

Programmatic Monitoring Report

CareerSource Citrus Levy Marion
Local Workforce Development Board – 10

Program Year 2023-2024

May 2, 2025

Prepared by



Division of Workforce Services
Bureau of One-Stop and Program Support

FloridaCommerce | Caldwell Building | 107 E.
Madison Street | Tallahassee, FL 32399
850.245.7105 | www.FloridaJobs.org |
www.Twitter.com/FLACOMMERCE

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Executive Summary

During the period of May 13, 2024, to May 17, 2024, the Florida Department of Commerce (FloridaCommerce) conducted a monitoring review of CareerSource Citrus Levy Marion's (CSCLM) workforce programs. CSCLM's service area includes Citrus, Levy, and Marion counties.

Programmatic monitoring was conducted by FloridaCommerce's Bureau of One-Stop and Program Support (OSPS) staff through a remote desktop review analysis. Monitoring activities included assessing CSCLM's program operations, management practices, system protocols, internal controls, record keeping, and reporting to determine if CSCLM operated in compliance with each of the programs' laws, regulations, state and local plans, policies and guidance, and any contract or agreement terms. Monitoring also included a sample testing of randomly selected participant case file records from each of the workforce programs reviewed.

Programmatic issues identified in the report are categorized as Findings, Other Noncompliance Issues (ONIs), and Observations based on a scale of high, medium, and low risk factors. High, medium, and low risk factors are used to separate issues that present more of a threat to program operations including issues that may impact the fiscal integrity or delivery of services within program operations.

The review revealed that CSCLM has the systems in place to perform the broad management and operational functions required to operate the workforce programs; however, deficiencies in case file documentation requirements and operational and management practices in several program review areas were identified. The programmatic monitoring review resulted in six findings, two ONIs, and several observations. While no material issues or weaknesses came to the reviewers' attention other than those contained in the report, there is no assurance that other issues do not exist.

As a subrecipient of authorized funds administered by FloridaCommerce, CSCLM is accountable for failing to correct performance and programmatic found during compliance monitoring reviews. To reduce programmatic monitoring deficiencies observed and to increase program integrity at the local level, corrective action by CSCLM is required to be taken.

The results of each of CSCLM's workforce programs are summarized in the following charts by program and category.

ACRONYM TABLE

ABAWD – Abled Bodied Adult without Dependents
AP – Administrative Policy
ARP – Alternative Responsibility Plan
CAP – Corrective Action Plan
CFR – Code of Federal Regulations
CLEO – Chief Local Elected Official
CSCLM – CareerSource Citrus Levy Marion
DCF – Department of Children and Families
DVOP – Disabled Veterans Outreach Program Specialist
DWG – Disaster Recovery Dislocated Worker Grant
DW – Dislocated Worker
EDP – Employability Development Plan
EEO – Equal Employment Opportunity
ES – Employment Service
ETA – Employment and Training Administration
F.A.C – Florida Administrative Code
FCOP – Farmworker Career Development Program
FG – Final Guidance
FLC – Foreign Labor Certification
FloridaCommerce – Florida Department of Commerce
FLSA – Fair Labor Standards Act
F.S. – Florida Statutes
FY – Fiscal Year
IEP – Individual Employment Plan
IRP – Individual Responsibility Plan
ISS – Individual Service Strategy
IT – Information Technology
ITA – Individual Training Account
IWT – Incumbent Worker Training
JPR – Job Participation Rate
JVA – Jobs for Veterans Act
JVSG – Jobs for Veterans State Grant
LMI – Labor Market Information
LVER – Local Veterans Employment Representative
LWDB – Local Workforce Development Board
MIS – Management Information System
MOU/IFA – Memorandum of Understanding & Infrastructure Funding Agreement
MSFW – Migrant and Seasonal Farmworker
MSG – Measurable Skills Gains
OJT – On-the-Job Training
ONI – Other Noncompliance Issue
O&O - Opportunities and Obligations form
OSPS – Bureau of One-Stop and Program Support
OSST – One-Stop Service Tracking
OST – Occupational Skills Training
PIRL – Participant Individual Report Layout
POS – Priority of Service
PY – Program Year

RESEA – Reemployment Services and Eligibility Assessment Program
SBE – Significant Barrier to Employment
SMA – State Monitor Advocate
S.M.A.R.T – Specific, Measurable, Attainable, Realistic, and Time-Bound
SNAP E&T – Supplemental Nutrition Assistance Program Employment and Training
SYEP – Summer Youth Employment Program
TAA – Trade Adjustment Assistance
TANF – Temporary Assistance for Needy Families
TCA – Temporary Cash Assistance
TEGL – Training and Employment Guidance Letter
TRA – Trade Readjustment Assistance
U.S.C. – United States Code
USDOL – United States Department of Labor
WE – Work Experience
WFS – Workforce Services
WIOA – Workforce Innovation and Opportunity Act
WP – Wagner-Peyser
WSA – Work Search Activity
WT – Welfare Transition

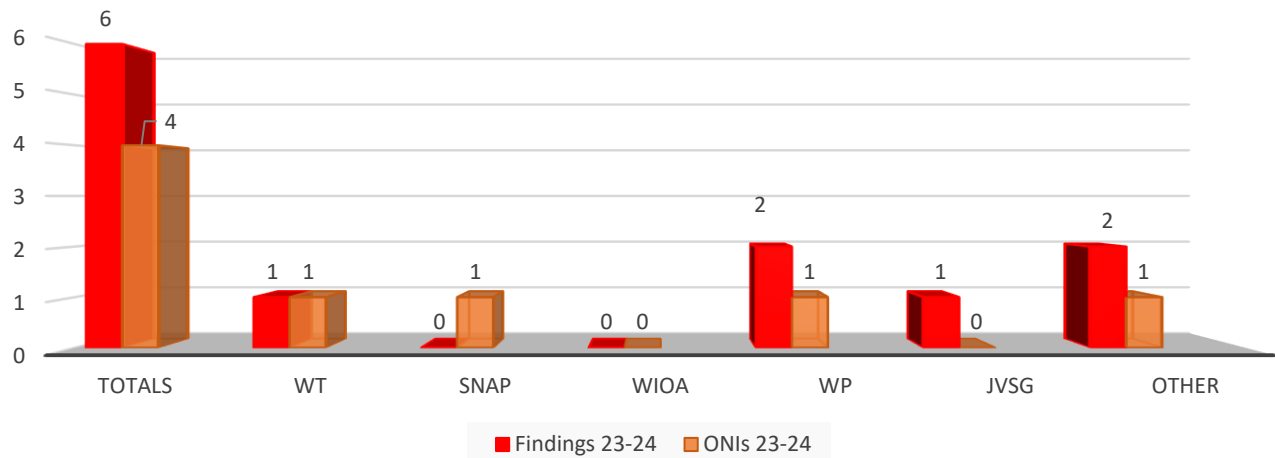
*This acronym table reflects all acronyms that have been used in the PY 2023-2024 monitoring cycle; however, all acronyms may not be used in this report.

SUMMARY TABLE OF PROGRAMMATIC MONITORING RESULTS

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

PY 2023-24 Programmatic Monitoring Results					
Workforce Program	Issue	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue
WT	The following issues were identified for the pre-penalty and sanction process: <ul style="list-style-type: none"> One participant was not mailed Form 2292 for a second failure within 30 days. There were no attempts to contact and/or counsel one participant during the pre-penalty process. 	Y	Y		
	One participant case file had employment dates on documents that did not match the information recorded in OSST.			Y	Y
WT Totals		1	1	1	1
SNAP E&T	Four participants did not have their 590 - initial appointment service code ended timely.			Y	Y
SNAP E&T Totals		0	0	1	1
WP	One employer-entered job order did not have a compliance review initiated within two business-days.	N	Y		
	Five job seekers had services recorded in Employ Florida that were missing documentation of required elements of the service or were delayed in entry into the system.			N	Y
RESEA	One participant had Work Search Activities listed on the EDP and RESEA Responsibility Statement that didn't match.	N	Y		
WP Totals		0	2	0	1
JVSG	The following issues were identified with Veteran Intake Screenings: <ul style="list-style-type: none"> Five veteran participants were not contacted by the DVOP within the required 2-day window following a Referral for DVOP Services, service code 168. Five veteran participants did not have a code 168 referral to DVOP code entered. 	N	Y		
JVSG Totals		0	1	0	0
Financial Disclosure	Two new board members filed financial disclosure forms after 30 days of appointment.			N	Y
Financial Disclosure Totals		0	0	0	1
Management Process-Board Governance	CSCLM did not provide documentation that two board members completed refresher training and the LWDB did not provide documentation that one board member completed orientation within six months of appointment as required. Additionally, the LWDB has a vacancy that was not filled within 12 months as required. Note: Issues were not apparent during the PY 2024-25 review and is considered resolved.	Y	Y		
	CSCLM does not have a one-stop operator policy in place with the required elements. Note: Issue was not apparent during the PY 2024-25 review and is considered resolved.	N	Y		
Management Process-Board Governance Totals		1	2	0	0
Results – All Programs		2	6	2	4

Monitoring Issues By Program PY 2023-2024 CareerSource Citrus Levy Marion



DEFINITIONS APPLICABLE TO PROGRAMMATIC MONITORING

1. **Finding** – A high risk issue that directly impacts the integrity or effectiveness of program operations or could potentially result in major program deficiencies (e.g., participant ineligibility, missing files, lack of fully executed contracts, issues indicative of systemic problems in program operations, has the appearance of fraud or abuse, possibility of non-conforming services provided to participants, potential questionable costs, etc.). Findings are expected to be responded to in the CAP.
2. **Other Noncompliance Issue** – A medium risk finding that results in deviation from process or practice not likely to result in failure of the management system or process but has a direct impact on program operations (data validity, timeliness of entering system information, missing program elements and employment plan information, failure to timely conduct follow-ups, etc.). ONIs could potentially be upgraded to a finding over time based on the nature of the deficiency (e.g., repeat violations, issues indicative of systemic problems in program operations, questionable costs, etc.). ONIs are expected to be responded to in the CAP.
3. **Observation** – A low risk issue that is intended to offer constructive comments and an opportunity to improve current local practices, processes, and procedures that result in positive program outcomes. Observations are not expected to be responded to in the CAP except when requested.

**MONITORING REPORT
CAREERSOURCE CITRUS LEVY MARION
LOCAL WORKFORCE DEVELOPMENT BOARD - 10**

I. DESCRIPTION OF MONITORING APPROACH

Review Purpose and Scope

Monitoring consisted of a programmatic review of CSCLM's workforce programs. The purpose of the monitoring review was to assess CSCLM's compliance with applicable federal and state program statutes, regulations, and programmatic and administrative requirements. The scope primarily involved a review of participant case file data entered in the State's MIS, a review of participant case file documentation provided by CSCLM from the selected file samples, and a review of local plans, procedures, reports, records, and other abstract information. In some instances, interviews were conducted with CSCLM staff, employers, and participants to gather information about program processes and service delivery strategies.

Type of Review

A remote desktop review was performed for programmatic with the selected sampled items provided through upload to FloridaCommerce's SharePoint monitoring system or access to CSCLM's document storage system.

Compliance Review Abstract Information

- Programmatic Review Dates: May 13, 2024 to May 17, 2024
- Programmatic Monitoring Sample Review Period Dates: April 1, 2023 to March 31, 2024

Note: Entrance conference and exit conference attendees are listed in Section VIII of this report.

Programs Reviewed:

- Welfare Transition
- Supplemental Nutrition Assistance Program – Employment and Training
- Workforce Innovation and Opportunity Act
- Trade Assistance Act
- Rapid Response
- Wagner-Peyser
- Jobs for Veterans State Grant
- Any identified special projects operational during the review period

Monitoring Review Tools

FloridaCommerce's PY 2023-2024 monitoring review tools were used to conduct the review. The tools were developed to provide a framework for monitoring activities performed by OSPS monitoring staff as well as the criteria used to monitor.

II. PROGRAMMATIC MONITORING REVIEW

The outcome of the programmatic monitoring is detailed in the following sections of the report. The information presented describes the issues noted and, where appropriate, required corrective actions for improvement.

The following general CAP requirements must be submitted for each finding, ONI, and any additional program specific issues identified in the report.

General Program CAP Requirements

- A copy of updated local operating procedures/policies that address the requirement, if applicable.
- A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.
- Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topics.
- Documentation of written communication to staff informing them of the requirements.

WELFARE TRANSITION

The sample size consisted of 18 participant case files. The following issues were identified:

Finding

Finding WT #10.24.01

Category: Pre-penalty and Sanction Process

Condition: Of the 10 case files reviewed of participants with a pre-penalty and/or a sanction recorded in OSST, the following issues were identified:

- One (10.0 percent) participant was not mailed the Notice of Failure to Demonstrate Satisfactory Compliance (WTP 2292) for a second failure within 30 days.
- There were no attempts to contact and/or counsel one (10.0 percent) participant during the pre-penalty process.

This is a repeat issue and is consistent with the PY 2022-2023 Monitoring Report.

Criteria: FloridaCommerce FG 03-037 states, in part, that, "Prior to the imposition of a sanction, the participant shall be notified orally or in writing that the participant is subject to sanction and that action will be taken to impose the sanction unless the participant complies with the work activity requirements. The participant shall be counseled as to the consequences of noncompliance and, if appropriate, shall be referred for services that could assist the participant to fully comply with program requirements."

45 CFR 261.10, 12-14; Section 414.065, F.S.; Rule 65A-4.205, F.A.C. also require certain preconditions be undertaken by local boards prior to and while imposing a sanction.

Cause: Common sanction issues and inadequate source documentation identified in other workforce programs may indicate that insufficient training, technical assistance, or follow-through by staff may be a causal factor for noncompliance.

Effect: Not following appropriate authoritative guidance and procedures during the penalty process could potentially result in a sanction being requested that could lead a participant to file a grievance and/or request a fair hearing for a sanction that should not have been imposed.

Required Action: CSCLM must provide documentation showing that staff have attempted to contact the participant to explain adverse actions which may be taken for noncompliance and enter counseling case notes of this action in OSST if the case is still open. CSCLM must also provide an assurance with the CAP that all subsequent pre-penalty and/or sanction requirements will be followed when processing a sanction in the future. Because this is a repeat issue, CSCLM must reevaluate the cause and provide a plan or process for preventing a recurrence of this issue in the future including documentation of staff training and written notification to staff informing them of the requirements.

Other Noncompliance Issue

ONI WT # 10.24.01

Category: Employment Verification

Condition: Of the three participant case files reviewed with an employment activity recorded in OSST, one (33.3 percent) had employment dates on documents in the case file that did not match the employment information recorded in OSST.

This is a repeat issue and is consistent with the PY 2022-2023 Monitoring Report.

Criteria: Florida's Work Verification Plan, states, in part, that, the "LWDB or provider staff must obtain documentation for each countable hour of participation prior to entering the hours in the workforce data entry system. Verification of employment hours or other employment information through employer contact must include the employer's name, date contacted, person talked with and the name of the provider staff person who obtained the verification. Provider staff maintains written verification in the case file."

Cause: Insufficient staff training and lack of local guidance may be factors in noncompliance of retaining the appropriate documentation in the participant case file or incorrectly entering employment information in OSST.

Effect: This data is used for reporting purposes and incorrect data entry impacts the validity of the data being reported which can negatively impact performance. The data entered in the system must be auditable and supported by documentation in the case files.

Required Action: CSCLM must provide an assurance that staff will thoroughly review each case transaction in the future to ensure employment documentation is received, and the data is accurately recorded in OSST to match documentation retained in participant case files. Documentation must also be provided with the CAP that CSCLM reviewed and verified the employment data and that efforts have been made to correct the data in OSST if the file is still open and active. Because this is a repeat issue, CSCLM must reevaluate the cause of continuing problems and provide a plan or process for preventing a recurrence of this issue in the future including documentation of staff training and written notification to staff informing them of the requirements.

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM – EMPLOYMENT AND TRAINING

The sample size consisted of 18 participant case files. The following issues were identified:

Other Noncompliance Issue

ONI SNAP #10.24.02

Category: Initial Engagement Process

Condition: Of the 14 case files reviewed where a 590 – appointment setting code was entered in OSST, four (28.6 percent) participants did not have their initial appointment status recorded within two business days of completion of the appointment or have “No show” indicated as required.

This is a repeat issue and is consistent with the PY 2022-2023 Monitoring Report.

Criteria: FloridaCommerce Memorandum entitled “Supplemental Nutrition Assistance Program Employment and Training Able-Bodied Adults without Dependents Initial Engagement Process Changes” dated January 5, 2017, states, in part, that, “SNAP E&T Case Managers are responsible for selecting the appointment status within two business days of completion or a no-show.”

Cause: CSCLM did not follow-up or maintain a tickler system for the closure of the 590-code within two business days of completion or No-show could be a factor for noncompliance.

Effect: Failure to adhere to federal requirements regarding the initial engagement process could potentially result in overpayment of food assistance benefits to an ineligible individual. It could also affect performance reporting.

Required Action: CSCLM must provide an assurance that all future initial appointments and status codes (either a 590 or 594) will be entered in OSST within two business days of completion of the appointment or have “No show” recorded as required. Because this is a repeat issue, CSCLM must reevaluate the cause and provide a plan of action or process with the CAP for preventing a recurrence of this issue in the future including more in-depth monitoring, documentation of staff training, and written notification to staff informing them of the requirements.

CSCLM should consider establishing some type of tickler system to set future alerts such as Outlook or use the case “To Do” screen in OSST as a way of reminding or alerting staff of timelines for completing required actions. This helps ensure that a check and balance system is in place to prevent further occurrences.

OBSERVATION

Some of CSCLM’s SNAP documents did not include all USDA Food and Nutrition Services guidelines. The SNAP Memorandum issued on Feb 3, 2023, requires changes in procedural processes that include revisions to the Self-attestation form to remove the \$25 transportation cap. CSCLM updated the SNAP Self-Attestation form for Transportation Reimbursement and subsequently supplied a revised copy of the Self-Attestation form to FloridaCommerce, removing the \$25 transportation cap to validate compliance with the correct form, therefore no further action is required for this issue. For future reference, CSCLM must ensure that staff understand the requirements and implications of these modifications allowing for a more uniform and consistent approach to delivering services across all career centers and avoid any potential findings or other noncompliance issues. More information on the revised requirements is located at the following link: [Supplemental Nutrition Assistance Program Employment and Training Updates](#).

WORKFORCE INNOVATION AND OPPORTUNITY ACT

WIOA ADULT AND DISLOCATED WORKER PROGRAM

The sample size consisted of 22 Adult and Dislocated Worker participant case files (12 Adults and 10 Dislocated Workers). The review did not reveal any Findings or ONIs, however, the following Observation was noted with regards to the recording of MSGs:

OBSERVATION

Recording of Measurable Skills Gains

Of the 21 Adult/DW case files reviewed of participants enrolled in an education or training program, one (4.8 percent) did not have an MSG recorded in Employ Florida within the applicable program year.

Going forward, it is recommended that CSCLM provides training to staff to ensure they understand the requirements and intent of MSGs including how to review, document, and timely record results in accordance with WIOA Section 116; 20 CFR Part 677.155(a)(v); and TEGL 10-16, Change 1.

If technical assistance or training is needed, CSCLM should contact the Workforce Training and Coordination unit at WFSTraining@commerce.fl.gov.

WIOA YOUTH PROGRAM

The sample size consisted of 13 WIOA Out-of-School Youth participant case files.

The review did not reveal any Findings, ONIs, or Observations.

WIOA SPECIAL PROJECTS

The sample size consisted of five (two Adult and three Dislocated Worker) participants case files for the following Special Projects: two SFY22-23 WIOA Rural Initiatives – Adult; three Hurricane Idalia DWG.

The review did not reveal any Findings or ONIs; however, the following Observations were noted:

OBSERVATION

- Documentation verifying U.S. Citizenship (documentation specified in I-9 documentation) did not match documentation listed in Employ Florida (social security card) for two participants. Mismatched documentation was chosen in the system.
- The employment agreement for three participants enrolled in the Hurricane Idalia DWG grant was missing the work hours and the name of the supervisor. Although additional information was found on the job referral document, the job referral document was not referenced or made part of the agreement by assignment, reference, or as a supplement or attachment to the agreement.

For future reference, it is recommended that CSCLM provides training to staff to ensure that documentation regarding participant's eligibility and engagement is retained in the case file and matches what is entered into

Employ Florida. If technical assistance or training is needed, CSCLM should contact the Workforce Training and Coordination unit at WFSTraining@commerce.fl.gov.

TRADE ADJUSTMENT ASSISTANCE

The sample size consisted of two participant case files. The review did not reveal any Findings, ONIs, or Observations.

RAPID RESPONSE

The review did not reveal any Findings or ONIs; however, the following Observations were noted:

OBSERVATIONS

- Rapid Response informational material distributed to affected workers did not include information on the impact of layoff on health coverage or other benefits. CSCLM must ensure informational material identified under the provision of information is developed and ready for distribution upon notification of a permanent business closure, mass layoff, natural or other disaster, or the filing of a Trade Adjustment Assistance (TAA) petition.
- The local process did not include the required delivery of Rapid Response activities to include information and access to services regarding the GI Bill, and work groups for which a TAA petition has been filed. CSCLM must ensure the delivery and access to services for affected workers include information regarding the GI Bill and TAA petition groups.
- CSCLM did not have a procedure that described the process for documenting employers who decline or refuse Rapid Response services. CSCLM must ensure employers who decline or refuse Rapid Response services are documented by entering a case note in Employ Florida's employer case note tab. If applicable, additional evidence of the employer's refusal or declining of services should be retained for source documentation.

WAGNER-PEYSER PROGRAM

The sample size consisted of 45 participant case files (20 job seekers, 15 job orders, and 10 job seeker placements). The following issues were identified:

Finding

Finding WP #10.24.02

Category: Employer-Entered Job Order Compliance Review

Condition: Of the 10 employer-entered job orders reviewed in Employ Florida, one (10 percent) was missing documentation of staff review of the job order's compliance with applicable state and federal laws, rules, and guidance within the two-business day deadline.

Criteria: CareerSource Florida AP 099 (IV)(A)(3) states that, "All job orders entered in Employ Florida must comply with Equal Employment Opportunity and Immigration and Nationality Act laws, regulations, and guidance, as well as the Employ Florida Terms and Conditions of Use. All job orders must be reviewed by the LWDB staff for

compliance. If the job order meets all compliance requirements, LWDB staff shall approve the job order according to local policy within two business days from the date and time of initial posting. LWDB staff must document with a case note their compliance review, and each step taken to verify the job order.”

Cause: Common causes of noncompliance may include high number of job order entries, particularly with third-party agents, calendaring approval deadlines, and staff training of reviewing and documenting job order compliance reviews.

Effect: Failure to conduct compliance reviews for employer-entered job orders can lead to companies entering job orders in Employ Florida that can violate the rights of job seekers and expose the State and LWDB to possible litigation and perhaps lead companies to defraud job seekers or acquire a job seekers’ personal protected information.

Required Action: CSCLM must provide documentation that staff have conducted and documented that a compliance review of the identified job order has taken place or a timeline of when it will take place if the job order is still open and available. CSCLM must also provide an assurance that staff will conduct and document the required steps to verify compliance for all future open job orders in Employ Florida within two business days.

Other Noncompliance Issue

ONI WP #10.24.03

Category: Wagner-Peyser Services and Activities

Condition: Of the 20 job seekers reviewed, five (25 percent) job seekers had entry of specific service codes in Employ Florida (code 114 – Staff-Assisted Job Search and 116 – Received Service from Staff Not Classified); however, case notes in the files did not meet the requirements for the specified services recorded.

Criteria: The Employ Florida Service Code Guide indicates service code definitions and subsequent service code entry documentation requirements. The elements of the case notes are detailed in the guide.

Cause: Lack of staff training on the required elements to be recorded for the service(s) entered in the state MIS may have led to noncompliance.

Effect: Errant and under-documented services can result in inaccurate reporting of state and federal performance numbers and could also lead to inflated participation numbers and fraudulent claiming of services.

Required Action: CSCLM must provide documentation that staff have verified that an actual and valid service was provided, recorded, and case noted for the identified job seekers if the job seeker files are still open. CSCLM must also provide an assurance that staff will review and monitor entry of all WP job seeker services in Employ Florida to ensure the services provided fit the description of the service code(s) recorded and are adequately documented. CSCLM must also provide documentation of staff training and written notification to staff informing them of the requirements.

REEMPLOYMENT SERVICES AND ELIGIBILITY ASSESSMENT PROGRAM

The RESEA program review focused on CSCLM’s compliance with the requirements of the grant to assist reemployment assistance claimants in returning to work faster by connecting claimants/participants with in-person assessments, and reemployment services and opportunities to further their reemployment goals and successful employment outcomes.

The sample size consisted of five RESEA participant case files. The following issue was identified:

Finding

Finding WP #10.24.03

Category: RESEA Responsibility Statement Work Search Activities

Condition: Of the five participants reviewed, one (20 percent) did not have the same Work Search Activities (WSA) documented on the RESEA Responsibility Statement and the participant's EDP.

Criteria: CareerSource Florida AP 068 (IV) states, in part, that, "Reemployment or work search activities must be identified and documented in the EDP at the time of the assessment interview." The same section on Work Search Activities states "The EDP [RESEA] Responsibility Statement must document the specified workshop(s) and date(s) the participant is to attend and must include the date and signatures of both the participant and case manager."

Cause: Staff oversight and programmatic training are likely causal factors leading to noncompliance.

Effect: Not accurately recording work search activities in the system reduces staff's ability to effectively determine what the claimant is required to do to assist in their reemployment service needs which may adversely affect the claimant's benefits.

Required Action: CSCLM must provide an assurance that staff will identify individualized WSA for each participant, document the WSA on the EDP, and then document the same WSA as assigned on the RESEA Responsibility Statement. A plan or process for preventing a recurrence of this issue in the future, including staff training and routine monitoring of work search activities, must also be included with the CAP.

CAREER CENTER CREDENTIALING

The career center credentialing review focused on ensuring administrative requirements and records were posted and maintained, and that front-line staff had completed all required Florida Certified Workforce Professional Tier I certification and continuing education courses.

The review did not reveal any Findings, ONIs, or Observations.

JOBS FOR VETERANS STATE GRANT PROGRAM

The sample size consisted of 15 participant case files and 15 employer profiles. The following issues were identified:

Finding

Finding JVSG #10.24.04

Category: Veteran Initial Intake Screening

Condition: Of the 15 veteran case files reviewed, the following issues were noted:

- Five (33.3 percent) veteran participants were not contacted by a DVOP within the required two-day window period following a Referral for DVOP Services (service code 168).
- Five (33.3 percent) veteran participants did not have a Referral for DVOP Services (service code 168) entered in Employ Florida.

Criteria: CareerSource Florida AP 117 (IV)(C) states, in part, that, “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.” The section also states that, “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.”

Cause: Staff training in the required collection and documentation at initial veteran intake, as well as the requirements of follow-up, could be factors for noncompliance.

Effect: Failure to screen, identify, and accurately document and record veteran program intake could affect veterans service delivery and limit veterans from receiving qualifying services.

Required Action: CSCLM must ensure DVOPs are contacting SBE veterans or eligible spouses within two business days following a referral. If there is no possible way for a DVOP to follow up within the two business days, or a delay occurred, the DVOP is responsible for recording case note documentation with an explanation as to the delay. An assurance must also be provided with the CAP that all requirements for determining proper intake procedures for veterans will be met in the future. Documentation of staff training and written notification to staff informing them of the requirements must also be provided with the CAP.

OBSERVATION

The employer case file review also revealed that two employers did not have accurate Federal Employer Identification Number (FEIN) information recorded in the employer’s Employ Florida profile. It was also observed that CSCLM’s LVERs did not correctly record employer service codes for the services provided. For future reference, CSCLM must ensure that the information recorded for the employer in Employ Florida is cross-referenced and matches the FEIN recorded in SunBiz. Additionally, employer service codes must be recorded correctly for the services provided to veterans and employers.

COMPLAINT SYSTEM

The sample size consisted of 40 complaint logs. The review did not reveal any Findings, ONIs, or Observations.

III. FINANCIAL DISCLOSURE REVIEW

The Financial Disclosure review focused on determining CSCLM’s compliance with financial disclosure requirements as referenced in Chapters 112.3145 and 445.07, F.S.; and CareerSource Florida FG-075.

The following issue was identified:

Other Noncompliance Issue

ONI Financial Disclosure #10.24.04
Category: Financial Disclosure Filing

Condition: Two new board members filed financial disclosure forms after 30 days of their appointment.

Criteria: Chapter 112.3145(4)(2)(b) F.S., states that, “Each state or local officer who is appointed and each specified state employee who is employed shall file a statement of financial interests within 30 days from the date of appointment.”

Cause: CSCLM does not have a written process in place for tracking and accounting for the filing of board member financial disclosures by the required deadline which leads to noncompliance.

Effect: Not filing financial disclosure forms by the required deadline can pose risks to regulatory compliance, transparency, operational effectiveness, and adequate internal controls.

Required Action: Although the board members filed their financial disclosure forms, they were filed after 30 days of the required appointment date. CSCLM must ensure that all board members file their financial disclosure statements within 30 days of appointment in the future. This should be stated during the orientation process. CSCLM must also provide an assurance that board members will be notified of the requirement to file the financial disclosure and the deadlines to do so. Additionally, CSCLM should develop a matrix of requirements for tracking and timely advising board members of financial filings as well as other requirements and following up to ensure this has been done. Documentation of written notification to appropriate staff informing them of the requirements must also be provided with the CAP.

IV. COLLECTION OF DEMOGRAPHIC DATA

The purpose of the Demographic Data review is to determine CSCLM’s compliance with the nondiscrimination and equal opportunity provisions of 29 CFR Part 37, and FloridaCommerce’s Guidelines for Compliance with Section 188 of WIOA regarding Collection of Demographic Data.

The review did not reveal any Findings, ONIs, or Observations.

V. MANAGEMENT REVIEW PROCESS

The purpose of this review is to determine whether CSGC is implementing requirements associated with local merit staffing responsibilities for FloridaCommerce staff assigned to work under the functional supervision of CSGC, local sector strategy implementation, and local board governance activities.

The following issues were identified:

Findings

Finding Board Governance #10.24.05

Category: Local Board Membership

Condition: CSCLM failed to provide documentation to verify that two board members had completed their annual refresher training, and that one new board member orientation had been completed within six (6) months of appointment. Additionally, the local board had a vacancy that was not filled within 12 months as required.

Criteria: Board member training and timelines for filling board vacancies are outlined in CareerSource policies. CareerSource Florida AP 110 states, in part, that, “All new LWDB members, within six months of appointment, will complete a new board member orientation.” The policy also specifies annual refresher training requirements.

Additionally, CareerSource Florida AP 091 sets board composition requirements based on federal and state requirements. This policy states, in part, that, “Local workforce development board vacancies must be filled within a reasonable amount of time, but no more than 12 months from the vacancy occurrence.”

Cause: Difficulty in assembling members of the board to complete annual refresher training may lead to board members not completing their required training on an annual basis which results in lack of compliance to the requirement. A lack of willing and qualified candidates for membership, tracking of open board positions, and following local operating procedures and bylaws may be possible causes for noncompliance.

Effect: Unfilled vacancies may place the board out of compliance with federal and state requirements. Absence of board member training may affect a board member’s decision-making process and understanding of the purpose of their participation to effectively serve on the board. Additionally, board members may not be aware of policies, procedures, best practices, and requirements of the local board or board members.

Required Action: While the issue was not apparent during the PY 2024-25 review, CSCLM must still provide documentation that they have developed a process for filling board member vacancies within 12 months and provide documentation that refresher training has been provided to the outstanding board members or will be provided within 30 days of receipt of this report. CSCLM must also provide an assurance that all board members will complete annual training by the specified deadlines in the future. Additionally, CSCLM must develop specific procedures, processes, and/or guidelines on board governance requirements including developing a matrix of requirements for tracking and timely advising board members of training as well as other requirements and following up to ensure this has been done. A copy of the procedures must be provided with the CAP.

Finding Board Governance # 10.24.06

Category: One-Stop Operator

Condition: CSCLM does not have a one-stop operator policy in place with the required elements.

Criteria: The Grantee/Subgrantee Agreement, Section 3d states, in part, that CSCLM must have written administrative procedures, processes, and fiscal controls in place for the operation of programs for which the Subrecipient receives funds from FloridaCommerce and must comply with applicable state and federal law, rules, regulations, policies, and guidance. CareerSource Florida AP 97 describes roles and responsibilities of one-stop operators and one-stop partners.

Cause: CSCLM did not identify the roles and responsibilities, including limitations, of the one-stop operator and its partners in the policy that was in place during the time of the monitoring.

Effect: Incomplete one-stop operator policies can create an environment in which the one-stop operator functions outside of the scope of work that is outlined in state policy. Additionally, failure to follow and/or include required guidelines in the one-stop operator agreement may lead to management, administrative, and fiduciary violations.

Required Action: While the issue was not apparent during the PY 2024-25 review, CSCLM must still submit an updated One-Stop Operator Policy with the CAP that includes the required elements and limitations of the role of the one-stop operator and its partners and provide an assurance that the updated policy will be used moving forward.

VI. MANAGEMENT INFORMATION SYSTEMS

The MIS security check focused on the effectiveness of the CSCLM's information security controls and whether business processes and policies are in place that protect FloridaCommerce MIS data and resources and complies with FloridaCommerce's IT guidelines and the FloridaCommerce/CSCLM Grantee- Subgrantee agreement requirements.

The review did not reveal any Findings, ONIs, or Observations.

VII. TRAINING AND TECHNICAL ASSISTANCE

Although technical assistance was provided during the review, the program area will begin proactive outreach to CSBD to provide program specific training and technical assistance on documentation requirements, understanding expectations, and positive practices to help alleviate or address issues such as those identified in the report. Training will be coordinated with OSPS's training unit as part of their annual training plan. However, any questions or if immediate training or technical assistance in any of the program review areas is needed, CSBD should contact the respective OSPS units at the following email addresses or by sending a [Training Request Form](#) to WFSTraining@commerce.fl.gov.

- WT – WTProgram@commerce.fl.gov
- SNAP – SNAPETProgram@commerce.fl.gov
- WIOA – WIOA@commerce.fl.gov
- TAA – TAA@commerce.fl.gov
- Rapid Response – RapidResponse@commerce.fl.gov
- WP – Wagner.Peyser@commerce.fl.gov
- RESEA – RESEA@commerce.fl.gov
- FLC – H-2A.JobOrder@commerce.fl.gov and H-2B.JobOrder@commerce.fl.gov
- MSFW – [State Monitor Advocate \(via direct email\)](#)
- JVSG – VETS@commerce.fl.gov

CORRECTIVE ACTION PLAN REQUIREMENTS

A CAP is required to address how CSCLM will correct any programmatic findings and ONIs identified in the report. For the noted deficiencies, corrective actions and recommendations have been provided to help respond to the issues identified, help develop and implement processes that result in positive program practices and performance outcomes and help to improve the quality and integrity of the data collected.

VIII. ENTRANCE AND EXIT CONFERENCE ATTENDEES

The programmatic monitoring entrance conference with CSCLM staff was conducted on May 13, 2024, and the programmatic exit conference was conducted on May 17, 2024. The entrance/exit conference attendees are listed below.

NAME	Agency	Entrance Conference	Exit Conference
Matrecia Bryant	FloridaCommerce (Review Lead)	x	x
Alyssa Raulerson	FloridaCommerce (Review Lead)	x	x
Terry Wester-Johnson	FloridaCommerce	x	x
Yolanda Garcia	FloridaCommerce	x	x
Andy Windsor	FloridaCommerce	x	x
Vincent Lynn	FloridaCommerce	x	x
Raymond Isham	FloridaCommerce	x	x
India Prehay	FloridaCommerce	x	x
Tameka Austin	FloridaCommerce	x	x
Minerva Figueroa	FloridaCommerce	x	x
Greg Tudor	FloridaCommerce	x	x
Barbara Walker	FloridaCommerce	x	x
Katina Williams	FloridaCommerce	x	x
Carol Booth	FloridaCommerce	x	x
Cory Weaver	CSCLM	x	x
Larry Trowbridge	CSCLM	x	x
Steven Litzinger	CSCLM	x	x
Sandra Crawford	CSCLM	x	x
Melissa Saco	CSCLM	x	x
Rusty Skinner	CSCLM		x
Dale French	CSCLM		x
Cira Schnettler	CSCLM		x
Heaven Colon	CSCLM		x
Kimberly Grey	CSCLM		x