialists who are unable to contact a participant after 90 days must close and exit the case in accordance with [Administrative Policy 115: Common Exit](#).

Successful consistent contact must be recorded by service code V09 (JVSG – Consistent Contact)⁷ and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

Unsuccessful contact attempt case note titles must be numbered in sequential order to indicate the number of attempts made (e.g., Unsuccessful Contact Attempt - 2nd, 3rd, 4th, etc.).

10. Disabled Veterans Outreach Program Specialist Outreach Engagement

As part of their primary duties, DVOP specialists conduct outreach activities in the local area to build capacity with community resources, engage with current participants, and actively recruit eligible veterans to increase their case load. When conducting outreach activities, DVOP specialists may provide immediate services to individuals determined eligible in accordance with [Administrative Policy 102: Veteran Intake at Career Centers](#).

⁷ Service code V09 (JVSG – Consistent Contact) is contingent on an IEP being present in the current program application and does not extend nor trigger participation.

Additionally, DVOP specialists may need to conduct outreach⁹ to actively case manage participants and provide necessary in-person services. When a DVOP specialist provides a service to a JVSG participant during outreach, or an individual presents at the career center and is enrolled in JVSG as a result of outreach activities, the DVOP specialist must document this by recording service code V10 (JVSG - DVOP Outreach Engagement) and including a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide. This service code must only be used for the following scenarios:

- a. When a DVOP specialist provides a service to a current participant during outreach.
- b. When a DVOP specialist provides a service to a new participant during outreach.
- c. When a new participant is enrolled in the JVSG program as a result of a DVOP specialist's outreach efforts.¹⁰

Note: The service code V10 (JVSG - DVOP Outreach Engagement) is to be utilized in conjunction with service code E49 (Organizational Visit VET/MSFW). The E49 (Organizational Visit VET/MSFW) code captures the outreach location visit and the V10 (JVSG - DVOP Outreach Engagement) code captures the individual who was served during, or as a result of, the outreach activities. LWDB 14 is encouraged to monitor and analyze the relationship between the V10 (JVSG - DVOP Outreach Engagement) and the E49 (Organizational Visit VET/MSFW) codes to determine the effectiveness of DVOP specialist outreach activities.

11. Work Readiness Case Conference

In a team approach, a DVOP specialist will provide the individualized career services needed to prepare the participant to be deemed work ready to be referred to a LVER for job development and advocacy services. These activities conducted by the LVER provide individualized advocacy and additional opportunities to veterans and eligible persons that effectively facilitate the participant's employment.

⁹ DVOP specialists must not conduct outreach to a participant's private residence. Outreach for the purpose of providing services to a participant who is already enrolled in JVSG should occur in a safe and public setting (e.g., college campus, homeless shelter, community partner's facility).

¹⁰ Service code V10 must only be entered once for individuals presenting at the career center and enrolling in JVSG as a result of a DVOP specialist's outreach efforts. Subsequent V10 service codes for that individual must only be entered for services provided during outreach.

The LVER must meet directly with the veteran or eligible person, in person or remotely, to verify work ready status and determine an effective outreach strategy to market the participant to appropriate employment opportunities. This meeting is facilitated by the DVOP specialist through an organized and scheduled case conference. It is recommended the DVOP specialist advise the participant of the role of the LVER as early in the case management process as possible. The effective explanation of the LVER's role demonstrates the program's value to the participant and should further encourage the participant to remain engaged throughout the case management process.

Prior to scheduling the work readiness case conference, the DVOP specialist must ensure the participant's work ready status by ensuring, at minimum, the participant has:

- a. An occupational goal with a favorable market outlook as determined using Employ Florida Labor Market Information (LMI);
- b. The knowledge, skills, aptitudes, and abilities required for the occupational goal;
- c. No barriers that prevent obtaining and retaining employment¹¹;
- d. An appropriate, targeted, and current resumé;
- e. Suitable interview attire;
- f. Reliable transportation¹²; and
- g. Demonstrated proper interviewing skills.

Additionally, prior to the referral, the DVOP specialist must provide the LVER information regarding the participant's:

- i. Justice-involvement issues (if applicable);
- ii. Occupational interests;
- iii. Physical limitations; and
- iv. Salary expectations.

The coordination of a work readiness case conference must be recorded by service code V11 (JVSG – Work Readiness Case Conference) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

¹¹ The veteran may be deemed work ready regardless of unresolved barriers to employment, so long as the remaining barriers will not hinder or prevent the obtaining or retaining of employment.

¹² Veterans who do not have access to reliable, private transportation may be referred to the LVER²⁴⁵ however, the LVER must tailor the outreach strategy to those employers accessible through public transportation and within walking/biking distance of the participant's residence.

12. Job Referrals

DVOP specialists may provide work-ready participants referrals to employment openings in accordance with [Administrative Policy 96: Job Seeker Registration, Application and Services](#). Job referrals must be recorded in Employ Florida by following the instructions available in the [Virtual OneStop® User Guide for Staff, Section 19: Manage Labor Exchange](#). Referrals recorded in Employ Florida in accordance with this policy will automatically generate the relevant service code and the DVOP specialist must include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide. DVOP specialists should inform LVER staff of referrals made to allow for veteran advocacy efforts.

13. Staff-Assisted Job Search Activities

DVOP specialists may provide staff-assisted job search activities for work ready participants. Staff assisted job search activities must include significant staff involvement designed to help the participant plan and carry out a successful job-search strategy. These activities include resume preparation assistance, job search workshops, job finding clubs, development of a job-search strategy, and conducting a job search on behalf of the participant. Conducting a job search through Employ Florida on behalf of the participant without the participant's knowledge, does not constitute a staff-assisted job search activity.

The provision of staff-assisted job search activities must be recorded by service code 114 (Staff-Assisted Job Search) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

C. Local Veterans' Employment Representative

LVER staff conduct employer outreach activities as part of LWDB 14's business services unit that support veteran individual job developments and the referral of veterans to appropriate job openings. To serve veterans and eligible persons effectively and efficiently, LVER staff must focus on their primary role, which is employer outreach on behalf of veterans. In executing this role, LVER staff must concentrate efforts on advocacy services for veterans jointly determined to be work ready after receipt of individualized career services from a DVOP specialist. These activities must include efforts to increase job opportunities for veterans and eligible persons through direct employer contact¹³.

¹³ Direct employer contact may be conducted in-person, over the phone, or through other remote means. Direct contact requires an acknowledgement from the employer regarding the specific service provided.

D. Advocacy, Job Development Activities, and Employ Florida Reporting

LVER staff must document advocacy efforts in the employer's service record and/or the participant's Employ Florida Wagner-Peyser program application, in accordance with this policy, by recording the service code which corresponds to the service provided, as follows:

Service Code	Service Code Description	Employer or Participant Code
123	Job Development Contact	Participant
E33	Job Development	Employer
500	Referred to Job Over 150 Days	Participant
V12	JVSG - Veteran Advocacy Contact	Participant
E53	Veteran Advocacy	Employer

1. Job Developments

[20 Code of Federal Regulations \(CFR\) § 651.10](#) defines a job development as the process of securing a job interview with a public or private employer for a specific participant for whom the career center has no suitable opening on file. Prior to conducting job development activities on behalf of a participant, LVER staff must conduct a full review of Employ Florida to ensure there is no suitable employment opening on file¹⁴.

The process of securing a job interview on behalf of a veteran or eligible person must occur through direct contact with the employer. Job developments must center on each veteran's needs, skills, abilities, goals, physical abilities, and limitations determined through the work readiness case conference, as described in [Section IV.B.11](#) of this policy.

LVER staff must document job developments made on behalf of work ready JVSG participants by:

- a. Recording service code 123 (Job Development Contact) in the participant's Employ Florida Wagner-Peyser Program Application and attaching a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide; and
- b. Recording employer service code E33 (Job Development) in the employer's service plan. A case note is not required if the case note was entered appropriately on the corresponding 123 (Job Development Contact) service code.

¹⁴ If a suitable employment opening is available in Employ Florida, the LVER should coordinate with Wagner-Peyser staff or the DVOP specialist to facilitate a direct referral. LVER staff may contact the employer to advocate on behalf of the veteran in accordance with this policy. 247

Note: The 123 (Job Development Contact) and E33 (Job Development) are complementary service codes that are required for documenting job development contact attempts in most cases. There must be a corresponding number between both services for LVER staff when a business is registered in Employ Florida.

i. Job Development Job Orders

Successful job development activities which result in a job order must be recorded in Employ Florida in accordance with [Administrative Policy 99: Job Orders and Placements](#) and relevant local policies and procedures.

ii. Referral to Job Development Job Orders

LVER staff may make direct referrals of veterans and eligible persons to job development job orders in accordance with [Administrative Policy 96: Job Seeker Registration, Application and Services](#). Job referrals must be recorded in Employ Florida by following the instructions available in the [Virtual OneStop® User Guide for Staff, Section 19: Manage Labor Exchange](#). Referrals recorded in Employ Florida in accordance with this policy will automatically generate the respective service code. LVER staff must not make referrals to job orders that were not created through their job development activities.

2. Veteran Advocacy Contact

LVER staff must advocate on behalf of all veterans, with an emphasis on individualized advocacy on behalf of veterans and eligible persons who have been deemed work ready after receipt of individualized career services from a DVOP specialist. LVER staff conduct veteran advocacy contacts by making direct contact with employers and attempting to secure an interview for a specific veteran for an employment opening that is on file in the Employ Florida online labor exchange system.

LVER staff must document veteran advocacy contact attempts made on behalf of work ready veterans and eligible persons by:

- a. Recording service code V12 (Veteran Advocacy Contact) in the participant's Employ Florida program application and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.
- b. Recording employer service code E53 (Veteran Advocacy) in the employer's service plan. A case note is not required if the case note was entered appropriately on the corresponding V12 (Veteran Advocacy Contact) service code.

Note: The V12 (Veteran Advocacy Contact) and E53 (Veteran Advocacy) are complementary service codes that are required for documenting individual advocacy attempts. There should be a corresponding number between both services for LVER staff.

3. Career Center Staff

Career center staff must be prepared to serve veterans and eligible persons when a DVOP specialist is unavailable. At minimum, the LWDB must ensure that the veteran or eligible person is provided with the services requested by the appropriate staff member. Additionally, career center staff must refer the eligible person to the DVOP specialist within two (2) business days so that they may provide a follow-up contact to determine if any additional services are desired. The DVOP specialist who receives the referral must attempt to contact the eligible veteran or person within two (2) business days of receipt of the referral. Career center staff are not required to case manage veterans and eligible persons, unless mandated by local policy or program-specific requirements.

Referral by a career center staff member to a DVOP specialist for follow-up must be recorded using service code 168 (Referral for DVOP Follow-Up) and include a case note that aligns with the requirements prescribed in the *Employ Florida Service Code Guide*.

V. STATE AND LOCAL MONITORING

Services and activities provided under JVSG must be monitored annually for compliance with JVSG requirements by DEO. DEO will monitor the requirements outlined in this policy inclusive of required local operating procedures. Additionally, LWDB 14 has established local monitoring policies and procedures that include, at minimum:

1. Roles of the JVSG participant and LWDB 14 staff;
2. Coordination of DVOP specialist and LVER staff; and
3. Local monitoring procedures for implementation of this policy.

VI. DEFINITIONS

Caregiver - As defined by [Title 38, U.S.C. 1720G\(d\)](#), with respect to an eligible veteran, a caregiver means an individual who provides personal care services to support the veteran's:

- a. Health and well-being;
- b. Everyday personal needs (like feeding, bathing, and dressing); and/or
- c. Safety, protection, or instruction in their daily living environment.

Career Center - Also known as a one-stop center or American Job Center (AJC), career centers are designed to provide a full range of assistance to job seekers under one roof. Established under the Workforce Investment Act and reauthorized in the Workforce Innovation and Opportunity Act of 2014, these centers offer training referrals, career counseling, job listings, and similar employment-related services.

Case Notes - Online statements entered in the State MIS, Employ Florida, by the staff member that identifies a participant's status for a specific data element, the date on which the information was obtained, and the career planner who obtained the information.

Consolidated Position (CP) - Staff who performs the functions and duties of both a LVER and DVOP specialist in select LWDBs as assigned by the State Veterans' Program Office.

Disabled Veterans Outreach Program (DVOP) Specialist - Specialists who provide individualized career services and facilitate placements to meet the employment needs of veterans and eligible persons who have significant barriers to employment or have otherwise been designated by the U.S. Department of Labor (DOL) Veterans' Employment and Training Service (VETS).

Eligible Person - A veteran, spouse, or caregiver who is eligible to receive services from a DVOP specialist as described in Administrative Policy 102: Veteran Intake at Career Centers.

Individualized Career Services - Services required to retain or obtain employment, consistent with [20 CFR 678.430](#). Generally, these services involve significant staff time and customization to the veteran's needs. Individualized career services include services such as: specialized assessments, developing an individual employment plan, counseling, work experiences (including transitional jobs), etc.

Job Finding Clubs - An organized activity that provides instructions on resume writing, application preparation, interviewing skills, and/or job lead development and includes a period of structured application where participants attempt to obtain jobs.

Job Referral - A staff-assisted job referral is the act of LWDB 14 staff facilitating the match between qualified jobseekers and employers with job openings; and the recording of such referral in Employ Florida.

Job Search Planning - Development of a plan (not necessarily a written plan) that includes the necessary steps and timetables to achieve employment in specific occupational, industry, and/or geographic area.

Job Search Workshop - An organized activity that provides instructions on resume writing, application preparation, interviewing skills, and/or job lead development.

Justice Involved - Having had interactions with the criminal justice system as a defendant.

Local Veterans' Employment Representative (LVER) - A representative funded by the JVSG who:

- a. Conducts outreach to employers in the area to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search groups;
- b. Ensures priority of service is administered within the career center in accordance with federal and state requirements; and
- c. Facilitates employment, training, and placement services furnished to veterans in a State under the applicable State employment service delivery systems.

Participant - An individual who is determined eligible to participate in the program and receives a service funded by the program in either a physical location (CareerSource Florida Network Career Center or affiliate site) or remotely through electronic technologies.

Priority of Service - With respect to any qualified job training program, a covered person shall be given priority over nonveterans for the receipt of employment, training, and placement services provided under that program, notwithstanding any other provision of law. In order to be eligible for priority of service, a veteran must have served at least one day in the active military, naval, or air service, and have been discharged or released under conditions other than dishonorable, as specified in [Title 38, U.S.C. Section 101](#).

Resume Assistance - The act of providing a participant instruction on resume content, format, and cover letters along with providing assistance in the development and creation of the same.

Suitable Employment - Employment that offers wages comparable to the participant's recent employment and duties that correspond to his/her education level and previous work experience. Further, suitable employment should be within a reasonable commuting distance from the participant's place of residence, based upon the participant's commuting capabilities (i.e., personal vehicle, bus, walking).

Transitioning Service Member - A member of the U. S. military who will separate from active service in the next 12 months, or who will retire from active service in the next 24 months.

VII. REVISION HISTORY

This policy rescinds DEO Memorandum Disabled Veterans Outreach Program (DVOP) Specialist and Individualized Career Services (ICS) Codes, issued April 1, 2019.

Date	Description
8/19/2021	Approved by CareerSource Florida Board of Directors.
8/20/2021	Issued by Florida Department of Economic Opportunity.
	Approved by the CareerSource Pinellas Board of Directors

VIII. RESOURCES

[Employ Florida Service Code Guide](#)

[Employ Florida VETS](#)

[Jobs for Veterans State Grants \(JVSG\) Primer](#)

[Veterans' Program Letters Directory](#)



VII. General Counsel Update



VIII. Other Administrative Matters



INFORMATION ITEM 1

Subrecipient Monitoring

For the Period July 1, 2020 – June 30, 2021

2 CFR 200.331(d) requires that awarding agencies “monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward.” CareerSource Pinellas conducts business with two entities that are considered subrecipients, Pinellas Education Foundation (Youth Connect) and Dynamic Workforce Solutions (One-Stop Operator).

Pinellas Education Foundation

Period Reviewed – July 1, 2019 – July 31, 2020

Contracted Amount - \$588,583

Observations

- Document and certify cost allocation plan
- Ensure proper internal controls are in place for prepaid supportive services cards
- Strengthen controls surrounding preparation of personnel activity reports
- Utilize training vouchers whenever possible to prevent being overcharged
- Ensure that timesheets are properly approved (repeat of prior year observation)

Technical Assistance

- Document procurement policy consistent with 2 CFR 200
- Florida Reemployment Taxes were not charged to Youth Connect grant
- Strengthen password requirements for financial systems
- Consider revising accounting policies and procedures (repeat of prior year technical assistance)
- Consider applying for an indirect cost rate or elect to charge a de minimis rate of 10% (repeat of prior year technical assistance)

Dynamic Workforce Solutions

Period Reviewed – July 1, 2019 – August 14, 2020

Contracted Amount - \$47,000

Other Non-Compliance Issue

- Recommendation to update indirect cost rate

Observation

- Recommendation to update cost allocation plan

The Internal Control Questionnaire from DEO that each Local Workforce Develop Board (LWDB) is required to complete on an annual basis specifically asks whether LWDB monitors all subrecipients and communicates the monitoring results to the LWDB’s board of directors²⁵³



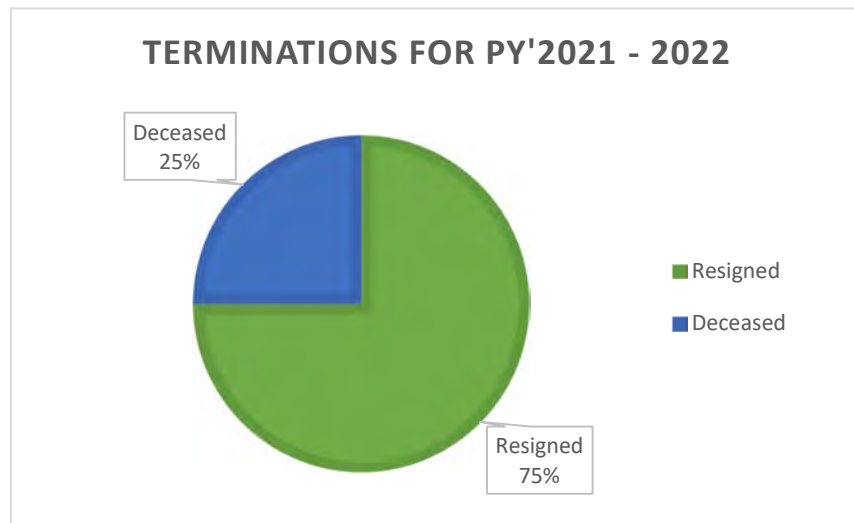
INFORMATION ITEM 2

Compensation Summary Report

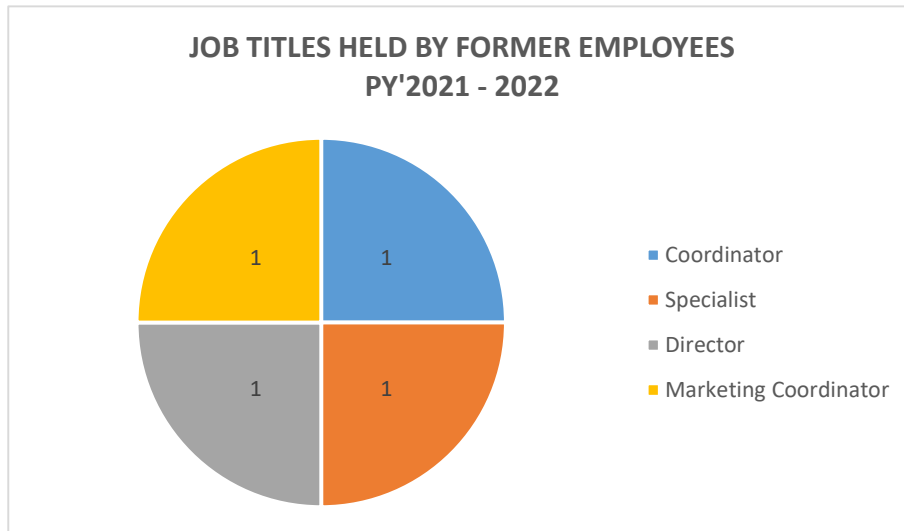
During the November 14, 2019, meeting, the Compensation Committee requested compensation summary reports for review.

Based on this request, we present the following compensation summary reports, including turnover data, the total number of active staff, a pay range summary, notice of newly hired positions, and the average salary.

For PY'2021 – 2022 as of September 23, 2021, four employees exited the organization. The reasons for separation are listed below:



The breakdown of positions for these former employees is as follows:



Additionally, for the program year as of July 1, 2021, a total of three new hires were chosen to join the organization for the following positions:



As of September 23, 2021, CareerSource Pinellas employees 47 individuals, and the average salary is \$54,692 annually.



INFORMATION ITEM 3

CareerSource Pinellas Pay Range by Job Family

For your review, please see the attached chart detailing pay ranges by Job Family for the 47 active employees as of 09/23/2021.

There is one Technician exceeding the maximum salary threshold due to seniority, having held a position since 06/29/2010.

There is one Navigator exceeding the maximum salary threshold due to seniority, having held a position since 07/01/2009.

There is one Lead exceeding the maximum salary threshold due to seniority, having held a position since 07/01/2009.

There are two Coordinators exceeding the maximum salary threshold due to industry experience.



INFORMATION ITEM 3

CareerSource Pinellas Pay Range by Job Family

Job Family Titles										
Job Title Family	Grade Level	No of Employees at min salary	No of Employees at mid-point	No of Employees at max salary	Min Salary	Mid Salary	Max Salary	Actual Salary - Single Position	Annual Benefit Stipend	401(k) Retirement Plan
Technicians	102	2	3	1	\$33,580	\$38,640	\$43,700		\$13,080.00	5% of base pay
Instructor	103				\$36,500	\$42,000	\$47,500		\$13,080.00	5% of base pay
Specialist	103	8	2		\$36,500	\$42,000	\$47,500		\$13,080.00	5% of base pay
Career Counselor	104	7	4		\$39,420	\$45,360	\$51,300		\$13,080.00	5% of base pay
Navigator	104			1	\$39,420	\$45,360	\$51,300		\$13,080.00	5% of base pay
Instructor, Trades	105		1		\$42,574	\$48,989	\$55,404	\$54,995.20	\$13,080.00	5% of base pay
Business Services Representative	105	1	1		\$42,574	\$48,989	\$55,404		\$13,080.00	5% of base pay
Lead	105	1	1	1	\$42,574	\$48,989	\$55,404		\$13,080.00	5% of base pay
Coordinator	206	1	4	2	\$45,979	\$52,908	\$59,836		\$13,080.00	5% of base pay
Supervisor	208	1			\$53,630	\$64,356	\$75,083	\$62,899.46	\$13,080.00	5% of base pay
Partner	210				\$62,555	\$75,065	\$87,576		\$13,080.00	5% of base pay
Director	214	2	1		\$82,943	\$103,841	\$124,741		\$13,080.00	5% of base pay
CFO/COO	219	1			\$121,870	\$158,431	\$194,992	\$137,812.74	\$13,080.00	5% of base pay
CEO	221		1		\$142,149	\$184,794	\$227,438	\$188,475.30	\$13,080.00	5% of base pay
Total Staff		24	18	5						
Percentage		47.06	35.29	9.80						

* Information as of Sept. 23 2021

Grade	Exemption
100s	Non-Exempt
200s	Exempt



INFORMATION ITEM 4

Request for Quotes for 2022 Compensation Review

In February 2019, hrEdge Consulting was retained by CareerSource Pinellas to conduct a Compensation Review. The review was designed to focus on salary range equity externally, as well as internal structure of position titles. The review included the following deliverables:

- Review of all active positions and recommendations for continued, discontinued, and merged position titles.
- Review of external Compensation Survey Reports and analysis of CareerSource ranges for each position.
- Review of CareerSource Pinellas Compensation versus other Florida CareerSource Compensation Structures.
- Development of new pay structure to include Min-Mid-Max for each Grade and the Spread between Grades.
- Analysis of employee impact and cost of implementation.

An important aspect of being an Employer of Choice includes offering our Team Members the best employment experience possible, which also incorporates robust benefit offerings to support Employees' well-being. To remain competitive in this incredibly tight talent market, CareerSource Pinellas will issue a Request for Quotes (RFQ) from various third-party HR practitioners to conduct an updated Compensation Review.



INFORMATION ITEM 5

Organizational Chart

As part of the Compliance Review and the request to continuously review and update the Organizational Chart, please see the attached version updated as of July 1, 2021.

Since March 1, the Finance Department has decreased by one Coordinator. As part of the succession planning efforts within the organization, we are currently sourcing for a senior finance professional to add to the department.

Since the beginning of the current Program Year, the Workforce Programs team has decreased by one Director. The Director of Business and Talent Development has stepped in to serve as the Interim Workforce Programs Director.

The Marketing Coordinator resigned her position with the organization, and at current, Tucker Hall is handling the Marketing function.

Since the beginning of the current Program Year, the organization has welcomed the following employees to the CareerSource Pinellas team:

- Jacqueline DuChene Heyward, Director of Human Resources
- Melissa Ehrhardt, Business Services Coordinator
- Deithre Brown, Business Services Representative

Jennifer Brackney
Chief Executive Officer (CEO)

Leah Geis
Executive Assistant

The Executive Assistant is responsible for planning and implementing administrative functions, including board activities, maintaining records and clerical support.

Jacqueline DuChene-Heyward
Human Resource Director

The HR Director is responsible for planning and implementing HR functions, including talent development, employee engagement, compensation, and benefits.

Vacant
Supervisor, Marketing

The Marketing Supervisor is responsible for internal and external communications, website maintenance, building our social media presence.

Steven Meier
Chief Financial Officer (CFO)

The Finance team is responsible for directing the financial activities of the organization in accordance with generally accepted accounting principles and federal/state guidelines including, budgeting, payroll, procurement, reporting and monitoring.

- Director – Vacant
- Coordinator, Finance – (1)
- MIS Technician – (1)

Paul Ashe
Virtual Chief Information Officer

The Virtual Chief Information Officer (CIO) will be responsible for planning and implementing information systems, including acting as liaison between Abacode, Cybersecurity and CTS Technology and helpdesk.

April Torregiante
Director, Workforce Strategic Initiatives

The Business and Strategic Initiatives Director is responsible for ensuring compliance with the subgrantee agreement and reporting requirements to the DEO and DOL.

Vacant
Director

Kristopher Lucas
Director, Business & Talent Development and Workforce Programs Interim Director

The Workforce Programs team is responsible for planning, development and implementation of workforce programs, including Welfare Transition (WT), SNAP, Workforce Opportunity Investment Act (WIOA) and Career Resource Centers.

- Supervisor – (1)
- Coordinators – (4)
- Lead – (1)
- Lead, MIS – (2)
- Career Counselors – (10)
- Technicians – (5)
- Disability Navigator – (1)
- ❖ State, Veterans, AARP Staff – (2)

The Business and Talent Development team is responsible for building relationships within the community, providing exceptional customer service to our employer-customers, and aid in their search for quality employees. This team is also responsible for the services delivered in the Career Resource Center.

- Coordinator – (4)
- Lead – (1)
- Career Counselor – (1)
- Specialists – (11)
- Business Account Executives – (1)
- Instructor, Trades – (1)
- ❖ State, Veteran Staff – (13)

PY' 2021 - 2022
CareerSource Pinellas
Employees: 50-55
Budget: \$4,184,408

Effective Date: July 1, 2021

❖ Denotes State, Veterans, AARP Staff



INFORMATION ITEM 6

CareerSource Pinellas Benefits Renewal for Open Enrollment

With the end of the 2021 Benefit Plan Year soon coming to a close, CareerSource Pinellas' HR Director has initiated the Benefits Renewal Process for 2022 Open Enrollment.

HUB International Southeast is CareerSource Pinellas' benefits broker, and two members of their team will be assisting CareerSource Pinellas' HR Director with the insurance renewal process:

- John D. Arcaro, Director of Payroll Services & Employee Benefits Advisor
- Felicia Hernandez, Account Manager

As of September 23, 2021, CareerSource Pinellas' HR Director has scheduled meetings with Mr. Arcaro and Ms. Hernandez to discuss benefit plan details and performance, as well as an outline the next steps for this process. The HR Director plans on focusing benefits plan design around developing a total rewards package that will allow CareerSource Pinellas to further its employer value proposition, as well as attract and retain new top talent.

The Board of Directors approved the Employee Health and Wellness Plan on November 14, 2019.

The Hybrid Benefit Plan is awarded in three parts 1) Medical stipend to equal the premium of the minimum essential plan (\$8,190), 2) Benefit stipend of a flat rate, standardized amount of \$4,390 to spend on cafeteria plan offering of benefits, and 3) Defined benefit of Life Insurance, AD&D, Long and Short-Term Disability. The estimated cost per each employee of the latter is \$500. The cost of the Hybrid Benefit Plan is approximately \$13,080 per employee.

As of September 2021, the current census is 47 eligible full-time employees with 24 employees (55%) currently enrolled in CareerSource Pinellas-sponsored health insurance.

The Benefit Renewal Process for 2022 Open Enrollment will be finalized soon for roll out to employees in December 2021.



INFORMATION ITEM 7

CareerSource Pinellas Wins an Award from Thrive by Five

CareerSource Pinellas' HR Director was notified by Dr. Paul Wirtz that the organization has won an award from Thrive by Five recognizing our family friendly employment policies. Being distinguished in our community for having employment policies that support our Team Members with young children speaks volumes about the organization's culture and priorities, and certainly positions CareerSource Pinellas as an Employer of Choice.

Thrive by Five Pinellas is a community-based organization committed to preparing children for kindergarten by building an early childhood system that's equitable, accountable, and responsive to children and their families.

Thrive by Five
1ST ANNUAL FAMILY FRIENDLY VIRTUAL BUSINESS AWARDS

Tuesday October 19 **11:30 a.m. - 1:00 p.m.**

Keynote Speaker
Madeleine Thakur
President of the Children's Movement of Florida

Moderator
Trevor Pettiford
Reporter Bay News 9

Eddie Gonzalez Loumeit
CEO of RUVIS

Dianne Jacob
PNC Bank
Senior Vice President

April Lott
CEO of Directions for Living

Kathleen Beckman
Clearwater City
Council Member

Bob Rohriack
Tampa Bay Chamber

Lindsay Carson
CEO of Pinellas Early Learning Coalition

Visit <https://bit.ly/3zivn1> to register

Proud Sponsors
TB

CareerSource Pinellas will be honored at Thrive by Five's 1st Annual Family Friendly Virtual Business Awards Ceremony, scheduled on October 19, 2021.



INFORMATION ITEM 8

Financial Statements

For the Two Months Ended August 31, 2021

Actual Year-To-Date Results compared to Prior Year

- Surplus for the two months-ended of \$2,226 compared to surplus of \$37,081 last year. Decrease resulted from lower Ticket-to-Work revenue this year (\$19,000), increased governmental relations expenses (\$10,000) and payment of annual Florida Workforce Development Association dues (\$4,250) which are all unrestricted items.
- Federal grant revenue was \$313,000 higher this year; driven by Welfare Transition Summer Youth Program (increase of \$278,000) and Training and Work-based initiatives for COVID Dislocated Worker grant (\$97,000) offset by lower WIOA Dislocated Worker training (\$87,000).
- Personnel expenses were slightly lower than prior year.
- On-the-Job Training expenses of almost \$166,000 represents Summer Youth Program participants wages.
- Dislocated Worker Work Experience of \$63,000 represents wages and fees paid related to COVID dislocated worker grant.
- Youth Stipends this year comprise milestone and attendance payments to YouthBuild students (\$8,200) and summer youth participants (\$2,800)
- Customer training is about \$64,000 lower this year as focus was on summer youth program.
- Internal monitoring is \$26,000 higher this year representing Taylor Hall's second compliance review in August.
- Contract Labor is almost \$50,000 higher this year; teachers' wages associated with summer youth program (\$17,600), virtual CIO expenses (\$22,000) and administrative assistant (\$8,600) in contract-to-hire position.
- Increase in Contract IT services attributable to SharePoint and One-Drive data migration.
- Repairs and maintenance this year represents painting of the St. Petersburg career center.

Actual YTD Results compared to Year-to-Date Budget

- Surplus for the month-ended of \$2,226 compared to a budgeted surplus of \$7,467.
- Federal grant revenue higher than budget due to Welfare Transition Summer Youth Program.



INFORMATION ITEM 8 cont.

Financial Statements For the Two Months Ended August 31, 2021

- Personnel costs behind budget due to change in the mix of positions.
- Service Provider Contract (with Pinellas Education Foundation) spending behind budget.
- On-the-Job Training expenses of almost \$156,000 higher than budget; represents Summer Youth Program participants wages.
- Dislocated Worker Work Experience of almost \$63,000 represents wages paid related to COVID dislocated worker grant; higher than budget by almost \$43,000.
- Training behind budget by about \$46,000.
- Contract Labor over budget due to teachers' wages associated with summer youth program, administrative assistant position on a contract-to-hire basis, and more time required by vCIO to manage IT strategic initiatives.
- Contract IT Services slightly higher than budget due to timing of SharePoint and One-Drive migration.
- Repairs and maintenance unfavorable spending; represents painting of St. Petersburg career center.



INFORMATION ITEM 8

CareerSource Pinellas
 Statement of Revenues and Expenditures
 From 7/1/2021 Through 8/31/2021
 (In Whole Numbers)

		Actual 2021-2022	Actual 2020-2021	Variance
Revenue				
Operating Revenue				
Grant Revenue				
Grant Revenue - Federal	3000	1,738,697	1,425,807	312,890
Total Grant Revenue		1,738,697	1,425,807	312,890
Contributions				
Donations	3102	1,000	0	1,000
Total Contributions		1,000	0	1,000
Program Revenue				
Ticket to Work Revenue	3103	16,662	35,733	(19,071)
Total Program Revenue		16,662	35,733	(19,071)
Investment Income				
Interest/Dividends	3200	1,814	3,644	(1,830)
Total Investment Income		1,814	3,644	(1,830)
Total Operating Revenue		1,758,172	1,465,183	292,989
Total Revenue		1,758,172	1,465,183	292,989
Expenditures				
Personnel Expenses				
Salary Expense	5000	464,383	455,977	(8,407)
Salary Expense - Benefit Stipend	5005	103,363	117,676	14,312
Payroll Taxes	5050	40,456	40,729	273
Fringe Benefits (ER Paid)	5060	2,758	6,053	3,295
Retirement	5090	26,931	30,137	3,206
Total Personnel Expenses		637,892	650,571	12,680
Program Expenses				
Food and Beverages	5310	268	0	(268)
Communications	5500	15,607	15,200	(407)
Outreach/Marketing	5520	150	262	112
Service Provider Contract	8000	61,713	51,272	(10,441)
One-Stop Operator	8100	3,927	2,876	(1,051)
Internal Monitoring	8200	26,140	0	(26,140)
OJT	8300	166,312	0	(166,312)
DWG Work Experience	8325	62,555	0	(62,555)
Workforce Services	8335	8,800	0	(8,800)
Youth Stipends	8340	11,061	0	(11,061)
Other Customer Support Services	8341	5,859	4,820	(1,040)
Customer Training	8342	412,806	476,964	64,157
Customer Supportive Services	8343	0	850	850
Training Related Material	8345	23,100	7,903	(15,196)
Fees/exams/certifications	8346	5,999	5,892	(108)
Total Program Expenses		804,298	566,038	(238,260)
Professional Fees				
Accounting/Audit Fees	5100	0	(300)	(300)
Legal Fees	5101	6,809	10,899	4,090
Professional Service	5104	11,462	14,238	2,776
Legal (Lobbying)	5105	10,000	0	(10,000)
Contract Labor	5170	49,734	91	(49,643)
Contract IT Services	5171	79,157	47,414	(31,743)
Cybersecurity - IT	5172	6,798	12,045	5,247
Total Professional Fees		163,960	84,386	(79,573)
Supplies				
Office Supplies	5302	1,809	2,326	517



INFORMATION ITEM 8

CareerSource Pinellas
 Statement of Revenues and Expenditures
 From 7/1/2021 Through 8/31/2021
 (In Whole Numbers)

		Actual 2021-2022	Actual 2020-2021	Variance
Postage/Shipping	5307	749	209	(540)
Document Shredding	5308	125	150	25
Total Supplies		2,683	2,685	2
Insurance				
Insurance - Commercial Property	5400	1,175	812	(363)
Insurance - General Liability	5401	14,756	9,221	(5,536)
Insurance - Workers Comp	5403	8,153	0	(8,153)
Insurance - Auto	5404	1,268	1,096	(172)
Total Insurance		25,353	11,128	(14,225)
Occupancy				
Office Rent/Lease	5200	39,956	45,060	5,104
Other Leases	5201	740	1,395	655
Utilities	5202	5,440	7,854	2,414
Repairs & Maintenance	5203	17,200	3,266	(13,934)
Security	5204	78	78	0
Janitorial Expense	5205	6,604	7,850	1,246
Pest Control	5206	392	384	(8)
Total Occupancy		70,410	65,887	(4,523)
Office Equipment				
Equipment Rent/Lease	5300	6,100	6,287	187
Copy Machine Usage/Maintenance	5301	1,640	1,201	(440)
Comp	5304	19,069	15,910	(3,159)
Software/License/Maintenance				
Equipment < \$5,000	5305	490	0	(490)
Total Office Equipment		27,299	23,398	(3,902)
Travel and Meetings				
Travel - Mileage	5540	578	603	25
Meetings/Conferences	5560	6,620	1,816	(4,804)
Total Travel and Meetings		7,198	2,419	(4,779)
Licenses, Dues and Other Fees				
Staff Training/Education	5052	1,000	9,085	8,085
Other Employee expenses	5055	0	155	155
Recruitment	5095	111	121	10
Payroll Processing Fees	5103	1,191	1,208	17
License/Dues & Other Fees	5581	13,621	8,631	(4,990)
401k Administrative Fees	5583	0	1,357	1,357
HRIS Administrative Fees	5584	826	904	77
Total Licenses, Dues and Other Fees		16,749	21,461	4,712
Miscellaneous				
Bank Fees	5102	104	1	(103)
Vehicle Expenses	5701	0	127	127
Total Miscellaneous		104	129	24
Total Expenditures		1,755,946	1,428,102	(327,844)
Net Revenue over (under) Expenditures		2,226	37,081	(34,855)



INFORMATION ITEM 8

CareerSource Pinellas
 Statement of Revenues and Expenditures - 21 - 22 Actual vs Budget
 From 7/1/2021 Through 8/31/2021
 (In Whole Numbers)

		Actual YTD	YTD Budget	YTD Budget Variance	Full Year Budget	Budget Remaining
Revenue						
Operating Revenue						
Grant Revenue						
Grant Revenue - Federal	3000	1,738,697	1,582,223	156,474	9,085,810	(7,347,113)
Total Grant Revenue		1,738,697	1,582,223	156,474	9,085,810	(7,347,113)
Contributions						
Corporate Revenue	3100	0	0	0	11,500	(11,500)
Sponsorship Revenue	3101	0	0	0	3,000	(3,000)
Donations	3102	1,000	0	1,000	0	1,000
Total Contributions		1,000	0	1,000	14,500	(13,500)
Program Revenue						
Ticket to Work Revenue	3103	16,662	18,000	(1,338)	108,000	(91,338)
Total Program Revenue		16,662	18,000	(1,338)	108,000	(91,338)
Investment Income						
Interest/Dividends	3200	1,814	2,000	(186)	12,000	(10,186)
Total Investment Income		1,814	2,000	(186)	12,000	(10,186)
Total Operating Revenue		1,758,172	1,602,223	155,949	9,220,310	(7,462,138)
Total Revenue		1,758,172	1,602,223	155,949	9,220,310	(7,462,138)
Expenditures						
Personnel Expenses						
Salary Expense	5000	464,383	506,772	42,389	2,998,039	2,533,656
Salary Expense - Benefit Stipend	5005	103,363	113,324	9,961	670,925	567,562
Payroll Taxes	5050	40,456	50,360	9,904	297,819	257,363
Fringe Benefits (ER Paid)	5060	2,758	6,738	3,980	40,428	37,670
Retirement	5090	26,931	29,982	3,051	177,197	150,266
Total Personnel Expenses		637,892	707,176	69,284	4,184,408	3,546,516
Program Expenses						
Operating Supplies	5303	0	300	300	1,750	1,750
Food and Beverages	5310	268	200	(68)	1,200	932
Communications	5500	15,607	16,324	717	97,944	82,337
Outreach/Marketing	5520	150	4,150	4,000	30,650	30,500
Service Provider Contract	8000	61,713	83,330	21,617	500,000	438,287
One-Stop Operator	8100	3,927	7,000	3,073	42,000	38,073
Internal Monitoring	8200	26,140	32,500	6,360	65,000	38,860
OJT	8300	166,312	10,000	(156,312)	60,000	(106,312)
Paid Work Experience	8320	0	15,000	15,000	90,000	90,000
DWG Work Experience	8325	62,555	20,000	(42,555)	90,000	27,445



INFORMATION ITEM 8

CareerSource Pinellas
 Statement of Revenues and Expenditures - 21 - 22 Actual vs Budget
 From 7/1/2021 Through 8/31/2021
 (In Whole Numbers)

		Actual YTD	YTD Budget	YTD Budget Variance	Full Year Budget	Budget Remaining
Apprenticeships	8330	0	8,000	8,000	36,000	36,000
Workforce Services	8335	8,800	9,600	800	67,200	58,400
Youth Stipends	8340	11,061	7,000	(4,061)	42,000	30,939
Other Customer Support Services	8341	5,859	4,020	(1,839)	24,120	18,261
Customer Training	8342	412,806	366,830	(45,976)	2,146,305	1,733,499
Customer Supportive Services	8343	0	13,500	13,500	81,000	81,000
Training Related Material	8345	23,100	18,640	(4,460)	111,840	88,740
Fees/exams/certifications	8346	5,999	6,756	757	40,540	34,541
Total Program Expenses		804,298	623,150	(181,148)	3,527,549	2,723,251
Professional Fees						
Accounting/Audit Fees	5100	0	9,000	9,000	42,500	42,500
Legal Fees	5101	6,809	10,000	3,191	60,000	53,191
Professional Service	5104	11,462	16,000	4,538	46,480	35,018
Legal (Lobbying)	5105	10,000	0	(10,000)	0	(10,000)
Contract Labor	5170	49,734	14,100	(35,634)	64,600	14,866
Contract IT Services	5171	79,157	71,900	(7,257)	331,400	252,243
Cybersecurity - IT	5172	6,798	6,798	0	41,643	34,845
Total Professional Fees		163,960	127,798	(36,162)	586,623	422,663
Supplies						
Office Supplies	5302	1,809	3,090	1,281	18,540	16,731
Postage/Shipping	5307	749	1,040	291	6,240	5,491
Document Shredding	5308	125	175	50	950	825
Total Supplies		2,683	4,305	1,622	25,730	23,047
Insurance						
Insurance - Commercial Property	5400	1,175	883	(292)	5,300	4,125
Insurance - General Liability	5401	14,756	11,502	(3,254)	69,087	54,331
Insurance - Workers Comp	5403	8,153	9,158	1,005	54,211	46,058
Insurance - Auto	5404	1,268	1,266	(2)	7,600	6,332
Total Insurance		25,353	22,809	(2,544)	136,198	110,845
Occupancy						
Office Rent/Lease	5200	39,956	39,956	(0)	257,397	217,441
Other Leases	5201	740	1,500	760	9,000	8,260
Utilities	5202	5,440	5,950	510	33,100	27,660
Repairs & Maintenance	5203	17,200	550	(16,650)	3,360	(13,840)
Security	5204	78	78	0	468	390
Janitorial Expense	5205	6,604	6,910	306	44,310	37,706
Pest Control	5206	392	386	(6)	2,316	1,924
Total Occupancy		70,410	55,330	(15,080)	349,951	279,541



INFORMATION ITEM 8

CareerSource Pinellas
 Statement of Revenues and Expenditures - 21 - 22 Actual vs Budget
 From 7/1/2021 Through 8/31/2021
 (In Whole Numbers)

		Actual YTD	YTD Budget	YTD Budget Variance	Full Year Budget	Budget Remaining
Office Equipment						
Equipment Rent/Lease	5300	6,100	6,066	(34)	36,396	30,296
Copy Machine Usage/Maintenance	5301	1,640	1,610	(30)	9,660	8,020
Comp Software/License/Maintenance	5304	19,069	17,476	(1,593)	86,977	67,908
Equipment < \$5,000	5305	490	3,666	3,176	22,000	21,510
Total Office Equipment		<u>27,299</u>	<u>28,818</u>	<u>1,519</u>	<u>155,033</u>	<u>127,734</u>
Travel and Meetings						
Travel - Mileage	5540	578	2,180	1,602	13,080	12,502
Travel - Out of Town	5541	0	1,700	1,700	34,200	34,200
Meetings/Conferences	5560	6,620	3,050	(3,570)	13,600	6,980
Total Travel and Meetings		<u>7,198</u>	<u>6,930</u>	<u>(268)</u>	<u>60,880</u>	<u>53,682</u>
Licenses, Dues and Other Fees						
Staff Training/Education	5052	1,000	2,300	1,300	8,800	7,800
Recruitment	5095	111	500	389	3,000	2,889
Payroll Processing Fees	5103	1,191	1,620	429	9,530	8,339
License/Dues & Other Fees	5581	13,621	12,590	(1,031)	36,104	22,483
FSA Administrative Expenses	5582	0	100	100	600	600
401k Administrative Fees	5583	0	0	0	5,400	5,400
HRIS Administrative Fees	5584	826	900	74	5,400	4,574
Total Licenses, Dues and Other Fees		<u>16,749</u>	<u>18,010</u>	<u>1,261</u>	<u>68,834</u>	<u>52,085</u>
Amortization and Depreciation						
Depreciation Expense	5901	0	0	0	22,769	22,769
Total Amortization and Depreciation		<u>0</u>	<u>0</u>	<u>0</u>	<u>22,769</u>	<u>22,769</u>
Miscellaneous						
Bank Fees	5102	104	80	(24)	480	376
Vehicle Expenses	5701	0	350	350	2,330	2,330
Total Miscellaneous		<u>104</u>	<u>430</u>	<u>326</u>	<u>2,810</u>	<u>2,706</u>
Total Expenditures		<u>1,755,946</u>	<u>1,594,756</u>	<u>(161,190)</u>	<u>9,120,785</u>	<u>7,364,839</u>
Net Revenue over (under) Expenditures		<u>2,226</u>	<u>7,467</u>	<u>(5,241)</u>	<u>99,525</u>	<u>(97,299)</u>



INFORMATION ITEM 8

CareerSource Pinellas Cost Allocation/Expenditure Report For the Two Months Ended August 31, 2021

	WIOA	Employment Services	WTP	SNAP	TAA	Total Direct Grants and Spec Projects	Total
Approved 2021-2022 Planning Budget	4,978,096	1,138,000	2,153,714	280,000	186,000	384,975	9,120,785
Expenditures to Date:							
Pooled Costs							-
Administrative	67,914	13,634	43,089	4,015	479	6,204	135,335
MIS\Technology	128	28,818	7,393	-	1,068	-	37,407
Outreach and Marketing	67	13,160	3,859	-	500	-	17,585
One-Stop Cost Pool	144	35,047	10,473	-	1,349	-	47,013
Program Management	40,848	16,296	63,927	9,388	2	-	130,461
Staff Training and Development	-	-	-	-	-	-	-
Business Services	65,477	5,180	50,076	-	-	-	120,733
Indirect Program	8,991	1,936	6,372	575	56	890	18,820
Total Pooled Costs	183,569	114,071	185,189	13,978	3,454	7,094	507,354
	21%	60%	33%	27%	63%	9%	29%
Direct Costs							
Personnel Expenses	97,810	24,510	151,437	30,160	28	42,651	346,596
Service Provider Contracts	61,206	-	507	-	-	-	61,713
Workbased Learning Initiatives	62,555	-	166,312	-	-	-	228,867
Training and Support Services	436,202	5,971	12,620	-	543	9,357	464,693
Other Direct Operating Costs	19,955	47,024	50,827	7,263	1,474	20,179	146,722
Total Direct Costs	677,728	77,505	381,703	37,423	2,045	72,186	1,248,591
	79%	40%	67%	73%	37%	91%	71%
Total Costs	861,297	191,576	566,892	51,401	5,499	79,280	1,755,945
Unexpended Budget Balance	4,116,799	946,424	1,586,822	228,599	180,501	305,695	7,364,841
Percentage of Budget Expended	17.3%	16.8%	26.3%	18.4%	3.0%	20.6%	19.3%



INFORMATION ITEM 8

CareerSource Pinellas Pooled Cost Expenditure Report For the Two Months Ended August 31, 2021

Expenditure	Admin	MIS/Tech Cost Pool	Outreach & Marketing Cost Pool	One-Stop Cost Pool	Case Mgmt Cost Pool	Business Services Cost Pool	Program Indirect	Total
Salary Expense	68,810	-	-	-	65,128	73,940	11,695	219,573
Salary Expense	6,943	-	-	-	16,986	16,045	996	40,970
Benefit Stipend								
Payroll Taxes	5,367	-	-	-	5,282	7,209	536	18,394
Fringe Benefits (ER Paid)	426	-	-	-	274	410	-	1,110
Retirement	3,108	-	-	-	4,060	3,498	585	11,251
Total Salary and Benefits	84,654	-	-	-	91,730	101,102	13,812	291,298
Office Rent/Lease	5,579	-	-	19,872	6,025	6,527	948	38,951
Contract Labor	8,582	22,050	-	-	-	-	1,460	32,092
Internal Monitoring	10,630	-	-	-	15,510	-	-	26,140
Contract IT Services	3,599	1,291	-	-	4,899	3,258	614	13,661
Professional Service	-	-	11,462	-	-	-	-	11,462
Insurance - General Liability	4,432	36	-	-	2,669	2,598	753	10,488
Comp Software/ License/Maintenance	2,023	6,660	-	-	748	300	344	10,075
License/Dues & Other Fees	785	-	5,973	-	250	2,000	134	9,142
Communications	1,327	83	-	3,109	1,387	1,270	225	7,401
Legal Fees	6,809	-	-	-	-	-	-	6,809
Cybersecurity - IT	-	6,798	-	-	-	-	-	6,798
Janitorial Expense	-	-	-	6,604	-	-	-	6,604
Utilities	-	-	-	5,440	-	-	-	5,440
Equipment Rent/Lease	278	-	-	3,925	251	278	47	4,779
Meetings/Conferences	1,788	-	-	-	1,341	1,553	-	4,682
Insurance - Workers Comp	1,421	-	-	-	1,835	929	90	4,275
One-Stop Operator	-	-	-	3,927	-	-	-	3,927
Workforce Services	-	-	-	-	2,933	-	-	2,933
Office Supplies	362	-	-	881	183	244	62	1,732
Copy Machine Usage/ Maintenance	207	-	-	830	223	242	35	1,537
Payroll Processing Fees	1,018	-	-	-	-	-	173	1,191
Insurance Commercial Property	21	-	-	953	23	25	4	1,026
Staff Training/Education	1,000	-	-	-	-	-	-	1,000
HRIS Administrative Fees	706	-	-	-	-	-	120	826
Postage/Shipping	33	-	-	627	30	33	-	723
Repairs & Maintenan	-	-	-	250	424	-	-	674
Equipment < \$5,000	-	490	-	-	-	-	-	490
Pest Control	-	-	-	392	-	-	-	392
Travel - Mileage	-	-	-	-	-	312	-	312
Outreach/Marketing	-	-	150	-	-	-	-	150
Document Shredding	-	-	-	125	-	-	-	125
Bank Fees	80	-	-	-	-	-	-	80
Security	-	-	-	78	-	-	-	78
Recruitment	-	-	-	-	-	61	-	61
Other/Rounding	1	(1)	-	-	-	1	(1)	-
	135,335	37,407	17,585	47,013	130,461	120,733	18,820	507,354



**INFORMATION ITEM 8
Grant Status Report**

CareerSource Pinellas														2021-2022 Fiscal Year			
Grant Status Report														16.67% through the Fiscal year as of 8/31/21			
														Total Grant			
MIP Fund #	Year	NFA ID	Program Name	Start Date	End Date	NFA Award	Cash Drawn 9/17/2021	Funds Available	LTD Expenditures 8/31/2021	Unexpended Funds	% Funds Spent	Time % of Grant	2021/2022 Budget	2021/2022 Spending	Unexpended Funds	Percentage Spent FY	
Workforce Innovation & Opportunity Act																	
0305/0405	2020	39068	WIOA Youth 2020	4/1/2020	6/30/2022	901,274	101,500	799,774	111,157	790,117	12%	59%	1,050,000	108,455	941,545	10%	
0306/0406	2021	40063	WIOA Youth 2021	4/1/2021	6/30/2023	1,187,924	-	1,187,924	-	1,187,924	-	-	-	-	-	-	
0105	2020	39249	WIOA - Adult - 2020-2022	7/1/2020	6/30/2022	1,154,776	1,101,000	53,776	1,097,000	57,776	95%	54%	1,350,000	280,931	1,069,069	21%	
0106	2021	40174	WIOA - Adult - 2021-2023	7/1/2021	6/30/2023	1,461,575	-	1,461,575	-	1,461,575	-	-	-	-	-	-	
0205	2020	39225	WIOA - Dislocated Worker - 2020-2022	7/1/2020	6/30/2022	1,757,157	911,000	846,157	921,638	835,519	52%	58%	1,700,000	331,268	1,368,732	19%	
0206	2021	40198	WIOA - Dislocated Worker - 2021-2023	7/1/2021	6/30/2023	1,412,136	-	1,412,136	-	1,412,136	-	-	-	-	-	-	
0523	2019	39725	Apprenticeship Expansion - 2019	4/1/2019	3/31/2022	87,250	4,529	82,721	318	86,932	0%	81%	67,500	84	67,416	0%	
0525	2019	39572	Apprenticeship Navigator	12/3/2020	12/31/2021	69,649	44,149	25,500	40,146	29,504	58%	69%	41,000	23,639	17,361	58%	
0544	2019	39524	WIOA Soft Skills	4/1/2019	9/30/2021	40,500	30,050	26,250	30,462	10,038	75%	97%	15,000	4,766	10,234	32%	
0250	2019	38893	COVID-19 2019	4/13/2020	3/31/2022	555,385	384,500	170,885	378,288	177,097	68%	70%	250,000	112,155	137,845	45%	
0550	2021	40354	Rapid Response	7/1/2021	6/30/2022	115,710	-	115,710	-	115,710	0%	17%	-	-	-	-	
			WIOA Supplemental										250,000	-	250,000	0%	
0604	2019	39310	SFY 19-20 Performance Incentives - 2019	7/1/2020	9/30/2021	64,468	-	64,468	-	64,468	0%	93%	64,468	-	64,468	0%	
0605	2019	39334	SFY 19-20 Performance Incentives - 2019	7/1/2020	2/28/2022	190,128	-	190,128	-	190,128	0%	70%	190,128	-	190,128	0%	
0546	2019	40149	SFY 21-22 Foundational Skills 2019	7/1/2021	6/30/2022	41,666	-	41,666	-	41,666	0%	17%	-	-	-	0%	
						9,039,598	2,576,728	6,478,670	2,579,009	6,460,590			4,978,096	861,297	4,116,799	17%	
Employment Services																	
1406	2020	39562	Local Veterans -2020-2021	10/1/2020	12/31/2021	19,395	16,884	2,511	17,838	1,557	92%	73%	33,000	4,415	28,585	13%	
1306	2020	39542	Disabled Veterans -2020-2021	10/1/2020	12/31/2021	97,549	78,125	19,424	73,798	23,751	76%	73%	120,000	17,515	102,485	15%	
1105	2020	39201	Wagner Peysner - 2020-2021	7/1/2020	9/30/2021	661,076	645,800	15,276	596,296	64,780	90%	93%	650,000	111,813	538,187	17%	
1106	2021	40437	Wagner Peysner - 2021-2022	7/1/2021	9/30/2022	751,210	-	751,210	-	751,210	0%	13%	-	-	-	-	
0530	2020	39915	Recovery Navigator Project 2021-2020	5/6/2021	6/30/2023	260,870	-	260,870	55	260,815	0%	15%	-	55	(55)	0%	
3106	2020	38962	RESEA -2020-2021	1/1/2020	9/30/2021	394,632	372,600	22,032	366,165	28,467	93%	95%	335,000	57,778	277,222	17%	
3107	2021	40009	RESEA 2021-2022	1/1/2021	9/30/2022	364,632	-	364,632	-	364,632	0%	38%	-	-	-	-	
						2,549,364	1,113,409	1,071,323	1,054,153	1,130,579			1,138,000	191,576	946,424	17%	
Supplemental Nutrition Assistance Program																	
1506	2020	39476	Supplemental Nutrition Assistance Prog - SNAP 2020	10/1/2020	9/30/2021	307,069	296,574	10,495	286,957	20,112	93%	92%	-	51,401	-	-	
						307,069	296,574	10,495	286,957	20,112			280,000	51,401	228,599	18%	
Welfare Transition																	
2608	2020	39405	Welfare Transition Prog - Oct - Jun 2021	10/1/2020	8/15/2021	1,899,605	1,899,605	-	1,899,605	-	100%	100%	-	531,574	-	-	
2609	2021	40124	Welfare Transition Prog - July - Sept 2021	7/1/2020	9/31/2021	538,429	96,363	442,066	35,318	503,111	7%	67%	-	35,318	-	-	
						2,438,034	1,995,967	442,066	1,934,922	503,111			2,153,714	566,892	1,586,822	26%	
Trade Adjustment Assistance																	
2005	2020	39496	Trade Adj Assistance - Training 2020	10/1/2020	9/30/2021	209,894	77,621	132,273	74,005	135,888	35%	92%	120,000	422	-	0%	
2105	2020	39359	Trade Adj Assistance - Case Management 2020	10/1/2020	9/30/2021	66,150	35,800	30,350	33,813	32,337	51%	92%	66,000	5,077	-	8%	
						276,044	113,421	162,623	107,818	168,226			186,000	5,499	180,501	3%	
Direct Services																	
6102	2019		USDOL Youthbuild 2019	2/1/2019	5/31/2022	1,100,000	721,016	378,984	738,483	361,517	67%	78%	350,000	62,031	287,969	18%	
8000			Corporate\Unrestricted			-	-	-	-	-			34,975	17,249	17,726	49%	
						1,100,000	721,016	378,984	738,483	361,517.21			384,975	79,280	305,695	33%	
						15,710,108	6,817,116	8,544,161	6,701,341	8,644,135			9,120,785	1,755,946	7,364,839	19%	
														1,755,945.65		Check total	
MIP Fund #	Year	NFA ID	Program Name	Start Date	End Date	NFA Award	LTD Expend 8/31/2021	LTD Admin	LTD Expend Less Admin	Category	Amount	Percentage	Goal				
0305/0405	2019	38112	WIOA Youth 2019	4/1/2020	6/30/2022	\$ 901,274	\$ 111,157	\$ 5,728	\$ 105,428	PWE	15,133	14.4%	20%				
						\$ 901,274	\$ 111,157	\$ 5,728	\$ 105,428	OSY	93,193	88.4%	75%				
0105	2020	39249	WIOA - Adult - 2020-2022	7/1/2020	6/30/2022	\$ 1,154,776	\$ 1,097,000	\$ 158,580	\$ 938,420	ITA State	674,697	71.9%	30%				
0205	2020	39225	WIOA - Dislocated Worker - 2020-2022	7/1/2020	6/30/2022	\$ 1,757,157	\$ 921,638	\$ 132,848	\$ 788,791	ITA State	527,229	66.8%	30%				



INFORMATION ITEM 9

Procurement of VOSGreeter Module PY'2021-2022

CareerSource Pinellas, like all other workforce boards throughout the state, utilizes Geographic Solutions' Employ Florida (EF) system for case management for all WIOA, Wagner Peyser, and TAA cases. In addition, Florida's Department of Economic Opportunity (DEO) has required that all case management for Welfare Transition, SNAP, and Veterans transition to EF to consolidate all case management for all DEO funded programs into one system.

CareerSource Pinellas utilizes a proprietary system, ATLAS from Complete Technology System (CTS), as its Document Management System; however, it is in the planning phase of transitioning to EF from ATLAS for its document management system. In addition, CareerSource Pinellas presently uses ATLAS as its kiosk greeter system in the career centers. In order to further integrate with the EF environment, thus increasing efficiency and capability of the CareerSource team, CareerSource Pinellas has made a strategic decision to migrate the kiosk system to EF's Virtual One-Stop VOSGreeter Module. Customer wait times will further be reduced and will allow for a better customer experience.

Geographic Solutions' EF system is the preferred vendor of DEO and DEO strongly encourages CareerSource Pinellas to fully utilize Employ Florida. The first-year cost is as follows:

Description	Amount
Initial Setup Fee	\$ 19,950
Annual License Fee	\$ 24,950
Total Cost	\$ 44,900

The current cost of ATLAS is \$6,000 per year as it is bundled with all other CTS services. Since the decision to procure another IT service provider is in process, the cost of ATLAS as a stand-alone product is expected to increase.



INFORMATION ITEM 10

All Program Monitoring Schedule - DEO



**Final Programmatic Monitoring Review Schedule
Program Year 2021-2022**

LWDB	CareerSource	Review Start/End Dates
2021		
11	Flagler Volusia	10/18/2021 - 10/22/2021
2	Okaloosa Walton	10/25/2021 - 10/29/2021
16	Pasco Hernando	11/01/2021 - 11/05/2021
7	Florida Crown	11/15/2021 - 11/19/2021
19	Heartland *	12/06/2021 - 12/10/2021
6	North Florida	12/13/2021 - 12/17/2021
2022		
20	Research Coast *	01/10/2022 - 01/14/2022
12	Central Florida	01/24/2022 - 01/28/2022
21	Palm Beach County*	01/31/2022 - 02/04/2022
5	Capital Region	02/07/2022 - 02/11/2022
13	Brevard	02/21/2022 - 02/25/2022
9	North Central Florida	02/28/2022 - 03/04/2022
18	Suncoast *	03/07/2022 - 03/11/2022
1	Escarosa	03/14/2022 - 03/18/2022
17	Polk *	03/21/2022 - 03/25/2022
8	Northeast Florida	03/28/2022 - 04/01/2022
14	Pinellas	04/04/2022 - 04/08/2022
15	Tampa Bay*	04/11/2022 - 04/15/2022
10	Citrus Levy Marion	04/25/2022 - 04/29/2022
24	Southwest Florida *	05/02/2022 - 05/06/2022
3	Chipola	05/23/2022 - 05/27/2022
4	Gulf Coast	06/06/2022 - 06/10/2022
22	Broward	06/13/2022 - 06/17/2022
23	South Florida*	06/21/2022 - 06/27/2022

*MSFW Significant LWDBs
Last Updated: 09/20/2021



X. Open Discussion



XI. Adjournment