



College of Central Florida
Enterprise Center, Building 42
3003 SW College Rd, Suite 206
Ocala, FL 34474

Performance and Monitoring Committee AGENDA

Tuesday, February 7, 2023 – 9:00 a.m.

Join Zoom Meeting: <https://us02web.zoom.us/j/83448537017>

Phone No: 1-646-558-8656 (EST) Meeting ID: 834 4853 7017

Call to Order

J. Chang

Roll Call

C. Schnettler

Approval of Minutes, November 8, 2022

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J. Chang

DISCUSSION ITEMS

State Update

R. Skinner

Workforce Issues that are Important to Our Community

R. Skinner

PUBLIC COMMENT

ACTION ITEMS

Monitoring Report

Pages 6 - 117

C. Weaver

PROJECT UPDATES

Talent Center Traffic

Page 118

A. Abrams

Contract Reports (Chamber, etc)

Page 119

C. Galica

Event Report – YTD

Page 120

C. Weaver

Workforce Intelligence

Pages 121 - 127

C. Weaver

Performance Measures

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C. Weaver

County Comparison Reports

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C. Weaver

Experiential Learning Contracts

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YouthBuild Reports

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C. Weaver

Program Participant Data Summary

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C. Weaver

Net Promoter

Pages 139 - 141

S. Litzinger

MATTERS FROM THE FLOOR

ADJOURNMENT

2022 – 2023 MEETING SCHEDULE

Performance/ Monitoring	Business and Economic Development	Career Center	Marketing/ Outreach	Executive	Full Board	
Tuesday, 9:00 am	Wednesday, 9:00 am	Thursday, 9:30 am	Wednesday, 9:00 am	Wednesday, 9:30 am	Wednesday, 11:30 am	
8/9/2022	8/10/2022	8/18/2022	8/17/2022	8/31/2022	9/7/2022	CF Levy
11/8/2022	11/9/2022	11/17/2022	11/16/2022	11/30/2022	12/7/2022	CF Ocala
2/7/2023	2/8/2023	2/16/2023	2/22/2023	3/1/2023	3/8/2023	CF Lecanto
5/9/2023	5/10/2023	5/18/2023	5/24/2023	5/31/2023	6/7/2023	CF Ocala

OUR VISION STATEMENT

To be known as the number one workforce resource in the state of Florida by providing constructive tools and professional supportive services that are reflected in the quality of our job candidates and meet the needs of the business community.



**CAREERSOURCE CITRUS LEVY MARION
Performance and Monitoring Committee**

MINUTES

DATE: November 8, 2022
PLACE: College of Central Florida, Enterprise Center
3003 SW College Road, Ocala, FL 34474
TIME: 9:00 a.m.

MEMBERS PRESENT

Al Jones
Arno Proctor
Brandon Whiteman
Fred Morgan
Jeff Chang, Chair

MEMBERS ABSENT

Deb Stanley
Ted Knight

OTHER ATTENDEES

Rusty Skinner, CSCLM
Dale French, CSCLM
Cory Weaver, CSCLM
Cathy Galica, CSCLM
Steven Litzinger, CSCLM

Andrea Abrams, CSCLM
Cira Schnettler, CSCLM

CALL TO ORDER

The meeting was called to order by Jeff Chang, Chair at 9:00 a.m.

ROLL CALL

Cira Schnettler called roll and a quorum was declared present.

APPROVAL OF MINUTES

Al Jones made a motion to approve the minutes from the August 9, 2022 meeting.
Brandon Whiteman seconded the motion. Motion carried.

DISCUSSION ITEMS

State Updates

Workforce Issues that are Important to Our Community

Rusty Skinner updated the committee on the following items:

- Gray and Robinson (CLM's lobbyist firm) arranged a meeting with Katie Crofoot (Reach Act office) and Rusty Skinner, Dale French and Cory Weaver for introductions. The Gray and Robinson team shared a document with Ms. Crofoot that highlighted CLM's achievements and partnerships. On November 3, the State's

realignment consultant, Ernst and Young, held an in-person meeting. During that meeting, Katie Flury, with Gray and Robinson, discussed this document with Clint Fuhrman from Ernst and Young and it was sent to him for his review.

- There have been discussions with DEO Adrienne Johnston and past presidents of FWDA regarding monitoring. The State believes that there needs to be stricter reviews of the regions. The regions believe that monitoring reports need to be finalized in a timely manner so that identified issues do not carryover into the next program year. The committee will be updated when additional information is available.

Letter Grades

Cory Weaver was happy to report that the CLM region received an A- letter grade in the new grading system that was release by the State in October. There are a few areas for improvement, but overall, the region did very well. Cory Weaver reviewed the measures and their weight against the final score. There was discussion on the opportunities for the areas that could be improved. We are in the process of identifying areas where customers would receive quality supportive services, that would also improve scores on the grading system. Rusty Skinner added that the letter grades are a work in progress and there may be some adjustments to the system in the future.

Workforce Issues that are Important to Our Community

Jeff Chang stated that he appreciated any assistance CLM provided in connecting local manufacturing businesses with the CTE program and MRMA. Rusty Skinner also noted that there will be discussions with the CEP and the school district to further the school to work transition efforts.

PUBLIC COMMENT

None

ACTION ITEMS

Annual Subrecipient Monitoring

Dale French informed the committee that Eckerd Connects is the only subrecipient. He reviewed the report and noted that issues found were rectified. No findings were reported. Al Jones made a motion to approve the subrecipient monitoring report. Fred Morgan seconded the motion. Motion carried.

CCIR Monitoring

Dale French explained that annual monitoring is conducted by vocational rehabilitation for reimbursement through the CCIR program. This reimbursement makes up most of the unrestricted funds account. The monitoring report concluded there were no issues or findings. Al Jones made a motion to approve the CCIR monitoring report. Brandon Whiteman seconded the motion.

PROJECT UPDATES

Talent Center

Andrea Abrams reviewed the quarterly Talent Center report. She explained that the Talent Center has seen a decrease in traffic and in placements. There has been an increase in student traffic and although they are not currently looking for jobs, we see

their interest as an investment for the future. Talent Center staff are working with realtors and mortgage company representatives to share referrals for individuals moving to a large home development coming to the Ocala area. One Talent Center employee will be retiring in December. That position will be filled by an internal candidate and the vacant position that will be then opened will be advertised in the new year.

Contract Reports

Cathy Galica reviewed the performance report for Citrus and Marion counties and the youth report. Overall, the partners did well on the report.

- County Reports:
 - Marion County continues to meet their goals.
 - Citrus County did not meet one of their goals but has time before the end of the year to make it up.
- Youth Report: The Eckerd reporting has not been released by the State. Once that data is available it will be presented to this committee.

Event Report

Cory Weaver highlighted items from the Event Report. She noted that 12 hiring events have already been conducted so far this program year and the hiring rate is at 50%. There are a few events scheduled in Levy and Citrus Counties in the coming months.

Workforce Intelligence

Performance Measures

Cory Weaver reviewed the reports and welcomed questions from the committee members.

- Workforce Intelligence: Center traffic is increasing, with many customers being job seekers.
- Cory Weaver stated that many CLM staff members volunteered to assist with the Flagler-Volusia with Hurricane Ian Relief Efforts. After assessing the needs of the affected communities, a team of 10 staff members assisted 224 individuals in the 4 weeks they were in there. Committee members expressed gratitude to staff members for volunteering and their hard work.
- Performance Measures: Our organization is doing well. We continue to steadily rank in the top 5 regions in the State in most areas.

Experiential Learning Contracts

Cory Weaver summarized each section of the report. Activity has picked up in October and November and that will be reflected in the report at the next meeting.

YouthBuild Reports

Cory Weaver reviewed the report and noted that Youth Build graduates received a combination of numerous certifications giving them a competitive edge when exiting the program. Invitations will be sent out for the wall raising for the upcoming cohort.

Net Promoter

Steven Litzinger reviewed the Net Promoter Surveys. Overall, we are providing

excellent customer service.

- There were 23 detractors, 7 of those detractors were not satisfied with the unemployment system and DEO.
- Chiefland did not have any detractors.
- Job Candidate continue to trend positively.
- Business Services scores decreased a bit. Many employers feel they are not receiving the quantity or quality candidates they are looking to hire.
- Talent Center continues to have a high level of customer service satisfaction.

MATTERS FROM THE FLOOR

ADJOURNMENT

There being no further business, the meeting was adjourned at 9:54 a.m.

APPROVED:



RECORD OF ACTION/APPROVAL

**Performance and Monitoring Committee
Tuesday, February 7, 2022**

TOPIC/ISSUE:

Acceptance of 2021-2022 monitoring close-out

BACKGROUND:

State programmatic and finance monitoring occurred April 25, 2022 through April 29, 2022. We have submitted our responses to the monitoring for DEO's review and approval.

POINTS OF CONSIDERATION:

We received a close-out letter dated January 31, 2023 accepting our responses and officially closing the last programmatic monitoring review.

STAFF RECOMMENDATIONS:

Accept the final report and close-out letter.

COMMITTEE ACTION:

BOARD ACTION:

Ron DeSantis
GOVERNOR



Meredith Ivey
ACTING SECRETARY

January 31, 2023

Mr. Thomas "Rusty" Skinner, CEO
CareerSource Citrus Levy Marion
Enterprise Center
3003 SW College Road, Suite 205
Ocala, Florida 34474

Dear Mr. Skinner:

The Florida Department of Economic Opportunity would like to thank you and CareerSource Citrus Levy Marion staff for your participation and cooperation in the Program Year (PY) 2021-2022 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 out the PY 2021-2022 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,

Kathryn Nelson, Chief
Bureau of One-Stop and Program Support

KN/ske

cc: Andrew Collins
Keantha Moore
Ken Williams

Florida Department of Economic Opportunity | Caldwell Building | 107 E. Madison Street | Tallahassee, FL 32399
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Program Year 2021-2022

November 1, 2022

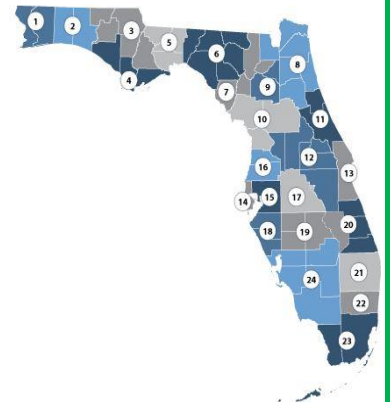
Quality Assurance Report

*Programmatic and Financial
Compliance Monitoring Review
for*



CareerSource
CITRUS | LEVY | MARION

Local Workforce Development Board - 10



Prepared and Issued By:



*Division of Workforce Services
and
Division of Finance and
Administration*

Florida Department of Economic Opportunity | Caldwell Building | 107 E. Madison Street | Tallahassee, FL 32399
850.245.7105 | www.floridajobs.org | [www.twitter.com/FLDEO](https://twitter.com/FLDEO) | www.facebook.com/FLDEO

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Executive Summary

During the period of April 25 to April 29, 2022, the Florida Department of Economic Opportunity (DEO) conducted a joint programmatic and financial monitoring review of CareerSource Citrus Levy Marion's (the "LWDB") workforce programs. Programmatic and financial monitoring was conducted by DEO's Bureau of One-Stop and Program Support (OSPS) and Bureau of Financial Monitoring and Accountability (FMA) staff via a remote desktop review analysis. This allowed for collaboration in the evaluation of both programmatic and financial data by a comprehensive monitoring review team.

Monitoring activities included assessing the LWDB's program operations, management practices, system protocols, internal controls, financial record keeping, and reporting to determine if the LWDB operated in compliance with each of the programs' laws, regulations, state and local plans, policies, guidance, and any contract or agreement terms. Monitoring also included sample testing of randomly selected participant case file records from each of the workforce programs reviewed.

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.

The review revealed that the LWDB has the systems in place to perform the broad management, operational, and financial 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 nine findings, seven other noncompliance issues (ONI), and several observations. The financial monitoring review resulted in one issue of noncompliance and one technical assistance. 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.

Note: As subrecipients of authorized funds administered by DEO, LWDBs are accountable for failing to correct performance, programmatic, and financial deficiencies found during the compliance monitoring reviews. To reduce programmatic or financial deficiencies observed and to increase program integrity at the local level, corrective action by the LWDB is required to be taken.

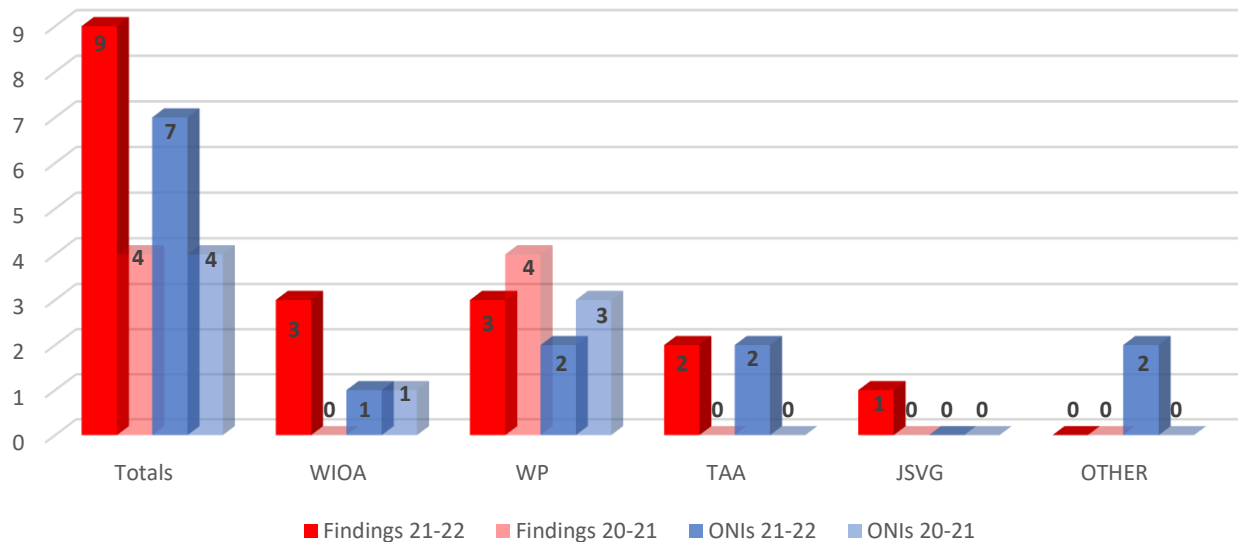
The results of each of the LWDB's workforce programs are summarized in the following charts by program and category. For additional programmatic and financial monitoring information and resources, click here: [Monitoring Overview](#).

SUMMARY TABLE OF PROGRAMMATIC MONITORING RESULTS

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

PY 2021-22 Programmatic Monitoring Results					
Workforce Program	Issue	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue
WIOA Adult/DW	The on-the-job (OJT) and customized training (CT) activities for several individuals exceeded the contract time limits without a justifiable reason.	N	Y		
	There was no documentation of an ITA or contract in a participant's case file to support the training.	N	Y		
WIOA Youth	A couple of credential attainments recorded in Employ Florida did not meet the definition of a nationally recognized credential.	N	Y		
WIOA Common Issue	Measurable skills gains (MSG) were not recorded in Employ Florida for a few participants.			Y	Y
WIOA Totals		0	3	1	1
TAA	Training activities were not accurately recorded under the appropriate codes in the Wagner-Peyser TAA program application in Employ Florida.	N	Y		
	A participant's referral to supportive services was not documented by the T07 code in Employ Florida.	N	Y		
	The Individual Employment Plan (IEP) in a participant's file did not contain objectives or specific action steps to accomplish the participant's goal.			N	Y
	A case file did not contain course and/or program outline and registration documentation, the training invoices and payments were not entered in the TAA/TRA Payment View link as required, and the training packet was submitted after the participant's training program had begun.			N	Y
TAA Totals		0	2	0	2
WP	A new employer account was not reviewed and verified within two business days.	N	Y		
	An agricultural job order was missing the wages to be paid and the specific days and hours to be worked.	Y	Y		
RESEA	A participant's EDP did not contain all required information.			N	Y
Career Center Credentialing	Several front-line staff did not complete the required 15 hours of continuing education.			Y	Y
Complaint System	Employment Service complaint logs were missing required information. Additionally, a complaint log was submitted late to the State Monitor Advocate for reporting purposes.	N	Y		
WP Totals		1	3	1	2
JVSG	A few participants were not provided priority of service (POS) and the corresponding code (089 automated or 189 manual) was not recorded in Employ Florida when participation began.	N	Y		
JVSG Totals		0	1	0	0
Other	There were instances of board members not filing financial disclosure statements by the due dates provided by law.			N	Y
	The LWDB's Kiosk system does not advise participants that collection of demographic information is voluntary and kept confidential as provided by law.			N	Y
Other Totals		0	0	0	2
Results-All Programs		1	9	2	7

**Monitoring Issues By Program
PY 2021-2022
CareerSource Citrus Levy Marion**



Note: The above chart reflects a two-year comparison of the number of monitoring issues (PY 2020-21 and PY 2021-22).

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 being provided to participants, potential questioned costs, etc.). Findings are expected to be responded to in the Corrective Action Plan (CAP).
2. **Other Noncompliance Issue (ONI)** – 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, questioned 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.

SUMMARY TABLE OF FINANCIAL MONITORING RESULTS

PY 2021-2022 Financial Monitoring Results				
Category	Findings	Issues of Non-Compliance	Observations	Technical Assistance Provided
General Ledger and Cost Allocation Statistics: MOUs/IFAs missing required elements.		1		
Cash Management and Revenue Recognition: Bank reconciliation.				1
TOTAL	0	1	0	1

DEFINITIONS APPLICABLE TO FINANCIAL MONITORING

1. Finding – Lack of compliance with federal or state laws, rules and regulations, administrative codes, or state guidance that may result in disallowed costs or impact the integrity of program operations. Findings are expected to be responded to in the CAP.
2. Noncompliance – Lack of compliance with federal or state laws, rules and regulations, administrative codes, or state guidance but may not result in disallowed costs or do not impact the integrity of program operations. Issues of Noncompliance are expected to be responded to in the CAP.
3. Observation – Informative statements or constructive comments to improve the delivery of services and to help ensure continued fiscal integrity of the LWDB. Observations are not expected to be responded to in the CAP.
4. Technical Assistance – Any assistance provided by the financial monitoring team to LWDB staff.

**QUALITY ASSURANCE REPORT
CAREERSOURCE CITRUS LEVY MARION
LOCAL WORKFORCE DEVELOPMENT BOARD (LWDB) 10**

I. DESCRIPTION OF MONITORING APPROACH

Review Purpose and Scope

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

The review scope also included an examination of the LWDB's accounting records, internal controls, and supporting documentation which included, but not limited to, a review of cash management, general ledger, cost allocations, payroll, personnel activity report (PAR) testing, disbursement testing, and reporting of program data in the MIS to determine if appropriate processes, procedures, and controls were in place and properly implemented.

Type of Review

Due to COVID-19 restrictions, a remote desktop review was performed in lieu of an on-site visit for both programmatic and financial monitoring, with the selected sampled items provided via upload to DEO's SharePoint monitoring system or access to the LWDB's document storage system.

Compliance Review Abstract information

- Programmatic and Financial Monitoring Review Dates: April 25 to April 29, 2022.
- Programmatic and Financial Sample Review Period dates: April 1, 2021 to March 31, 2022.

Note: Entrance/Exit conference attendees are listed in Section IX of this report.

Programs Reviewed:

- Welfare Transition (WT)
- Supplemental Nutrition Assistance Program - Employment and Training (SNAP E&T)
- Workforce Innovation and Opportunity Act (WIOA)
- Trade Adjustment Assistance (TAA)
- Wagner-Peyser (WP)
- Jobs for Veterans State Grant (JVSG)
- Any identified special projects operational during the review period
- Financial management practices, record keeping, safeguards, and reporting

Monitoring Review Tools

DEO's PY 2021-2022 programmatic and financial monitoring review tools were used to conduct the review. The tools were developed to provide a framework for monitoring activities performed by OSPS and FMA staff as well as the criteria used to monitor.

II. FINANCIAL MONITORING RESULTS

FMA performed financial monitoring procedures based on the elements described in the PY 2021-2022 Financial Monitoring Tool. The results of the financial monitoring testing are described below:

Prior Year Corrective Action Follow-Up

There were no Findings or Issues of Noncompliance in the prior year.

Findings

There were no Findings identified during the financial monitoring review period of April 1, 2021 to March 31, 2022; however, the following Issues of Noncompliance were identified.

Issues of Noncompliance

Issue of Non-Compliance FMA #10.22.01

Category: 7.0 General Ledger and Cost Allocation:

Condition: The LWDB did not ensure its Memorandum of Understanding & Infrastructure Funding Agreements with Central Florida Community Action and Florida Division of Blind Services Vocational Rehabilitation included all the required information in accordance with 20 CFR 678.755, 20 CFR 678.500(d), and the Sub-Grantee Agreement as follows:

Central Florida Community Action Agency

- Identification of all one-stop partners, chief local elected officials, and the LWDB participating in the infrastructure funding arrangement. *While the agreement identified the one-stop partners, it did not identify the chief local elected official.*
- Steps the LWDB, chief local elected officials, and career center partners used to reach consensus or an assurance that the local area followed the guidance for the State funding process.
- Description of the process to be used among partners to resolve issues during the MOU duration period when consensus cannot be reached.
- Signatures of the LWDB, one-stop partners, and chief local elected officials. *While the agreement included the signature of the LWDB and the one-stop partner, the signature of the local chief elected official was not included.*

Florida Division of Blind Services

- Identification of all one-stop partners, chief local elected officials, and the LWDB participating in the infrastructure funding arrangement. *While the agreement identified the one-stop partner the LWDB is participating in the agreement with, it did not identify all of the other required one-stop system partners or the chief local elected official.*

- Signatures of the LWDB, one-stop partners, and chief local elected officials. *While the agreement included the signature of the LWDB and the one-stop partner, the signature of the local chief elected official was not included.*

Criteria: 20 CFR 678.755 states, in part: *The MOU, fully described in § 678.500, must contain the following information whether the local areas use either the local one-stop or the State funding method:*

- (c) Identification of all one-stop partners, chief elected officials, and Local WDB participating in the infrastructure funding arrangement.*
- (d) Steps the Local WDB, chief elected officials, and one-stop partners used to reach consensus or an assurance that the local area followed the guidance for the State funding process.*
- (e) Description of the process to be used among partners to resolve issues during the MOU duration period when consensus cannot be reached.*

20 CFR 678.500 (d) states: *When fully executed, the MOU must contain the signatures of the Local WDB, one-stop partners, the chief elected official(s), and the time period in which the agreement is effective. The MOU must be updated not less than every 3 years to reflect any changes in the signatory official of the Board, one-stop partners, and chief elected officials, or one-stop infrastructure funding.*

Recommendation: We recommend the LWDB put processes and procedures in place to ensure the elements stated in 20 CFR 678.755, 20 CFR 678.500(d), and the Sub-Grantee Agreement are included in the Memorandums of Understanding & Infrastructure Funding Agreements as required.

Resource: Administrative Policy Number 106, Memorandums of Understanding and Infrastructure Funding Agreements, 02/20/2020 (floridajobs.org).

Observations

There were no Observations identified during the financial monitoring review period of April 1, 2021 to March 31, 2022.

Technical Assistance

Technical Assistance FMA #10.22.01

Category: 4.0 Cash Management and Revenue Recognition

The Section X- *Bank Reconciliation* of the LWDB's Administrative Plan does not include a time frame by which monthly bank reconciliations are to be completed. For the sample month of October 2021, the reconciliation was completed on November 20, 2021. While this completion date is not unreasonable, for financial consistency and accountability the LWDB would benefit from enhanced policies which specify a timeframe in which reconciliations are to be completed.

III. PROGRAMMATIC MONITORING RESULTS

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.

NOTE: The following general CAP requirements must be submitted with each Finding and Other Noncompliance Issue identified in the report. Additionally, a separate CAP response must be submitted for any additional program specific issues identified in each section of the report.

General Program CAP Requirements

- 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 (WT)

The sample size consisted of 18 participant case files. The review did not reveal any Findings or Other Noncompliance Issues; however, the following Observation was noted:

OBSERVATION

A participant's case file was closed prior to the Department of Children and Families' (DCF) alert date. Moving forward, LWDB staff must ensure that participant cases are closed on the date specified by the DCF alert.

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM - EMPLOYMENT AND TRAINING (SNAP E&T)

The sample size consisted of 17 participant case files. The review did not reveal any Findings or Other Noncompliance Issues; however, the following Observation was noted:

OBSERVATION

The LWDB's SNAP Local Operating Procedures (LOP) did not include a section on employment activities. The LWDB must provide an assurance with the CAP that LOPs will be updated to reflect specific and detailed direction and instruction on employment activities. A copy of the revised procedures or a timeline for completion must be included with the CAP. Having detailed procedures in place will help eliminate confusion in processes and help ensure staff follow a planned and consistent approach to administering the programs across all career centers.

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

WIOA ADULT AND DISLOCATED WORKER PROGRAM

The sample size consisted of 22 Adult and Dislocated Worker participant case files (13 Adults and nine Dislocated Workers). The following issues were identified:

Finding Number WIOA 10.22.01

Customized Training (CT)/On-the-Job Training (OJT) Activities

Applicable reference(s): WIOA Sec.122(h); 20 CFR 680.700-840; WIOA Sec. 134(c)(3)(A); LWDB Local Plan; and DEO Administrative Policy 009.

Of the four WIOA Adult case files reviewed of participants enrolled in a CT or OJT activity, the training activities for three participants (75.0 percent) exceeded the contract end dates without a justifiable reason.

Recurring Issue from Previous Year: No.

Risk Impact: Exceeding the specified contract end dates without a justifiable reason could lead to potential questioned cost if funds were expended without amending the agreements.

Required Action: In addition to the general required CAP actions, documentation must be provided that the LWDB has reviewed the three cited contract files and taken steps to extend the agreement dates if the case files are still open and active. Additionally, the LWDB must review all open OJT and CT case files to ensure the work-based activities have not exceeded the contract duration without documenting the reason(s) for such action. Documentation of these efforts as well a plan or process for preventing a recurrence of this issue in the future must be provided.

Finding Number WIOA 10.22.02

Individual Training Accounts (ITA)/Contracts for Classroom Training

Applicable reference(s): 20 CFR 680.410-420; WIOA Sec. 122 (b)(1)(D); WIOA Sec. 122 (b)(4)(A); WIOA Sec. 122 (a)(3); and Administrative Policy 90.

Of the 14 WIOA Adult/Dislocated Worker case files reviewed of participants enrolled in an occupational skills training activity, one (7.1 percent) did not have documentation to support the issuance of an ITA or a contract detailing the method of payment for training services provided to the participant.

Recurring Issue from Previous Year: No.

Risk Impact: Failure to have an executed agreement or issuance of an ITA between the LWDB and the training institution could result in improper payments and questioned costs.

Required Action: In addition to the general required CAP actions, the LWDB must review the accounts of all participants enrolled in training with the particular training provider/institution and submit documentation to support whether the training was provided via a contract or an ITA. If no ITA or contract was in place, then documentation must be provided to support the arrangement/authority under which the training was authorized.

The LWDB must also strengthen its processes by developing a policy or procedure that aligns with WIOA guidance and DEO Administrative Policy 90 in instances when an ITA is not used. The policy/procedure must describe the process regarding the use of a contract instead of an ITA when there is an insufficient number of eligible providers in the local area. The policy/procedure must also instruct career managers to identify the training provider, training course, and source of funding used to pay for training not covered under an ITA. This information can be entered as a case note in Employ Florida or on a form developed for such purpose. A copy of the policy/procedure and documentation must be provided with the CAP. A plan of action or process for preventing a recurrence of this issue in the future must also be provided.

WIOA YOUTH PROGRAM

The sample size consisted of 13 Out-of-School Youth participant case files. The following issue was identified:

Finding Number WIOA 10.22.03

Recording of Nationally Recognized Credentials

Applicable reference(s): Federal Data Validation Requirements; TEGL 10-16, Change 1; WIOA Sec. 3(52); WIOA Sec. 129(c) (1) (C) (i).

Of the 13 WIOA Youth case files reviewed of participants who had a credential attainment recorded in Employ Florida, two (15.4 Percent) did not have documentation to support the credentials were recognized as an occupational credential for WIOA purposes. The LWDB recorded the two "Safe Staff" certificates as recognized credentials.

Note: The Safe Staff certificate is a general skills certificate that does not document measurable technical or industry/occupational skills necessary to gain employment or to advance within an occupation. Therefore, it does not meet the definition of a nationally recognized credential and does not count in the primary indicator of performance for credential attainment.

Recurring Issue from Previous Year: No.

Risk Impact: Failure to enter and accurately record credential attainment information in Employ Florida negatively impacts performance results.

Required Action: In addition to the general required CAP actions, the LWDB must ensure that credentials recorded in Employ Florida meet the definition of a nationally recognized credential. Documentation to support the credential attainment must be retained in the participant's case file or made available upon request. The LWDB must provide a plan of action with the CAP outlining efforts taken to prevent future occurrences including routine monitoring, staff training, and written notification to staff informing them of the requirements. The CAP must also include documentation showing that staff will review and monitor all files that opened subsequent to the review period to ensure credential attainments are recorded correctly in Employ Florida.

WIOA SPECIAL PROJECTS

The sample size consisted of 13 participant case files for the following special projects: Sector Strategies-Bridge to Skilled Trades II, Soft Skills Development 2019-Retail and Hospitality Academy, Apprenticeships Expansion 2019, Covid-19 Public Health Emergency, and Foundational Skills Initiative.

COMMON ISSUE

The following common issue was identified in the WIOA Special Projects and the Adult/Dislocated Worker Programs.

ONI Number WIOA 10.22.01

Recording of Measurable Skill Gains (MSG)

Applicable reference(s): WIOA Section 116; 20 CFR Part 677.155(a)(v); and TEGL 10-16, Change 1.

- Of the 16 WIOA Adult/Dislocated Worker case files reviewed of participants enrolled in an education or training program, one (6.3 percent) did not have an MSG recorded within the program year.
- Of the 11 WIOA Special Project case files reviewed of participants enrolled in an education or training program, two (18.2 percent) did not have an MSG recorded within the program year.

Recurring Issue from Previous Year: Yes (Prior year CAP reviewed and verified but noncompliance continues to occur).

Risk Impact: Failure to enter and accurately record MSG information in Employ Florida negatively impacts performance results.

Required Action: In addition to the general required CAP actions, the LWDB must provide an assurance with the CAP that MSGs will be documented and recorded by the end of the applicable program year. The LWDB must also review its internal policies, processes, and procedures to ensure that MSGs are recorded correctly and carried out in accordance with guidance. Additionally, the LWDB must provide documentation of training to all staff and ensure they understand the requirements and intent of MSGs including how to review and timely record results. Because this is a repeat issue, the LWDB must reevaluate the cause of continuing problems and provide a plan or process for preventing a recurrence of this issue in the future.

TRADE ADJUSTMENT ASSISTANCE (TAA) PROGRAM

The sample size consisted of one participant case file. The following issues were identified:

Finding Number TAA 10.22.04

Recording of TAA Services

Waivers

Applicable reference(s): TEGLs 22-08, 10-11, 7-13, and 05-15; PIRL; and 20 CFR 618.735.

- A waiver of training was not accurately recorded in Employ Florida. The Successful Completion date of the waiver activity does not match the “Closed” review status under the Waiver Entry/Edit Waiver link. Therefore, the activity closed prematurely in Employ Florida due to conflicting dates entered in Employ Florida.

Rapid Response

Applicable reference(s): Trade Act 2002; TAARA 2015; TEGLs 22-08, 10-11, and 7-13; TEGL 11-02 and 05-15; 20 CFR 682.300 - 682.370; DEO Memo Rapid Response Requirement for Trade Assistance Petitions Dated 02/14/20; PIRL; USDOL TAA Data Integrity Requirement; DEO Administrative Policy 114; and Employ Florida Service Code Guide.

- The Rapid Response activity was not recorded under the Wagner-Peyser 110-service code program application. The 110-service code is required to be completed to document that staff provided information to a jobseeker during a rapid response event.

Recurring Issue from Previous Year: No.

Risk Impact: Failure to provide and record rapid response services can lead to a participant's inability to receive required services and the entitlements and benefits that are due. Additionally, not recording or inaccurately recording waiver entry/exit dates can lead to premature exit of the participant and failure to meet federal TAA data integrity measures regarding exits and common exits. Services provided and reporting requirements are also impacted.

Required Action: In addition to the general CAP action requirements, the LWDB must provide an assurance that the Local TAA Coordinator will always enter the 110 Service Code under the Wagner Peyser program application after providing Rapid Response activities. An assurance must also be provided that LWDB staff will review reporting procedures to ensure waivers of training are addressed for all TAA case management staff including how to properly enter, record, and close an activity. A plan of action outlining the LWDB's efforts to prevent a recurrence of these issues in the future must also be provided with the CAP.

Finding Number TAA 10.22.05

Referral to Supportive Services

Applicable reference(s): 20 CFR 617.10; 20 CFR 618.325; TEGLs 22-08, 10-11, 7-13, 5-15, Change 1; DEO Administrative Policy 108; and Employ Florida Service Code Guide.

The referral to supportive services was not documented by the T07 code which is the code used to record and document the offering and/or provision of supportive services. The LWDB must ensure an offer, or a referral, to supportive services is provided to each TAA participant in training and that the services are recorded under the T07 code in Employ Florida and documented in the participant's case file.

Recurring Issue from Previous Year: No.

Risk Impact: Failure to offer, record, and document the referral or provision of supportive services could hinder a participant's successful completion of training without the necessary complimentary services available to allow them to reach self-sufficiency and successfully re-enter the workforce. It may also negatively impact performance accountability and reporting.

Required Action: In addition to the general CAP action requirements, the LWDB must provide an assurance that the Local TAA Coordinator will assess each TAA participant's supportive service needs and refer them as appropriate to the WIOA program for assistance. These services must be recorded under the T07 Service Code in the TAA case file. Documentation must also be provided showing the LWDB has a check and balance system in place to document the offering and/or provision of supportive services and whether the services are approved, allowable, and invoices match the amounts recorded in Employ Florida. A plan of action or process outlining the LWDB's efforts to prevent a recurrence of this issue in the future must be provided with the CAP.

ONI Number TAA 10.22.02

Individual Employment Plans (IEP)

Applicable reference(s): 20 CFR 617.20; 20 CFR 618.600-665; TEGLs 22-08, 10-11, 7-13, 05-15; and DEO Administrative Policy 107.

IEPs are to be developed based on a comprehensive assessment including short-term and long-term goals and action steps needed to accomplish the goals.

The IEP in the participant's case file was incomplete and lacked sufficient objectives, action steps, and completion dates to assist the participant in achieving their occupational goal.

Recurring Issue from Previous Year: No.

Risk Impact: Absence of objectives and specific action steps and dates on the IEP reduces staff's ability to work effectively and efficiently with participants in delivering services, tracking employability goals, and determining what the participant is required to do to attain their long-term occupational goals.

Required Action: In addition to the general required CAP actions, the LWDB must provide an assurance that staff have or will review all future IEPs recorded in Employ Florida to ensure case notes have been recorded identifying all required elements of the service(s) provided. Documentation must also be provided of attempts to contact and develop the missing objectives and action steps for the participant if the application is still open and active in Employ Florida. A plan of action outlining the LWDB's efforts to prevent a recurrence of this issue in the future must be provided with the CAP.

ONI Number TAA 10.22.03

Program of Study Outline/Registration Documentation/Expenditures

Applicable reference(s): TEGL 22-08, 10-11, 7-13, and 05-05; 20 CFR 618.600-665; PIRL; USDOL TAA Data Integrity Requirement; and DEO Administrative Policy 107.

The course work and/or a program of study outline, registration documentation, and training invoices and expenditures for the participant were not recorded in Employ Florida under the TAA program application. In addition, the TAA training packet was submitted after the participant had already started the training program.

Recurring Issue from Previous Year: No.

Risk Impact: Failure to document, record and/or update all training activities in the TAA application can lead to activities not being reported accurately and can negatively impact performance results as well as participant misunderstanding and completion of planned training services and activities. Additionally, overpayments, or lack thereof, could occur without a clear and readily available record of all training related expenses.

Required Action: In addition to the general CAP requirements, the LWDB must provide an assurance that the Local TAA Coordinator will ensure that all documentation, including expenditures, that support the activities participants are enrolled in are uploaded to Employ Florida under the TAA program application. Although training expenditures and matching invoices were uploaded to Atlas, they must be reported under the TAA application (TAA/TRA Payment View link) as required. Documentation to be retained and uploaded includes the course syllabus or program outline, invoices, program acceptance/enrollment letter(s), 2100 series training forms, and any other documents that support the training application. Documentation of these efforts as well a plan or process for preventing a recurrence of these issues in the future must be provided with the CAP.

WAGNER-PEYSER (WP) PROGRAM

The sample size consisted of 50 participant case files (20 job seekers, 15 job orders, 10 job order placements, and five RESEA). The following issues were identified:

Finding Number WP 10.22.06

Employer-Entered Job Order Review and Verification

Applicable reference(s): 20 CFR 651.10; and DEO Administrative Policy 099.

Of the two employer-entered job orders reviewed in Employ Florida, one (50.0 percent) was missing documentation of staff review and verification of the job order within two business days.

Recurring Issue from Previous Year: No.

Risk Impact: Failure to verify employer-entered job orders can lead to companies entering job orders in Employ Florida with the intent to defraud job seekers or acquiring job seekers personal protected information.

Required Action: In addition to the general required CAP actions, the LWDB must provide an assurance that staff have or will review all future open job orders in Employ Florida to ensure the job orders are reviewed within two-business days. An assurance must also be provided that LWDB staff will take necessary steps to document all employer entered job orders in case notes on the job order in Employ Florida. A plan or process for accomplishing this in the future must also be provided with the CAP.

Finding Number WP 10.22.07

Agricultural Job Orders

Applicable reference(s): Fair Labor Standards Act of 1938, as amended; 20 CFR 653; and DEO FG 03-040.

Agricultural job orders must contain certain information as required by federal law and state policy. This is critical to prevent MSFWs from becoming victims of labor law violations.

The one agricultural job order reviewed was missing the wages the job will pay as well as specific days and hours to be worked.

Recurring Issue from Previous Year: No.

Risk Impact: Noncompliance could lead to jobseekers being referred to employment where they may be exposed to violations of labor laws if certain information is not included on the job orders.

Required Action: In addition to the general required CAP actions, the LWDB must provide an assurance that the job order has been reviewed and verified and that the employer has or will pay at least the Florida minimum wage rate. This can be documented in a case note if the job order is still open and active. The LWDB must also provide an assurance that case notes will be entered on all job orders documenting staff verification of the Florida minimum wage rate and that the job order descriptions contain all necessary information and requirements in the future including specific days and hours to be worked. The LWDB must provide a plan or process for preventing a recurrence of this issue in the future.

REEMPLOYMENT SERVICES AND ELIGIBILITY ASSESSMENT (RESEA) PROGRAM

The RESEA program review focused on the LWDB's compliance with the requirements of the grant to assist reemployment assistance (RA) 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 participant case files.

The following issue was identified:

ONI Number WP 10.22.04

Employability Development Plans (EDPs)

Applicable reference(s): 20 CFR 651.10; F.S. 443.091 and 443.1317(1)(b); UI Handbook-NO. 401-ETA 9048; DEO Administrative Policy 068; and Employ Florida Service Code Guide.

Of the five EDPs reviewed, one (20.0 percent) was missing specific action steps for the participant to reach their long-range occupational goals.

Recurring Issue from Previous Year: Yes (Prior year CAP verified but noncompliance continues to occur).

Risk Impact: Absence of specific action steps on the EDP reduces staff's ability to work effectively and efficiently with participants in delivering services, tracking employability goals, and determining what the participant is required to do to attain their long-term occupational goals.

Required Action: In addition to the general required CAP actions, the LWDB must provide an assurance that staff have or will review all future EDP codes recorded in Employ Florida for WP job seekers to ensure case notes have been recorded identifying all required elements of the service(s) provided. Documentation must be provided of attempts to contact and develop clear and specific action steps the participant should take to accomplish their goals if the application is still open or the job seeker is still active in Employ Florida. Because this is a repeat issue, the LWDB must reevaluate the cause of continuing problems and provide a plan or process for preventing a recurrence of this issue in the future.

CAREER CENTER CREDENTIALING

The career center credentialing review focused on ensuring administrative requirements and records were posted and maintained, that front-line staff had completed all required Tier I certification and continuing education courses. The review also verified whether an Employment Service (ES) Complaint System was in place to process any complaints received.

The following issues were identified:

ONI Number WP 10.22.05

Staff Continuing Education Units (CEU)

Applicable reference(s): DEO Administrative Policy 092.

The LWDB did not provide documentation to verify that all front-line staff completed the required 15 CEU hours within the year subsequent to the anniversary date of their completion of the Tier 1 certification.

Recurring Issue from Previous Year: Yes (Prior year CAP verified but noncompliance continues to occur).

Risk Impact: The LWDB must adhere to Tier I Certification and CEU requirements. Lack of credentialed and certified staff could affect the level and quality of services provided to job seekers at career centers.

Required Action: In addition to the general required CAP actions, an assurance must be provided that all staff CEU requirements have been or will be met including a timeline for accomplishing this. Additionally, documentation must be maintained to support that all front-line staff complete their required 15 CEU hours within the year subsequent to the anniversary date of their completion of the Tier 1 certification. Because this is a repeat issue, the LWDB must reevaluate the cause of continuing problems and improve upon its course of action from

the previous year to resolve this issue. A plan of action must also be submitted with the CAP for preventing a recurrence of this issue in the future.

COMPLAINT SYSTEM

The sample size consisted of two Employment Service (ES) complaint logs.

The following issue was identified:

Finding Number CS 10.22.08

Employment Service Complaint System

Applicable reference(s): 20 CFR 658.400.

All career centers must maintain an Employment Service (ES) and Employment-related Law Complaint System.

The ES complaint logs were missing required information such as type of complaint and referral to other agencies. Additionally, a complaint log was submitted late to the State Monitor Advocate (SMA) for reporting purposes.

Recurring Issue from Previous Year: No.

Risk Impact: Non-adherence to ES Complaint System requirements can lead to legal issues or further action on the part of the individual to file a complaint against the LWDB and State.

Required Action: In addition to the general required CAP actions, the LWDB must submit a plan of action with the CAP outlining specific efforts taken to prevent future occurrences. Documentation of written communication to staff informing them of these requirements along with a signed statement acknowledging they have been made aware must also be submitted.

JOBS FOR VETERANS STATE GRANT (JVSG) PROGRAM

The sample size consisted of 13 Participant case files. The following issues were identified:

Finding Number JVSG 10.22.09

Priority of Service Code

Applicable reference(s): 20 CFR 1010; DEO Administrative Policy 102 and 111; and Employ Florida Service Code Guide.

Of the 13 veteran case files reviewed, three (23.1 percent) did not have Priority of Service code (089 automated or 189 manual) recorded in Employ Florida when participation began.

Recurring Issue from Previous Year: No.

Risk Impact: The absence of the POS 189 activity code can impact a veteran's ability to receive information regarding the provision set forth under priority of service and denial services could have occurred. Noncompliance has an impact on veteran service delivery and may result in a negative federal review of the Veterans Program.

Required Action: In addition to the general required CAP actions, the LWDB must provide documentation that staff have made or initiated contact to verify veteran status and to ensure POS was provided if the case is still

active. The LWDB must also ensure that the 189-service code along with a proper case note is recorded on the Wagner-Peyser application if no automated 089 code is present. The LWDB must also record the appropriate service code and case notes in Employ Florida to document this action. A plan to prevent a recurrence of this issue in the future must also be provided with the CAP.

OBSERVATION

The case file review also revealed that a couple of participants did not have an Individual Employment Plan (IEP) created. Although an IEP is required under DEO Policy 117 and must contain a clear goal and outline the steps necessary (objectives) to achieve the goal, it was not effective until August 20, 2021. To meet the requirements of policy, the LWDB must ensure that all future IEPs address the participant's goals and objectives and any barriers that may prohibit the participant from achieving the goal. Additionally, goals and objectives should be specific, measurable, attainable, realistic, and time-bound (S.M.A.R.T) and provide specific action steps for LWDB staff to work effectively and efficiently with participants in delivering services, tracking employability goals, and determining what the participant is required to do to attain the occupational goals.

IV. FINANCIAL DISCLOSURE REVIEW

The Financial Disclosure review focused on determining the LWDB's compliance with financial disclosure requirements as referenced in Sections 112.3145 and 445.07, Florida Statutes, and DEO's Final Guidance FG-075.

The following issue was identified:

ONI Number FD 10.22.06

Financial Disclosure

Applicable reference(s): F.S. 112.3145 and 445.07; and DEO Final Guidance FG-075.

The Financial Disclosure Management Review Tool completed by the LWDB indicated that several LWDB board members had not fulfilled the financial disclosure filing requirements for the review period. A review of the Ethics Commission website could not verify whether those board members had filed their financial disclosure statements by July 1 of the current year or by the September 1st grace period filing date. Additionally, a new board member did not file a financial disclosure statement within 30 days of their appointment date. Although the information could not be verified because the website may not capture all filings until the next posting dates, the LWDB is reminded that the names and information of all board members and the Executive Director must be updated annually with the Ethics Commission.

Required Action: In addition to the general required CAP actions, the LWDB must develop LOPs or a process that reflect a check and balance system to verify the filing of financial disclosure statements by LWDB board members by July 1, or not later than September 1, of each year. A copy of the LOPs or a timeline of when this will be completed must be provided with the CAP.

V. COLLECTION OF DEMOGRAPHIC DATA

The Demographic Data review is to determine the LWDB's compliance with the nondiscrimination and equal opportunity provisions of 29 CFR Part 37, and DEO's Guidelines for Compliance with Section 188 of the Workforce Innovation and Opportunity Act regarding Collection of Demographic Data.

The following issue was identified:

ONI Number 10.22.07

Collection of Demographic Data

Applicable reference(s): 29 CFR 38.41; DEO Guidelines for Compliance with Section 188 (nondiscrimination) of the Workforce Innovation and Opportunity Act; Grantee – Subgrantee Agreement.

The management process review tool was used to gather information about the LWDB's practice of collecting demographic information when applicants first enter the career centers. Although demographic data is requested of an applicant in the state's management information systems upon registration, LWDB staff indicated they ask customers to provide limited demographic information at the initial point they enter the career centers. The information is collected via their Kiosk system which is an electronic sign-in sheet used for customers who visit the career centers.

LWDB staff provided a screenshot of their Kiosk sign-in sheet used to collect customer names and demographic information; however, the screenshot did not include a statement informing the participants that providing demographic information is voluntary and is kept confidential as provided by law.

Required Corrective Action: In addition to the general required CAP actions, the LWDB must provide an assurance that the Kiosk system used to collect demographic information and data will include a statement informing the participant that providing demographic information is voluntary and is kept confidential as provided by law. A copy of the screenshot depicting this statement or a timeline when this will be done must be provided with the CAP.

VI. MANAGEMENT REVIEW PROCESS

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

OBSERVATION

DEO Administrative Policy 110 states that all board members are required to participate in orientation and training. The training must include, in part, a section that covers conflict of interest. The training agenda provided to the monitors did not include a training session on conflict of interest. For future reference, the LWDB must ensure that the training agenda includes a session on conflict of interest and that conflict of interest is discussed as part of the training session.

VII. MANAGEMENT INFORMATION SYSTEMS (MIS)

The MIS security check focused on the effectiveness of the LWDB's information security controls and whether a business process and policy are in place that protects DEO data and information technology resources and complies with DEO's Information Technology (IT) guidelines and the DEO/LWDB Grantee/Subgrantee agreement requirements.

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

VIII. TRAINING AND TECHNICAL ASSISTANCE

For questions and/or technical assistance in any of the program review areas, the LWDB should contact OSPS at the following email addresses:

- WT - WTProgram@DEO.MyFlorida.com
- SNAP - SNAPETProgram@DEO.MyFlorida.com
- WIOA - WIOA@DEO.MyFlorida.com
- TAA - TAA@DEO.MyFlorida.com TAA - TAA@DEO.Myflorida.com
- WP - Wagner.Peyser@DEO.MyFlorida.com WP - Wagner.Peyser@DEO.Myflorida.com
- RESEA - RESEA@DEO.MyFlorida.com
- FLC - H-2A.JobOrder@DEO.MyFlorida.com and H-2B.JobOrder@DEO.MyFlorida.com
- MSFW – [State Monitor Advocate \(via direct email\)](#)
- JVSG - VETS@DEO.MyFlorida.com

Additional training can be requested by sending a [Training Request Form](#) to WFSTraining@DEO.MyFlorida.com

CORRECTIVE ACTION PLAN REQUIREMENTS

A CAP is required to address how the LWDB will correct any programmatic and financial management review findings and other noncompliance issues identified in the report. For the noted deficiencies, recommendations and suggestions 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 also help to improve the quality and integrity of the data collected.

IX. ENTRANCE AND EXIT CONFERENCE ATTENDEES:

A joint programmatic and financial monitoring entrance conference with LWDB staff was conducted on April 25, 2022. The programmatic exit conference was conducted on April 29, 2022; however, the financial monitoring exit conference was conducted on October 13, 2022. The programmatic entrance/exit conference attendees are listed below:

Name	Agency	Entrance Conference	Exit Conference
Sanchez Emanuel	DEO (Review Lead)	x	x
Andy Windsor	DEO	x	x
Sharon Saulter	DEO	x	x
Sharmarie Gray	DEO	x	x
Terry Wester-Johnson	DEO	x	x
Corey Hayes	DEO	x	x
Morena Owens	DEO	x	x
Barbara Walker	DEO	x	x
Pamela Lightbourne	DEO	x	x
Vincent Lynn	DEO	x	x
Paul Adams	DEO	x	x
Minerva Figueroa	DEO	x	x
Exit Smith	DEO	x	x
Reza Kavoosi	DEO	x	x
Christina Omran	DEO	x	x
Wayne Barr	DEO	x	
Steven Litzinger	LWDB	x	x
Rusty Skinner	LWDB	x	x
Cory Weaver	LWDB	x	
Cathy Galica	LWDB	x	
Dale French	LWDB	x	x
Larry Trowbridge	LWDB	x	x
Myrna Serrano	LWDB	x	
Melissa Sacco	LWDB	x	x
Kevin Harrison	LWDB	x	x
Kim Grey	LWDB	x	x
Heaven Colon	LWDB	x	x

A joint entrance conference with DEO programmatic and LWDB staff was conducted on April 25, 2022; however, the financial monitoring exit conference was conducted on October 13, 2022. The entrance/exit conference attendees are listed below:

Wayne Barr II, FMA	DEO	x	x
Yvette McCullough	DEO		x
Susan Heller, Director of Finance	LWDB	x	x
Steven Litzinger, Director of Continuous Improvement	LWDB	x	

Finding Number WIOA 10.22.02

Individual Training Accounts (ITA)/Contracts for Classroom Training

Applicable reference(s): 20 CFR 680.410-420; WIOA Sec. 122 (b)(1)(D); WIOA Sec. 122 (b)(4)(A); WIOA Sec. 122 (a)(3); and Administrative Policy 90.

- Of the 14 WIOA Adult/Dislocated Worker case files reviewed of participants enrolled in an occupational skills training activity, one (7.1 percent) did not have documentation to support the issuance of an ITA or a contract detailing the method of payment for training services provided to the participant.

Required Action:

In addition to the general required CAP actions, the LWDB must review the accounts of all participants enrolled in training with the particular training provider/institution and submit documentation to support whether the training was provided via a contract or an ITA. If no ITA or contract was in place, then documentation must be provided to support the arrangement/authority under which the training was authorized.

The LWDB must also strengthen its processes by developing a policy or procedure that aligns with WIOA guidance and DEO Administrative Policy 90 in instances when an ITA is not used. The policy/procedure must describe the process regarding the use of a contract instead of an ITA when there is an insufficient number of eligible providers in the local area. The policy/procedure must also instruct career managers to identify the training provider, training course, and source of funding used to pay for training not covered under an ITA. This information can be entered as a case note in Employ Florida or on a form developed for such purpose. A copy of the policy/procedure and documentation must be provided with the CAP. A plan of action or process for preventing a recurrence of this issue in the future must also be provided.

CareerSource CLM Response

Plan of Action

This training was authorized under the 2019 Statewide Soft Skills Development Grant for Retail and Hospitality awarded by CareerSource Florida (Attached). In this instance, online training was purchased in bulk for students as part of the grant and there were no individual invoices by customer. The training raining was led by a CareerSource Citrus Levy Marion staff member who was certified through the American Hotel and Lodging Association. This individual exited training in 2019 but stayed open under WIOA Adult for Job Search before closing in 2021, causing them to fall into the PY2021 Monitoring Sample. All cases enrolled in training with this provider have since exited. This provider is no longer approved due to the recent removal of the Hospitality sector as a Targeted Sector by the LWDB10 Board in December of 2022. Additionally, Hospitality training has been excluded from the Master Credential List. Should this provider be used again, we will ensure proper documentation is included to support the ITA or contract under the

updated WIOA ITA Policy: OPS 27 – Individual Training Accounts (attached in draft)
This update includes the procedure by which Contract Class training will be managed going forward on page 9.

Monitoring

- Staff engages in a monitoring strategy in which each staff member will monitor three cases per month; two cases will be self-monitored and the third will be a peer-monitor.
- Region 10 engages a third-party monitor, Underwood Sloan and Associates, to monitor all programs at least once annually. All monitoring deficiencies have been shared with Underwood and they have been asked to pay close attention to these areas for the cases they monitor.

Training

Staff were asked to review a presentation covering all monitoring deficiencies, which went over all results. All staff were asked to view the presentation, regardless of program or specialty. Once viewing the presentation, they were asked to confirm they had watched by sending an email to our Director of Continuous Improvement. Presentation linked here:

[Video Link](#)

Staff were then asked to review all Programmatic Monitoring findings and take a quiz in May 2022 to demonstrate mastery of the deficient areas found in the monitoring (Please refer to Attachment 1 – DEO Monitoring Quiz - 2021).

Written Communication to Staff

The results of DEO's monitoring were shared with staff May 9th, 2022. Below is the email sent to staff by the Director of Continuous Improvement. Please refer to the screenshot of this email on Page 4.

An email was sent to Case Management staff outlining the updated Contract Class procedure now included in OPS 27 – Individual Training Accounts. See below:

Policy Update - OPS 27 Individual Training Account



Cory Weaver

To: Carol Davidyock; Valerie Hancock; Janet Clymer
Cc: Larry Trowbridge



Reply

Reply All

Forward

Print

More

Thu 1/19/2023 3:39 PM



OPS-27 ITA Revised 1.19.2023.docx
173 KB

Good Afternoon,

Please refer to the updated attached policy, OPS 27 Individual Training Accounts (draft) for an updated clause on Contract Classes. The update is also outlined below.

On page 9, a section has been added to help ensure consistency in funding and enrolling candidates in Contract Classes in the future. We have used the Contract Class format in the past for programs like the Soft Skills Initiative and Weatherization Classes, among others. We may use this format in the future for Teacher training and other programs if suitable.

CONTRACT CLASSES

There may be a need to enroll a cohort of trainees in a Contract Class offered by an approved training provider to meet a local training demand within the community. Contract classes may be used when traditional 'class size' requirements by our educational providers are difficult to meet. Staff will coordinate with the training provider and business, or businesses (if applicable), eliciting the training to assess candidate eligibility and begin the enrollment process.

Veteran and low-income individuals applying to these programs will be given priority.

Contract classes will be identified by invoicing providing training with an 'up to' rate of trainees and provides flexibility of dropping trainees in and out.

*Priority will be given to training in our identified Targeted Sectors and will align to local demand occupations listed on the Area Targeted Occupational List (**OPS-28 Area Targeted Occupation List and Training Provider Selection**). Contract Classes will be funded in bulk rather than individually. All completers must receive a credential upon program completion. Proper documentation of the bulk invoice will be included in each participant's electronic file.*

Cathy will be sending the updated policy out once it is signed later this week. Please reach out if you have any questions.

Thank you,

Cory Weaver

Director of Operations
CareerSource Citrus Levy Marion
3003 SW College Road, Suite 205
Ocala, FL 34474
Phone: 352.873.7939 ext 1109

Project Design

Collaboration:

With this application we are proposing to develop industry-specific 'academies' based in developing soft skills relevant to the hospitality and retail industries. Specifically, we will have a Hospitality and Tourism Academy and a Retail Advancement Academy. Both of these academies will be created through collaboration with industry partners such as the Ocala/Marion County Chamber and Economic Partnership (CEP), the Hotel Development and Management Group based in Ocala (currently owns and operates 8 hotels in our workforce area) and individual franchise owners. Since our area does not have a retail association, the CEP will act as the conduit and voice for the retail industry.

Hospitality and Tourism Academy:

The Hospitality and Tourism academy will employ the START and Guest Service Gold training curriculum developed by the American Hotel & Lodging Educational Institute (AHLEI) as the fundamental training content. This formalized classroom instruction will be combined with presentations from industry leaders in the hospitality and tourism fields. This exposure to firsthand information will support the classroom instruction and introduce the students to the work cultures and expectations of actual employers.

This academy is projected to consist of approximately 36 hours of classroom instruction and certification testing. Students will have the opportunity to attain the AHLEI Guest Service Gold credential as well as a credential that is focused in one of the three most common entry-level positions at a lodging property – front desk representative, guestroom attendant, or restaurant server. Regardless of the track the students take they will learn the fundamentals of customer service and customer/employer expectations.

Each academy will conclude with a private meet and greet with employers from the hospitality and tourism sector. Workforce staff will facilitate the events to inform the businesses of available hiring incentives and additional work-based training opportunities such as On the Job Training (OJT) and paid work experience to help offset the extraordinary costs of hiring and training a new employee and to allow for practical hands-on experience in the field.

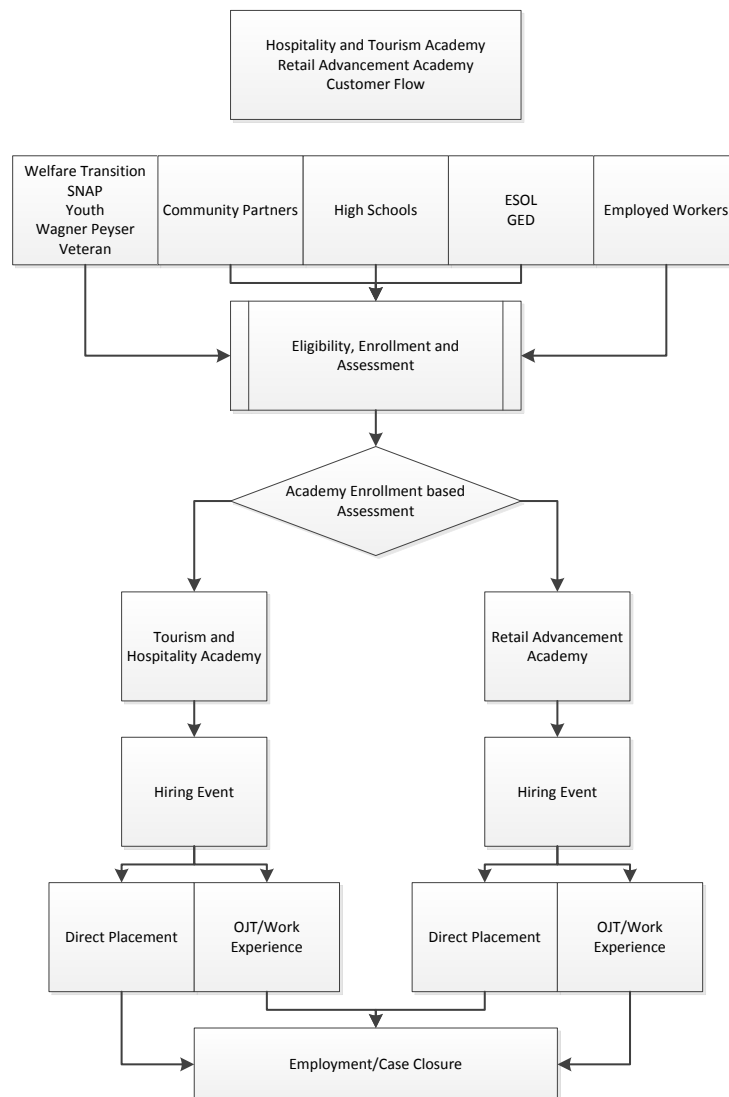
Retail Advancement Academy:

The Retail Advancement Academy will be conducted in partnership with Marion Technical College (MTC). MTC is currently developing a soft skills program tailored from input and needs of local businesses and is expecting to launch the program in the spring of 2019. This academy will cover a wide array of soft skills topics including reliability and time management, communication and problem solving. It will also include the curriculum and testing for the National Retail Federation (NRF) certification.

Like the Hospitality and Tourism Academy the Retail Advancement Academy will consist of approximately 36 hours of classroom training and will conclude with a private meet and greet with hiring employers from the retail sector. As, before, CareerSource CLM staff will facilitate the events and discuss additional work-based incentives with the businesses to promote our graduating candidates.

Customer Focus:

Both academies will be designed to help our harder to serve populations obtain the skills needed to move quickly into entry level positions within the hospitality, tourism and retail fields. Our recruitment for the academies will take a broad approach of introducing new customers to the workforce system. Aside from recruiting from partner programs within our offices we will also be working with our community based organizations, high schools and Marion Technical College. We experienced great success in holding information sessions about our construction classes at the ESOL and GED classes at MTC during the launch of our Construction Core program for the Bridge to Skilled Trades grant, and will once again conduct sessions with these classes. We will also leverage our strong partnerships with local high schools and businesses to attract graduates that may wish to enter these fields at graduation as well as existing employees that businesses wish to train, retrain or advance within their organization. This training can be accomplished through traditional WIOA enrollment or development of an Employed Worker agreement depending on the situation. Each academy will be comprised of 8 students for a total enrollment of 96 over the life of the grant.



Funding:

While this grant will fund the classroom training portion of the Academies, local partner program funds will be used to cover costs of OJT, Paid Work Experience and any needed supportive services. Funds from the formula Adult and Dislocated Worker, Welfare Transition and Youth programs will be blended with Strategic Initiative Funding for those students that need additional services to gain employment.

Project Milestones/Timelines:

Launch of the first academies is expected to occur in February of 2019. Once awarded, we will begin recruitment and selection of a Case Manager/Instructor that has previous experience in one of the targeted fields.

Curriculum and program development and planning will take place in December 2018 and extend through January 2019. This planning will include determining facility locations for the training, computer lab setup, and alignment of the curriculum to local needs through industry leadership planning meetings.

Once the academies go live we will be hosting one academy per month for 12 months rotating the industry focus each month. This will allow staff to coordinate placement of graduates into employment or enrollment into work-based training activities before the next cohort begins. The rotation will allow for individuals engaged in paid work experience to complete and obtain employment prior to the next round of graduates entering the workforce and vying for similar positions.

Academy Execution Timeline			
Month	Year	Activity	Enrollments
December	2018	Recruitment of instructor	
December/January	2018/2019	Planning and curriculum completion	
February	2019	Launch Hospitality and Tourism Academy	8
	2019	Hospitality and Tourism Hiring Event	
March	2019	Launch Retail Advancement Academy	8
	2019	Retail Advancement Hiring Event	
April	2019	Hospitality and Tourism Academy	8
	2019	Hospitality and Tourism Hiring Event	
May	2019	Retail Advancement Academy	8
	2019	Retail Advancement Hiring Event	
June	2019	Hospitality and Tourism Academy	8
	2019	Hospitality and Tourism Hiring Event	
July	2019	Retail Advancement Academy	8
	2019	Retail Advancement Hiring Event	
August	2019	Hospitality and Tourism Academy	8
	2019	Hospitality and Tourism Hiring Event	
September	2019	Retail Advancement Academy	8
	2019	Retail Advancement Hiring Event	
October	2019	Hospitality and Tourism Academy	8
	2019	Hospitality and Tourism Hiring Event	
November	2019	Retail Advancement Academy	8
	2019	Retail Advancement Hiring Event	

December	2019	No Classes	
January	2020	Hospitality and Tourism Academy	8
	2020	Hospitality and Tourism Hiring Event	
February	2020	Retail Advancement Academy	8
	2020	Retail Advancement Hiring Event	
March - June	2020	Completion and closeout of Work-Based training contracts	
		Case Closures	
		Customer follow ups/follow up services	
		Total Enrollments	96

Sustainability:

This grant will act as the catalyst to establish the groundwork for industry developed academies. Plans for sustainability include: 1.) industry partnerships/sponsorships for Hospitality and Retail Academies through local industry organizations, 2.) cross partner program funding for hard to serve populations to include formula Youth, AD/DW, Welfare Transition, and SNAP funds, 3.) marketing to local businesses to sponsor/host classes to include training for existing staff on a fee for service basis.

Budget Narrative:

Attached (next page)

BUDGET NARRATIVE

Personnel - \$57,000. Personnel covers 100% of the cost for 1 Career Coach @ \$38,000 annually for an 18 month period.

Fringe Benefits - \$16,176. Fringe for personnel equals 28.38% of payroll and is broken down as follows: FICA - \$4,360.50 @ 7.65%; Insurance - \$7,216.20 @ 12.66%; Retirement - \$3,568.20 @ 6.26; Workers Comp - \$615.60 @ 1.08%; and State Unemployment Tax - \$416.10 @ .73%

Travel - \$400.00. Estimated travel expenses for instructor travel to offsite training locations, meetings and business engagement for work-based training development.

Equipment - \$0. There will be no equipment purchases for this program.

Supplies - \$500.00. Classroom supplies and outreach/marketing materials.

Other (including Training and Support Services) - \$18,544.

Hospitality and Tourism Academy

- **\$179.95 Customer Service Instructor Package**
- **\$124.95 START Instructor Package**
- **\$1680.00 Customer Service Workbooks 48 X \$35.00**
- **\$2160.00 START Workbooks 48 X \$45.00**

Retail Advancement Academy

- **\$14,400.00 Tuition Cost 48 X \$300.00**

Indirect costs - \$7,380.00. Approved cost rate is 33%. 8% for purposes of this grant

Total Grant Request - \$100,000.00. Will serve 96 individuals.

SECTION: Program Operations	POLICY # OPS-27	PAGE 1 of 18
TITLE: Individual Training Account (ITA, Budgeting and Fund Coordination Policy)	EFFECTIVE DATE: July 1, 2022	
SUPERCEDES: OPS-27 OPS-Interim Policy Change I OPS-Interim Policy Change II LOP-WC-20 Cost of Attendance Funding Coordination and Budgeting LOP-WC-27 Assessments for Training Services Enrollments		Dated: July 27, 2021 Dated: July 6, 2012 Dated: January 1, 2013

PURPOSE:

POLICY:

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1. WIOA ENROLLMENT

Career Seekers are referred from CareerSource Citrus Levy Marion to an educational provider, or training provider. Also, career seekers may be referred from the educational provider, or training provider to CareerSource Citrus Levy Marion.

Occasionally students are referred to WIOA for additional training assistance which is identified during the schools admissions process. Customers may also be referred to explore training opportunities by CSCLM staff while engaged in other CSCLM programs. In all cases the WIOA enrollment process remains the same. Customers who are interested specifically in training under WIOA are not required to complete the Career Success Guide.

A. WIOA Staff Assisted Application Process

All career seekers referred/interested in training services must have already completed the preliminary steps for staff assisted services for WIOA enrollment as follows:

- CareerSource CLM WIOA Services Application
- EF Self-Service Registration

Upon completion of the above activities, customers will be referred by the Resource Room front desk (or other CSCLM staff) to meet or schedule an appointment with a CSCLM WIOA Career Development Coach. The WIOA Career Development Coach will review the Targeted Occupation List with the Applicant. If the Applicant is interested in pursuing training opportunities on the Targeted Occupation List, the WIOA Career Development Coach will scan the completed application documents into Atlas. Then the WIOA Career Development Coach will assist the customer in completing the Assessment for Training Enrollment as specified in Item (4) below.

B. CareerSource CLM WIOA Services Application

CSCLM will utilize the CareerSource CLM WIOA Services Application to assist career seekers. The applications will enable career seekers to initiate the data collection process and notify a CSCLM WIOA Career Development Coach of their interest in training opportunities. The application will be stored in the Electronic filing system.

The WIOA Career Development Coach will contact the applicants for further screening, schedule appointment for next steps. The WIOA Career Development Coach will assist the customer in completing the Assessment for Training Enrollment as specified in Item (4) below.

2. ELIGIBILITY

20 CFR section 680.210(c) states that WIOA training services must be provided when other sources of grant assistance are unavailable to the customer.

All recipients of an ITA from CSCLM must be eligible for WIOA services as described in 20 CFR section 680.100 through 680.350, or an active, open and participating customer of the Welfare Transition Program.

3. PROGRAM CHOICE

20 CFR section 680.210(b) stipulates that approved training services are to be directly linked to occupations in demand in the area as established by the local area board and as published on the Area Targeted Occupation List (ATOL). The CSCLM ATOL is available at the Career Centers in Citrus, Levy and Marion Counties as well as available on the careersourceclm.com webpage. The Area Targeted Occupation List is derived from information gathered from the Florida Education and Training Placement Information Program (FETPIP) data, State Labor Market Information and local data analysis as set forth in CareerSource CLM's Policy *OPS 28: Area Targeted Occupation List and Training Provider Selection*. Customers may select a program and training vendor that has been approved and is listed on the ATOL. This list will show currently available programs and the associated training vendors approved to provide such training utilizing local WIOA, WTP, and Trade Adjustment Act (TAA) funds.

The number of individual program enrollments through WIOA or WTP may be limited based on data reviewed during the ATOL development process. For example: the number of current training completers in comparison to employment projections as listed in state labor market information (LMI) may indicate that opportunities for additional training completers may be limited if enrollments are allowed to continue. In cases such as this the number of ITAs issued will be limited for those occupations. This limitation will be at the discretion of senior management.

Eligible customers must also exhibit the skills, ability and competency to successfully complete a training program prior to WIOA enrollment. This is often referred to as 'suitability'. Customers with existing certifications and degrees may be deemed to have marketable skills and may be referred to Individualized Career Services prior to enrollment in training if it cannot be determined that training is required for the customer to gain employment.

Each customer that is applying for an ITA may need to complete an assessment, other than the Initial Assessment in partnership with the Career Development Coach, which may be used to determine suitability.

ITAs may be established for programs up to the attainment of a two-year degree. ITA's may be established for customers enrolling into training for a Baccalaureate degree assuming that CSCLM funds were not used for the attainment of the preceding Associate degree. Funding for tuition beyond an Associate degree may only be granted after approval from the Director of Operations or Executive Vice President. At this time, no assistance can be granted for training above the Baccalaureate level.

4. ASSESSMENT FOR TRAINING ENROLLMENT

The purpose of training is to provide eligible customers with the means to obtain the necessary skills to become gainfully employed or re-employed. The purpose of assessment is to help customers and program staff make decisions about appropriate employment goals and develop effective service strategies for reaching those goals. The cornerstone to assisting our customers is providing meaningful advice and recommendations when assisting them in selecting training programs or appropriate employment. Various methods may be used to determine the needs and outcome for each customer.

Although, CSCLM staff are responsible for ensuring that any educational, training or supportive service provided to customers is appropriate and necessary to meet that customer's employment goal, customers must be afforded choice in setting goals, developing employment strategies and choosing providers. CSCLM staff assumes the role of career coach or career guide and not decision maker.

Detailed below are the recommended methods to assess a customer when enrolling them into training services. At a minimum the Career Development Coach must complete the Initial Assessment with each customer. Before a customer is referred to an educational partner, one the following tools can be used to help determine the customer's ability to benefit from the identified training activity, and if a successful outcome from the training program is likely for the customer. The assessment process used by staff and partners to assist customers in choosing and identifying appropriate assistance varies by service access point and program specific service levels. The Career Development Coach will determine the assessments needed to best determine eligibility and suitability.

- 1. WIOA Initial Assessment:** All WIOA enrollments should begin with an Initial Assessment along with the WIOA application. The assessment utilizes a standardized form that helps the Career Development Coach understand the customer's individual needs and the level of service required to best assist them in achieving their goals. The Initial Assessment and WIOA application are used to draft the customer's Individual Employment Plan (IEP) and to set short- and long-term employment and educational related goals.
- 2. WTP/SNAP Initial Assessment:** Much like WIOA, the WTP Initial Informal Assessment takes place during a one-on-one consultation session utilizing a standardized locally developed form. The results of this informal assessment are documented in the participant's Individual Responsibility Plan (IRP). The IRP helps with the development of long/short employment and education related goals for the participant.
- 3. EF Interest Profiler:** Examines the customer's interests to determine what occupations may be a good fit. The Interest Profiler does not assess specific aptitude but should be used as a self-discovery tool as well as an indicator of true interest in particular occupations.
- 4. EF Work Values Indicator:** Assesses what principals or values are most

important to the customer and suggests occupations that match the importance levels. For example: A customer that rates personal interaction as a high importance would not be suggested for occupations that would isolate that customer such as a backroom position.

- 5. Talevation:** This line of assessments tests specific skills and act as a solid indicator of current knowledge possessed in certain topics. There are also several behavioral assessments that indicate motivation and 'soft-skill' strengths.

A. Exceptions to Assessment Requirements

Exceptions to the assessment requirements in this policy may be granted by the member of management at the Assistant Director level or above. Exception will be based on:

- Reasonable accommodation
- Test validity issues
- Any unexpected circumstances that do not yield the test results valid
- Approach to recruitment
- Previous competency testing conducted by an educational provider

The following exception does not require documentation in the customer's case file:

- ALL customers seeking assistance with GED costs are exempt from taking assessments other than the Initial Assessment.

5. SUITABILITY DETERMINATION

Enrollment into training must not only factor in eligibility but suitability as well. CSCLM utilizes the 'Whole Person' approach when determining suitability. Career Development Coaches will use a combination of, the Initial Assessment, EF Interest Profiler, EF Work Values Indicator, Talevation, educational provider administered entrance exams or assessments and information gained throughout career counseling sessions as the baseline for determining the customer's suitability for enrollment.

Customers deemed unsuitable will be notified (by their CSCLM WIOA Career Development Coach) upon determination of unsuitability. The WIOA Career Development Coach will document the denial with a case note in the Customer's Employ Florida file.

6. DURATION

ITA's will be reviewed, re-written and renewed with the customer on a yearly basis depending on availability of funds. Customers must be notified that funding can only be allotted for the current program year. Continuance of funding will be reviewed each program year.

It is the intent of this policy that each customer who is determined eligible has the opportunity for training if training is deemed necessary for the customer to obtain employment. This opportunity for training includes a commitment to a specific training program that includes the completion of the training and employment in a related field as a final goal.

The demand for training is always greater than the funding available. CSCLM will pay for training for a customer only once in order to ensure that another customer will have the opportunity to receive training. As such, each customer shall be limited to one ITA unless conditions exist which prohibit the completion of the agreed upon program. CSCLM program management shall, at their discretion, grant approval of the issuance of an additional ITA. At the point of eligibility determination, it is the responsibility of the Career Development Coach to determine whether the customer has received prior training assistance from CSCLM.

ITAs may be issued/renewed for a time equivalent to the time required to complete a two-year degree. It is not the intent of this policy to imply that a limit of twenty-four (24) months is strictly established. Additional training requirements should be considered when establishing a timeline for completion (pre-requisites, remediation, testing, etc.).

7. COORDINATION OF FUNDS

WIOA requires the coordination of training costs with funds available under other Federal programs. To avoid duplicate payment of costs when a customer is eligible for both WIOA and other assistance, including a Pell Grant, 20 CFR section 680.230(b) requires that program operators and training providers coordinate by entering into arrangements with the entities administering the alternate sources of funds, including eligible providers administering Pell grants. All sources of funds, excluding loans, shall be considered in determining a customer's overall need for WIOA funds. **Participation in a training program funded under WIOA may not be conditioned on applying for or using a loan to help finance training costs.**

A primary focus of our customer training and support funds shall be directed at Dislocated Workers, Adults, and Out of School Youth who meet priority of service for: On the Job Training, Customized Training (Custom Business Training), Internship, Work Experience, Apprenticeship and classroom/online training programs.

Additionally, it is often determined through assessment that short term, certificate-based training is a valuable resource for customers that need additional assistance to re-enter the job market. Quite often, during low cycles within the economy job positions and duties are compressed to make up for staffing short falls, or due to long term employment, a customer's skills may become antiquated. This often leaves talented customers lacking specific market required skills that can be acquired through short-term training. Examples of such training would include office skills, keyboarding, MS Word, Access, Excel or PowerPoint. These short terms, skill-based trainings should be made available to customers when they are determined to be needed to help the candidate re-enter the workforce. Prior approval is required for all training that is certificate based (skill based) and is outside of the regular occupationally based ATOL. These courses may be

approved by senior level management.

When the financial aid package together with the funds requested from the local workforce development area are in excess of the required funds needed to meet the direct training and supportive service needs of the customer, CSCLM will coordinate with the educational partner to obtain reimbursement for additional funds applied to the student's account.

20 CFR section 680.230(c) permits a WIOA customer to enroll in a training program with WIOA funds while an application for Pell Grant funds is pending but requires that the local workforce development area be reimbursed for the amount of the Pell Grant used for training if the application is approved. Since Pell Grants are intended to provide for both tuition and other education-related costs, the Rule also clarifies that only the portion provided (with Pell funds) for tuition is subject to reimbursement.

It is important to note that the Pell Grant is not school-based; rather, it is a portable grant for which preliminary eligibility can, and should, be determined before the customer enrolls in a particular school or training program. The application (or access electronically to it) for determining eligibility and ultimately the amount of the grant, should be readily available at all CSCLM office locations. CSCLM staff should be prepared and knowledgeable in the application process and should provide assistance in the completion of these "gateway" financial aid applications. The application for PELL grants is available online through the Free Application for Student Aid (FAFSA) website at: <https://fafsa.ed.gov>.

8. DOCUMENTATION

It is mandatory that Career Development Coaches document fund coordination each program year, using:

- the customer's financial aid award letter or SAR (Student Aid Report),
- a copy of the customer's training budget ((referred to as the Cost of Attendance Budget Worksheet (Form FM-CS-034)) developed by the customer and Career Development Coach,
- Statements on the Individual Employment Plan (IEP) or Individual Responsibility Plan (IRP) that WIOA or WTP funds are awarded in coordination with other financial assistance when appropriate.
- A copy of the published Cost of Attendance provided by the training provider in the case where such cost is utilized to calculate financial and support assistance.

All of the items listed above are necessary to document fund coordination.

In the cases where a program is not eligible for Pell or other financial aid assistance, documentation shall be in the form of correspondence on the training contractor's letterhead, a form letter signed by an agent of the training contractor or a copy of an e-mail from an agent of the contractor or other relevant documentation that specifies that Pell funding is not available and that the customer is/is not eligible for any other assistance that the contractor has available. The letter must include the specific program(s) for which there is no funding or be a copy of the FAFSA confirmation page stating that the customer

is not eligible for funding. Customers that are not eligible for Pell when applying for a Pell eligible program will need to detail the reason they are NOT eligible with the Career Development Coach. Customers that are not eligible for PELL due to default on federal student loans will not be eligible for WIOA funding. All decisions regarding funding should be clearly case noted in the customer's file. Funding is dependent on eligibility and suitability and is awarded strictly at the discretion of CSCLM staff and service providers.

Note: Completion of the Cost of Attendance Budget Worksheet is NOT required in the absence of funding coordination.

9. DOCUMENT STORAGE

All of the documents required to demonstrate fund coordination must be located in the customer's ATLAS electronic records file.

10. COVERED COSTS

The Career Development Coach shall work with the WIOA or WTP customer to calculate the total funding resources available as well as to assess the complete "education and education related costs" (training and supportive services costs) incurred if the customer is to complete the chosen program. This also ensures both that duplicate payments of training costs are not made and that the amount of funded training is not reduced by the amount of Federal student financial assistance in violation of 20 U.S.C. 1087. CSCLM's funds should be used to cover expenses that cannot be covered through other funding sources. Other funding sources should be used to cover those "cost of attendance" needs which cannot be funded through CSCLM ITAs.

Due to the above, CSCLM funds, in most cases, should be prioritized to cover the costs of tuition, fees and licensing/testing costs, and other materials or equipment required for the training program that cannot be covered by another source. The customer will be made aware of CSCLM's right to amend the ITA based on changes in other available training/funding resources as well as available funding.

CSCLM reserves the right to limit the amount of funding for an ITA. The funding rate for any approved training shall not exceed the published in-state tuition rate at a local, public educational institution or community college.

The exact mix of funds should be determined based on the availability of funding for either training costs or supportive services with the goal of ensuring that the costs of the training program the customer selects are fully paid and that necessary supportive services are available so that the training can be completed successfully. This determination should focus on the needs of the customer; simply reducing the amount of WIOA funds by the amount of Pell Grant funds is not permitted.

Students that wish to attend private schools will only be funded (with exception) at the local, public educational institution's credit hour rate for each credit hour of instruction that is approved on the ITA. Customers attending private institutions will also be asked to show documentation or proof of ability to pay the additional expenses that are not covered

by WIOA training services. This documentation must be stored in the customer's electronic file for future reference and will establish the customer's commitment to completion of the program. In cases where additional funds are available, any funding above the public entities rate will be reviewed on a case by case basis and must be pre-approved by member of management at the Assistant Director level or above.

11. CONTRACT CLASSES

There may be a need to enroll a cohort of trainees in a Contract Class offered by an approved training provider to meet a local training demand within the community. Contract classes may be used when traditional 'class size' requirements by our educational providers are difficult to meet. Staff will coordinate with the training provider and business, or businesses (if applicable), eliciting the training to assess candidate eligibility and begin the enrollment process.

Veteran and low-income individuals applying to these programs will be given priority.

Contract classes will be identified by invoicing providing training with an 'up to' rate of trainees and provides flexibility of dropping trainees in and out.

Priority will be given to training in our identified Targeted Sectors and will align to local demand occupations listed on the Area Targeted Occupational List (***OPS-28 Area Targeted Occupation List and Training Provider Selection***). Contract Classes will be funded in bulk rather than individually. All completers must receive a credential upon program completion. Proper documentation of the bulk invoice will be included in each participant's electronic file.

12. ESTABLISHED COST CAP

At this time CSCLM has an established cost cap for training related expenses (tuition, books, fees) and recognizes that each ITA request will be reviewed on a customer 'as needed' basis considering the total cost of attendance. Exceptions to this cap require prior approval of the Chief Executive officer, Executive Vice President or Director of Operations.

- **Current cap amount:**
 - Non-Pell programs: \$3,600
 - Pell eligible programs: \$3,000
 - Support Services: \$400

13. OTHER TRAINING COSTS

Those materials necessary for successful completion of the course not already covered by other sources can be provided via purchase order or CSCLM issued prepaid debit card. These costs shall be included as part of the customer's overall ITA budget and will be made available depending on available funding.

14. SUPPORT SERVICES

Support Services will continue to be paid and documented as specified in *OPS-81– WTP*

Support Services and OPS-46 WIOA Services.

PROCEDURES:

All CSCLM ITA's and additional support services are documented on and issued using the Scholarship Voucher Agreement (SVA) – (Form FM-CS-007) and Support Services Agreement (SSA) – (Form FM-CS-008). It is the responsibility of the Career Development Coach to create the SVA and SSA documents with the customer. Both forms require the Career Development Coach AND the customer to sign the documents showing agreement of the terms of continued assistance and issuance from the agreement. Note that a separate SSA does not need to be completed when an SVA form is completed with a customer. All budgeted support services can be combined on the SVA.

The SVA and SSA are used to establish a proposed budget of funds that will be utilized by the customer for the duration of the training program. SVA and SSA documents should be dated to expire no later than June 30th of the current program year. Each agreement has space to detail the beginning and ending date of the agreement.

- Once the agreement is completed and signed by both the Career Development Coach and the customer it is sent to the approving manager for review.
- Once the SVA or SSA is signed by the appropriate manager, the budget in the Gazelle system that covers the projected cost of the training program is established and the executed SVA forwarded to the Career Development Coach.
- The Career Development Coach will file the executed SVA/SSA in the customer's electronic file.
- The Career Development Coach may now issue purchase orders/payments against the established budget.

BUDGET DEVELOPMENT

A. As stated above in Section 10:

- The exact mix of funds should be based on the availability of funding with a goal of ensuring that the costs of the training program the customer selects are fully paid so that the training can be completed successfully.
- WIOA regulations delineate the responsibility of One-Stop operators to make arrangements for reimbursement of WIOA funds used when the Pell Grant covers the same training costs, but notes: "Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIOA participant for education-related expenses." Please note that education-related expenses are those associated with housing, food, other living expenses, books & supplies.
- A good starting point is to examine the training institution's annualized cost of attending school full time. It should be noted and taken into consideration that this figure, used for financial aid purposes, can be significantly lower than the actual cost of living. Areas that should be closely reviewed, but not limited

to, are:

- a. Resources/income (saving, wages, reemployment payments, cash assistance, etc.)
 - b. Financial aid (grants, scholarships, other program support such as cash assistance, food assistance, etc.)
 - c. Other training related expenses (books, supplies, uniforms, transportation, childcare, housing and utilities, etc.)
- The Cost of Attendance Budget Worksheet calculates the difference between the expenditures and income including PELL and other training grants to formulate the maximum allowable funding for that training period.
 - Cost of Attendance detail sheets from each educational provider will be used as a reference for average statewide costs for that institution's training programs and are typically released by the institutions prior to the beginning of a new school year.
 - The worksheet and the educational provider's Cost of Attendance calculations will be submitted with each participant's SVA to ensure the line items on the budget represent amounts that are 'reasonable'.
 - The Cost of Attendance Budget Worksheet must be completed using either actual costs as attested by the customer or entered as a lump sum using the total amount provided by the education provider.
 - A negative amount in the "Total Allowable Tuition Funding" line item represents income figures that are higher than expenditure figures. In these instances, the participant will be required to utilize additional, available funding sources before WIOA training dollars are granted as it is documented that the customer is not in need of additional funding to complete the program.
 - A positive amount in the "Total Allowable Tuition Funding" line item represents expenditures that are higher than income. The total amount listed under this line item represents the total amount of funding that may be granted to the participant not to exceed the actual cost of training expenses listed under line item "Total Training".
 - Additional support services may be granted to any participant based on current need. All requests for additional support services may be approved by member of management at the Assistant Director level or above or Designee per OPS-46.
 - Certain categories on the Cost of Attendance Budget Worksheet shall be capped in consideration of determining 'reasonable' costs for the purpose of calculating financial and support assistance. Customers are asked to declare monthly costs for each category. Actual costs should be used in all categories unless the declared cost is higher than an allowed 'cap' cost. In such instances, the cap cost should be used unless the customer can provide documentation

justifying a higher cost. Approval is required for all instances where an amount above the established cap is used. Approval must be given by member of management at the Assistant Director level or above.

- Cap costs default onto the appropriate line items on the Cost of Attendance Budget Worksheet and may be changed as needed. These capped categories are:
 - a. Rent/Mortgage costs – based on area census
 - b. Utilities – based on area census
 - c. Food – Department of Children and Families benefit table
 - d. Child Care – limited to the amount as specified in *OPS-46 WIOA Services* Section V (II) (b)
- Capped costs should be changed to reflect \$0.00 when the educational providers Cost of Attendance calculation is used.
- Tuition expenses are to be capped at the maximum allowable amount. The maximum allowable amount is considered when a customer is attending a private school. The maximum allowable amount will be based on the total required credit hours at the current published in-state rate of other local, public education entities. (See section **10 Covered Costs** for exception)
- The Cost of Attendance Budget Worksheet must be completed each program year when the Career Development Coach and customer are completing a new SVA. Changes in income, expenses, scholarships, etc. may impact the overall amount awarded to a customer and will need to be conducted so that accurate budgets and fund coordination can be documented.

NOTE:

- Staff should consider all available sources of funds, excluding loans, in determining a customer's overall need for WIOA funding, which may not be conditioned on applying for or using a loan to help finance training costs.
- Reducing the amount of WIOA funds by the amount of awarded Pell Grant funds is not permitted.
- Veterans and/or eligible spouses:
 - a. Will not be precluded from receiving WIOA funded services due to their entitlement to education benefits
 - b. Are not required to coordinate their entitlements to education benefits with WIOA funds.
 - c. Will not be required to exhaust their entitlement to educational benefits prior to receiving WIOA funded services.

DOCUMENTATION

SVA and SSA forms should be sent for approval with the necessary accompanying documentation when available. When exact figures for budget purposes are not available

at the time of SVA/SSA issuance budget figures may be estimated. All SVA/SSA documents must be approved by member of management at the Assistant Director level or above.

Documentation provided should include:

- Backup showing proposed tuition, book and fee costs
- Cost of Attendance Budget Worksheet (Form FM-CS-034)
- Backup for mileage when travel is requested (printout from mapping program, etc.)
- ATOL Training Provider Variance Request (Form FM-CS-057) when a training provider or training program is not listed on the local ATOL and a one-time variance is sought. Note: justification for variance must be provided and must document that the variance is in the best interest of the customer and will complement the customer's current skills or previous experience
- Copy of PELL award letter showing the amount of PELL grant funds awarded for programs that are PELL eligible or documentation showing not Pell eligible.

ATTACHMENTS

SNAP Benefit Table

OFFICIAL SIGNATURE

Thomas E. Skinner, Jr.
Chief Executive Officer

EVP Coord:

CareerSource Citrus Levy Marion is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers listed above may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711. If you need accommodations, please call 352-840-5700, ext. 7878 or e-mail accommodations@careersourceclm.com at least three business days in advance. Additionally, program information may be made available in Spanish upon request. A proud partner of the American Job Center Network.

FOOD ASSISTANCE PROGRAM

FACT SHEET



This Fact Sheet provides a general description of the Food Assistance Program. The Department of Children and Families (DCF) determines eligibility for public assistance programs in Florida. State Statute, Administrative Rule and federal regulations contain specific eligibility policy. Note: Eligibility standards are subject to change October of each year.

October 2021

Food Assistance Program

Program Description

The Food Assistance Program helps people with low income buy food they need for good health. The U.S. Department of Agriculture (USDA) estimates how much it costs to buy food to prepare nutritious, low-cost meals and determines the amount of food assistance benefits an individual or family receives. Food assistance benefits are a supplement to a family's food budget. Households may need to spend some of their own cash, along with their food assistance benefits, to buy enough food for a month. Refer to this USDA brochure for an explanation about how food assistance benefits can help a family eat better: <https://fns-prod.azureedge.net/sites/default/files/resource-files/2019%20FNS%20313%20SNAP%20English%20for%20508.pdf>.

Household Status

Individuals who buy and cook food together are one household for food assistance purposes and must have their eligibility determined as a group. There are situations where DCF must include individuals in the same household, regardless of how they buy and cook their food. Examples include parents and children under age 22, adults exercising parental control over minors in the home, and spouses.

Residence/Citizenship

An individual must be a resident of Florida to receive food assistance benefits in Florida. An individual must either be a U.S. citizen or meet specific qualified noncitizen criteria. Noncitizens are not eligible for food assistance benefits until they provide acceptable proof of a qualified noncitizen status. Noncitizens who do not want DCF to verify their noncitizen status have the option of withdrawing their application or allowing the other household members to participate without that member.

Social Security Numbers

Individuals, including children, applying for food assistance benefits, must either provide a social security number, or proof they have applied for a social security number. Individuals in the household not applying for food assistance benefits do not have to supply a number or apply for a social security number.

Child Support Cooperation/Child Support Payment Requirements

Parents or relatives applying for food assistance benefits for dependent children, who have absent parent(s), must cooperate with the state's Child Support Enforcement office to establish paternity and obtain child support for the children. Failure to cooperate, without good cause, results in removal of the individual from the food assistance benefits.

Individuals applying for food assistance benefits, who are court ordered to pay child support for children under age 18, not living with them, may receive a deduction in the food assistance budget if making court ordered child support payments.

Work/Work Registration

Physically and mentally fit adults age 16 through 59 years old must register for work, accept offers of suitable work, and take part in an employment and training program when referred, if they do not meet an exemption. Healthy adults ages 18 through 49 years old who do not have dependent children can only receive food assistance benefits for three months in a three-year period if they are not working or participating in a work program. For additional information on work requirements for adults ages 18 through 49, refer to DCF's website at: <https://www.myflfamilies.com/service-programs/access/snap/abawd-faqs.shtml>.

Income

The Food Assistance Program counts most types of income to see if a household is eligible. Households must have their total monthly gross income compared to a percentage of the federal poverty level. Gross income means a household's total income before deductions, not counting money we can exclude. The "Income Chart" below shows the Gross and Net Income limits and the benefit amounts for the number of people in the household.

People in Household	200% Gross Monthly Income Limits Effective 10/1/21	130% Gross Monthly Income Limits Effective 10/1/21	100% Net Monthly Income Limits Effective 10/1/21	Maximum Benefit Amount Effective 10/1/21
1	\$2,148	\$1,396	\$1,074	\$250
2	\$2,904	\$1,888	\$1,452	\$459
3	\$3,660	\$2,379	\$1,830	\$658
4	\$4,418	\$2,871	\$2,209	\$835
5	\$5,174	\$3,363	\$2,587	\$992
6	\$5,930	\$3,855	\$2,965	\$1,190
7	\$6,688	\$4,347	\$3,344	\$1,316
8	\$7,444	\$4,839	\$3,722	\$1,504
For Each Additional Person Add	+\$758	+\$492	+\$379	+\$188

Deductions

Deductions are expenses subtracted from the household's gross income when determining the amount of the food assistance benefits for a month. The food assistance deductions include:

- 20% deduction from earned income;
- Standard deduction based on household size;
- Cost of child care when needed to work, seek work or attend training for work;
- Medical expenses more than \$35 for elderly or disabled household members;

- Court ordered child support payments paid to non-household members; or
- A portion of shelter and utility costs

Assets

Examples of assets include: bank accounts, savings bonds, and cash on hand. Most food assistance households are not subject to an asset limit. If a household member becomes disqualified for benefits for breaking Food Assistance Program rules, felony drug trafficking including agreeing, conspiring, combining, or confederating with another person to commit the act on or after 08/22/1996, running away from a felony warrant, or not participating in a work program, the household will be subject to the asset limit. If applicable, the maximum allowable asset limit for households that contain a disqualified member shall not exceed \$2,500 (\$3,750 for households containing at least one elderly or disabled member).

Students

Most students, ages 18 through 49 enrolled in college or other institutions of higher education at least half time, are not eligible for food assistance benefits. Students may be able to get food assistance benefits if they are:

- Physically or mentally unfit;
- Receiving Temporary Cash Assistance benefits;
- Participating in a state or federally financed work study program;
- Enrolled in college as a result of participation in a Job Opportunities and Basic Skills program under Title IV of the Social Security Act;
- Working a minimum of 80 hours per month;
- Participating in an on-the-job training program;
- Taking care of a dependent household member under the age of six;
- Taking care of a dependent household member over the age of five but under 12 and do not have adequate child care to enable them to attend school or work a minimum of 80 hours per month, or to take part in a state or federally financed work study program;
- Single parent enrolled full time in college and taking care of a dependent household member under the age of 12; or
- Participating or enrolled in specific programs that will assist in obtaining the skills needed for the current job market

*** The Consolidated Appropriations Act, 2021 temporarily expanded student eligibility to two new groups from January 16, 2021 through the end of the public health emergency. Students who meet one of two criteria listed below may receive Food Assistance, if all other requirements are met:

- a) are eligible to participate in State or federally financed work study during the regular school year, as determined by the institution of higher education, or
- b) have an expected family contribution (EFC) of \$0 in the current academic year determined in accordance with part F of title IV of the Higher Education Act of

1965.

SUNCAP Program

The SUNCAP Program is a special Food Assistance Program for individuals who receive Supplemental Security Income (SSI). For additional information on the SUNCAP Program, refer to DCF's brochure at: [Business tri-fold brochure \(Soft Blue design\) \(myflfamilies.com\)](http://myflfamilies.com).

Foods You Can Buy with Food Assistance Benefits

Households **can** use food assistance benefits to buy:

- Breads and cereals;
- Fruits and vegetables;
- Meats, fish, and poultry;
- Dairy products; and
- Seeds and plants to grow and produce food for the household to eat

Households **cannot** use food assistance benefits to buy:

- Beer, wine, liquor, cigarettes, or tobacco;
- Pet food, soaps, paper products, or household supplies;
- Vitamins and other medicines;
- Food that will be eaten in the store; and
- Hot foods

Stores are not allowed to give cash to individuals who receive food assistance benefits or for the return of empty bottles and cans that contained food purchased with food assistance benefits.



**Corrective Action Plan For
LOCAL WORKFORCE DEVELOPMENT BOARD – 10
CareerSource Citrus Levy Marion Program Year**

2021-2022

December 22nd, 2022

Prepared by: Dale French, Steven Litzinger, Larry Trowbridge, Heaven Colon and Cory Weaver

CareerSource Citrus Levy Marion is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers listed above may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711. If you need accommodations, please call 352-840- 5700, ext. 7878 or e-mail accommodations@careersourceclm.com at least three business days in advance. Additionally, program information may be made available in Spanish upon request. A proud partner of the American Job Center Network.

This corrective action plan was prepared as a result of a programmatic quality assurance review conducted April 25th – 29th, 2022 for the following programs administered by CareerSource Citrus Levy Marion (CSCLM):

- Welfare Transition (WT)
- Supplemental Nutrition Assistance Program - Employment and Training (SNAP E&T)
- Workforce Innovation and Opportunity Act (WIOA)
- Wagner-Peyser (WP)
- Any special projects operational during the review period

Financial Monitoring was scheduled for the week of April 25th but continued through October 13th, 2022.

FINANCIAL MONITORING

General Ledger and Cost Allocation

ONI Number FMA 10.22.01

MOUs and IFA

Criteria: 20 CFR 678.755 states, in part: *The MOU, fully described in § 678.500, must contain the following information whether the local areas use either the local one-stop or the State funding method:*

- 20 CFR 678.500 (d) states: When fully executed, the MOU must contain the signatures of the Local WDB, one-stop partners, the chief elected official(s), and the time period in which the agreement is effective. The MOU must be updated not less than every 3 years to reflect any changes in the signatory official of the Board, one-stop partners, and chief elected officials, or one-stop infrastructure funding.

Required action:

Recommendation: We recommend the LWDB put processes and procedures in place to ensure the elements stated in 20 CFR 678.755, 20 CFR 678.500(d), and the Sub-Grantee Agreement are included in the Memorandums of Understanding & Infrastructure Funding Agreements as required.

CareerSource CLM Response

Plan of Action

Our MOU/IFA boilerplate has been updated and attached. The current affected MOU's will be updated with modifications to include the missing verbiage as noted in the monitoring. Please refer to Attachment 3 – Updated MOU Boilerplate.

Monitoring

Ongoing monitoring will be conducted by our third party programmatic and administrative

monitoring agency, Underwood Sloan & Associates.

PROGRAMMATIC MONITORING

WIOA AD/DW Corrective Action Plan

Finding Number WIOA 10.22.01

Customized Training/On-the-Job Training Activities

Applicable references: WIOA Section 122(h); 20 CFR 680.700-840; WIOA Sec. 134)c (3)(A); LWDB Local Plan; and DEO Administrative Policy 009.

- Of the four WIOA Adult case files reviewed of participants enrolled in a CT or OJT activity, the training activities for three participants (75.0 percent) exceeded the contract end dates without a justifiable reason.

Required Action:

In addition to the general required CAP actions, documentation must be provided that the LWDB has reviewed the three cited contract files and taken steps to extend the agreement dates if the case files are still open and active. Additionally, the LWDB must review all open OJT and CT case files to ensure the work-based activities have not exceeded the contract duration without documenting the reason(s) for such action. Documentation of these efforts as well a plan or process for preventing a recurrence of this issue in the future must be provided.

CareerSource CLM Response

Plan of Action

This was a misunderstanding by staff due to the onset of 1-day duration activities mid-way through the program year. As there were no longer activities available to record in the system while we awaited documentation, the training activity remained open pending the receipt of the verification of employment. Experiential Learning and activity procedures have been reviewed with the appropriate staff members. Staff were also asked to review all findings and take a quiz to demonstrate mastery of the deficient areas found in the PY2021 Programmatic Monitoring.

Monitoring

- Staff engages in a monitoring strategy in which each staff member will monitor three cases per month; two cases will be self-monitored and the third will be a peer-monitor.
- Region 10 engages a third-party monitor, Underwood Sloan and Associates, to monitor all programs at least once annually. All monitoring deficiencies have been shared with Underwood and they have been asked to pay close attention to these areas for the cases they monitor.

Training

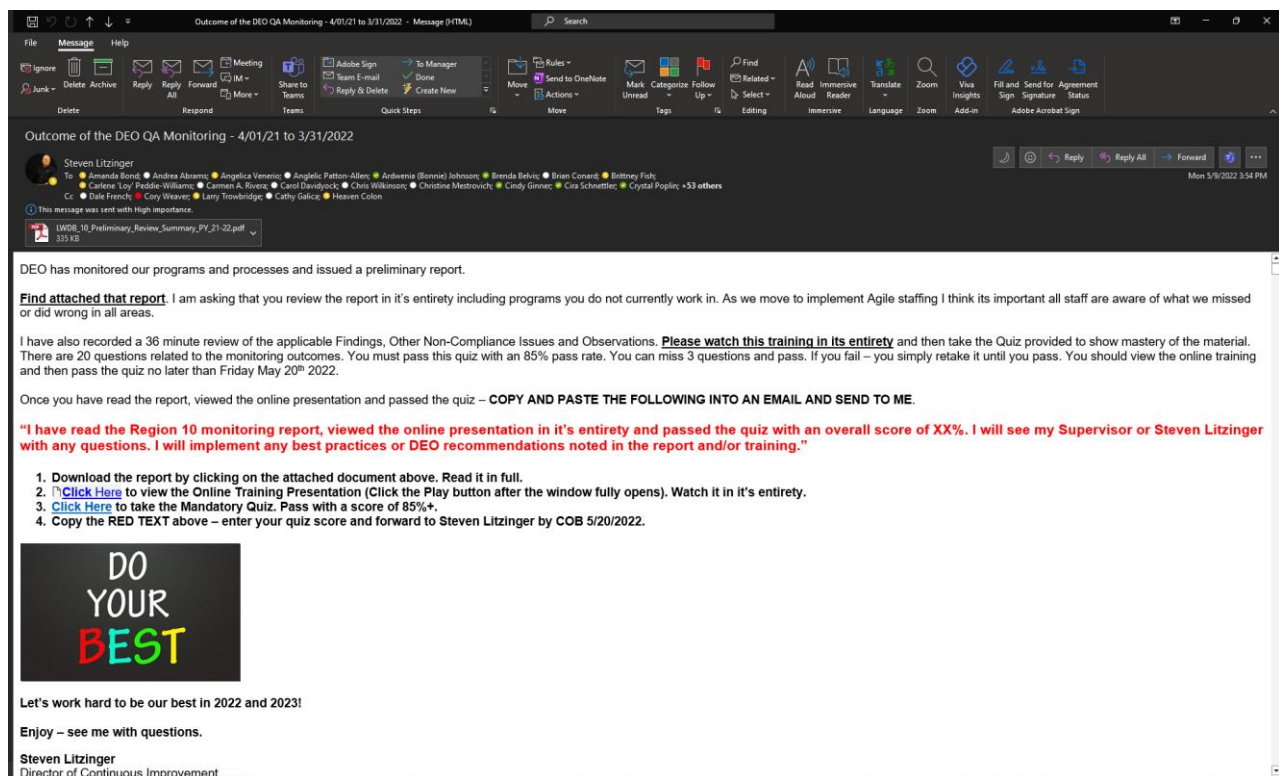
Staff were asked to review a presentation covering all monitoring deficiencies, which went over all results. All staff were asked to view the presentation, regardless of program of specialty. Once viewing the presentation, they were asked to confirm they had watched by sending an email to our Director of Continuous Improvement. Presentation linked here:

Video Link

Staff were then asked to review all Programmatic Monitoring findings and take a quiz in May 2022 to demonstrate mastery of the deficient areas found in the monitoring (Please refer to Attachment 1 – DEO Monitoring Quiz - 2021).

Written Communication to Staff

The results of DEO's monitoring were shared with staff May 9th, 2022. Below is the email sent to staff by the Director of Continuous Improvement:



Finding Number WIOA 10.22.02

Individual Training Accounts (ITA)/Contracts for Classroom Training

Applicable reference(s): 20 CFR 680.410-420; WIOA Sec. 122 (b)(1)(D); WIOA Sec. 122 (b)(4)(A); WIOA Sec. 122 (a)(3); and Administrative Policy 90.

- Of the 14 WIOA Adult/Dislocated Worker case files reviewed of participants enrolled in an occupational skills training activity, one (7.1 percent) did not have

documentation to support the issuance of an ITA or a contract detailing the method of payment for training services provided to the participant.

Required Action:

In addition to the general required CAP actions, the LWDB must review the accounts of all participants enrolled in training with the particular training provider/institution and submit documentation to support whether the training was provided via a contract or an ITA. If no ITA or contract was in place, then documentation must be provided to support the arrangement/authority under which the training was authorized.

The LWDB must also strengthen its processes by developing a policy or procedure that aligns with WIOA guidance and DEO Administrative Policy 90 in instances when an ITA is not used. The policy/procedure must describe the process regarding the use of a contract instead of an ITA when there is an insufficient number of eligible providers in the local area. The policy/procedure must also instruct career managers to identify the training provider, training course, and source of funding used to pay for training not covered under an ITA. This information can be entered as a case note in Employ Florida or on a form developed for such purpose. A copy of the policy/procedure and documentation must be provided with the CAP. A plan of action or process for preventing a recurrence of this issue in the future must also be provided.

CareerSource CLM Response

Plan of Action

In this instance, online certifications were purchased in bulk for students as part of the SW Soft Skills Development 2019 Grant for Retail and Hospitality and there were no individual invoices by customer. This individual exited training in 2019 but stayed open under WIOA Adult for Job Search before closing in 2021, causing them to fall into the PY2021 Monitoring Sample. All cases enrolled in training with this provider have since exited. This provider is unlikely to be used in the future due to the recent removal of the Hospitality sector as a Targeted Sector by the LWDB10 Board in December of 2022. Additionally, Hospitality training has been excluded from the Master Credential List. Should this provider be used again, we will ensure proper documentation is included to support the ITA or contract.

Monitoring

- Staff engages in a monitoring strategy in which each staff member will monitor three cases per month; two cases will be self-monitored and the third will be a peer-monitor.
- Region 10 engages a third-party monitor, Underwood Sloan and Associates, to monitor all programs at least once annually. All monitoring deficiencies have been shared with Underwood and they have been asked to pay close attention to these areas for the cases they monitor.

Training

Staff were asked to review a presentation covering all monitoring deficiencies, which went over all results. All staff were asked to view the presentation, regardless of program of specialty. Once viewing the presentation, they were asked to confirm they had watched by

sending an email to our Director of Continuous Improvement. Presentation linked here:

[Video Link](#)

Staff were then asked to review all Programmatic Monitoring findings and take a quiz in May 2022 to demonstrate mastery of the deficient areas found in the monitoring (Please refer to Attachment 1 – DEO Monitoring Quiz - 2021).

Written Communication to Staff

The results of DEO's monitoring were shared with staff May 9th, 2022. Below is the email sent to staff by the Director of Continuous Improvement. Please refer to the screenshot of this email on Page 4.

WIOA Youth Corrective Action Plan

Finding Number WIOA 10.22.03

Recording of Nationally Recognized Credentials

Applicable reference(s): Federal Data Validation Requirements; TEGL 10-16, Change 1; WIOA Sec. 3(52); WIOA Sec. 129(c) (1) (C) (i).

- Of the 13 WIOA Youth case files reviewed of participants who had a credential attainment recorded in Employ Florida, two (15.4 Percent) did not have documentation to support the credentials were recognized as an occupational credential for WIOA purposes. The LWDB recorded the two "Safe Staff" certificates as recognized credentials.

Note: The Safe Staff certificate is a general skills certificate that does not document measurable technical or industry/occupational skills necessary to gain employment or to advance within an occupation. Therefore, it does not meet the definition of a nationally recognized credential and does not count in the primary indicator of performance for credential attainment.

Required Action:

In addition to the general required CAP actions, the LWDB must ensure that credentials recorded in Employ Florida meet the definition of a nationally recognized credential. Documentation to support the credential attainment must be retained in the participant's case file or made available upon request. The LWDB must provide a plan of action with the CAP outlining efforts taken to prevent future occurrences including routine monitoring, staff training, and written notification to staff informing them of the requirements. The CAP must also include documentation showing that staff will review and monitor all files that opened subsequent to the review period to ensure credential attainments are recorded correctly in Employ Florida.

CareerSource CLM Response

Plan of Action

Youth files were closed prior to the notification of the change that occurred with the

definition of a nationally recognized credential. It was brought to our attention when other WIOA regions using the same youth provider underwent their state audit in March of 2022, that it was not an approved credential. We ceased offering Safe Staff Food Handler as a credential at this point and instead implemented it as training under Work Readiness as a part of the life skills/personal development training. This was addressed with staff on 3/30/2022 via a team meeting along with a follow up email notifying the team we will no longer be using Safe Staff Food Handler as a credential.

Monitoring

- Staff self-service monitoring on this issue was implemented upon notification of removal of this credential.
- Peer to Peer audit monitoring remains in place to ensure compliance with proper state credential recordings.
- Managerial and supervisory monitoring occur monthly.
- Third Party monitoring occurs annually through a contract with Underwood Sloan and Associates.

Training

- Training was immediately held via TEAMS conference and a follow up email was sent upon notification received stating Safe Staff was no longer recognized as a credential.
- Staff Guidance templates were updated to remove the step directing the recording of a credential in Employ Florida.
- Safe Staff has now been added as a module to our Work Readiness Curriculum and is no longer recorded as a credential.
- Case Note Guidance/Templates have been updated to remind staff to no longer record Safe Staff as a credential in Employ Florida. (See below)

Safe Staff Food Handler Steps

1. During Work Readiness, youth will attend Safe Staff Training as a separate module to learn and understand proper sanitation guidelines and life skills.
2. Create a 422- Develop U CareerPathway Training voucher (found in voucher templates) in the amount of \$8.00 and sign together with youth. Case note subject referred in the guidance listed as: 422- Work Readiness Prep / Career Pathway Certificate-Safe Staff
3. Print the **Safe Staff Food Handler Pre Test** and instruct for the youth to complete this to see what they know.
4. Provide the youth with the Safe Staff book and assign youth to complete the workbook during training.
5. Youth are then scheduled to view the Safe Staff Videos and prepare to complete the Post test.
6. Once the exam is completed with a passing score, upload Pre Test, Post Test and Certificate to ATLAS. Case note subject referred in the guidance listed as: 422-Successful Work Readiness Prep / Food Handling.

**422- Work
Readiness Prep /
Career Pathway
Certificate-AHEI
Server** (Please
specify which one)

Participant took a Work Readiness Assessment and based on assessment the training topics in Work Readiness that are lacking and needed are the following- understanding employer expectations, financial literacy, soft skills, life skills and job searching, resume writing, filling out applications, and interview preparation. Participant has been enrolled in Work Readiness Training and will be attending an intensive training program.

Participant requested Occupational Training for **Safe Staff Food Handler/AHEI/NRF**. For Participant to work towards their goal and help Participant become more marketable to employers. A voucher was created in the amount of **\$8.00/75.00/55.00/115.00**
Tracking number: **79250114**

**422-Successful
Work Readiness
Prep / Food
Handling/AHEI/NRF**

Participant has completed Work Readiness Training and Occupational Training Certificate in **AHEI Front Desk Representative** and learned all the concepts for completion. Employer expectations, life skills, soft skills, financial literacy, sample applications, resume creation, and mock interview skills. Participant scored a **65%** on the Work Readiness Pre-Test and **100%** on the Work Readiness Posttest. Copies of these tests have been uploaded to ATLAS with a copy of the completion certificate.

**422- Work
Readiness Prep/
Food Handling**

Participant attended Safe Staff Food Handler training and received the certification. Participant's Safe Staff Food Handler training competencies included: Basic Food Safety, Food borne Illnesses, Holding Time & Temperatures, Importance of Personal Hygiene, Safe Practices: Preparing, Cooking & Serving Foods, Receiving & Storing Foods, Cleaning & Sanitizing, and Pest Prevention.
Participant pre-tested at **76 %** correct on **01/14/2020** and post-tested at **100%** correct on **1/14/2020**.

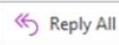
Written Communication to Staff

- Staff were communicated with via TEAMS conference and a follow up email on Wednesday, 3/30/2022. See Meeting Email below:

Credential Updates Meeting



Amanda Bond
To: Eckerd



Wed 3/30/2022 9:14 AM

Good Morning Team,

Thank you for taking the time to meet with us this morning. Please see some notes below regarding our breaking news:

- Safe Staff is no longer a recognized credential and will not be considered an MSG
- Need to make sure that **all enrolled** are receiving an actual credential to capture as an MSG. **This needs to become the TOP priority upon enrollment.**
- Going forward- Safe Staff is not to be completed during participation. Starting Monday, 4/1.
 - Vouchers for Safe Staff can be completed during participation if you'd like. However, the training will begin during work readiness.
 - Safe Staff will continue to be included in the ISS since the training will continue
 - **Did not mention this on the call... but we will no longer open the 430 activity with Safe Staff. Instead, it will be tied right into 422.**
 - **This has been updated on the case note guidance manual.**
- Safe Staff will still be implemented in our program and process during Work Readiness training. Since there is still value in this training and can provide opportunities for the youth with to better market them for employment.
- Friendly reminder- remember to have substantial hours/ training case noted for all credential trainings.

The note guidance manual has been updated at this time. Please reach out if you have any questions.

Thank you,

Amanda Bond
Eckerd Youth Site Manager



From: abond@careersourceclm.com

Title: MANDATORY Meeting- Credential Updates

Required: Eckerd

Optional: Chelsi Steele, Brittney Fish, Edward Deskovic, Kimberly Grey, Crystal Poplin, Heaven Colon, Keshira Smith, Lauren Marcucci, Talia Kong-quee, Kimberly Grey <KGrey@eckerd.org>

Start time: Wed 3/30/2022 8:30 AM ☐ All day ☐ Time zones

End time: Wed 3/30/2022 9:00 AM [Make Recurring](#)

Location: Microsoft Teams Meeting

[Room Finder](#)

Good Afternoon Team,

Leadership has some credential updates that we would like to discuss with you at this time. Please plan to attend this meeting as it is mandatory.

Understand that a couple of you will be traveling, if you are able to call in safely, please plan to do so. Or please get with leadership to chat individually to be brought up to speed.

Thank you!

- Staff were reminded in the new Program Year that Safe Staff was no longer to be recorded as a credential and instead used as a module in our Work Readiness Training (See below):

Updates for New PY



Amanda Bond

To: Eckerd



Reply

Reply All

Forward



Thu 6/30/2022 4:13 PM

Hi Team,

Please review this email in full for additional information regarding new processes, procedures and paperwork.

- We have a new inquiry form. One of the main changes on this was the "How did you hear about us?" for the youth to now complete. We need to work diligently to have this recorded for recruitment purposes. Please ensure this is marked on all inquiries going forward. And documented in our intake spreadsheet for tracking purposes. **Kudos to Victoria for updating for the team!**
- Please review the new Opportunities & Obligations form for new language
- WEX Forms have been updated and revised. Please review. **Kudos to Lauren for taking care of this!**
- **No staff are to add anything to the Zdrive without prior approval in writing. It's imperative that we adhere to this, otherwise we risk losing the privileges to have our ZDrive.**
- **Drop boxes are to be utilized for a 5 day period MAX. Anything past this 5 day window will be deleted. Leadership will be reviewing drops every week, so please ensure you keep yours clear to avoid losing any important docs you may need.**
- As you all are aware from last week's meeting, several changes will be in effect as of 7/1/22 based on our performance measures. This will significantly change how we have written ISS plans in the past. Please see some notes below:
 - ISS Requirements with new changes will include Supportive Services for Career Pathway Certificates (AHLEI, NRF, ETC). These certificates are now under 422 and will no longer be under 430 activities. These will also no longer be recorded as an MSG.
 - It will be more important now than ever to spend **quality time** with each youth and build a solid plan with them based on actual conversations while completing their RIASEC, WR Assessment and Clarifying Certificate Training under WR. No longer occupational.
 - **Youth are required to complete Safe Staff plus one Career Pathway Certificate as part of their Work Readiness Training.** These trainings will now be listed as part of the Work Readiness Assessment in the ISS and **no longer in occupational skills.**

WIOA Special Projects Corrective Action Plan

ONI Number WIOA 10.22.01

Recording of Measurable Skills Gains (MSG)

Applicable reference(s): WIOA Section 116; 20 CFR Part 677.155(a)(v); and TEGL 10-16, Change 1.

- Of the 16 WIOA Adult/Dislocated Worker case files reviewed of participants enrolled in an education or training program, one (6.3 percent) did not have an MSG recorded within the program year.
- Of the 11 WIOA Special Project case files reviewed of participants enrolled in an education or training program, two (18.2 percent) did not have an MSG recorded within the program year.

Required Action:

In addition to the general required CAP actions, the LWDB must provide an assurance with the CAP that MSGs will be documented and recorded by the end of the applicable program year. The LWDB must also review its internal policies, processes, and procedures to ensure that MSGs are recorded correctly and carried out in accordance with guidance. Additionally, the LWDB must provide documentation of training to all staff and ensure they understand the requirements and intent of MSGs including how to review and timely record results. Because this is a repeat issue, the LWDB must reevaluate the cause of continuing problems and provide a plan or process for preventing a recurrence of this issue in the future.

CareerSource CLM Response

Plan of Action

In one instance, this was due to candidate failure to complete. In the other two, the documentation provided was not accepted by the monitoring team. Due to the parameters of MSG entry, we were not able to correct these cases as we were past the program year constraints for which the MSG was required. A case review was conducted and staff were reminded of the MSG requirements. A report is pulled at the end of each program year to check for cases still missing an MSG at that time. In most instances, it is due to candidate dropping out. Any that are still pending are recorded at that time if they have been received.

Monitoring

- Staff engages in a monitoring strategy in which each staff member will monitor three cases per month; two cases will be self-monitored and the third will be a peer-monitor.
- Region 10 engages a third-party monitor, Underwood Sloan and Associates, to monitor all programs at least once annually. All monitoring deficiencies have been shared with Underwood and they have been asked to pay close attention to these areas for the cases they monitor.

Training

Staff were asked to review a presentation covering all monitoring deficiencies, which went over all results. All staff were asked to view the presentation, regardless of program of specialty. Once viewing the presentation, they were asked to confirm they had watched by sending an email to our Director of Continuous Improvement. Presentation linked here:

[Video Link](#)

Staff were then asked to review all Programmatic Monitoring findings and take a quiz in May 2022 to demonstrate mastery of the deficient areas found in the monitoring (Please refer to Attachment 1 – DEO Monitoring Quiz - 2021).

Written Communication to Staff

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TAA Corrective Action Plan

Finding Number TAA 10.22.04

Recording of TAA Services

Waivers

Applicable reference(s): TEGs 22-08, 10-11, 7-13, and 05-15; PIRL; and 20 CFR 618.735.

- A waiver of training was not accurately recorded in Employ Florida. The Successful Completion date of the waiver activity does not match the “Closed” review status under the Waiver Entry/Edit Waiver link. Therefore, the activity closed prematurely in Employ Florida due to conflicting dates entered in Employ Florida.

Rapid Response

Applicable reference(s): Trade Act 2002; TAARA 2015; TEGLs 22-08, 10-11, and 7-13; TEGL 11-02 and 05-15; 20 CFR 682.300 - 682.370; DEO Memo Rapid Response Requirement for Trade Assistance Petitions Dated 02/14/20; PIRL; USDOL TAA Data Integrity Requirement; DEO Administrative Policy 114; and Employ Florida Service Code Guide.

- The Rapid Response activity was not recorded under the Wagner-Peyser 110-service code program application. The 110-service code is required to be completed to document that staff provided information to a jobseeker during a rapid response event.

Required Action:

In addition to the general CAP action requirements, the LWDB must provide an assurance that the Local TAA Coordinator will always enter the 110 Service Code under the Wagner Peyser program application after providing Rapid Response activities. An assurance must also be provided that LWDB staff will review reporting procedures to ensure waivers of training are addressed for all TAA case management staff including how to properly enter, record, and close an activity. A plan of action outlining the LWDB’s efforts to prevent a recurrence of these issues in the future must also be provided with the CAP.

CareerSource CLM Response

Plan of Action

This was an oversight by staff. The staff in place at the time of the incident was new to the role and has since moved on. A new TAA case manager has been hired. Staff has thoroughly reviewed related policies and procedures and is awaiting formal training via State Trade Unit.

Monitoring

- Staff engages in a monitoring strategy in which each staff member will monitor three cases per month; two cases will be self-monitored and the third will be a peer-monitor.
- Region 10 engages a third-party monitor, Underwood Sloan and Associates, to monitor all programs at least once annually. All monitoring deficiencies have been shared with Underwood and they have been asked to pay close attention to these areas for the cases they monitor.
- Underwood and Sloan have been asked to do a 100% monitoring of active TAA cases with special consideration for areas of deficiency in the PY21 monitoring.

Training

The new case manager, Ana, has been provided all TAA-related policies and procedures by the state Trade Unit and is currently awaiting formal training.

Written Communication to Staff

Correspondence from Christina Omran 8/24/2022

Good Morning Ana,

Welcome to the TAA Community! We received your information from Mr. Trowbridge. I am connecting you with Ms. Booth for a TAA program onboarding session. She'll reach out with resources and links so you may review and bookmark them for reference and use while serving TAA program participants. The best practice is creating a reference binder or e-binder for yourself and reviewing the content prior to meeting with Ms. Booth to establish a foundation of knowledge, then come to the meeting with any questions. Please respond with your virtual meeting availability for ~30 to 45 minutes via MS Teams.

Looking ahead, if you have programmatic and policy questions, you'll direct your questions to TAA@DEO.MyFlorida.com. Questions left with staff via phone or voicemail are not considered under review.

We are looking forward to meeting and collaborating with you! If you need anything, let us know.

Thank you,

Christina Omran

Senior Management Analyst Supervisor, State Trade & Rapid Response Program

Correspondence from Carol Booth 8/26/2022

Hello Anna!

Welcome! I am forwarding some material for the Trade Adjustment Assistance program for your reading pleasure 😊 I will send more items in a few days. At your convenience, you and I can meet for a chat regarding any areas you feel additional information is needed.

DEO Resources:

- Our Trade Adjustment Assistance [home page](#)
- [Our FAQ page](#)
- [Trade Adjustment Assistance Program Benefits](#)
- Our [Local Trade Adjustment Assistance Coordinators](#)
- Our 2021 [Training Materials](#)
- Our existing [Administrative Policies](#), click on the "TAA" tab.
- Our existing [Memorandums](#). There are multiple years on this page. Years 2018-2020 are a great place to start.
- 2021 DEO Service Code Guide (attached) for [Employ Florida](#). That is our case management system.

DOL Resources:

- Training and Employment Guidance Letters [home page](#). There are multiple TEGLs and TENs online. I've attached three here.
 - TEGL 3-20 (attached) [Determining the Availability of Suitable Employment](#) Under the Trade Adjustment Assistance (TAA) Program's Final Rule to Return Trade-Affected Workers to Employment as Quickly as Possible
 - TEGL 4-20 (attached) [Guidance on Integrating Services](#) for Trade-Affected Workers under the Trade Adjustment Assistance Program (TAA Program) with the Workforce Innovation and Opportunity Act (WIOA) Title I Dislocated Worker (DW) Program
 - TEGL 11-20 (attached) [Guidance on Trade-Affected Workers' Withdrawal from Approved Training](#) under the Trade Adjustment Assistance (TAA) Program
- The 2020 TAA Final Rule (attached)
- [Reversion 2021 - TEGL 24-20](#) (attached)
- TAA, ATAA and RTAA program operations after June 30, 2022 – [TEGL 13-21](#) (attached)

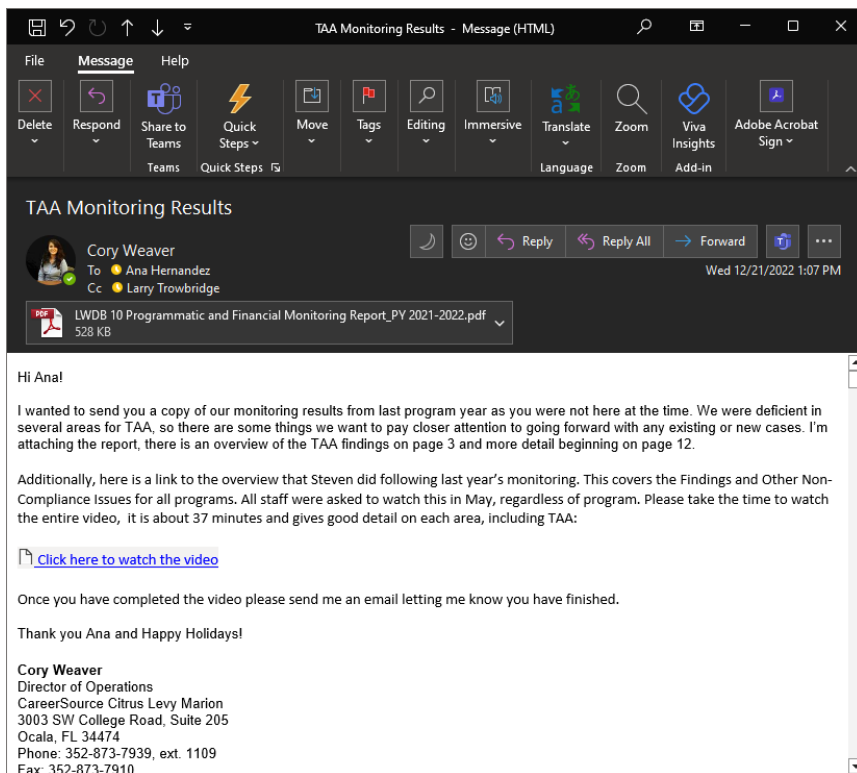
Have a wonderful weekend,

Carol F. Booth

State Trade Petition Navigation Program Lead, State Trade & Rapid Response Program
Division of Workforce Services, Bureau of One-Stop and Program Support

Florida Department of Economic Opportunity
Office: 850-245-7167
www.FloridaJobs.org

Additionally, the results of DEO's monitoring were shared with Ana 12/21/2022. While she was not employed with LWDB10 at that time, we want to ensure she is aware of the deficiencies so she can be prepared going forward:



Finding Number TAA 10.22.05

Referral to Supportive Services

Applicable reference(s): 20 CFR 617.10; 20 CFR 618.325; TEGLs 22-08, 10-11, 7-13, 5-15, Change 1; DEO Administrative Policy 108; and Employ Florida Service Code Guide.

- The referral to supportive services was not documented by the T07 code which is the code used to record and document the offering and/or provision of supportive services. The LWDB must ensure an offer, or a referral, to supportive services is provided to each TAA participant in training and that the services are recorded under the T07 code in Employ Florida and documented in the participant's case file.

Required Action:

In addition to the general CAP action requirements, the LWDB must provide an assurance that the Local TAA Coordinator will assess each TAA participant's supportive service needs and refer them as appropriate to the WIOA program for assistance. These services must be recorded under the T07 Service Code in the TAA case file. Documentation must also be provided showing the LWDB has a check and balance system in place to document the offering and/or provision of supportive services and whether the services are approved, allowable, and invoices match the amounts recorded in Employ Florida. A plan of action or process outlining the LWDB's efforts to prevent a recurrence of this issue in the future must be provided with the CAP.

CareerSource CLM Response

Plan of Action

This was a mistake made by the case manager. The staff in place at the time of the incident was new to the role and has since moved on. A new TAA case manager has been hired. Staff has thoroughly reviewed related policies and procedures and is awaiting formal training via State Trade Unit.

Monitoring

- Staff engages in a monitoring strategy in which each staff member will monitor three cases per month; two cases will be self-monitored and the third will be a peer-monitor.
- Region 10 engages a third-party monitor, Underwood Sloan and Associates, to monitor all programs at least once annually. All monitoring deficiencies have been shared with Underwood and they have been asked to pay close attention to these areas for the cases they monitor.
- Underwood and Sloan have been asked to do a 100% monitoring of active TAA cases with special consideration for areas of deficiency in the PY21 monitoring.

Training

The new case manager, Ana, has been provided all TAA-related policies and procedures by the state Trade Unit and is currently awaiting formal training.

Written Communication to Staff

Written communication has been provided to the new TAA Case Manager by both DEO and the LWDB10 Director of Operations. Please refer to screenshots under “Written Communication to Staff” for Finding Number TAA 10.22.04, Recording of TAA Services on pages 13 and 14. While she was not employed with LWDB10 at that time, we want to ensure she is aware of the deficiencies so she can be prepared going forward.

ONI Number TAA 10.22.02

Individual Employment Plans (IEP)

Applicable reference(s): 20 CFR 617.20; 20 CFR 618.600-665; TEGLs 22-08, 10-11, 7-13, 05-15; and DEO Administrative Policy 107.

- IEPs are to be developed based on a comprehensive assessment including short-term and long-term goals and action steps needed to accomplish the goals.
- The IEP in the participant’s case file was incomplete and lacked sufficient objectives, action steps, and completion dates to assist the participant in achieving their occupational goal.

Required Action:

In addition to the general required CAP actions, the LWDB must provide an assurance that staff have or will review all future IEPs recorded in Employ Florida to ensure case notes have been recorded identifying all required elements of the service(s) provided.

Documentation must also be provided of attempts to contact and develop the missing objectives and action steps for the participant if the application is still open and active in Employ Florida. A plan of action outlining the LWDB's efforts to prevent a recurrence of this issue in the future must be provided with the CAP.

CareerSource CLM Response

Plan of Action

Our new TAA case manager, Ana, has been provided information on the IEP ONI and will ensure IEP's have the appropriate goals and action steps recorded. Completion dates and progress will be recorded as updates are made to ensure all support is provided to the candidate in helping them achieve their educational and employment goals.

Monitoring

- Staff engages in a monitoring strategy in which each staff member will monitor three cases per month; two cases will be self-monitored and the third will be a peer-monitor.
- Region 10 engages a third-party monitor, Underwood Sloan and Associates, to monitor all programs at least once annually. All monitoring deficiencies have been shared with Underwood and they have been asked to pay close attention to these areas for the cases they monitor.
- Underwood and Sloan have been asked to do a 100% monitoring of active TAA cases with special consideration for areas of deficiency in the PY21 monitoring.

Training

The new case manager, Ana, has been provided all TAA-related policies and procedures by the state Trade Unit and is currently awaiting formal training.

Written Communication to Staff

Written communication has been provided to the new TAA Case Manager by both DEO and the LWDB10 Director of Operations. Please refer to screenshots under "Written Communication to Staff" for Finding Number TAA 10.22.04, Recording of TAA Services on pages 13 and 14. While she was not employed with LWDB10 at that time, we want to ensure she is aware of the deficiencies so she can be prepared going forward.

ONI Number TAA 10.22.03

Program of Study Outline/Registration Documentation/Expenditures

Applicable reference(s): TEGL 22-08, 10-11, 7-13, and 05-05; 20 CFR 618.600-665; PIRL; USDOL TAA Data Integrity Requirement; and DEO Administrative Policy 107.

- The course work and/or a program of study outline, registration documentation, and training invoices and expenditures for the participant were not recorded in Employ Florida under the TAA program application. In addition, the TAA training packet was submitted after the participant had already started the training program.

Required Action:

In addition to the general CAP requirements, the LWDB must provide an assurance that the Local TAA Coordinator will ensure that all documentation, including expenditures, that support the activities participants are enrolled in are uploaded to Employ Florida under the TAA program application. Although training expenditures and matching invoices were uploaded to Atlas, they must be reported under the TAA application (TAA/TRA Payment View link) as required. Documentation to be retained and uploaded includes the course syllabus or program outline, invoices, program acceptance/enrollment letter(s), 2100 series training forms, and any other documents that support the training application. Documentation of these efforts as well a plan or process for preventing a recurrence of these issues in the future must be provided with the CAP.

CareerSource CLM Response

Plan of Action

This was a mistake made by the case manager in place at the time. The individual was only in the role briefly before moving on and did not have time to master the program. Our new TAA Case Manager, Ana, has been provide information on this specific ONI relating to properly recording and documenting information in Employ Florida. The Assistant Director of Workforce Initiatives has thoroughly reviewed the TAA-related policies and procedures with her while she is awaiting formal training via State Trade Unit.

Monitoring

- Staff engages in a monitoring strategy in which each staff member will monitor three cases per month; two cases will be self-monitored and the third will be a peer-monitor.
- Region 10 engages a third-party monitor, Underwood Sloan and Associates, to monitor all programs at least once annually. All monitoring deficiencies have been shared with Underwood and they have been asked to pay close attention to these areas for the cases they monitor.
- Underwood and Sloan have been asked to do a 100% monitoring of active TAA cases with special consideration for areas of deficiency in the PY21 monitoring.

Training

The new case manager, Ana, has been provided all TAA-related policies and procedures by the state Trade Unit and is currently awaiting formal training.

Written Communication to Staff

Written communication has been provided to the new TAA Case Manager by both DEO and the LWDB10 Director of Operations. Please refer to screenshots under "Written Communication to Staff" for Finding Number TAA 10.22.04, Recording of TAA Services on pages 13 and 14. While she was not employed with LWDB10 at that time, we want to ensure she is aware of the deficiencies so she can be prepared going forward.

WP Corrective Action Plan

Finding Number WP 10.22.06

Employer-Entered Job Order Review and Verification

Applicable reference(s): 20 CFR 651.10; and DEO Administrative Policy 099.

Of the two employer-entered job orders reviewed in Employ Florida, one (50.0 percent) was missing documentation of staff review and verification of the job order within two business days.

Required Action: In addition to the general required CAP actions, the LWDB must provide an assurance that staff have or will review all future open job orders in Employ Florida to ensure the job orders are reviewed within two business days. An assurance must also be provided that LWDB staff will take necessary steps to document all employer entered job orders in case notes on the job order in Employ Florida. A plan or process for accomplishing this in the future must also be provided with the CAP.

✓ CareerSource CLM Response

Region 10 concurs with **Finding Number WP 10.22.06**

Corrective Action Steps for WP Finding 10.22.06

- **Explanation/Reason for Noncompliance:**

- Job Order 11819167 was self-service entered by the employer on Friday 1/21/2022. A review was initiated by business services staff on 1/25/2022 BUT the review was not fully completed until 2/7/2022. Simply put Region 10 initiated the review as required but completion of the review was delayed based on a backlog in job order processing. We did not fully comply with the time standard.
- The processing staff member was aware of the two (2) business day requirement but based on a processing backlog simply failed to meet the standard.

Plan of Action

Efforts Taken to Prevent Future Occurrences: Region 10 has reviewed its approach to employer entered job order compliance review and verification and has implemented a more rigorous process to ensure that all staff who use Employ Florida as part of job order processing and documentation meet the required time standard. A more robust monitoring and training process is outlined below to ensure that job orders are reviewed within two (2) business days and that staff document all employer entered job orders in case notes on the job order in Employ Florida.

Monitoring

- Staff self-monitoring on these and other issues were implemented during the pandemic and continues at present. A full list of self-monitored cases for PY 22-23 is available upon request.
- Last year we also added an additional peer-to-peer monitoring requirement.

- Each Wagner Peyser related staff member who makes entries into Employ Florida is required to read two (2) of their own cases and one (1) of a colleague's cases each month.
- This totals 36 cases (3 cases x 12 months) a year per staff member.
 - Identified errors are reported to supervisors and are then corrected.
 - A tracked correct monitoring score of 85%+ for each staff member is required and is determined by a self-scoring monitoring instrument (excel worksheet) created in the region.
- Additionally, Our Business Services Manager will conduct a comprehensive supervisory monitoring on this specific issue (Job Order Review) during January/February 2023.
- Region (Area) 10 continues to contract with ***Underwood and Sloan*** (<https://underwoodsloan.com/about>) who acts as an independent and external monitor on all its WIOA programs. A review of this specific issue (among others) will be part of a wider Wagner Peyser monitoring process which will be conducted as follows:

Underwood and Sloan Monitoring Schedule for PY 2022 to 2023

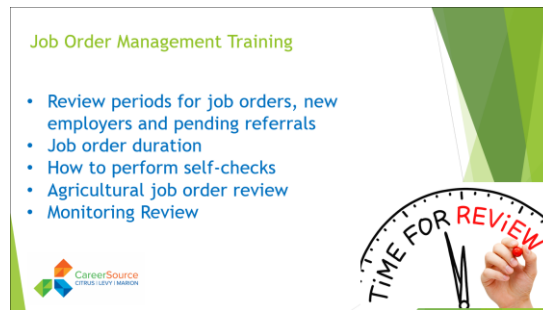
- During the timeframe 12/19/22 to 1/13/23 – A participant case file review will be conducted.
- During 1/16/23 to 1/27/23 – A Preliminary Programmatic Monitoring Report will be drafted and submitted for CSCLM review.
- During 1/30/23 to 2/21/23 – A presentation of preliminary findings and report to CSCLM, discussion, and revisions if needed will be conducted.
- This calendar of activities will conclude the file review process for PY 2022 to 2023.

Training

- All staff members were retrained/refreshed on this issue (and others) over the course of two (2) training sessions.
- The first training session was conducted online between May 09, 2022 and May 20, 2022. [Click Here](#) to view the 36-minute-long online training. It directly addresses the job order review issues outlined.




- The second training was an in-person training session conducted on May 25, 2022 with business services staff only. The actual training PowerPoint is available upon request. Content of that training can be found below.



This PowerPoint is available for review upon request

- Training Agenda Topics Related to this Finding**
 - Review periods for job orders, new employers and pending referrals
 - Job order duration
 - How to perform self-checks
 - Agricultural job order review
 - Monitoring Review
- See the sign-in sheet for this in-person training below.

 Staff Training/Continuing Education Sign-In Sheet			
Date and Time of Training Event:		5/25/22 8:30 am-9:30 am	
Name of Training Event:		Job Order Training	
Number of CEU Hours:		1	
Staff Name (Please Print)		Signature	
First	Last		
1	Amanda	Bond	<i>Amanda Bond</i>
2	Andrea	Abrams	<i>Zoom MS</i>
3	Angelica	Venerio	<i>AT</i>
4	A. Bonnie	Johnson	<i>Zoom MS</i>
5	Chris	Wilkinson	<i>Zoom MS</i>
6	C. Loy	Williams	<i>Zoom MS</i>
7	Deborah	Letterman	<i>Zoom MS</i>
8	Heather	Gamble	<i>Zoom MS</i>
9	Henry	Ayala	<i>Zoom MS</i>
10	Ida	Cordero-Pagan	<i>John Cordero-Pagan</i>
11	Ivette	Escobar-Givens	<i>Zoom MS</i>
12	Jerry	Flanders	<i>Zoom MS</i>
13	Lauren	Marcucci	<i>Zoom MS</i>
14	Malte	Marz	<i>Zoom MS</i>
15	Mary	Terrell	<i>Zoom MS</i>
16	Melissa	Saco	<i>Melissa Saco</i>
17	Michele	Schultze	<i>Michele Schultze</i>
18	Sandra	Crawford	<i>Sandra Crawford</i>
19	Shanelle	Shaw	<i>Shanelle Shaw</i>
20	Tia	Williams	<i>Tia Williams</i>
21	Starr	Winters	<i>Starr Winters</i>
22			
23			
24			
25			

Written Communication to Staff

- On May 09, 2022, all staff were notified in writing via email (see below) of this and other findings and non-compliance issues.
- They were provided with the Preliminary Review Summary issued by DEO and were required to review it in detail and reply back that they fully understood the issues cited and how to avoid them in the future.

From: Steven Litzinger
Sent: Monday, May 9, 2022 3:54 PM
To: Amanda Bond <abond@careersourceclm.com>; Andrea Abrams <aabrams@talentcenter.org>; Angelica Venerio <avenerio@careersourceclm.com>; Angelle Patton-Allen <apatton-allen@careersourceclm.com>; Ardwenia (Bonnie) Johnson <bjohnson@careersourceclm.com>; Brenda Belvis <bbelvis@careersourceclm.com>; Brian Conard <bconard@careersourceclm.com>; Brittany Fish <bfish@careersourceclm.com>; Carlene Loy <clloyd@careersourceclm.com>; Carmen A. Rivera <crivera@careersourceclm.com>; Carol Davidyock <cdavidyock@careersourceclm.com>; Chris Wilkinson <cwilkinson@talentcenter.org>; Christine Mestrovich <cmestrovich@careersourceclm.com>; Cindy Ginner <cginner@careersourceclm.com>; Cira Schmettler <cschmettler@careersourceclm.com>; Crystal Poplin <cpoplin@careersourceclm.com>; Danielle Negron <dnegron@careersourceclm.com>; Danielle Veenstra <dveenstra@careersourceclm.com>; Deana Tumlin <dtumlin@careersourceclm.com>; Deborah Letterman <dletterman@careersourceclm.com>; Don Lettgeb <dlettgeb@careersourceclm.com>; Dwain Henderson <dhenderson@careersourceclm.com>; Earl Beegle <ebeegle@careersourceclm.com>; Edward Deskowic <edeskowic@careersourceclm.com>; Elizabeth Rodriguez <erodriguez@careersourceclm.com>; Heather Gamble <hgamble@careersourceclm.com>; Heaven Colon <hcolon@careersourceclm.com>; Henry Ayala <hayala@careersourceclm.com>; Ida Cordero-Pagan <icordero@careersourceclm.com>; Iris Pozo <ipozo@careersourceclm.com>; Ivette Escobar-Givens <igivens@careersourceclm.com>; Janet Clymer <jclymer@careersourceclm.com>; Jerry Flanders <jflanders@careersourceclm.com>; John Stepaniak <jstepaniak@careersourceclm.com>; Kathleen Harrington <kharrington@careersourceclm.com>; Kathleen Betr <kbetr@careersourceclm.com>; Keshira Smith <ksmith@careersourceclm.com>; Kevin Harrison <kharrison@careersourceclm.com>; Lauren Marcucci <lmarcucci@careersourceclm.com>; Luis Perez <lperez@careersourceclm.com>; Maite 'Maria' Marx <mmarx@careersourceclm.com>; Mary Roberson <mroberson@careersourceclm.com>; Maria Coimbra <mcoimbra@careersourceclm.com>; Mary O'Connell <moconnell@careersourceclm.com>; Mary Terrell <enterrell@talentcenter.org>; Melissa Saco <msaco@careersourceclm.com>; Michael Barrington <mbarrington@careersourceclm.com>; Michele Schulze <mschulze@careersourceclm.com>; Myrna Serrano <mserrano@careersourceclm.com>; Noreen Salatin <nsalatin@careersourceclm.com>; Patricia Harney <pharney@careersourceclm.com>; Paula Singleton <psingleton@careersourceclm.com>; Penny Spence <pspence@careersourceclm.com>; Sandra Crawford <scrawford@careersourceclm.com>; Sandra Moseley <smoseley@careersourceclm.com>; Scott Orteen <sorteen@careersourceclm.com>; Shanelle Shaw <sshaw@careersourceclm.com>; Shannon Mills <smills@careersourceclm.com>; Sharon Young <syoun@careersourceclm.com>; Shiann Adams <sadams@careersourceclm.com>; Star Labu <slabu@careersourceclm.com>; Steven Litzinger <slitzinger@careersourceclm.com>; Syra Cardona <scardona@careersourceclm.com>; Talla Kong-que <tkong-que@careersourceclm.com>; Tia Thompson <tthompson@careersourceclm.com>; Valerie Hancock <vhancock@careersourceclm.com>; Victoria Wilson-Reich <vreich@careersourceclm.com>; Wendy Ross <wross@careersourceclm.com>; Yolanda Ocasio <yocasio@careersourceclm.com>
Cc: Dale French <dfrench@careersourceclm.com>; Cory Weaver <cweaver@careersourceclm.com>; Larry Trowbridge <ltrowbridge@careersourceclm.com>; Cathy Galica <cgatica@careersourceclm.com>; Heaven Colon <hcolon@careersourceclm.com>
Subject: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022
Importance: High

DEO has monitored our programs and processes and issued a preliminary report.


Find attached that report. I am asking that you review the report in it's entirety including programs you do not currently work in. As we move to implement Agile staffing I think its important all staff are aware of what we missed or did wrong in all areas.

I have also recorded a 36 minute review of the applicable Findings, Other Non-Compliance Issues and Observations. **Please watch this training in its entirety** and then take the Quiz provided to show mastery of the material. There are 20 questions related to the monitoring outcomes. You must pass this quiz with an 85% pass rate. You can miss 3 questions and pass. If you fail – you simply retake it until you pass. You should view the online training and then pass the quiz no later than Friday May 20th 2022.

Once you have read the report, viewed the online presentation and passed the quiz – **COPY AND PASTE THE FOLLOWING INTO AN EMAIL AND SEND TO ME.**

"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of XX%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO recommendations noted in the report and/or training."


- Download the report by clicking on the attached document above. Read it in full.
- Click [Here](#) to view the Online Training Presentation (Click the Play button after the window fully opens). Watch it in it's entirety.
- Click [Here](#) to take the Mandatory Quiz. Pass with a score of 85%+.
- Copy the RED TEXT above – enter your quiz score and forward to Steven Litzinger by COB 5/20/2022.



Let's work hard to be our best in 2022 and 2023!

Enjoy – see me with questions.

Steven Litzinger
Director of Continuous Improvement
CareerSource Citrus Levy Marion
3003 SW College Road, Suite 205
Ocala, FL 34474
Phone: 352-732-1700, ext. 1260
Fax: 352-873-7910
slitzinger@careersourceclm.com



- See an excerpt of the email responses below acknowledging review of the email and the Preliminary Review Summary. The responses in-toto are available upon request.

From	Subject	Size	Categories	Received	Mentor
Noreen Salatino	Monitoring Report "I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO re..."	82 KB		Fri 5/27/2022 10:28 AM	
Angelica Venerio	RE: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022 Good morning Steven, Here is my completion of the Monitoring quiz. Thank you, Angelica Venerio Business Development Coordinator CareerSource Citrus Levy Marion 2703 NE 14th St. Ocala, FL 34470	589 KB		Fri 5/20/2022 9:24 AM	
Heather Gamble	FW: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022 I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 95%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...	747 KB		Thu 5/19/2022 2:03 PM	
Shannon Mills	Outcome of the DEO QA Monitoring Quiz "I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."	183 KB		Thu 5/19/2022 12:39 PM	
Janet Clymer	FW: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022 I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...	752 KB		Thu 5/19/2022 9:46 AM	
Brenda Belvis	Region 10 monitoring report Good Afternoon Mr. Steven: "I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 95%. I will see my Supervisor or Steven Litzinger with any questions. I will impli..."	85 KB		Wed 5/18/2022 4:34 PM	
Yolanda Ocasio	Monitoring Quiz "I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."	314 KB		Wed 5/18/2022 11:08 AM	
Talia Kong-que	Mandatory Training Results "I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."	116 KB		Tue 5/17/2022 11:23 AM	
Andrea Abrams	Quiz completed I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...	79 KB		Fri 5/13/2022 3:30 PM	
Elizabeth Rodriguez	Quiz - Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022 Hello Steven, "I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any be..."	87 KB		Fri 5/13/2022 1:35 PM	
Brian Conard	RE: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022 "I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."	542 KB		Fri 5/13/2022 10:47 AM	
Patricia Harney	Mandatory Quiz "I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."	81 KB		Thu 5/12/2022 2:40 PM	
Don Leitgeb	Monitoring quiz "I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."	82 KB		Thu 5/12/2022 2:32 PM	
Kimberly Grey	RE: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022 Good Afternoon Steven, I have read the Region 10 report and viewed the online presentation entirely and passed the quiz with a 90% as indicated below. I will discuss with you if I have any questions and ensure that I implement any best practices and/o...	432 KB		Thu 5/12/2022 11:57 AM	
Dallina Negron	DEO QA Monitoring Quiz "I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 85%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."	273 KB		Wed 5/11/2022 4:32 PM	
Ardwenia (Bonnie) Johns...	DEO QA Monitoring Quiz "I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 85%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."	79 KB		Wed 5/11/2022 3:20 PM	

Quiz Administration and Results

- All staff were also assigned to take a post training online quiz to demonstrate they had mastered what mistakes were made and how to avoid the mistakes in the future.
- The quiz was "open book" and allowed retakes until staff passed with a minimum acceptable score of 85% correct
- The quiz can be found at: <https://www.flexiquiz.com/SC/N/monquiz2022>
- See an excerpt of the quiz scores below. The scores in-toto are available upon request.

Individual Summary - DEO QA Monitoring Quiz - What Did We Do Wrong? May 2022					
First name	Last name	Email	Date submitted	Score	Grade
Amanda	Bond	abond@careersourcedm.com	10-May-2022 9:15 AM	85 / 100 (85%)	Pass
Andrea	Abrams	AAbrams@talentcenter.org	13-May-2022 3:27 PM	90 / 100 (90%)	Pass
Angelica	Venerio	avenerio@careersourcedm.com	10-May-2022 10:07 AM	90 / 100 (90%)	Pass
Ardweina (Bonnie)	Johnson	bjohnson@careersourcedm.com	11-May-2022 3:18 PM	90 / 100 (90%)	Pass
Brenda	Belvis	bbelvis@careersourcedm.com	18-May-2022 4:28 PM	95 / 100 (95%)	Pass
Brian	Conard	boconard@careersourcedm.com	13-May-2022 10:44 AM	90 / 100 (90%)	Pass
Carol	Davidyock	cdavidyock@careersourcedm.com	10-May-2022 1:53 PM	90 / 100 (90%)	Pass
Cathy	Galica	cgalica@careersourcedm.com	10-May-2022 4:29 PM	100 / 100 (100%)	Pass
Christine	Mestrovich	cmestrovich@careersourcedm.com	10-May-2022 10:32 AM	95 / 100 (95%)	Pass
Christopher	Wilkinson	cwilkinson@talentcenter.org	11-May-2022 1:21 PM	85 / 100 (85%)	Pass
Cindy	Ginner	cginner@careersourcedm.com	12-May-2022 10:22 AM	85 / 100 (85%)	Pass
Crystal	Poplin	cpoplin@careersourcedm.com	13-May-2022 10:57 AM	95 / 100 (95%)	Pass
Dale	French	dfrench@careersourcedm.com	10-May-2022 10:35 AM	100 / 100 (100%)	Pass
Dallina	Negron	dnegron@careersourcedm.com	11-May-2022 4:17 PM	85 / 100 (85%)	Pass

Case Corrections

- Inactive Job Order is closed and off-line. No other action taken.

Finding Number WP 10.22.07

Agricultural Job Orders

Applicable reference(s): Fair Labor Standards Act of 1938, as amended; 20 CFR 653; and DEO FG 03-040.

Agricultural job orders must contain certain information as required by federal law and state policy. This is critical to prevent MSFWs from becoming victims of labor law violations. The one agricultural job order reviewed was missing the wages the job will pay as well as specific days and hours to be worked.

Required Action: In addition to the general required CAP actions, the LWDB must provide an assurance that the job order has been reviewed and verified and that the employer has or will pay at least the Florida minimum wage rate. This can be documented in a case note if the job order is still open and active. The LWDB must also provide an assurance that case notes will be entered on all job orders documenting staff verification of the Florida minimum wage rate and that the job order descriptions contain all necessary information and requirements in the future including specific days and hours to be worked. The LWDB must provide a plan or process for preventing a recurrence of this issue in the future.

✓ CareerSource CLM Response

Region 10 concurs with **Finding Number WP 10.22.07**

Corrective Action Steps for WP Finding 10.22.07

- **Explanation/Reason for Noncompliance:**

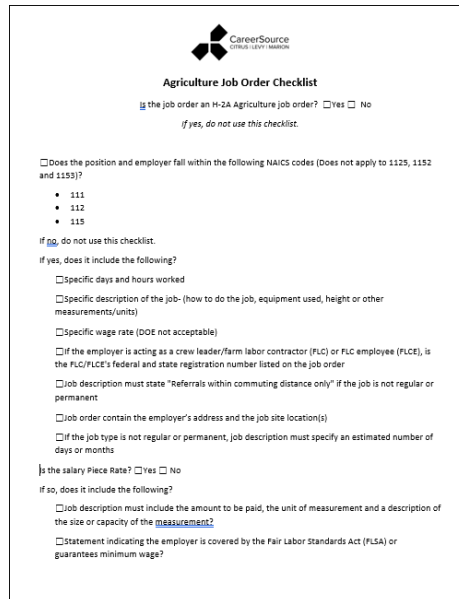
- Job Order 11841509 was a direct staff entered Agricultural job order entered on 2/17/22. Our staff member failed to enter all information as required by federal law and state policy.
- Simply put - the processing staff member was not fully aware of the wage entry requirement or the specific days and hours to be worked rule. This staff member was not as thoroughly trained as they should have been.

Plan of Action

Efforts Taken to Prevent Future Occurrences: Region 10 has reviewed its agricultural job order management process and has implemented and reenforced a more robust monitoring and training process as outlined below to ensure that all job order unit staff members pay consistent and due attention to the issue of proper Agricultural job order

management and documentation. This includes making sure all job orders contain a specific wage rate which pays at least minimum wage and that the specific days and hours to be worked are listed.

In addition to the training and monitoring outlined further below, Region 10 has created and implemented the use of an **Agricultural Job Order Checklist** to ensure no steps are missed when managing these job orders. The checklist is provided below.



The image shows a document titled "Agriculture Job Order Checklist" with the CareerSource logo at the top. The form contains several sections of questions and checkboxes. The first section asks if the job order is an H-2A Agriculture job order, with checkboxes for Yes and No. If Yes, it instructs to use the checklist. The second section asks if the position and employer fall within specific NAICS codes (111, 112, 115). If No, it instructs not to use the checklist. The third section asks if the job order includes specific information: days and hours worked, a specific description of the job, a specific wage rate, if the employer is a crew leader/farm labor contractor (FLC) or FLC employee (FLCE), if the job description states "Referrals within commuting distance only", if the job order contains the employer's address and job site location(s), and if the job type is not regular or permanent. The fourth section asks if the salary is Piece Rate, with checkboxes for Yes and No. If Yes, it asks if the job description includes the amount to be paid, the unit of measurement, and a description of the size or capacity of the measurement. The fifth section asks if the statement indicating the employer is covered by the Fair Labor Standards Act (FLSA) or guarantees minimum wage.

Agriculture Job Order Checklist

Is the job order an H-2A Agriculture job order? ☐ Yes ☐ No
If yes, do not use this checklist.

☐ Does the position and employer fall within the following NAICS codes (Does not apply to 1125, 1152 and 1153)?

- 111
- 112
- 115

If no, do not use this checklist.

If yes, does it include the following?

- ☐ Specific days and hours worked
- ☐ Specific description of the job- (how to do the job, equipment used, height or other measurements/units)
- ☐ Specific wage rate (DOE not acceptable)
- ☐ If the employer is acting as a crew leader/farm labor contractor (FLC) or FLC employee (FLCE), is the FLC/FLCE's federal and state registration number listed on the job order
- ☐ Job description must state "Referrals within commuting distance only" if the job is not regular or permanent
- ☐ Job order contain the employer's address and the job site location(s)
- ☐ If the job type is not regular or permanent, job description must specify an estimated number of days or months

Is the salary Piece Rate? ☐ Yes ☐ No

If so, does it include the following?

- ☐ Job description must include the amount to be paid, the unit of measurement and a description of the size or capacity of the measurement?
- ☐ Statement indicating the employer is covered by the Fair Labor Standards Act (FLSA) or guarantees minimum wage?

Monitoring

- Staff self-monitoring on these and other issues was implemented during the pandemic and continues at present. A full list of self-monitored cases for PY 22-23 is available upon request.
- Last year we also added an additional peer-to-peer monitoring requirement.
- Each Wagner Peyser related staff member who makes entries into Employ Florida is required to read two (2) of their own cases and one (1) of a colleague's cases each month.
- This totals 36 cases (3 cases x 12 months) a year per staff member.
 - Identified errors are reported to supervisors and are then corrected.
 - A tracked correct monitoring score of 85%+ for each staff member is required and is determined by a self-scoring monitoring instrument (excel worksheet) created in the region.
- Additionally, Our Business Services Manager will conduct a comprehensive supervisory monitoring on this specific issue (Ag Orders) during January/February 2023.

- Region (Area) 10 continues to contract with ***Underwood and Sloan*** (<https://underwoodsloan.com/about>) who acts as an independent and external monitor on all its WIOA programs. A review of this specific issue (among others) will be part of a wider Wagner Peyser monitoring process which will be conducted as follows:

Underwood and Sloan Monitoring Schedule for PY 2022 to 2023

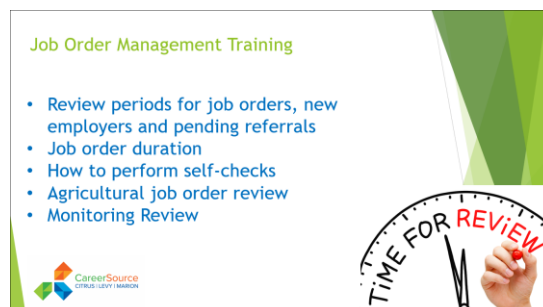
- During the timeframe 12/19/22 to 1/13/23 – A participant case file review will be conducted.
- During 1/16/23 to 1/27/23 – A Preliminary Programmatic Monitoring Report will be drafted and submitted for CSCLM review.
- During 1/30/23 to 2/21/23 – A presentation of preliminary findings and report to CSCLM, discussion, and revisions if needed will be conducted.
- This calendar of activities will conclude the file review process for PY 2022 to 2023.

Training

- All staff members were retrained/refreshed on this issue (and others) over the course of two (2) training sessions.
- The first training session was conducted online between May 09, 2022 and May 20, 2022. [Click Here](#) to view the 36-minute-long online training. It directly addressed the Ag issues outlined.



- An in-person training session was also conducted on May 25, 2022 with business Services Staff only. The actual training PowerPoint is available upon request. Content of that training can be found below.



This PowerPoint is available for review upon request

○ **Training Agenda Topics Related to this Finding**

- Review periods for job orders, new employers and pending referrals
- Job order duration
- How to perform self-checks
- Agricultural job order review
- Monitoring Review

- See the sign-in sheet for this in-person training below.

CareerSource CITRUS LEVY MARION		Staff Training/Continuing Education Sign-In Sheet	
Date and Time of Training Event:		5/25/22 8:30 am-9:30 am	
Name of Training Event:		Job Order Training	
Number of CEU Hours:		1	
Staff Name (Please Print)		Signature	
First	Last		
1	Amanda	Bond	<i>Amanda Bond</i>
2	Andrea	Abrams	<i>Zoom MS</i>
3	Angelica	Venerio	<i>ATK</i>
4	A. Bonnie	Johnson	<i>Zoom MS</i>
5	Chris	Wilkinson	<i>Zoom MS</i>
6	C. Loy	Williams	<i>Zoom MS</i>
7	Deborah	Letterman	<i>Zoom MS</i>
8	Heather	Gamble	<i>Heather G</i>
9	Henry	Ayala	<i>Zoom MS</i>
10	Ida	Cordero-Pagan	<i>Ida Cordero-Pagan</i>
11	Ivette	Escobar-Givens	<i>Zoom MS</i>
12	Jerry	Flanders	<i>Zoom MS</i>
13	Lauren	Marcucci	<i>Zoom MS</i>
14	Malte	Marz	<i>Zoom MS</i>
15	Mary	Terrell	<i>Zoom MS</i>
16	Melissa	Saco	<i>Melissa Saco</i>
17	Michele	Schultze	<i>Michele Schultze</i>
18	Sandra	Crawford	<i>Sandra Crawford</i>
19	Shanelle	Shaw	<i>Shanelle Shaw</i>
20	Tia	Williams	<i>Tia Williams</i>
21	Stacy	Williams	<i>Stacy Williams</i>
22			
23			
24			
25			

Written Communication to Staff

- On May 09, 2022, all staff were notified in writing via email (see below) of this and other findings and non-compliance issues.
- They were provided with the Preliminary Review Summary issued by DEO and were required to review it in detail and reply back that they fully understood the issues cited and how to avoid them in the future.

From: Steven Litzinger
Sent: Monday, May 9, 2022 3:54 PM

To: Amanda Bond <abond@careersourcedm.com>; Andrea Abrams <aabrams@talentcenter.org>; Angelica Venerio <avenerio@careersourcedm.com>; Angelle Patton-Allen <apatton-allen@careersourcedm.com>; Ardwenia (Bonnie) Johnson <bjohnson@careersourcedm.com>; Brenda Belvis <bbelvis@careersourcedm.com>; Brian Conard <bconard@careersourcedm.com>; Brittny Fish <bfish@careersourcedm.com>; Carlene Loy <clloyd@careersourcedm.com>; Carol Davidock <cdavidock@careersourcedm.com>; Chris Wilkinson <cwikinson@talentcenter.org>; Christine Mestrovich <cmestrovich@careersourcedm.com>; Cindy Ginner <cginner@careersourcedm.com>; Ora Schettler <cschettler@careersourcedm.com>; Crystal Poplin <cpoplin@careersourcedm.com>; Dalina Negron <dnegron@careersourcedm.com>; Danielle Veestra <dveestra@careersourcedm.com>; Deana Tumlin <dtumlin@careersourcedm.com>; Deborah Letterman <dletterman@careersourcedm.com>; Don Lettgeb <dlettgeb@careersourcedm.com>; Dwain Henderson <dhenderson@careersourcedm.com>; Eidi Beegle <ebeegle@careersourcedm.com>; Edward Deskovic <edeskovic@careersourcedm.com>; Elizabeth Rodriguez <erodriguez@careersourcedm.com>; Heather Gamble <hgamble@careersourcedm.com>; Heaven Colon <hcolon@careersourcedm.com>; Henry Ayala <hayala@careersourcedm.com>; Ida Cordero-Pagan <icordero@careersourcedm.com>; Iris Pozo <ipozo@careersourcedm.com>; Ivette Escobar-Diwns <ivescobar@careersourcedm.com>; Janet Clymer <jclymer@careersourcedm.com>; Jerry Flinders <jflinders@careersourcedm.com>; John Stepaniak <jstepaniak@careersourcedm.com>; Kathleen Harrington <kharrington@careersourcedm.com>; Kathleen Betz <kbetz@careersourcedm.com>; Kelsia Smith <ksmith@careersourcedm.com>; Kevin Harrison <kharrison@careersourcedm.com>; Lauren Marcus <lmarcus@careersourcedm.com>; Luis Perez <lperez@careersourcedm.com>; Malle 'Maria' Mar <mmar@careersourcedm.com>; Mary Roberson <mroberson@careersourcedm.com>; Maria Coimbra <mcoimbra@careersourcedm.com>; Mary O'Connell <mocConnell@careersourcedm.com>; Mary Terrell <enterrell@talentcenter.org>; Melissa Saco <msaco@careersourcedm.com>; Michael Barrington <mbarrington@careersourcedm.com>; Michele Schulze <mschulze@careersourcedm.com>; Myrna Serrano <mserrano@careersourcedm.com>; Noreen Salatin <nsalatin@careersourcedm.com>; Patricia Harney <pharney@careersourcedm.com>; Paula Singleton <psingleton@careersourcedm.com>; Penny Spence <pspence@careersourcedm.com>; Sandra Crawford <scrawford@careersourcedm.com>; Sandra Moseley <smoseley@careersourcedm.com>; Scott Osteen <sosteen@careersourcedm.com>; Shanell Shaw <sshaw@careersourcedm.com>; Shannon Mills <smills@careersourcedm.com>; Sharon Young <syong@careersourcedm.com>; Shiann Adams <sadams@careersourcedm.com>; Star Lahu <slahu@careersourcedm.com>; Steven Litzinger <slitzinger@careersourcedm.com>; Syra Cardona <scardona@careersourcedm.com>; Talia Kong-quee <tkong-quee@careersourcedm.com>; Tia Thompson <tthompson@careersourcedm.com>; Valerie Hancock <vhancock@careersourcedm.com>; Victoria Wilson-Reich <vorrreich@careersourcedm.com>; Wendy Ross <wross@careersourcedm.com>; Yolanda Ocasio <yocasio@careersourcedm.com>

Cc: Dale French <dfrench@careersourcedm.com>; Cory Weaver <cweaver@careersourcedm.com>; Larry Trowbridge <ltrowbridge@careersourcedm.com>; Cathy Galica <cgatica@careersourcedm.com>; Heaven Colon <hcolon@careersourcedm.com>

Subject: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022

Importance: High

DEO has monitored our programs and processes and issued a preliminary report.


Find attached that report. I am asking that you review the report in it's entirety including programs you do not currently work in. As we move to implement Agile staffing I think its important all staff are aware of what we missed or did wrong in all areas.

I have also recorded a 36 minute review of the applicable Findings, Other Non-Compliance Issues and Observations. **Please watch this training in its entirety** and then take the Quiz provided to show mastery of the material. There are 20 questions related to the monitoring outcomes. You must pass this quiz with an 85% pass rate. You can miss 3 questions and pass. If you fail – you simply retake it until you pass. You should view the online training and then pass the quiz no later than Friday May 20th 2022.

Once you have read the report, viewed the online presentation and passed the quiz – **COPY AND PASTE THE FOLLOWING INTO AN EMAIL AND SEND TO ME.**

"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of XX%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO recommendations noted in the report and/or training."

1. Download the report by clicking on the attached document above. Read it in full.
2. [Click Here](#) to view the Online Training Presentation (Click the Play button after the window fully opens). Watch it in it's entirety.
3. [Click Here](#) to take the Mandatory Quiz. Pass with a score of 85%+.
4. Copy the RED TEXT above – enter your quiz score and forward to Steven Litzinger by COB 5/20/2022.




DO YOUR BEST

Let's work hard to be our best in 2022 and 2023!

Enjoy – see me with questions.

Steven Litzinger
Director of Continuous Improvement
CareerSource Citrus Levy Marion
3003 SW College Road, Suite 205
Ocala, FL 34474
Phone: 352-732-1700, ext. 1260
Fax: 352-873-7910
slitzinger@careersourcedm.com



- See an excerpt of the email responses below acknowledging review of the email and the Preliminary Review Summary. The responses in-toto are available upon request.

	From	Subject	Size	Categories	Received	Month
	Noreen Salatin	Monitoring Report	82 KB		Fri 5/27/2022 10:28 AM	
		"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO re...				
	Angelica Venerio	RE: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022	589 KB		Fri 5/20/2022 9:24 AM	
		Good morning Steven, Here is my completion of the Monitoring quiz. Thank you, Angelica Venerio Business Development Coordinator CareerSource Citrus Levy Marion 2703 NE 14th St. Ocala, FL 34470				
	Heather Gamble	FW: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022	747 KB		Thu 5/19/2022 2:03 PM	
		I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 95%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...				
	Shannon Mills	Outcome of the DEO QA Monitoring Quiz	183 KB		Thu 5/19/2022 12:39 PM	
		"I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of XX%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...				
	Janet Clymer	FW: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022	752 KB		Thu 5/19/2022 9:46 AM	
		I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...				
	Brenda Belvis	Region 10 monitoring report	85 KB		Wed 5/18/2022 4:34 PM	
		Good Afternoon Mr. Steven: "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 95%. I will see my Supervisor or Steven Litzinger with any questions. I will impli...				
	Yolanda Ocasio	Monitoring Quiz	314 KB		Wed 5/18/2022 11:08 AM	
		"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...				
	Talia Kong-quee	Mandatory Training Results	116 KB		Tue 5/17/2022 11:23 AM	
		"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...				
	Andrea Abrams	Quiz completed	79 KB		Fri 5/13/2022 3:30 PM	
		I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO recom...				
	Elizabeth Rodriguez	Quiz - Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022	87 KB		Fri 5/13/2022 1:35 PM	
		Hello Steven, "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any be...				
	Brian Conard	RE: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022	542 KB		Fri 5/13/2022 10:47 AM	
		"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of XX%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO rec...				
	Patricia Harney	Mandatory Quiz	81 KB		Thu 5/12/2022 2:40 PM	
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	Don Lettgeb	Monitoring quiz	82 KB		Thu 5/12/2022 2:32 PM	
		"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of XX%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO rec...				
	Kimberly Grey	RE: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022	432 KB		Thu 5/12/2022 11:57 AM	
		Good Afternoon Steven, "I have read the Region 10 report and viewed the online presentation entirely and passed the quiz with a 90% as indicated below. I will discuss with you if I have any questions and ensure that I implement any best practices and/o...				
	Dalina Negron	DEO QA Monitoring Quiz	273 KB		Wed 5/11/2022 4:32 PM	
		"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 85%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...				
	Ardwenia (Bonnie) Johnson	DEO QA Monitoring Quiz	79 KB		Wed 5/11/2022 3:20 PM	
		"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 85%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...				

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- The quiz can be found at: <https://www.flexiquiz.com/SC/N/monquiz2022>
- See an excerpt of the quiz scores below. The scores in-toto are available upon request.

First name ▾	Last name	Email	Date submitted	Score	Grade
Amanda	Bond	abond@careersourcedm.com	10-May-2022 9:15 AM	85 / 100 (85%)	Pass
Andrea	Abrams	AAbrams@talentcenter.org	13-May-2022 3:27 PM	90 / 100 (90%)	Pass
Angelica	Venerio	avenerio@careersourcedm.com	10-May-2022 10:07 AM	90 / 100 (90%)	Pass
Ardweina (Bonnie)	Johnson	bjohnson@careersourcedm.com	11-May-2022 3:18 PM	90 / 100 (90%)	Pass
Brenda	Belvis	bbelvis@careersourcedm.com	18-May-2022 4:28 PM	95 / 100 (95%)	Pass
Brian	Conard	boonard@careersourcedm.com	13-May-2022 10:44 AM	90 / 100 (90%)	Pass
Carol	Davidyock	cdavidyock@careersourcedm.com	10-May-2022 1:53 PM	90 / 100 (90%)	Pass
Cathy	Galica	cgalica@careersourcedm.com	10-May-2022 4:29 PM	100 / 100 (100%)	Pass
Christine	Mestrovich	cmestrovich@careersourcedm.com	10-May-2022 10:32 AM	95 / 100 (95%)	Pass
Christopher	Wilkinson	cwilkinson@talentcenter.org	11-May-2022 1:21 PM	85 / 100 (85%)	Pass
Cindy	Ginner	cginner@careersourcedm.com	12-May-2022 10:22 AM	85 / 100 (85%)	Pass
Crystal	Poplin	cpoplin@careersourcedm.com	13-May-2022 10:57 AM	95 / 100 (95%)	Pass
Dale	French	dfrench@careersourcedm.com	10-May-2022 10:35 AM	100 / 100 (100%)	Pass
Dallina	Negron	dnegron@careersourcedm.com	11-May-2022 4:17 PM	85 / 100 (85%)	Pass

Case Corrections

- Inactive Job Order is closed and off-line. Staff did confirm the position paid minimum wage – no other action taken.

ONI Number WP 10.22.04

Employability Development Plans (EDPs)

Applicable reference(s): 20 CFR 651.10; F.S. 443.091 and 443.1317(1)(b); UI Handbook-NO. 401-ETA 9048; DEO Administrative Policy 068; and Employ Florida Service Code Guide.

Of the five EDPs reviewed, one (20.0 percent) was missing specific action steps for the participant to reach their long-range occupational goals.

Required Action: In addition to the general required CAP actions, the LWDB must provide an assurance that staff have or will review all future EDP codes recorded in Employ Florida for WP job seekers to ensure case notes have been recorded identifying all required elements of the service(s) provided. Documentation must be provided of attempts to contact and develop clear and specific action steps the participant should take to accomplish their goals if the application is still open or the job seeker is still active in Employ Florida. Because this is a repeat issue, the LWDB must reevaluate the cause of continuing problems and provide a plan or process for preventing a recurrence of this issue in the future.

✓ **CareerSource CLM Response**

Region 10 concurs with **ONI Number WP 10.22.04**

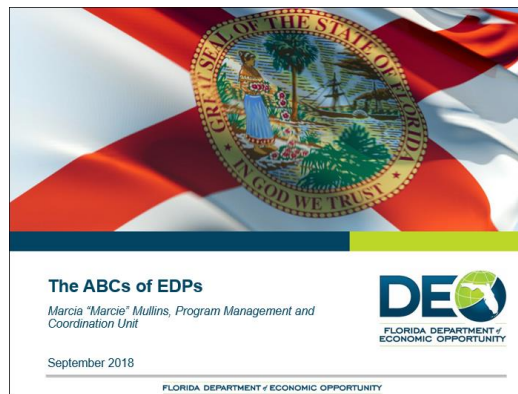
Corrective Action Steps for WP ONI 10.22.04

- **Explanation/Reason for Noncompliance:** Four of five RESEA EDP's reviewed by DEO met monitoring standards. This demonstrates Region 10 has the skills and knowledge in house to help RESEA participants create effective plans. On this singular case the RESEA Career Coach did enter action steps, but we agree that the steps did not fully support the achievement of the established long-term goal. It appears the staff member was confused and uncertain about the correctness of the job title and therefore struggled in establishing requisite steps for this specific long-range occupation (Spray Tech Management /Supervisor). The staff member was somewhat unfamiliar with the occupation and did not seek out help from colleagues or management in finalizing the plan.

Plan of Action

Efforts Taken to Prevent Future Occurrences: Region 10 has reviewed its approach to RESEA plan creation. We concluded that generally staff are able and skilled at plan creation. We simply needed to reinforce some basics. Therefore, we have implemented and reinforced a more robust monitoring and training process as outlined below to ensure that no single future EDP is left incomplete. Additionally, we have made sure that our RESEA staff are aware they can seek support and help during plan creation – in the moment - if they find they are struggling in helping the participant create a useful plan.

In addition to the training and monitoring outlined further below, Region 10 obtained an EDP training packet put together by Marcie Mullins (formerly of DEO) and we now use that packet with any new hires.



This PowerPoint is available for review upon request

Monitoring

- Staff self-monitoring on these and other issues was implemented during the pandemic and continues at present. A full list of self-monitored cases for PY 22-23 is available upon request.
- Last year we also added an additional peer-to-peer monitoring requirement.

- Each Wagner Peyser related staff member who makes entries into Employ Florida is required to read two (2) of their own cases and one (1) of a colleague's cases each month.
- This totals 36 cases (3 cases x 12 months) a year per staff member.
 - Identified errors are reported to supervisors and are then corrected.
 - A tracked correct monitoring score of 85%+ for each staff member is required and is determined by a self-scoring monitoring instrument (excel worksheet) created in the region.
- Additionally, Our Director of Continuous Improvement will conduct a comprehensive supervisory monitoring on this specific issue (RESEA EDP Creation) during January/February 2023.
- Region (Area) 10 continues to contract with ***Underwood and Sloan*** (<https://underwoodsloan.com/about>) who acts as an independent and external monitor on all its WIOA programs. A review of this specific issue (among others) will be part of a wider Wagner Peyser monitoring process which will be conducted as follows:

Underwood and Sloan Monitoring Schedule for PY 2022 to 2023

- During the timeframe 12/19/22 to 1/13/23 – A participant case file review will be conducted.
- During 1/16/23 to 1/27/23 – A Preliminary Programmatic Monitoring Report will be drafted and submitted for CSCLM review.
- During 1/30/23 to 2/21/23 – A presentation of preliminary findings and report to CSCLM, discussion, and revisions if needed will be conducted.
- This calendar of activities will conclude the file review process for PY 2022 to 2023.

Training

- All RESEA staff members were retrained/refreshed on this issue (and others) via a Zoom session.
- This training session was conducted online between May 09, 2022 and May 20, 2022. [Click Here](#) to view the 36-minute-long online training. It directly addresses the EDP issue outlined.



This PowerPoint is available for review upon request

Written Communication to Staff

- On May 09, 2022, all staff were notified in writing via email (see below) of this and other findings and non-compliance issues.
- They were provided with the Preliminary Review Summary issued by DEO and were required to review it in detail and reply back that they fully understood the issues cited and how to avoid them in the future.

From: Steven Litzinger
Sent: Monday, May 9, 2022 3:54 PM
To: Amanda Bond <abond@careersourcecdm.com>; Andrea Abrams <aabrams@talentcenter.org>; Angelica Venerio <avenerio@careersourcecdm.com>; Angelle Patton-Allen <apallon@careersourcecdm.com>; Ardwenia (Bonnie) Johnson <bjohnson@careersourcecdm.com>; Brenda Belvis <bbelvis@careersourcecdm.com>; Brian Conard <bconard@careersourcecdm.com>; Brittney Fish <bfish@careersourcecdm.com>; Carlene 'Loy' Peddie-Williams <cwilliams@careersourcecdm.com>; Carmen A. Rivera <crivera@careersourcecdm.com>; Carol Davidyock <cdavidyock@careersourcecdm.com>; Chris Wilkinson <cwillkinson@talentcenter.org>; Christine Mestrovich <cmestrovich@careersourcecdm.com>; Cindy Ginner <cginner@careersourcecdm.com>; Ora Schiethler <cschiethler@careersourcecdm.com>; Crystal Poplin <cpoplin@careersourcecdm.com>; Dallina Negron <dnegron@careersourcecdm.com>; Danielle Veenstra <dveenstra@careersourcecdm.com>; Deana Tunlin <dtunlin@careersourcecdm.com>; Deborah Letterman <dletterman@careersourcecdm.com>; Don Lettgeb <dlettgeb@careersourcecdm.com>; Dwain Henderson <dhenderson@careersourcecdm.com>; Earl Beegle <ebeegle@careersourcecdm.com>; Edward Deskowic <edeskowic@careersourcecdm.com>; Elizabeth Rodriguez <erodriguez@careersourcecdm.com>; Heather Gamble <hgamble@careersourcecdm.com>; Heaven Colon <hcolon@careersourcecdm.com>; Henry Ayala <hayala@careersourcecdm.com>; Ida Cordero-Pagan <icordero@careersourcecdm.com>; Iris Pozo <ipozo@careersourcecdm.com>; Ivette Escobar-Givens <igivens@careersourcecdm.com>; Janet Clymer <jclymer@careersourcecdm.com>; Jerry Flanders <jflanders@careersourcecdm.com>; John Stepaniak <jstepaniak@careersourcecdm.com>; Kathleen Harrington <kharrington@careersourcecdm.com>; Kathleen Betz <kbetz@careersourcecdm.com>; Keshira Smith <ksmith@careersourcecdm.com>; Kevin Harrison <kharrison@careersourcecdm.com>; Lauren Marcucci <lmarcucci@careersourcecdm.com>; Luis Perez <lperez@careersourcecdm.com>; Matte 'Maria' Marz <mmarz@careersourcecdm.com>; Marcy Roberson <mroberson@careersourcecdm.com>; Maria Combre <mcombre@careersourcecdm.com>; Mary O'Connell <moconnell@careersourcecdm.com>; Mary Terrell <mtterrell@talentcenter.org>; Melissa Saco <msaco@careersourcecdm.com>; Michael Barrington <mbarrington@careersourcecdm.com>; Michele Schulte <mschulte@careersourcecdm.com>; Myrna Serrano <mserrano@careersourcecdm.com>; Noreen Salafino <nsalafino@careersourcecdm.com>; Patricia Harney <pharney@careersourcecdm.com>; Paula Singleton <psingleton@careersourcecdm.com>; Penny Spence <pence@careersourcecdm.com>; Sandra Crawford <scrawford@careersourcecdm.com>; Sandra Moseley <smoseley@careersourcecdm.com>; Scott Osteen <sosteen@careersourcecdm.com>; Shanell Shaw <sshaw@careersourcecdm.com>; Shannon Mills <smills@careersourcecdm.com>; Sharon Young <syong@careersourcecdm.com>; Shyann Adams <sadams@careersourcecdm.com>; Star Lazu <slazu@careersourcecdm.com>; Steven Litzinger <slitzinger@careersourcecdm.com>; Syra Cardona <scardona@careersourcecdm.com>; Talia Kong-que <tkong-que@careersourcecdm.com>; Tia Thompson <tthompson@careersourcecdm.com>; Valerie Hancock <vhancock@careersourcecdm.com>; Victoria Wilson-Reich <vwreich@careersourcecdm.com>; Wendy Ross <wross@careersourcecdm.com>; Yolanda Ocasio <yocasio@careersourcecdm.com>
Cc: Dale French <dfrench@careersourcecdm.com>; Cory Weaver <cweaver@careersourcecdm.com>; Larry Trowbridge <ltrowbridge@careersourcecdm.com>; Cathy Galica <cgatica@careersourcecdm.com>; Heaven Colon <hcolon@careersourcecdm.com>
Subject: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022
Importance: High

DEO has monitored our programs and processes and issued a preliminary report.

Find attached that report. I am asking that you review the report in its entirety including programs you do not currently work in. As we move to implement Agile staffing I think its important all staff are aware of what we missed or did wrong in all areas.

I have also recorded a 36 minute review of the applicable Findings, Other Non-Compliance Issues and Observations. **Please watch this training in its entirety** and then take the Quiz provided to show mastery of the material. There are 20 questions related to the monitoring outcomes. You must pass this quiz with an 85% pass rate. You can miss 3 questions and pass. If you fail – you simply retake it until you pass. You should view the online training and then pass the quiz no later than Friday May 20th 2022.

Once you have read the report, viewed the online presentation and passed the quiz – **COPY AND PASTE THE FOLLOWING INTO AN EMAIL AND SEND TO ME**

"I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of XX%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO recommendations noted in the report and/or training."

1. Download the report by clicking on the attached document above. Read it in full.
2. [Click Here](#) to view the Online Training Presentation (Click the Play button after the window fully opens). Watch it in its entirety.
3. [Click Here](#) to take the Mandatory Quiz. Pass with a score of 85%+.
4. Copy the RED TEXT above – enter your quiz score and forward to Steven Litzinger by COB 5/20/2022.

DO YOUR BEST

Let's work hard to be our best in 2022 and 2023!

Enjoy – see me with questions.

Steven Litzinger
Director of Continuous Improvement
CareerSource Citrus Levy Marion
3003 SW College Road, Suite 205
Ocala, FL 34474
Phone: 352-732-1700, ext. 1260
Fax: 352-873-7910
slitzinger@careersourcecdm.com

- See an excerpt of the email responses below acknowledging review of the email and the Preliminary Review Summary. The responses in-toto are available upon request.

#	From	Subject	Size	Categories	Received	Menu
	Noreen Salatin	Monitoring Report "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO re...	82 KB		Fri 5/27/2022 10:28 AM	
	Angelica Venerio	RE: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022 Good morning Steven, Here is my completion of the Monitoring quiz. Thank you, Angelica Venerio Business Development Coordinator Careersource Citrus Levy Marion 2703 NE 14th St. Ocala, FL 34470	589 KB		Fri 5/20/2022 9:24 AM	
	Heather Gamble	FW: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022 I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 95%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...	747 KB		Thu 5/19/2022 2:03 PM	
	Shannon Mills	Outcome of the DEO QA Monitoring Quiz "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...	183 KB		Thu 5/19/2022 12:39 PM	
	Janet Oymer	FW: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022 I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...	752 KB		Thu 5/19/2022 9:46 AM	
	Brenda Belvis	Region 10 monitoring report Good Afternoon Mr. Steven: "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 95%. I will see my Supervisor or Steven Litzinger with any questions. I will impli...	85 KB		Wed 5/18/2022 4:34 PM	
	Yolanda Ocasio	Monitoring Quiz "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...	314 KB		Wed 5/18/2022 11:08 AM	
	Talia Kong-quest	Mandatory Training Results "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO re...	116 KB		Tue 5/17/2022 11:23 AM	
	Andrea Abrams	Quiz completed "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO recom...	79 KB		Fri 5/13/2022 3:30 PM	
	Elizabeth Rodriguez	Quiz - Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022 Hello Steven, "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any be...	87 KB		Fri 5/13/2022 1:35 PM	
	Brian Conard	RE: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022 "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...	542 KB		Fri 5/13/2022 10:47 AM	
	Patricia Harney	Mandatory Quiz "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...	81 KB		Thu 5/12/2022 2:40 PM	
	Don Lettgeb	Monitoring quiz "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...	82 KB		Thu 5/12/2022 2:32 PM	
	Kimberly Grey	RE: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022 "I have read the Region 10 report and viewed the online presentation entirely and passed the quiz with a 90% as indicated below. I will discuss with you if I have any questions and ensure that I implement any best practices and/o...	432 KB		Thu 5/12/2022 11:57 AM	
	Dallina Negron	DEO QA Monitoring Quiz "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 85%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...	273 KB		Wed 5/11/2022 4:32 PM	
	Ardvenia (Bonnie) Johns...	DEO QA Monitoring Quiz "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 85%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco...	79 KB		Wed 5/11/2022 3:20 PM	

Quiz Administration and Results

- All staff were also assigned to take a post training online quiz to demonstrate they had mastered what mistakes were made and how to avoid the mistakes in the future.
- The quiz was “open book” and allowed retakes until staff passed with a minimum acceptable score of 85% correct
- The quiz can be found at: <https://www.flexiquiz.com/SC/N/monquiz2022>
- See an excerpt of the quiz scores below. The scores in-toto are available upon request.

Individual Summary - DEO QA Monitoring Quiz - What Did We Do Wrong? May 2022					
First name ▼	Last name	Email	Date submitted	Score	Grade
Amanda	Bond	abond@careersourcedm.com	10-May-2022 9:15 AM	85 / 100 (85%)	Pass
Andrea	Abrams	AAbrams@talentcenter.org	13-May-2022 3:27 PM	90 / 100 (90%)	Pass
Angelica	Venerio	avenerio@careersourcedm.com	10-May-2022 10:07 AM	90 / 100 (90%)	Pass
Ardweina (Bonnie)	Johnson	bjohnson@careersourcedm.com	11-May-2022 3:18 PM	90 / 100 (90%)	Pass
Brenda	Belvis	bbelvis@careersourcedm.com	18-May-2022 4:28 PM	95 / 100 (95%)	Pass
Brian	Conard	boonard@careersourcedm.com	13-May-2022 10:44 AM	90 / 100 (90%)	Pass
Carol	Davidyock	cdavidyock@careersourcedm.com	10-May-2022 1:53 PM	90 / 100 (90%)	Pass
Cathy	Galica	cgalica@careersourcedm.com	10-May-2022 4:29 PM	100 / 100 (100%)	Pass
Christine	Mestrovich	cmestrovich@careersourcedm.com	10-May-2022 10:32 AM	95 / 100 (95%)	Pass
Christopher	Wilkinson	cwilkinson@talentcenter.org	11-May-2022 1:21 PM	85 / 100 (85%)	Pass
Cindy	Ginner	cginner@careersourcedm.com	12-May-2022 10:22 AM	85 / 100 (85%)	Pass
Crystal	Poplin	cpoplin@careersourcedm.com	13-May-2022 10:57 AM	95 / 100 (95%)	Pass
Dale	French	dfrench@careersourcedm.com	10-May-2022 10:35 AM	100 / 100 (100%)	Pass
Dallina	Negron	dnegron@careersourcedm.com	11-May-2022 4:17 PM	85 / 100 (85%)	Pass

Case Corrections

- Case is closed - no other action taken.

ONI Number WP 10.22.05

Staff Continuing Education Units (CEU)

Applicable reference(s): DEO Administrative Policy 092.

- The LWDB did not provide documentation to verify that all front-line staff completed the required 15 CEU hours within the year subsequent to the anniversary date of their completion of the Tier 1 certification.

Required Action:

In addition to the general required CAP actions, an assurance must be provided that all staff CEU requirements have been or will be met including a timeline for accomplishing this. Additionally, documentation must be maintained to support that all front-line staff complete their required 15 CEU hours within the year subsequent to the anniversary date of their completion of the Tier 1 certification. Because this is a repeat issue, the LWDB must reevaluate the cause of continuing problems and improve upon its course of action from 2021-22 Quality Assurance Report, CareerSource Citrus Levy Marion – LWDB 10 Page 16 of 20 the previous year to resolve this issue. A plan of action must also be submitted with the CAP for preventing a recurrence of this issue in the future.

CareerSource CLM Response

Plan of Action

CEU hour tracking was updated in August of 2021 following an ONI for using staff anniversary dates rather than Tier One Anniversary dates in the prior year's monitoring (PY2020). Following the previous year's monitoring in PY2020, a question was emailed to the monitors asking for confirmation of the new methodology. Due to a delayed response confirming the move to Tier One Anniversary Date from Anniversary Date, there were some staff whose anniversary would have fallen within the lag time of beginning the PY2021 monitoring period (April 2021) and implementation of the new methodology in August of 2021. The methodology that was implemented complies with the Tier One Anniversary date and will continue to be used going forward.

Unfortunately, due to timing of monitoring there were still some staff that were affected in the new program year. Going forward all staff should be caught up to date in the new methodology. In the new CEU tracking system, the employee, supervisor and staff are tasked with CEU tracking and can all access and upload/update information as needed throughout the year. The system runs from the staff person's Tier One Anniversary Date as instructed by the monitors.

Monitoring

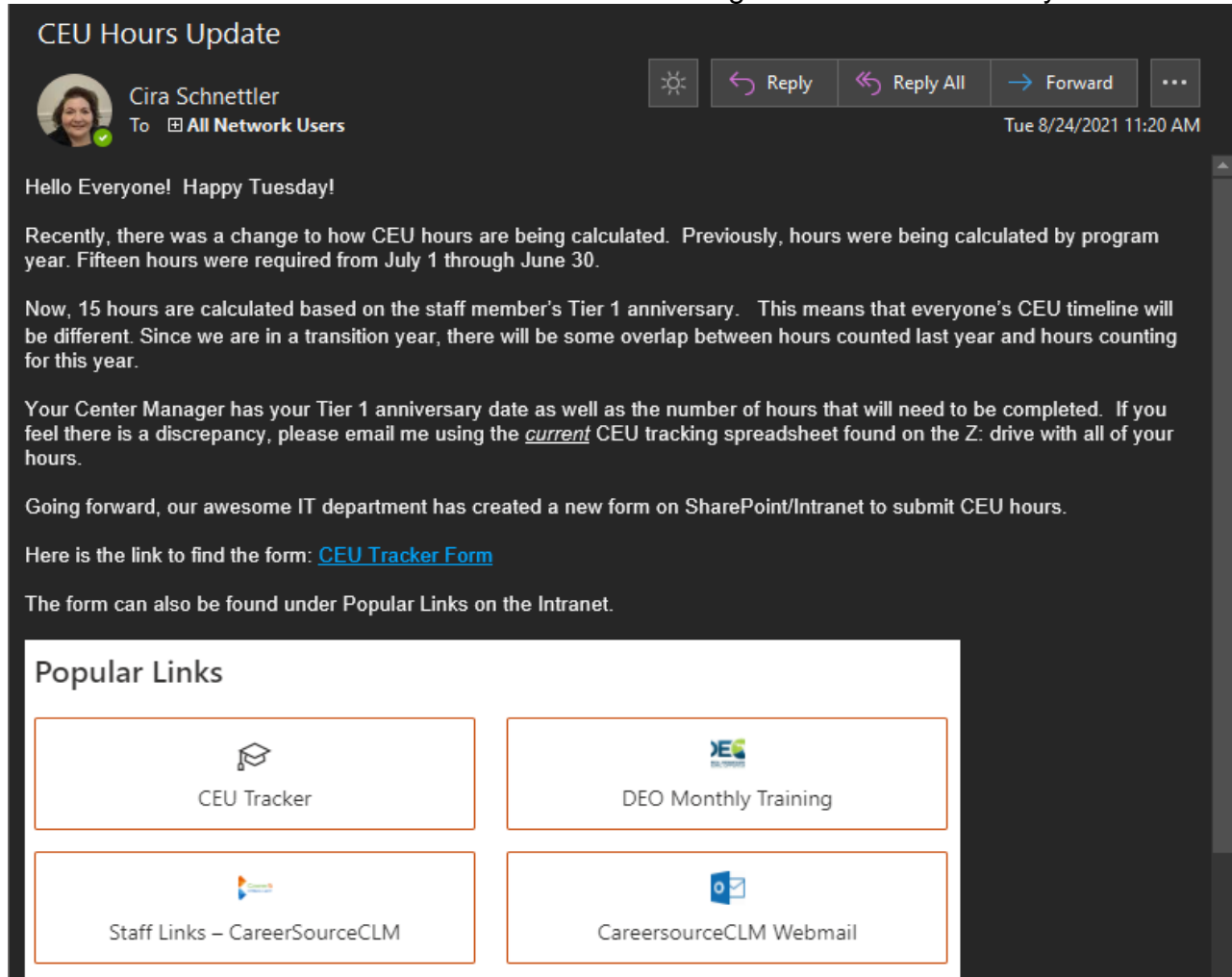
In addition to now being able to pull more accurate reports from our new system which will assist with ongoing monitoring, we will also have our third-party monitor, Underwood and Sloane, monitor CEU completion hours as part of Credentialing monitoring. This will be completed once per year according to our contract.

Training

Staff were provided written instruction via email on the new CEU system and can also contact our IT team via helpdesk ticket should they have any issues recording in the new system. This was also covered at our All Staff meeting in August 2021.

Written Communication to Staff

Below is the e-mail sent to staff on 8/24/2021 detailing how to use the new system:



Complaint System

Finding Number CS 10.22.08

Employment Service Complaint System

Applicable reference(s): 20 CFR 658.400

All career centers must maintain an Employment Service (ES) and Employment-related Law Complaint System.

The ES complaint logs were missing required information such as type of complaint and referral to other agencies. Additionally, a complaint log was submitted late to the State Monitor Advocate (SMA) for reporting purposes.

Required Action: In addition to the general required CAP actions, the LWDB must submit a plan of action with the CAP outlining specific efforts taken to prevent future occurrences. Documentation of written communication to staff informing them of these requirements along with a signed statement acknowledging they have been made aware must also be submitted.

Plan of Action

This was an older log that was attached by mistake but was included in the sample anyway. Staff were reminded of complaint procedures following the preliminary monitoring report in May 2022. The Human Resources Manager will also meet with the center managers in person in January 2023 to review Complaint processing system again and clarify and questions about completing the logs and forms.

Monitoring

Center complain files will be reviewed each quarter with the center managers for accurate completion to ensure compliance.

Training

Staff were asked to review a presentation covering all monitoring deficiencies, which went over all results. All staff were asked to view the presentation, regardless of program of specialty. Once viewing the presentation, they were asked to confirm they had watched by sending an email to our Director of Continuous Improvement. Presentation linked here:

[Video Link](#)

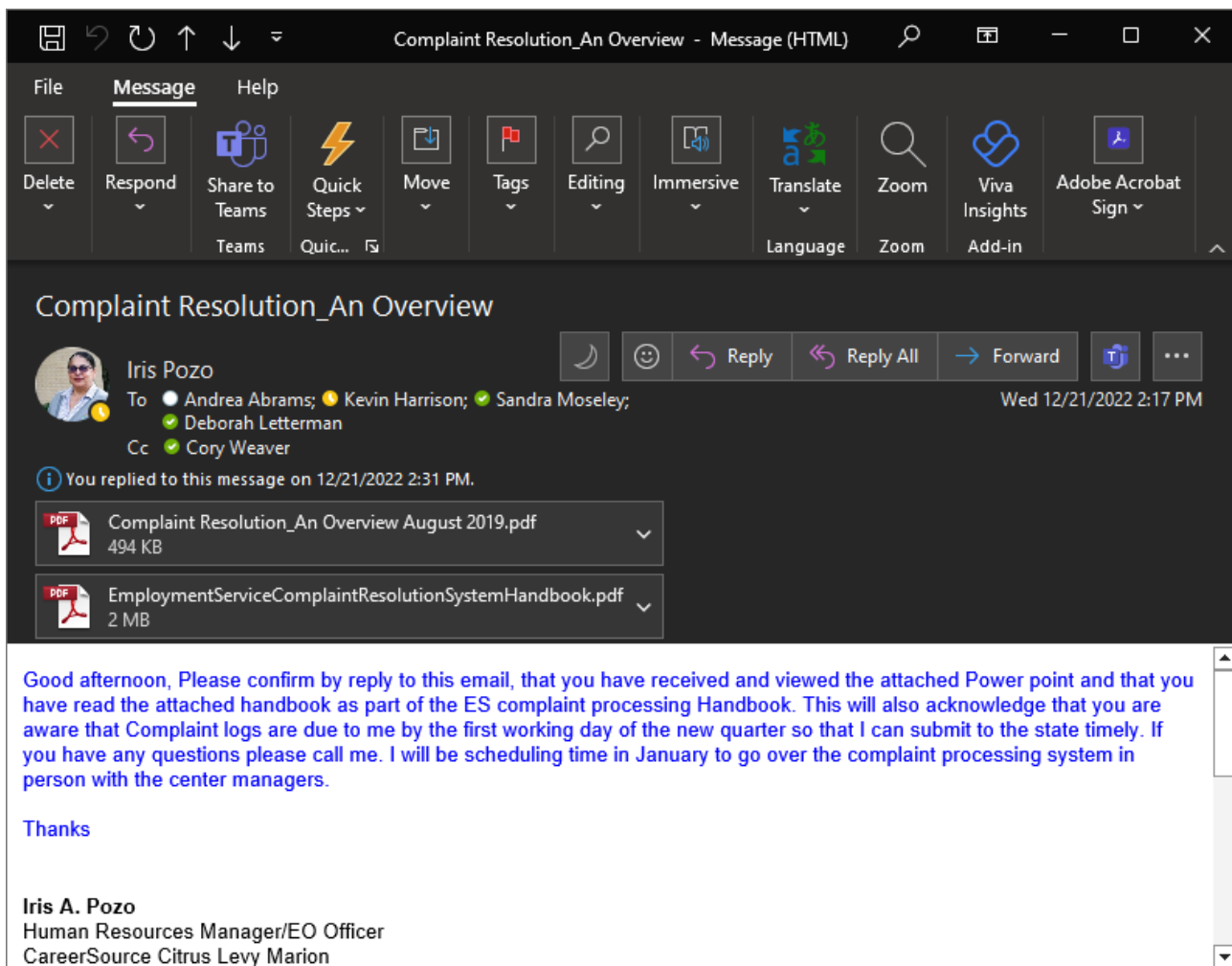
Staff were then asked to review all Programmatic Monitoring findings and take a quiz in May 2022 to demonstrate mastery of the deficient areas found in the monitoring (Please refer to Attachment 1 – DEO Monitoring Quiz - 2021).

As a follow up, the HR Manager provided center managers with the ES Complaint guide and PowerPoint training electronically, and will meet with the center managers in person to review complaint processing once per year and review any complaint files with center managers as received and prior to submitting to state quarterly.

Written Communication to Staff

The results of DEO's monitoring were shared with staff May 9th, 2022. The email was sent to staff by the Director of Continuous Improvement. Please refer to the screenshot of this email on Page 4.

A follow-up email was sent to the Center Managers by the HR Manager on 12/21/2022:



Each Center Manager was asked to sign a form acknowledging receipt of the proper procedures. Please refer to Attachment 4 – Signed Complaint System Procedures Receipt.

JVSG Corrective Action Plan

Finding Number JVSG 10.22.09

Priority of Service Code

Applicable reference(s): 20 CFR 1010; DEO Administrative Policy 102 and 111; and Employ Florida Service Code Guide.

Of the 13 veteran case files reviewed, three (23.1 percent) did not have Priority of Service code (089 automated or 189 manual) recorded in Employ Florida when participation began.

Required Action: In addition to the general required CAP actions, the LWDB must provide documentation that staff have made or initiated contact to verify veteran status and to ensure POS was provided if the case is still active. The LWDB must also ensure that the 189-service code along with a proper case note is recorded on the Wagner-Peyser

application if no automated 089 code is present. The LWDB must also record the appropriate service code and case notes in Employ Florida to document this action. A plan to prevent a recurrence of this issue in the future must also be provided with the CAP.

✓ **CareerSource CLM Response**

Region 10 concurs with Finding Number JVSG 10.22.09

Corrective Action Steps for JVSG Finding 10.22.09

• **Explanation/Reason for Noncompliance:**

- This issue presented based on the fact that multiple staff members did not CONSISTENTLY follow state and local guidelines which require the entry of code 189 into Employ Florida (EF) following notification of eligibility for Priority of Service (POS). They were fully trained on the 189 documentation requirements but failed to follow a process that ensured service entry.

Plan of Action

Efforts Taken to Prevent Future Occurrences: Region 10 has reviewed its approach to documenting POS. All appropriate staff have been retrained to ensure that they are initiating/confirming the entry of the priority of service code. In addition to the training and monitoring outlined further below, Region 10 obtained a POS training packet put together by the State Veterans Program Office and we now use that packet with any new hires.

A more robust monitoring and training process is outlined below to ensure that POS documentation requirements are adhered to.

Monitoring

- ✓ We have initiated a monthly review of all veterans served to identify any cases missing the required service and case note.
- ✓ Staff self-monitoring on these and other issues was implemented during the pandemic and continues at present. A full list of self-monitored cases for PY 22-23 is available upon request.
- ✓ Last year we also added an additional peer-to-peer monitoring requirement.
- ✓ Each Wagner Peyser related staff member who makes entries into Employ Florida is required to read two (2) of their own cases and one (1) of a colleague's cases each month.
- ✓ This totals 36 cases (3 cases x 12 months) a year per staff member.
 - Identified errors are reported to supervisors and are then corrected.

- A tracked correct monitoring score of 85%+ for each staff member is required and is determined by a self-scoring monitoring instrument (excel worksheet) created in the region.
- Additionally, Our Veterans Program Manager will conduct a comprehensive supervisory monitoring on this specific issue (POS Documentation) during January/February 2023.
- Region (Area) 10 continues to contract with Underwood and Sloan (<https://underwoodsloan.com/about>) who acts as an independent and external monitor on all its WIOA programs. A review of this specific issue (among others) will be part of a wider Wagner Peyser monitoring process which will be conducted as follows:

Underwood and Sloan Monitoring Schedule for PY 2022 to 2023

- During the timeframe 12/19/22 to 1/13/23 – A participant case file review will be conducted.
- During 1/16/23 to 1/27/23 – A Preliminary Programmatic Monitoring Report will be drafted and submitted for CSCLM review.
- During 1/30/23 to 2/21/23 – A presentation of preliminary findings and report to CSCLM, discussion, and revisions if needed will be conducted.
- This calendar of activities will conclude the file review process for PY 2022 to 2023.

Training

- Staff members were retrained/refreshed on this issue (and others) over the course of two (2) training sessions.
- The first training session was conducted online between May 09, 2022 and May 20, 2022. [Click Here](#) to view the 36-minute-long online training. It directly addresses the POS issue outlined.



This PowerPoint is available for review upon request

- The second training session was conducted by our LVER and focused only on JVSG and Welcome Desk (Front Desk) staff members. It was conducted over the course of two (2) training sessions via Zoom on May 26 and May 27, 2022. The

actual training PowerPoint is available upon request. Content of that training can be found below.



This PowerPoint is available for review upon request

Training Agenda Topics Related to this Finding

- How to conduct a POS.
- What code to use when conducting a POS
- Reiterated the importance of entering the Activity Code and case note.
- POS Eligibility Flier was given to all staff members
- Veteran Services Flowchart was discussed to ensure that POS was conducted at the most appropriate time.
- Staff members who missed or joined CSCLM after these meetings were given one-on-one training by the LVER.

Written Communication to Staff

- On May 09, 2022, all staff were notified in writing via email (see below) of this and other findings and non-compliance issues.
- They were provided with the Preliminary Review Summary issued by DEO and were required to review it in detail and reply back that they fully understood the issues cited and how to avoid them in the future.

From: Steven Litzinger
Sent: Monday, May 9, 2022 3:54 PM
To: Amanda Bond <abond@talentcenter.org>; Andrea Abrams <aabrams@talentcenter.org>; Angelica Venerio <avenerio@careersourcedm.com>; Angelle Patton-Allen <apatton-allen@careersourcedm.com>; Ardwenia (Bonnie) Johnson <bjohnson@careersourcedm.com>; Brenda Belvis <bbelvis@careersourcedm.com>; Brian Conard <bconard@careersourcedm.com>; Brittney Fish <bfish@careersourcedm.com>; Carlene 'Loy' Peddie-Williams <cwilliams@careersourcedm.com>; Carmen A. Rivera <crivera@careersourcedm.com>; Carol Davidyock <cdavidyock@careersourcedm.com>; Chris Wilkinson <cwillkinson@talentcenter.org>; Christine Mestrovich <cmestrovich@careersourcedm.com>; Cindy Ginner <cginner@careersourcedm.com>; Cira Schnettler <cschnettler@careersourcedm.com>; Crystal Poplin <cpoplin@careersourcedm.com>; Dalina Nigron <dnigron@careersourcedm.com>; Danielle Veenstra <dveenstra@careersourcedm.com>; Deana Tumlin <dtumlin@careersourcedm.com>; Deborah Letterman <dletterman@careersourcedm.com>; Don Leitgeb <dleitgeb@careersourcedm.com>; Duain Henderson <dhenderson@careersourcedm.com>; Earl Beegle <ebeegle@careersourcedm.com>; Edward Deskovic <edeskovic@careersourcedm.com>; Elizabeth Rodriguez <erodriguez@careersourcedm.com>; Heather Gamble <hgamble@careersourcedm.com>; Heaven Colon <hcolon@careersourcedm.com>; Henry Ayala <hayala@careersourcedm.com>; Ida Cordero-Pagan <ispagan@careersourcedm.com>; Iris Ross <iriss@careersourcedm.com>; Jette Escobar-Givens <jgivens@careersourcedm.com>; Janet Clymer <jclymer@careersourcedm.com>; Jerry Flinders <jflinders@careersourcedm.com>; John Stepaniak <jstepaniak@careersourcedm.com>; Kathleen Harrington <kharrington@careersourcedm.com>; Kathleen Betz <kbetz@careersourcedm.com>; Keshira Smith <ksmith@careersourcedm.com>; Kevin Harrison <kharrison@careersourcedm.com>; Lauren Marucci <lmarucci@careersourcedm.com>; Luis Perez <lperez@careersourcedm.com>; Maite 'Maria' Marz <mmarz@careersourcedm.com>; Marcy Roberson <mroberson@careersourcedm.com>; Maria Coimbra <mcoimbra@careersourcedm.com>; Mary O'Connell <moconnell@careersourcedm.com>; Mary Terrell <mtterrell@talentcenter.org>; Melissa Saco <msaco@careersourcedm.com>; Michael Barrington <mbarrington@careersourcedm.com>; Michele Schulte <mschulte@careersourcedm.com>; Myrna Serrano <mserrano@careersourcedm.com>; Noreen Salatino <nsalatino@careersourcedm.com>; Patricia Harney <pharney@careersourcedm.com>; Paula Singleton <psingleton@careersourcedm.com>; Penny Spence <pspence@careersourcedm.com>; Sandra Crawford <scrawford@careersourcedm.com>; Sandra Moseley <smoseley@careersourcedm.com>; Scott Osteen <sosteen@careersourcedm.com>; Shanell Shaw <sshaw@careersourcedm.com>; Shannon Mills <smills@careersourcedm.com>; Sharon Young <syoun@careersourcedm.com>; Shyanne Adams <sadams@careersourcedm.com>; Star Laku <slaku@careersourcedm.com>; Steven Litzinger <slitzinger@careersourcedm.com>; Syra Cardona <scardona@careersourcedm.com>; Talla King-Quee <tking-quee@careersourcedm.com>; Tia Thompson <tthompson@careersourcedm.com>; Valerie Hancock <vhancock@careersourcedm.com>; Victoria Wilson-Reich <vwreisch@careersourcedm.com>; Wendy Ross <wross@careersourcedm.com>; Yolanda Ocasio <yocasio@careersourcedm.com>
Cc: Dale French <dfrench@careersourcedm.com>; Cory Weaver <cweaver@careersourcedm.com>; Larry Trowbridge <ltrowbridge@careersourcedm.com>; Cathy Galica <cgatica@careersourcedm.com>; Heaven Colon <hcolon@careersourcedm.com>
Subject: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022
Importance: High

DEO has monitored our programs and processes and issued a preliminary report.

Find attached that report. I am asking that you review the report in its entirety including programs you do not currently work in. As we move to implement Agile staffing I think its important all staff are aware of what we missed or did wrong in all areas.

I have also recorded a 36 minute review of the applicable Findings, Other Non-Compliance Issues and Observations. **Please watch this training in its entirety** and then take the Quiz provided to show mastery of the material. There are 20 questions related to the monitoring outcomes. You must pass this quiz with an 85% pass rate. You can miss 3 questions and pass. If you fail – you simply retake it until you pass. You should view the online training and then pass the quiz no later than Friday May 20th 2022.

Once you have read the report, viewed the online presentation and passed the quiz – **COPY AND PASTE THE FOLLOWING INTO AN EMAIL AND SEND TO ME.**

"I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of XX%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO recommendations noted in the report and/or training."

1. Download the report by clicking on the attached document above. Read it in full.
2. [Click Here](#) to view the Online Training Presentation (Click the Play button after the window fully opens). Watch it in its entirety.
3. [Click Here](#) to take the Mandatory Quiz. Pass with a score of 85%+.
4. Copy the RED TEXT above – enter your quiz score and forward to Steven Litzinger by COB 5/20/2022.



Let's work hard to be our best in 2022 and 2023!

Enjoy – see me with questions.

Steven Litzinger
 Director of Continuous Improvement
 CareerSource Citrus Levy Marion
 3003 SW College Road, Suite 205
 Ocala, FL 34474
 Phone: 352-732-1700, ext. 1260
 Fax: 352-873-7910
slitzinger@careersourceclm.com



- See an excerpt of the email responses below acknowledging review of the email and the Preliminary Review Summary. The responses in-toto are available upon request.

From	Subject	Size	Categories	Received	Menu
Noreen Salatino	Monitoring Report	82 KB		Fri 5/27/2022 10:28 AM	
"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."					
Angela Venerio	RE: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022	589 KB		Fri 5/20/2022 9:24 AM	
Good morning Steven, Here is my completion of the Monitoring quiz. Thank you, Angelica Venerio Business Development Coordinator CareerSource Citrus Levy Marion 2703 NE 14th St. Ocala, FL 34470					
Heather Gamble	FW: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022	747 KB		Thu 5/19/2022 2:03 PM	
I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 95%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."					
Shannon Mills	Outcome of the DEO QA Monitoring Quiz	183 KB		Thu 5/19/2022 12:39 PM	
"I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of XX%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."					
Janet Clymer	FW: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022	752 KB		Thu 5/19/2022 9:46 AM	
I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."					
Brenda Belvis	Region 10 monitoring report	85 KB		Wed 5/18/2022 4:34 PM	
Good Afternoon Mr. Steven: "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 95%. I will see my Supervisor or Steven Litzinger with any questions. I will impl..."					
Yolanda Ocasio	Monitoring Quiz	314 KB		Wed 5/18/2022 11:08 AM	
"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."					
Talia Kong-quee	Mandatory Training Results	116 KB		Tue 5/17/2022 11:23 AM	
"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."					
Andrea Abrams	Quiz completed	79 KB		Fri 5/13/2022 3:30 PM	
I have read the Region 10 monitoring report, viewed the online presentation in its entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO recom..."					
Elizabeth Rodriguez	Quiz - Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022	87 KB		Fri 5/13/2022 1:35 PM	
Hello Steven, "I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 100%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any be..."					
Brian Conard	RE: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022	542 KB		Fri 5/13/2022 10:47 AM	
"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of XX%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."					
Patricia Harney	Mandatory Quiz	81 KB		Thu 5/12/2022 2:40 PM	
"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 90%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."					
Don Leitgeb	Monitoring quiz	82 KB		Thu 5/12/2022 2:32 PM	
"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of XX%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."					
Kimberly Grey	RE: Outcome of the DEO QA Monitoring - 4/01/21 to 3/31/2022	432 KB		Thu 5/12/2022 11:57 AM	
Good Afternoon Steven, I have read the Region 10 report and viewed the online presentation entirely and passed the quiz with a 90% as indicated below. I will discuss with you if I have any questions and ensure that I implement any best practices and/o...					
Dalina Hegron	DEO QA Monitoring Quiz	273 KB		Wed 5/11/2022 4:32 PM	
"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 85%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."					
Ardwenia (Bonnie) Johns...	DEO QA Monitoring Quiz	79 KB		Wed 5/11/2022 3:20 PM	
"I have read the Region 10 monitoring report, viewed the online presentation in it's entirety and passed the quiz with an overall score of 85%. I will see my Supervisor or Steven Litzinger with any questions. I will implement any best practices or DEO reco..."					

Quiz Administration and Results

- All staff were also assigned to take a post training online quiz to demonstrate they had mastered what mistakes were made and how to avoid the mistakes in the future.
- The quiz was “open book” and allowed retakes until staff passed with a minimum acceptable score of 85% correct
- The quiz can be found at: <https://www.flexiquiz.com/SC/N/monquiz2022>

- See an excerpt of the quiz scores below. The scores in-toto are available upon request.

Individual Summary - DEO QA Monitoring Quiz - What Did We Do Wrong? May 2022					
First name ▾	Last name	Email	Date submitted	Score	Grade
Amanda	Bond	abond@careersourcedm.com	10-May-2022 9:15 AM	85 / 100 (85%)	Pass
Andrea	Abrams	AAbrams@talentcenter.org	13-May-2022 3:27 PM	90 / 100 (90%)	Pass
Angelica	Venerio	avenerio@careersourcedm.com	10-May-2022 10:07 AM	90 / 100 (90%)	Pass
Ardweina (Bonnie)	Johnson	bjohnson@careersourcedm.com	11-May-2022 3:18 PM	90 / 100 (90%)	Pass
Brenda	Belvis	bbelvis@careersourcedm.com	18-May-2022 4:28 PM	95 / 100 (95%)	Pass
Brian	Conard	bconard@careersourcedm.com	13-May-2022 10:44 AM	90 / 100 (90%)	Pass
Carol	Davidyock	cdavidyock@careersourcedm.com	10-May-2022 1:53 PM	90 / 100 (90%)	Pass
Cathy	Galica	cgalica@careersourcedm.com	10-May-2022 4:29 PM	100 / 100 (100%)	Pass
Christine	Mestrovich	cmestrovich@careersourcedm.com	10-May-2022 10:32 AM	95 / 100 (95%)	Pass
Christopher	Wilkinson	cwilkinson@talentcenter.org	11-May-2022 1:21 PM	85 / 100 (85%)	Pass
Cindy	Ginner	cginner@careersourcedm.com	12-May-2022 10:22 AM	85 / 100 (85%)	Pass
Crystal	Poplin	cpoplin@careersourcedm.com	13-May-2022 10:57 AM	95 / 100 (95%)	Pass
Dale	French	dfrench@careersourcedm.com	10-May-2022 10:35 AM	100 / 100 (100%)	Pass
Dallina	Negron	dnegron@careersourcedm.com	11-May-2022 4:17 PM	85 / 100 (85%)	Pass

Case Corrections

- Case is closed - no other action taken.

Financial Disclosure

ONI Number FD 10.22.06

Financial Disclosure

Applicable reference(s): F.S. 112.3145 and 445.07; and DEO Final Guidance FG-075.

- The Financial Disclosure Management Review Tool completed by the LWDB indicated that several LWDB board members had not fulfilled the financial disclosure filing requirements for the review period. A review of the Ethics Commission website could not verify whether those board members had filed their financial disclosure statements by July 1 of the current year or by the September 1st grace period filing date. Additionally, a new board member did not file a financial disclosure statement within 30 days of their appointment date. Although the information could not be verified because the website may not capture all filings until the next posting dates, the LWDB is reminded that the names and information of all board members and the Executive Director must be updated annually with the Ethics Commission.

Required Action:

In addition to the general required CAP actions, the LWDB must develop LOPs or a process that reflect a check and balance system to verify the filing of financial disclosure statements by LWDB board members by July 1, or not later than September 1, of each year. A copy of the LOPs or a timeline of when this will be completed must be provided with the CAP.

CareerSource CLM Response

Plan of Action

A draft policy detailing requirements of board members and staff for filing financial disclosures. This policy will go before our Executive committee on March 1, 2023, for review and will be sent to the full board for ratification on March 8, 2023. At that time the finalized policy will be reviewed with all board members and applicable staff.

Monitoring

Ongoing monitoring will be conducted by our third party programmatic and administrative monitoring agency, Underwood Sloan & Associates.

Written Communication to Staff

Staff will be notified of the finalized policy upon approval by full board in March 2023. Please refer to Attachment 2 – Financial Disclosure Policy – Draft.

Observation – Board Member Orientation

Discussion

It was noted in our report that the orientation program provided to our board members was lacking the required training on conflict of interest. However, this was incorrectly cited and the syllabus of the training was provided. Due to receiving a ‘final’ report for this section of monitoring without discussion or the opportunity to provide evidence of the training we felt it important to note. Our board orientation program is provided through Taylor Hall Miller Parker, P.A.. This orientation program is used by many boards throughout Florida and covers overview of the workforce system, reporting, auditing, monitoring, primary indicators of performance, ethics and transparency, Sunshine Law, public records, compensation, board governance, conflict of interest, financial disclosure among other required topics.

Collection of Demographic Data

ONI Number 10.22.07

Collection of Demographic Data

Applicable reference(s): 29 CFR 38.41; DEO Guidelines for Compliance with Section 188 (nondiscrimination) of the Workforce Innovation and Opportunity Act; Grantee – Subgrantee Agreement.

- The management process review tool was used to gather information about the LWDB’s practice of collecting demographic information when applicants first enter

the career centers. Although demographic data is requested of an applicant in the state's management information systems upon registration, LWDB staff indicated they ask customers to provide limited demographic information at the initial point they enter the career centers. The information is collected via their Kiosk system which is an electronic sign-in sheet used for customers who visit the career centers.

- LWDB staff provided a screenshot of their Kiosk sign-in sheet used to collect customer names and demographic information; however, the screenshot did not include a statement informing the participants that providing demographic information is voluntary and is kept confidential as provided by law.

Required Action:

In addition to the general required CAP actions, the LWDB must provide an assurance that the Kiosk system used to collect demographic information and data will include a statement informing the participant that providing demographic information is voluntary and is kept confidential as provided by law. A copy of the screenshot depicting this statement or a timeline when this will be done must be provided with the CAP.

CareerSource CLM Response

Plan of Action

CareerSource Citrus Levy Marion uses the Geographic Solutions VOS Greeter product to track traffic. This allows customers to check in at our kiosk as point of entry. The kiosk demographic data collection screen currently reads:

"Please provide the following information. This information is voluntary and is being asked to meet Federal Law requirements of individuals seeking services through the One-Stop Centers."

The CSCLM RSO has entered a Non-Development Ticket in the Geographic Solutions Online Project Communication System (OPC) requesting the following change:

"Please provide the following information. This information is voluntary and will be kept confidential under Federal Law requirements of individuals seeking services through the One-Stop Centers."

This ticket can be viewed in the OPC under ID # 813471.

Monitoring

The kiosk system is updated as staff are hired or leave the organization. It is also updated to meet any programming needs identified by economic shifts in the community. Staff will include the kiosk system as part of their annual monitoring of the One Stop Centers for credentialing and ADA compliance.

Training

While no training is required for this update, staff who work in the resource room will be made aware of the update once it is applied by the developers.

Written Communication to Staff

Staff will be notified of the change via email once the system update takes place.

Attachments begin on next page

CareerSource Citrus Levy Marion is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers listed above may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711. If you need accommodations, please call 352-840- 5700, ext. 7878 or e-mail accommodations@careersourceclm.com at least three business days in advance. Additionally, program information may be made available in Spanish upon request. A proud partner of the American Job Center Network.

DEO QA Monitoring Quiz - What Did We Do Wrong? May 2022

Welfare Transition

True or False - If a staff member receives a DCF case closure alert in the Welfare Transition program instructing them to close the WT case on a specific date, the staff member has the option to close the case anytime in the month.

- ☐ True
- ☐ False

SNAP

True or False - Regions (LWDBs) are not allowed to create Local Operating Procedures (LOPS) which outline local implementation of policies, procedures and practices.

- ☐ True
- ☐ False

Demographic Data

In collecting demographic data from job candidates, each region is required to give immediate notice to the candidate that collected demographic information is, _____, _____ and _____. Select All Answers that Apply

- ☐ confidential
- ☐ voluntary
- ☐ mandatory
- ☐ will only be used in accordance with the law
- ☐ redacted
- ☐ required

WIOA

True or False - Region 10 staff must ensure that the activity end date in Employ Florida (EF) does not exceed the end date identified in an OJT contract. If the activity requires an extension, an addendum to the contract must be created and a case note must be entered in Employ Florida explaining the reason for the extension. The LWDB must not leave the OJT activity open when waiting for verification of continued employment with the OJT employer.

- ☐ True
☐ False
-

WIOA

True or False - If WIOA training is not paid for through the ITA process, a contract must be developed with the USDOL, identifying the cost of training and how payments to the training institution will be made. The contract must also be made available upon request.

- ☐ True
☐ False
-

WIOA

True or False - Region 10 staff must ensure that a Measurable Skills gain (MSG) is captured and recorded for all participants who are enrolled in an education or training program. If the includable activity crosses program years, a MSG for each program year must be documented and recorded.

- ☐ True
☐ False
-

Youth

True or False - Region 10 staff must ensure that the credential is a nationally recognized credential as defined in TEGL 10-16 Change 1.

- ☐ True
☐ False
-

TAA

A Rapid Response activity was reported in Employ Florida only under the TAA program. 'Yes' was indicated in the TAA program application. However, the _____ service code was not reported under the Wagner Peyser program application. **The _____ service code is required.**

TAA

True or False - When a TAA waiver of training is approved, the **Successful Completion Date** of the waiver must match the "**Closed**" Review Status, located under the Waiver Entry/Edit Waiver Entry link.

- ☐ True
- ☐ False
-

TAA

True or False - Region 10 staff must ensure an offer or a referral to supportive services is provided to each TAA participant in training and reported in Employ Florida TAA program case file..

- ☐ True
- ☐ False
-

TAA

Region 10 staff must ensure all TAA IEPs include _____ towards the specific occupational goal, and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

|

TAA

True or False - Region 10 staff must ensure that action steps (objectives and estimated milestone completion dates) are listed for the participant to work toward achievement of the listed occupational goal. The IEP should detail how the participant will overcome barriers to training completion and employment. At a minimum, the IEP should be reviewed by the Local TAA Coordinator every 60 days. The IEP must be amended, as appropriate, when additional needs are identified, or objectives are achieved. When new objectives are added, the IEP should be reviewed and signed by the TAA participant and accompanied by service code T05 (TAA - Individual Employment Plan) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.

- ☐ True
- ☐ False

TAA

True or False - Region 10 must ensure all documentation supporting the case file and program expenditures are uploaded to Employ Florida under the TAA program application. Documentation to be uploaded includes the course syllabus or program outline, invoices, program acceptance/enrollment letter(s), 2100 series training forms, and any other

- ☐ True
- ☐ False

TAA

Region 10 staff must ensure that all TAA training expenditures are reported in Employ Florida, under the [a], and the expenditure has a matching invoice located in the Employ Florida, TAA case file.

- ☐ TAA/TRA Benefits Payment View section
- ☐ WIOA Payment section
- ☒ WP Payment section
- ☐ IHA Benefits Payment View section

TAA

In accordance with DEO Memorandums dated June 1, 2017 and April 17, 2019, and Administrative Policy No. 108, Region 10 must ensure the TR0 ((Eligibility Review "Local TAA Coordinator Use")) code is accurately reported in Employ Florida and the projected end date matches the participant's _____ weeks deadline date.

TAA

True or False - Region 10 staff must ensure the activities and services are reported in Employ Florida when services are provided. Services and activities must be reported accurately and timely to reflect the participant's service history and support program expenditures.

- ☐ True
- ☐ False
-

WP

True or False - Region 10 must conduct an independent verification of the employer's registration within two business days from the date and time of initial registration.

- ☐ True
- ☐ False
-

WP

True or False - Region 10 staff do not need to ensure agricultural job orders always specify a wage rate.

- ☐ True
- ☐ False
-

WP

True or False - Agricultural job orders must have all required information including the specific days and hours to be worked and they must specify a wage rate.

- ☐ True
- ☐ False
-

JVSG (Veterans)

True or False - Staff must ensure veterans who receive services receive priority of service notification and that code 189 (or 089) with an aligned case note is entered into Employ Florida. These entries must occur for each new Wagner Peyser Application..

- ☐ True
- ☐ False
-

Attachment 2



Policies and Procedures

SECTION: Administration	POLICY # ADM-26	PAGE 1 of 2
TITLE: Financial Disclosure and Annual Training Requirements for Board Members	EFFECTIVE DATE: January 1, 2023	
SUPERCEDES: N/A		Dated: N/A

DISTRIBUTION: All CareerSource Citrus Levy Marion administrative staff and board members.

PURPOSE: This policy outlines the process by which administrative staff will work to ensure that board members and required staff identities and documentation are updated annually with the Commission on Ethics as required by F.S. 112.3145, F.S. 445.07, and DEO Final Guidance FG-075.

POLICY: It is the policy of CareerSource CLM that staff will work with all board members and required staff to ensure deadlines are met for appropriate filing of documentation. Financial disclosure documents are required to be filed annually with the Commission on Ethics by July 1st of each year. A grace period until September 1st of each year is given to meet filing requirements. Information for all board members and the Chief Executive Officer must be updated annually with the Commission on Ethics.

Process:

1. All board members are provided requirements for financial disclosure during board membership orientation.
2. All board members are verbally notified at the year-end board meeting of financial disclosure requirements. This board meeting is typically held the first week of June each year to allow adequate time for filing.
3. The Research and Executive Assistant sends the forms electronically with a reminder to all board members after the meeting.
4. The Research and Executive Assistant researches the Commission on Ethics website to confirm filings 7-10 days before July 1. Individual members who have not yet filed are sent email reminders.
5. During mid-July, the elections offices will email the CEO with delinquent disclosure notices.

6. Individual members are emailed and/or contacted by phone by the Research and Executive Assistant as a reminder to submit.

Annual Training: All board members are required to complete mandatory, annual board membership training. The training program includes the following elements:

1. Chapter 1: Introduction
 - a. Workforce Development system structure
 - b. Board member selection
 - c. State and federal regulatory environment and legislation
 - d. Typical business and job seeker services
 - e. Board member and LWDB roles and responsibilities
2. Chapter 2: Budget and Financial Responsibilities
 - a. Report structure
 - b. Analyzing variances
 - c. Reviewing key indicators
3. Chapter 3: Auditing and Monitoring
 - a. Annual audits
 - b. DEO fiscal and programmatic monitoring
 - c. Regional monitoring responsibilities and benefits
4. Chapter 4: Performance Oversight
 - a. Outlines WIOA's six primary indicators of performance
5. Chapter 5: Transparency and Ethics
 - a. CSF's ethics and transparency policy
 - b. Florida's Sunshine Law
 - c. Public Records Law
 - d. Ethics guidelines including:
 - i. Meeting and communications
 - ii. Exemptions
 - iii. Gifts policy
 - iv. Public comment
 - v. Conflicts of interest
 - vi. Financial Disclosure
6. Chapter 6: DEO Agreement
 - a. Performance
 - b. Compensation and travel
 - c. Board member selection
 - d. Board member training
 - e. Governance and transparency
 - f. Ethics and related parties
 - g. Additional provisions

OFFICIAL SIGNATURE

Thomas E. Skinner, Jr.
Chief Executive Officer

EVP Coord:

Attachment 3

MEMORANDUM OF UNDERSTANDING

Between

Citrus Levy Marion Regional Workforce Development Board, Inc.
DBA CareerSource Citrus Levy Marion
And

1. **Purpose of this Memorandum of Understanding**

The Workforce Innovation and Opportunity Act (WIOA) requires that a Memorandum of Understanding (MOU) be developed and executed between the local Workforce Development Board, in this case, CareerSource Citrus Levy Marion (CSCLM) and the Career Center Partners. The MOU is the product of local discussion and negotiation, and is an agreement developed and executed between the Local WDB and the one-stop partners, with the agreement of the chief elected official and the one-stop partners, relating to the operation of the one-stop delivery system in the local area in accordance with 20 CFR 687.500. (This covers (c) under Criteria) This Act requires specific programs to make their services available through a one-stop delivery system and encourages increasing access through additional partnerships with optional partners. Additionally, WIOA requires CSCLM and the One-Stop system partners to establish an agreement concerning the operations of the one-stop system and to establish the framework for providing services to employers, employees, job seekers and others needing workforce services.

CareerSource CLM and Career Center Partners will meet to discuss the purpose of the MOU to determine the mutual benefit of entering into an agreement. The discussion will consist of equitable sharing such as facility rental utilities and maintenance, equipment (including assessment-related products and assistive technology for individuals with disabilities and technology to facilitate access to the one-stop center including technology used for the center's planning and outreach activities. This will also include negotiations involving the Infrastructure Funding Agreement. CSCLM and Center Partners will consider common identifier costs as costs of one-stop infrastructure. Each entity must use a portion of the funds available for the program and activities to maintain the once-stop delivery system, including any payments, if applicable for the infrastructure costs of the one-stop centers. In accordance with CFR 678.700.

A draft of the MOU will be created and forwarded to all parties for review and further discussion if needed. Once all partners determine the MOU is agreeable, a formal MOU is drafted and approved by all parties. An Action Sheet is completed and presented to the appropriate Board Committee for approval. The MOU is presented to the Executive, Full Board and Consortium for review, discussion on reaching consensus that the local WDB is following guidance for the State funding with final signature provided by the Chief Local Elected Official in accordance with

20 CFR 678.500 (d).

Florida's one-stop delivery system, the CareerSource Network, is a locally-driven system which develops strategic partnerships and provides streamlined and integrated programs and services to the businesses and citizens of Florida.

Florida's strategic vision for WIOA implementation will be realized by accomplishing these three goals:

- Enhance alignment and market responsiveness of workforce, education and economic development systems through improved service integration that provides businesses with skilled, productive, and competitive talent and Floridians with employment, education, training, and support services that reduce welfare dependence and increase opportunities for self-sufficiency, high-skill and high-wage careers and lifelong learning.
- Promote accountable, transparent, and data-driven workforce investment through performance measures, monitoring and evaluation that informs strategies, drives operational excellence, leads to the identification and replication of best practices and empowers an effective and efficient workforce delivery system.
- Improve career exploration, educational attainment and skills training for in-demand industries and occupations for Florida youth that lead to enhanced employment, career development, credentialing and post-secondary education opportunities.

These objectives will be accomplished locally by providing all customers access to high-quality career centers within a one-stop system that connects them with the full range of services available in their communities, whether they are customers seeking to find jobs, build basic educational or occupational skills, earn a postsecondary certificate or degree, or obtain guidance on how to make career choices, or are businesses and employers seeking skilled workers.

The purpose of this MOU is to establish or enhance a cooperative working relationship between CSCLM and _____ to define our respective roles and responsibilities in achieving the policy objectives.

2. **System Partners**

MOUs will be developed with system partner programs that are provided physically within the center, provided through cross-training of partner staff, or provided through direct linkage from technology. The partner programs and targeted population programs available in CSCLM will be:

Locally Operated by CSCLM through agreement with DEO

- WIOA Title I Adult, Dislocated Worker and Youth*
- WIOA Title III Wagner-Peyser*
- Veterans Employment and Training*

- Trade Act*
- Unemployment* (Primarily provided at State level)
- Temporary Assistance for Needy Families*
- Supplemental Nutrition Act Program (SNAP)

Locally Operated by CSCLM through agreement with DOL

- YouthBuild*

MOU Provided at State Level

- WIOA Title II Adult Education and Literacy*
- WIOA Title IV Vocational Rehabilitation*
- Carl Perkins Career and Technical Education*

MOU with CSCLM

- Title V Older Americans Act aka SSCEP*
- Job Corps*
- Community Action Agencies*
- Housing Authorities*
- Agencies serving individuals with disabilities
- Agencies serving youth with barriers to employment
- Early Learning Coalitions
- Homeless Continuum of Care organizations
- Veteran Agencies
- Economic Development
- Support Service Providers
- Others as determined to be beneficial to serving both employers and job seekers.

* denotes those that are “required” partners

3. One-Stop System Description

As designated by CareerSource Florida on behalf of the Governor, CSCLM is the local workforce board and the regional planning area, under Title I of the WIOA. Currently CSCLM has been provided permission to provide and act as the One-Stop Operator and Career Services Provider.

The CSCLM area consists of the counties of Citrus, Levy and Marion with Career Centers located in Lecanto, Chiefland, and Ocala. The Ocala Career center located at 2703 NE 14th Street is the comprehensive center for CSCLM. A professional placement center is located at the College of Central Florida Campus in Ocala for specialized recruitment and placement of professionals throughout the region and in partnership with our training partners. CSCLM also has two mobile units to assist in providing services to remote and rural areas within the region.

All of our centers provide seamless access to workforce programs for both the job seeker

and the employer. Our system is linked through Employ Florida, the State's talent matching system, to provide a system wide approach for job seeking and job placement.

Our centers provide access to a multitude of services that can be obtained through either self-service or with assistance from staff. By blending and weaving our various funding streams we are able to provide services to customers without pushing a customer from program to program, but handling in a customer driven manner based on individual strategies.

The One-Stop System is the result of the partnerships developed within our region that links the programs and services provided at the Career Centers and at other partner locations that provide the full complement of services needed by our customers.

This MOU will increase our ability to serve mutual customers, reduce duplication of efforts and expand our abilities to provide services throughout the One-Stop System either in one of our Career Centers, electronically at your location, or as an affiliate site.

4. General Responsibilities of One-Stop System Partners:

- The One-Stop System partner agrees to participate in joint planning, plan development, and modification of activities to result in:
 - Continuous partnership building;
 - Continuous planning responsive to State and Federal requirements;
 - Responsive to specific local and economic conditions including employer needs;
 - Solutions to common data collection and reporting needs;
- Make available to customers through the One-Stop System the services that are applicable to the partners programs
- Participate in the operation of the One-Stop System consistent with the agreed upon "service integration" following in the next part, number 5
- Participate in capacity building and staff development activities
- Insure that all partners and staff are cross-trained to understand programs and specific "service integration" goals as specified in the next part, number 5

5. Service Integration Plan and Goals:

CSCLM and

agree to the following:

6. Resource and Cost Sharing

This MOU between CSCLM and _____ is an agreement of service provision.

7. Data Access and Sharing

To facilitate integration of services, partners are encouraged to provide cross-access or protected information from systems of customer data within the applicable federal and state privacy laws and regulations governing the partner programs. All state and federal confidentiality regulations regarding the creation, maintenance and/or use of records shall be in effect. Client records and/or information may be shared among partners subject to these confidentiality requirements. Data sharing arrangements will be included in section 5.

Client information shall be shared solely for the purpose of eligibility, enrollment, referral, or provision of services. In carrying out their respective responsibilities, each party shall respect and abide by the confidentiality policies of the other parties.

8. Access for Individuals with Barriers to Employment

All One-Stop system partners will ensure access for individuals with barriers to employment, and will offer priority for services to recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient for individualized career services and training services funded with WIOA adult funds.

9. Non-Discrimination

As required by federal and state law, participating agencies will assure that no person shall be discriminated against in consideration for or receipt of partner agency services and/or employment based upon sex, disability, race, color, age, religion, national origin, political affiliation, belief, veteran status, familial status, sexual orientation, gender identity, pregnancy, or genetic information.

The One-Stop system partner will assure compliance with the Americans with Disabilities Act of 1990, and its Amendments, which prohibits discrimination on the basis of disability, as well as applicable regulations and guidelines issued pursuant to the ADA.

Partners agree to comply fully with the WIOA, Title VII of the civil rights act of 1964, the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities, and The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; and 29 CFR Part 37 and all other regulations implementing the aforementioned laws.

10. Duration, Modification, and Termination of the Partner MOU

It is mutually understood that this MOU shall not become effective until signed. This MOU shall remain in effect until modified, extended or terminated in accordance with this section. However, this MOU shall be reviewed every two (2) years and updated not less than every 3 years to reflect any changes in the signatory official of the Board, One-Stop Partners and Chief

Elected Officials or One-Stop infrastructure funding as cited in 20 CFR 678.500. . This MOU may be amended at any time in writing and will be effective when signed by both entities.

In accordance with 20 CFR 678.755, if either party, during negotiations and the term of the agreement, presents issues/changes in the MOU, they should submit the request in writing to:

Brandon Whiteman, Board Chair
3003 SW College Road
Enterprise Center, Suite 205
Ocala, FL 34474

Either party may cancel its participation in whole or in part at any time with thirty (30) days written notice.

11. Infrastructure Funding Agreement Terms

12. Signatures

**Approved for Citrus Levy Marion
Regional Workforce Development
Board, Inc.:**

Approved for:

By: _____

By: _____

Name: Thomas E. Skinner, Jr.

Name: _____

Title: Chief Executive Officer

Title: _____

Date: _____

Date: _____

Chief Elected Official

By: _____

Name: _____

Title: _____

Date: _____

An equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers may be reached by using TTY/TDD equipment via the Florida Relay Service at 711. If you need accommodations, call 1-800-434-5627 ext. 7878 or e-mail accommodations@careersourceclm.com three business days in advance. A proud member of the American Job Center network.

Attachment 4



Complaint Procedures

I, Kevin Harrison

Have received a copy of and reviewed the Complaint Resolution Overview PowerPoint and the Employment Service Complaint Resolution System Handbook.

In signing this form, I acknowledge that Complaint logs are due to the CareerSource Citrus Levy Marion Human Resources Manager by the first working day of each new quarter to ensure timely submission to DEO.

12/21/2022

Date Filed

Signature

Kevin Harrison

Printed Name

Career center Manager

Title



Complaint Procedures

I, Andrea Abrams

Have received a copy of and reviewed the Complaint Resolution Overview PowerPoint and the Employment Service Complaint Resolution System Handbook.

In signing this form, I acknowledge that Complaint logs are due to the CareerSource Citrus Levy Marion Human Resources Manager by the first working day of each new quarter to ensure timely submission to DEO.

12-21-2022
Date Filed

[Signature]
Signature

Andrea Abrams
Printed Name

Center Manager
Title



Complaint Procedures

I, Deborah Letterman

Have received a copy of and reviewed the Complaint Resolution Overview PowerPoint and the Employment Service Complaint Resolution System Handbook.

In signing this form, I acknowledge that Complaint logs are due to the CareerSource Citrus Levy Marion Human Resources Manager by the first working day of each new quarter to ensure timely submission to DEO.

12/21/2022

Date Filed

A handwritten signature in blue ink that reads "D. Letterman".

Signature

Deborah Letterman

Printed Name

Career Center Manager

Title



Complaint Procedures

I, Iris A. Pozo

Have received a copy of and reviewed the Complaint Resolution Overview PowerPoint and the Employment Service Complaint Resolution System Handbook.

In signing this form, I acknowledge that Complaint logs are due to the CareerSource Citrus Levy Marion Human Resources Manager by the first working day of each new quarter to ensure timely submission to DEO.

12/21/2022

Date Filed

A handwritten signature in black ink, appearing to be "Iris Pozo", written over a horizontal line.

Signature

Iris Pozo

Printed Name

HR Mgr./EO Officer

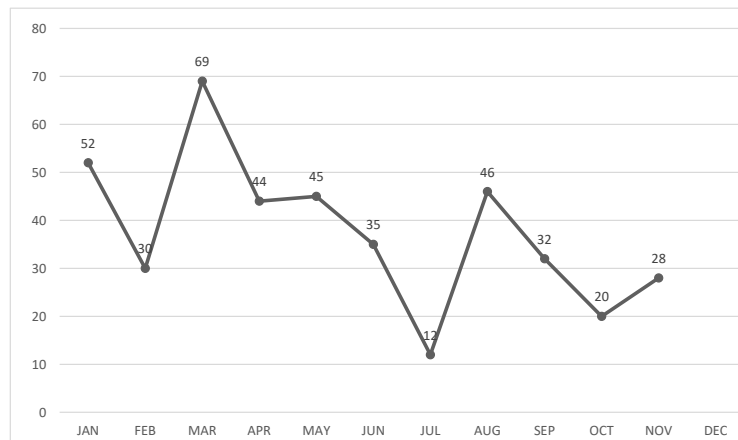
Title

TRAFFIC COUNT

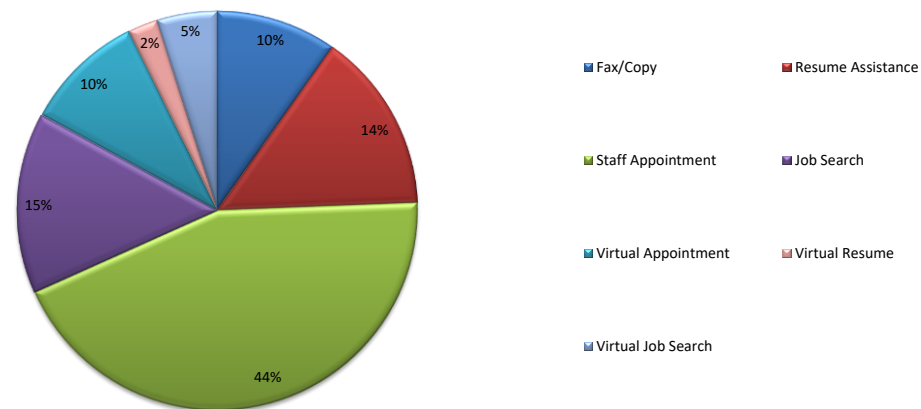
							PY 22						YTD
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
REFERRALS	9	11	6	5	5	3	2	2	3	2	3	1	52
PLACEMENTS	4	8	7	2	7	3	2	4	2	1	2	2	44
INTERNSHIPS	0	0	0	0	0	0	0	0	0	0	0	0	0
OJT/WEX/CBT	0	0	0	0	0	0	0	0	0	0	0	0	0
TRAFFIC*	52	30	69	44	45	35	12	46	32	20	28		413

SERVICES BREAKDOWN

CENTER TRAFFIC BY MONTH



* Center traffic counted by in office and virtual services provided, and traffic count will be updated once data is available.





	Q1 PY22-23			Q2 PY22-23			Q3 PY22-23			Q4 PY22-23			ANNUAL		
County Chamber/EDC	# Goals	Goals Met	Rate	# Goals	Goals Met	Rate	# Goals	Goals Met	Rate	# Goals	Goals Met	Rate	# Goals	Goals Met	Rate
CITRUS (Citrus Chamber)	5	4	80.00%	5	4	80.00%	5		0.00%	4		0.00%	5		0.00%
MARION (CEP)	4	4	100.00%	5	5	100.00%	6		0.00%	5		0.00%	6		0.00%

	Q1 PY21-22			Q2 PY21-22			Q3 PY21-22			Q4 PY21-22			ANNUAL		
Eckerd Youth Connects	# Goals	Goals Met	Payment	# Goals	Goals Met	Payment	# Goals	Goals Met	Payment	# Goals	Goals Met	Payment	# Goals	Goals Met	Payment
Enrollments	20	17	\$0.00	17	32	\$0.00	28			25			90		
Measureable Skills Gains	80%	86	1595.83	80%			80%			80%			80%		
Employment/Education Retention Rate 2nd Quarter After Exit	75%	85	1595.83	75%			75%			75%			75%		
Employment/Education Retention Rate 4thd Quarter After Exit	69%	79.4	1595.83	69%			69%			69%			69%		
Credential Attainment Rate	83%	98.5	1595.83	83%			83%			83%			83%		
Median Wages	\$2,800	\$4,405	1595.83	\$2,800			\$2,800			\$2,800			\$2,800		

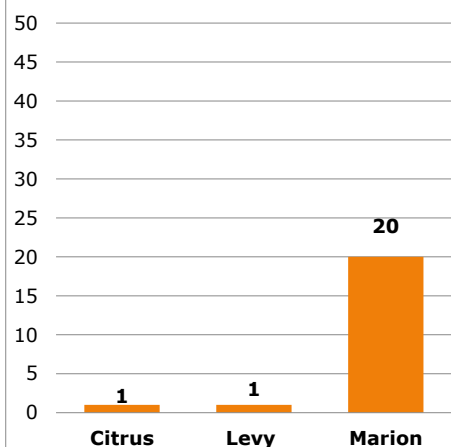
PY 22 - 23 Individual Events

**Total Events: 22
Attendees: 349
Reported Hires: 142**

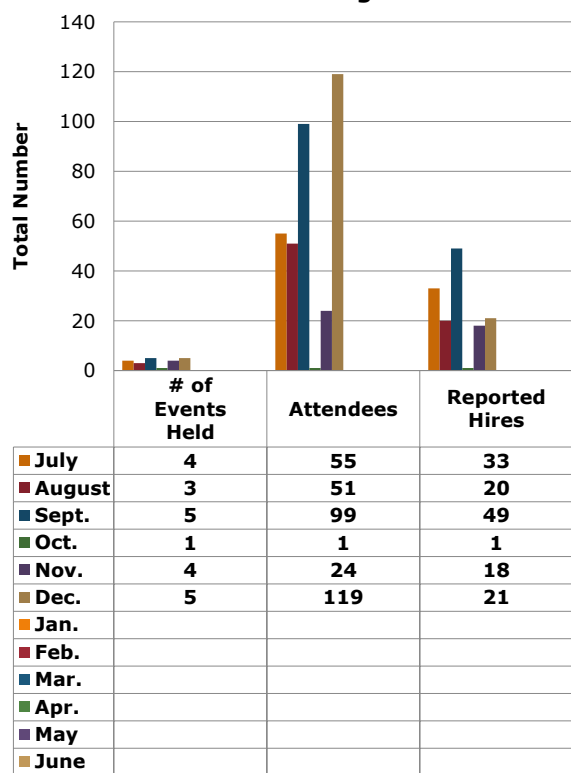
PY 22 - 23 Job Fairs

**Attendees: 225
Businesses: 66**

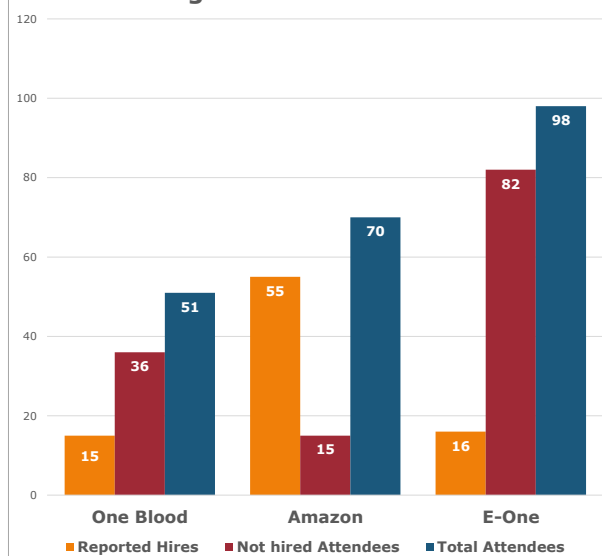
**Hiring Events by County
PY 22-23**



Individual Hiring Events



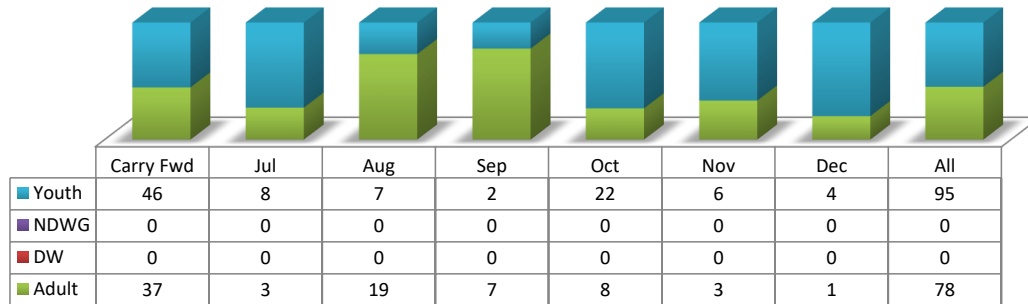
**Top 3 Hiring Events
Program Year 2022-2023**



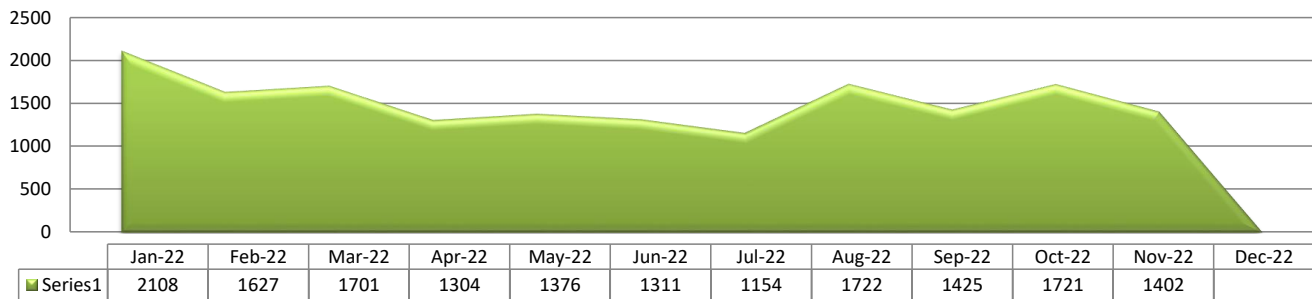
Other Recruitment Events 10/2022 - 12/2022

Event Date	Event Name	Event Location	County
10/13	Coca Cola Florida	14th Street	Marion
11/17	Oasis Landscape Services	14th Street	Marion
11/29	Quick Care Med	Lecanto	Citrus
11/30	Quick Care Med	Chiefland	Levy
12/1	Quick Care Med	14th Street	Marion
12/13	Nash Plumbing and Mechanical	14th Street	Marion
12/14	Brookdale Chambrel Pinecastle	Company Location	Marion
12/21	Coca Cola Florida	14th Street	Marion

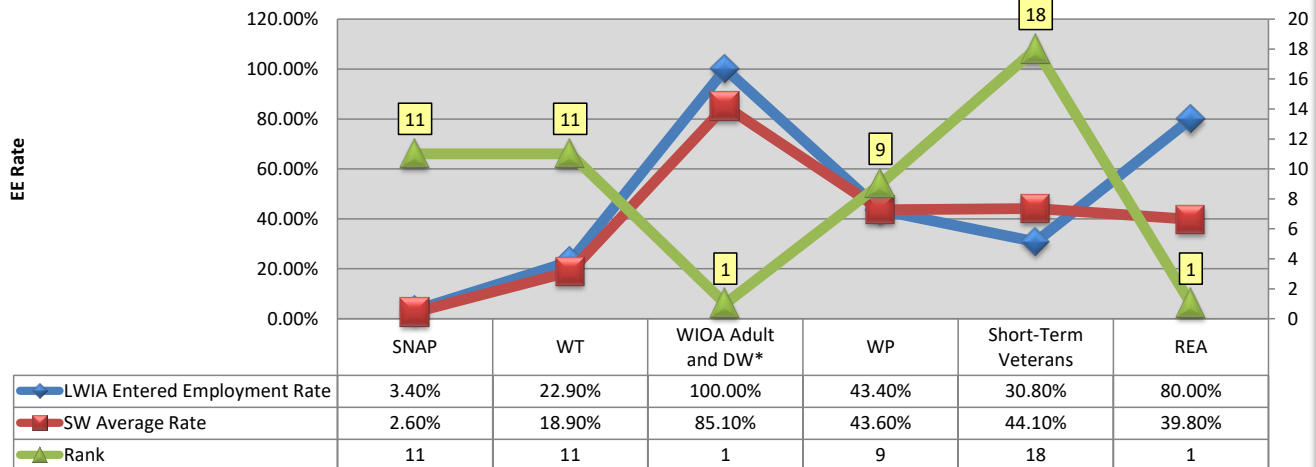
All WIOA Participant Enrollments



Center Traffic - 12 Months

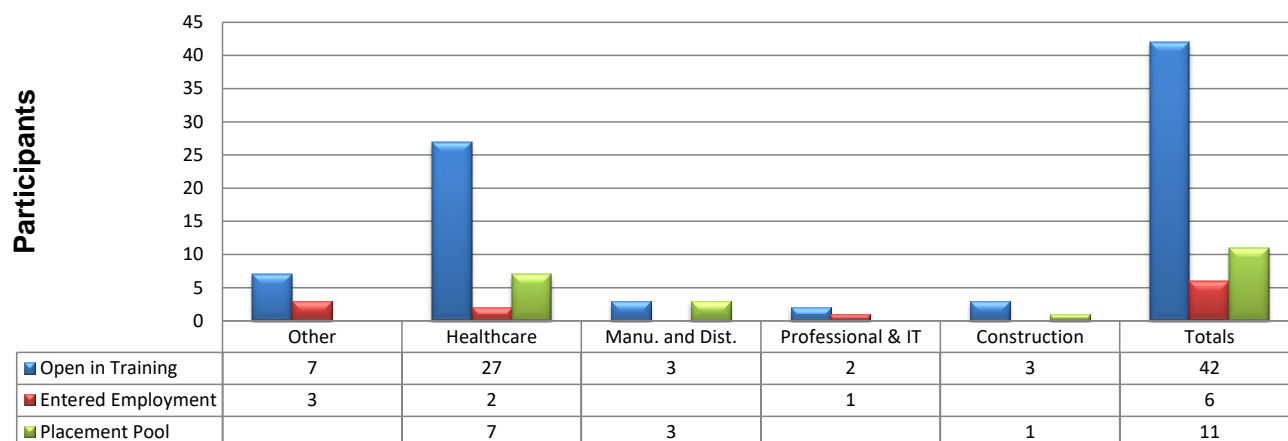


MMR Entered Employment Rates by Program

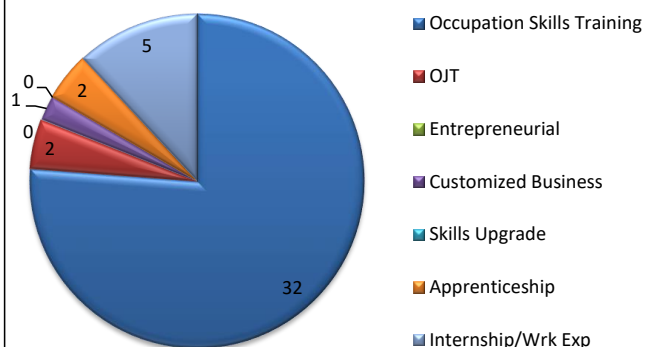


*#1 Ranking shared between 12 RWB's

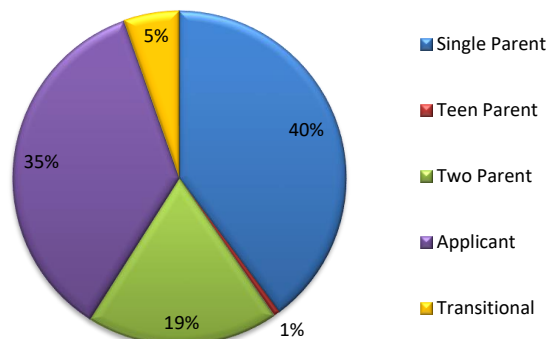
WIOA Industry Training Comparison*



Open WIOA Training Activity Classification- Adult/DW

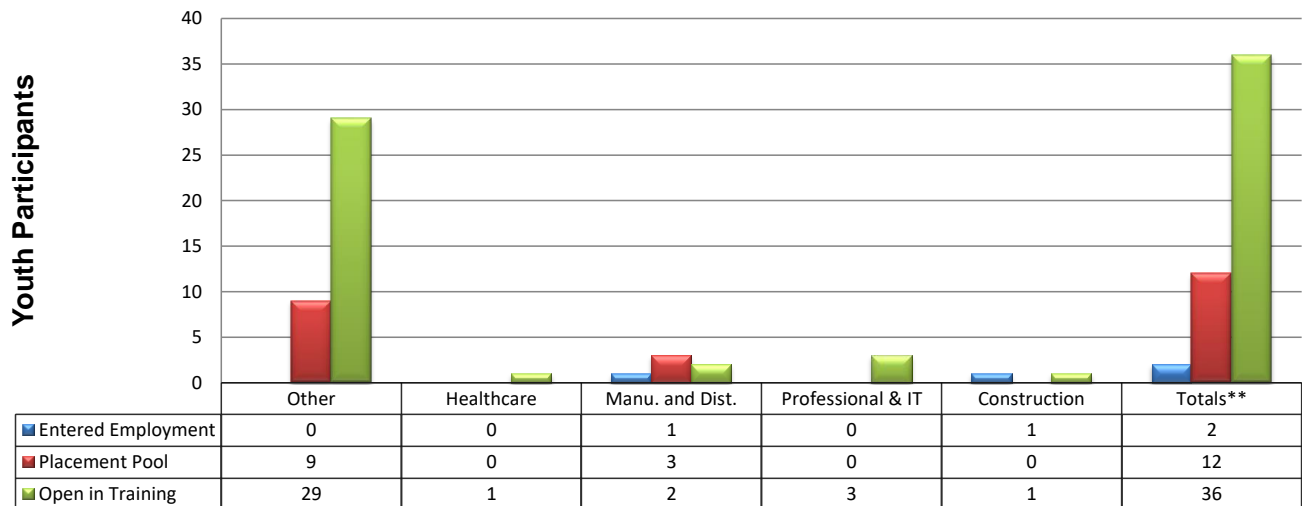


Current WT Caseload Breakdown

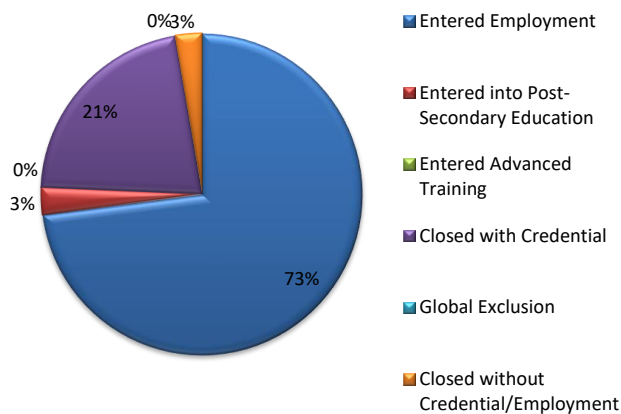


Traffic	Dec-21	Dec-22	YTD 21.22	YTD 22.23
Newly Registered Job Seekers	162	217	1,459	1,252
Total Job Referrals	475	622	5,482	3,588
Managed Job Orders	415	407	4,531	3,290
External Job Orders	7,819	6,245	51,912	40,360
Overall Traffic	1,163	-	12,413	7,498
Receiving Reemployment Assistance	457	503	5,348	2,827
Welfare Transition	Dec-21	Dec-22		
Participation Rate All Family	31.4%	17.3%		
Case Load	206	174		

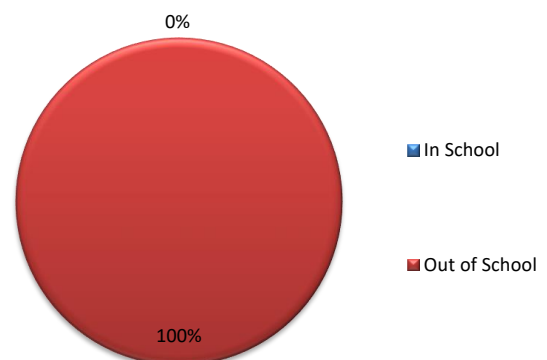
WIOA Youth Industry Training Comparison



Youth Placements Breakdown



Youth Breakdown by Enrollment Code



Youth Carry Forward:	46	AVG Closure Wage (With Credential):	\$12.39
Total Youth Closed:	37	ROI for PY 21/22 Youth Services:	\$510,846
Total Youth Served:	95	Average Training Lifespan:	94

Traffic		PY 15-16	PY 16-17	PY 17-18	PY 18-19	PY 19-20	PY 20-21	PY 21-22	PY2022 2023						
									JUL	AUG	SEP	OCT	NOV	DEC	YTD
Center Traffic*	14th Street	34,101	35,557	28,800	23,726	15,245	12,363	14,399	754	1,088	922	927	879		4,570
	Lecanto	8,448	8,071	6,278	6,392	4,255	4,723	4,660	256	382	308	395	323		1,664
	Chiefland	5,653	5,431	4,085	4,136	3,132	2,863	2,432	134	215	142	158	160		809
	Talent Center	1,458	697	1,319	1,072	846	526	325	10	34	28	17	21		110
	*MCC 1	1,257	800	902	862	426	-	-	-	-	-	-	-		0
	*MCC 2	342	282	359	398	151	-	24	-	77	25	224	19		345
	Total	51,259	50,141	41,743	36,586	24,055	20,475	21,840	1,154	1,796	1,425	1,721	1,402	-	7,498
Online Traffic	Citrus	71,187	57,011	37,587	22,002	17,190	10,079	9,279	395	843	605	722	693	580	3,838
	Levy	14,461	12,971	10,745	6,089	3,999	2,593	2,620	124	173	117	110	89	129	742
	Marion	180,839	155,810	116,901	67,101	40,990	24,857	21,806	855	1,472	1,146	1,321	1,292	1,246	7,332
	Other	23,425	8,356	12,218	6,387	3,337	1,959	1,848	62	124	79	96	86	85	532
	Total	289,912	234,148	177,451	101,579	65,516	39,488	35,553	1,436	2,612	1,947	2,249	2,160	2,040	12,444
Events	Events	22	126	147	135	68	78	61	4	3	6	2	5	4	24
	Attendees	1,808	4,535	4,028	3,406	1,042	1,736	1,426	53	51	241	143	81	115	684
Wagner Peyser		PY 15-16	PY 16-17	PY 17-18	PY 18-19	PY 19-20	PY 20-21	PY 21-22	PY2022 2023						
									JUL	AUG	SEP	OCT	NOV	DEC	YTD
Newly Registered Job Seekers	Marion	3,981	4,081	3,883	2,573	4,903	2,220	1,697	113	159	134	163	141	161	871
	Citrus	1,420	1,442	1,323	995	2,007	848	683	46	57	50	63	53	42	311
	Levy	339	376	375	272	442	205	197	9	17	10	9	11	14	70
	Total	5,808	5,899	5,581	3,840	7,352	3,273	2,577	168	233	194	235	205	217	1,252
Total Employers Posting Jobs	Marion	748	724	705	724	654	785	853	361	382	366	340	326	316	544
	Citrus	305	308	283	155	183	204	170	48	51	49	57	59	52	93
	Levy	90	82	77	54	56	65	55	14	19	18	18	20	16	31
	Total	1,143	1,114	1,066	933	893	1,054	1,078	423	452	433	415	405	384	668
Managed Job Orders	Marion	3054	3326	3514	4854	4568	5316	5956	450	494	417	462	480	367	2670
	Citrus	736	815	934	1157	1114	1456	1620	81	94	119	82	61	22	459
	Levy	214	163	213	238	232	306	317	33	22	26	31	12	17	141
	Other	177	177	73	78	41	67	54	4	6	8	0	1	1	20
	Subtotal	4181	4481	4734	6327	5955	7145	7947	568	616	570	575	554	407	3,290
	External Job Orders	33972	31693	28587	32498	28846	66111	103910	6,501	7,485	7,422	6,781	5,926	6,245	40,360
	Total	38121	36174	33321	38825	34801	73256	111857	7,069	8,101	7,992	7,356	6,480	6,652	43,650
	% of internal vs. total	10.88%	12.39%	14.21%	16.30%	17.11%	9.75%	7.10%	8.04%	7.60%	7.13%	7.82%	8.55%	6.12%	7.54%
Welfare Transition		PY 15-16	PY 16-17	PY 17-18	PY 18-19	PY 19-20	PY 20-21	PY 21-22	PY2022 2023						
									JUL	AUG	SEP	OCT	NOV	DEC	YTD
Open Case Load	Marion	1,286	1,073	942	902	963	807	724	129	151	192	235	140	119	404
	Citrus	384	379	311	272	268	245	252	35	60	69	78	38	44	142
	Levy	180	150	136	108	135	112	74	13	18	22	27	14	11	43
	Total	1,850	1,602	1,389	1,282	1,366	1,164	1,050	177	229	283	340	192	174	589
Participation Rate	All Family	35.80%	30.70%	36.50%	36.90%	30.30%	0.30%	19.90%	23.60%	22.00%	17.90%	18.50%	24.30%	17.30%	20.40%

*Center Traffic will be updated when data is available in EF

Training		PY 15-16	PY 16-17	PY 17-18	PY 18-19	PY 19-20	PY 20-21	PY 21-22	PY2022 2023						
									JUL	AUG	SEP	OCT	NOV	DEC	YTD
Occupation Skills Training	Citrus	142	121	91	122	31	8	5	2	1	2	2	1	1	2
	Levy	54	34	24	19	6	4	4	1	4	5	4	4	4	5
	Marion	224	233	335	365	157	94	70	27	37	35	29	27	27	38
	Subtotal	420	388	450	506	194	106	79	30	42	42	35	32	32	45
Skills Upgrade	Citrus	0	0	0	6	1	1	0	0	0	0	0	0	0	0
	Levy	0	0	0	2	1	0	0	0	0	0	0	0	0	0
	Marion	0	0	2	59	35	0	1	0	0	0	0	0	0	0
	Subtotal	0	0	2	67	37	1	1	0	0	0	0	0	0	0
OJT	Citrus	8	13	4	3	0	0	3	0	0	0	0	0	0	0
	Levy	0	0	0	3	0	2	0	0	0	0	0	0	0	0
	Marion	11	14	81	97	8	2	2	1	1	0	1	1	2	3
	Subtotal	19	27	85	103	8	4	5	1	1	0	1	1	2	3
Entrepreneurial	Citrus	0	0	3	0	0	0	0	0	0	0	0	0	0	0
	Levy	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Marion	0	0	1	0	0	0	0	0	0	0	0	0	0	0
	Subtotal	0	0	4	0	0	0	0	0	0	0	0	0	0	0
Internships	Citrus	5	2	4	3	2	4	0	0	0	0	0	0	0	0
	Levy	0	0	0	0	3	1	0	0	0	0	0	0	0	0
	Marion	4	3	9	12	11	11	6	0	0	0	4	5	5	6
	Subtotal	9	5	13	15	16	16	6	0	0	0	4	5	5	6
Customized Training	Citrus	5	2	7	0	6	8	4	0	0	0	0	0	0	0
	Levy	0	1	6	1	32	32	6	0	0	0	0	0	0	0
	Marion	21	21	58	10	38	28	8	0	0	0	3	1	1	3
	Subtotal	26	24	71	11	76	68	18	0	0	0	3	1	1	3
Apprenticeship	Citrus	0	0	0	0	1	1	0	0	0	0	0	0	0	0
	Levy	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Marion	0	0	0	0	8	5	4	2	2	2	2	2	2	2
	Subtotal	0	0	0	0	9	6	4	2	2	2	2	2	2	2
Total		474	444	621	702	340	201	113	33	45	44	45	41	42	59
E-Training		PY 15-16	PY 16-17	PY 17-18	PY 18-19	PY 19-20	PY 20-21	PY 21-22	PY2022 2023						
									JUL	AUG	SEP	OCT	NOV	DEC	YTD
Skill Up Metrix 180 Skills	Citrus							39	3	5	2	2	2	2	16
	Levy							15	0	1	0	0	1	0	2
	Marion							77	8	11	6	6	1	7	39
	Total							131	11	17	8	8	4	9	57
Placements		PY 15-16	PY 16-17	PY 17-18	PY 18-19	PY 19-20	PY 20-21	PY 21-22	PY2022 2023						
									JUL	AUG	SEP	OCT	NOV	DEC	YTD
	Citrus	260	225	189	122	58	32	33	0	2	2	2	2	1	9
	Levy	87	86	70	52	15	5	15	0	0	0	0	0	0	0
	Marion	1275	944	1008	643	244	164	134	12	14	8	7	9	3	53
	External/New Hire Report	8680	6167	3002	1865	946	432	273	0	52	41	20	39	27	179
	Total	10302	7422	4269	2682	1263	633	455	12	68	51	29	50	31	241



Workforce Intelligence

December 2022

CT Agreements PY2022/2023

Carry Forward from PY 21/22	0	Number Served	3
New for PY 21/22	2	Amount Spent	\$0.00

Business	Industry	Outcome Certification	Total Trained	Employer Contribution	CareerSource Reimbursement	Contract #	Begin	End Date	Status
Bryant's Pump Service	Construction	CDL License	2	\$1,830.00	\$1830.00	CBT 22-10-01	10/26/22	10/27/22	Completed
Quad Nurse LLC	Healthcare	CompTIA A+ Certification	1	\$866.50	\$866.50	CBT 22-10-02	10/31/22	06/01/23	In Progress

OJT Agreements PY2022/2023

Carry Forward from PY 21/22	0	Number Served	2
New for PY 22/23	2	Amount Spent	\$0.00

Business	Industry	Outcome Occupation	Total Trained	Employer Contribution	CareerSource Reimbursement	Contract #	Begin	End Date	Status
Outlaw Snax	Manufacturing	Quality Control Technician	1	\$1,322.50	\$3,997.50	OJT 22-10-01	10/12/22	01/11/23	In Progress
Alien Engineered Products LLC	Manufacturing	Welder, Level 1	1	\$4,000.00	\$4,125.00	OJT 22-12-01	12/06/22	03/13/23	In Progress

WE Agreements PY2022/2023

Carry Forward from PY 21/22	0	Number Served	4
New for PY 22/23	4	Amount Spent	\$5,447.95

Business	Industry	Position	Total Trained	Wage	Begin	End Date	Status
Quad Nurse LLC	Healthcare	Administrative Assistant	1	\$12.15	09/26/22	12/18/22	Unsuccessful Completion
Zero Hour Life Center LLC	Healthcare	CCAR Authorized Recovery Coach	1	\$13.50	10/05/22	12/28/22	Completed - Retained
CF Professional Multiservices Inc	Professional-Legal Services	Receptionist	1	\$11.25	10/31/22	01/22/23	In Progress
Quad Nurse LLC	Healthcare	HR Coordinator	1	\$13.50	01/09/23	04/02/23	In Progress

Internship Agreements PY2022/2023

Carry Forward from PY 21/22	0	Number Served	3
New for PY 22/23	3	Amount Spent	\$12,392.91

Business	Industry	Position	Total Trained	Wage	Begin	End Date	Status
Magnolia Homestead Realty LLC	Other-Real Estate	Digital Marketing Intern	1	\$16.20	10/5/2022	12/28/2022	Completed - Retained
Evergreen Private Care	Healthcare	Office Services Coordinator	1	\$14.40	10/24/2022	12/25/2022	Completed - Retained
PediM Healthcare	Healthcare	Billing Specialist	1	\$13.50	11/8/2022	1/29/2023	In Progress

Term	Definition
CBT	Custom Business Training
DW	Dislocated Worker (funding stream for WIOA)
Entered Employment Rate	The number of individuals exiting the system with employment divided by the total number of exiters.
LWIA	Local Workforce Investment Area
MMR	Monthly Management Report - produced by the State for the local areas
OJT	On the Job Training
RA	Reemployment Assistance (used to be Unemployment Compensation)
REA	Reemployment Assistance Act
Spidered Job Order	Job Orders pulled into the system from outside sources
WE	Work Experience
WIOA	Workforce Innovation and Opportunity Act (Training Program)
WP	Wagner Peyser Act (Universal Jobseeker Program)
WT	Welfare Transition Program

PERFORMANCE MEASURES

PY 2022/2023

Numbers current as of 12/31/2022

Performance Measure	Performance PY2020	Performance PY2021	Previous Month Performance November 2022	Current Month Performance December 2022	Performance YTD PY2022/2023	Previous Month Ranking	State Ranking YTD PY2022/2023
WP Entered Employment Rate	42.20%	44.80%	57.10%	43.40%	48.60%	3	3
WIOA AD/DW Entered Employment Rate	80.80%	85.00%	100.00%	100.00%	85.70%	9	9
WTP Entered Employment Rate	50.80%	28.70%	19.60%	22.90%	29.80%	4	4
All Family Partic. Rate	0.30%	19.90%	24.30%	17.30%	20.40%	2	2
2-Parent Partic. Rate	0.20%	15.90%	15.80%	13.30%	13.40%	2	1
			Previously Reported Quarter	Current Reported Quarter			
IEP/ISS/IRP Quality Pass Rate	93.30%	90.00%	80.00%	100.00%	90.00%	n/a	n/a
Case Note Quality Pass Rate	99.30%	100.00%	100.00%	100.00%	100.00%	n/a	n/a

MMR:
Run Date: January 2023

Based on Local Monitoring
Case Notes & IEP/ISS: PY2019

CITRUS COUNTY

Comparison: JUL 1ST – DEC 31ST for PY2021/PY2022

TOTAL RECEIVING SERVICES	CENTER TRAFFIC
<u>PY2022: 855</u> PY2021: 1,252	<u>Not Provided</u> 2,799
VETERANS SERVED	TRAINING PROVIDED
<u>98</u> 104	<u>13</u> 66
BUSINESSES SERVED	WELFARE TO WORK TRANSITION
<u>137</u> 176	<u>142</u> 157
POSITIONS POSTED	TOTAL PLACEMENTS
<u>560</u> 912	<u>36 (Avg Wage: Not Provided)</u> 45 (Avg Wage: \$14.73/hr)

Your Employment Solution Starts Here

CareerSource Citrus Levy Marion brings together business and community partners, economic development leaders and educational providers to connect employers with qualified, skilled talent and job seekers with employment and career development opportunities. **Contact us at 1.800.434.5627.**

Comparison: JUL 1ST – DEC 31ST for PY2021/PY2022

TOTAL RECEIVING SERVICES	CENTER TRAFFIC
<u>PY2022: 244</u> PY2021: 392	<u>Not Provided</u> 1,400
VETERANS SERVED	TRAINING PROVIDED
<u>25</u> 24	<u>3</u> 5
BUSINESSES SERVED	WELFARE TO WORK TRANSITION
<u>39</u> 39	<u>53</u> 53
POSITIONS POSTED	TOTAL PLACEMENTS
<u>212</u> 258	<u>12 (Avg Wage: Not Provided)</u> 13 (Avg Wage: Not Provided)

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Comparison: JUL 1ST – DEC 31ST for PY2021/PY2022

TOTAL RECEIVING SERVICES	CENTER TRAFFIC
<u>PY2022: 2,059</u> PY2021: 3,215	<u>Not Provided</u> 8,200
VETERANS SERVED	TRAINING PROVIDED
<u>213</u> 248	<u>85</u> 234
BUSINESSES SERVED	WELFARE TO WORK TRANSITION
<u>358</u> 388	<u>404</u> 506
POSITIONS POSTED	TOTAL PLACEMENTS
<u>4,141</u> 5,339	<u>182</u> (Avg Wage: \$14.24/hr) 150(Avg Wage: \$15.36/hr)

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CareerSource
CITRUS | LEVY | MARION

Experiential Learning Contracts

PY2022-2023

Customized Training

Business	Industry	Total Trained	Employer Contribution	CareerSource Reimbursement	Begin	End Date	Status
Bryant's Pump Service	Construction	2	\$1,830.00	\$1830.00	10/26/2022	10/27/2022	Completed
Quad Nurse LLC	Healthcare	1	\$866.50	\$866.50	10/31/2022	6/1/2023	In Progress

On the Job Training

Business	Industry	Total Trained	Employer Contribution	CareerSource Reimbursement	Begin	End Date	Status
Outlaw Snax	Manufacturing	1	\$1,322.50	\$3,997.50	10/12/2022	1/11/2023	In Progress
Alien Engineered Products LLC	Manufacturing	1	\$4,000.00	\$4,125.00	12/6/2022	3/13/2023	In Progress

Paid Work Experience

Business	Industry	Total Trained	Wage	Begin	Status
Quad Nurse LLC	Healthcare	1	\$12.15	9/26/2022	Unsuccessful Completion
Zero Hour Life Center LLC	Healthcare	1	\$13.50	10/5/2022	Completed - Retained
CF Professional Multiservices Inc	Legal Services	1	\$11.25	10/31/2022	In Progress
Quad Nurse LLC	Healthcare	1	\$13.50	1/9/2023	In Progress

Internships

Business	Industry	Total Trained	Wage	Begin	Status
Magnolia Homestead Realty LLC	Other-Real Estate	1	\$16.20	10/5/2022	Completed - Retained
Evergreen Private Care	Healthcare	1	\$14.40	10/24/2022	Completed - Retained
PediM Healthcare	Healthcare	1	\$13.50	11/8/2022	In Progress

Apprenticeship

Business	Industry	Occupation	Total Trained	Begin	Status
Marion Technical College	Manufacturing	Masonry	9	9/1/2019	1 In Progress / 1 Successful w/ emp / 7 Unsuccessful (5 closed w/ emp)
Lockheed Martin	Manufacturing	Electronic Assembler	4	Spring 2020	2 Hired PY20-21, 2 Hired PY 21-22

YouthBuild Performance Update

2022-2024

YB Cohort 1: (11/2/2022-3/23/2023)

Enrolled: 14

Completed: N/A

Receiving HS Diploma: 7

Receiving Additional Certs:

Certification Breakdown: OSHA – (13), Warehouse Operations (13), Forklift (13), HBI (), NRF – (n/a)

AHELI Front Desk – (n/a) , AHLEI Restaurant Server – (n/a) AHLEI Guestroom – (n/a) , AHLEI

Maintenance Employee – (n/a)

Exited with Employment: Currently Enrolled

Exited with Education: Currently Enrolled

Exited as Outcome: Currently Enrolled

YB Cohort 2: (Tentative Start 3/8/2023-8/8/2023)

Enrolled:

Completed:

Receiving HS Diploma:

Receiving Additional Certs:

Certification Breakdown: OSHA – (n/a), Warehouse Operations (n/a), Forklift (n/a), HBI (n/a), NRF –

(n/a) AHLEI Front Desk – (n/a) , AHLEI Restaurant Server – (n/a) AHLEI Guestroom – (n/a), AHLEI

Maintenance Employee – (n/a)

Exited with Employment: Currently Enrolled

Exited with Education: Currently Enrolled

Exited as Outcome: Currently Enrolled

YB Cohort 3: (Tentative Start 9/6/2023-)

Enrolled:

Completed:

Receiving HS Diploma:

Receiving Additional Certs:

Certification Breakdown: OSHA – (n/a), Warehouse Operations (n/a), Forklift (n/a), HBI (n/a), NRF –

(n/a) AHLEI Front Desk – (n/a) , AHLEI Restaurant Server – (n/a) AHLEI Guestroom – (n/a), AHLEI

Maintenance Employee – (n/a)

Exited with Employment: Currently Enrolled

Exited with Education: Currently Enrolled

Exited as Outcome: Currently Enrolled

YB Cohort 4: (dates pending)

Enrolled:

Completed:

Receiving HS Diploma:

Receiving Additional Certs:

Certification Breakdown: OSHA – (n/a), Warehouse Operations (n/a), Forklift (n/a), HBI (n/a), NRF –

(n/a) AHLEI Front Desk – (n/a) , AHLEI Restaurant Server – (n/a) AHLEI Guestroom – (n/a), AHLEI

Maintenance Employee – (n/a)

Exited with Employment: Currently Enrolled

Exited with Education: Currently Enrolled

Exited as Outcome: Currently Enrolled

PROGRAM PARTICIPANT DATA SUMMARY

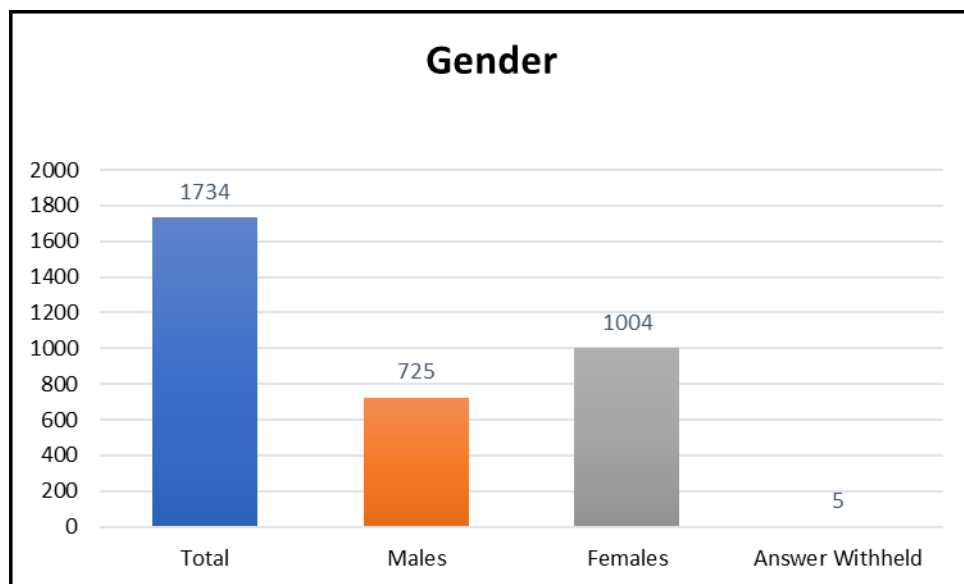
REGION 10

October 1, 2022 – December 31, 2022

An analysis of data for the Wagner-Peyser, Workforce Innovation and Opportunity Act (WIOA) Title I and Welfare Transition Programs. Data for each program is analyzed based on gender, race/ethnicity, and age for the first quarter of PY2022, October 1st through December 31st.

Data from Employ Florida Marketplace identified the following applicant characteristics for the Region:

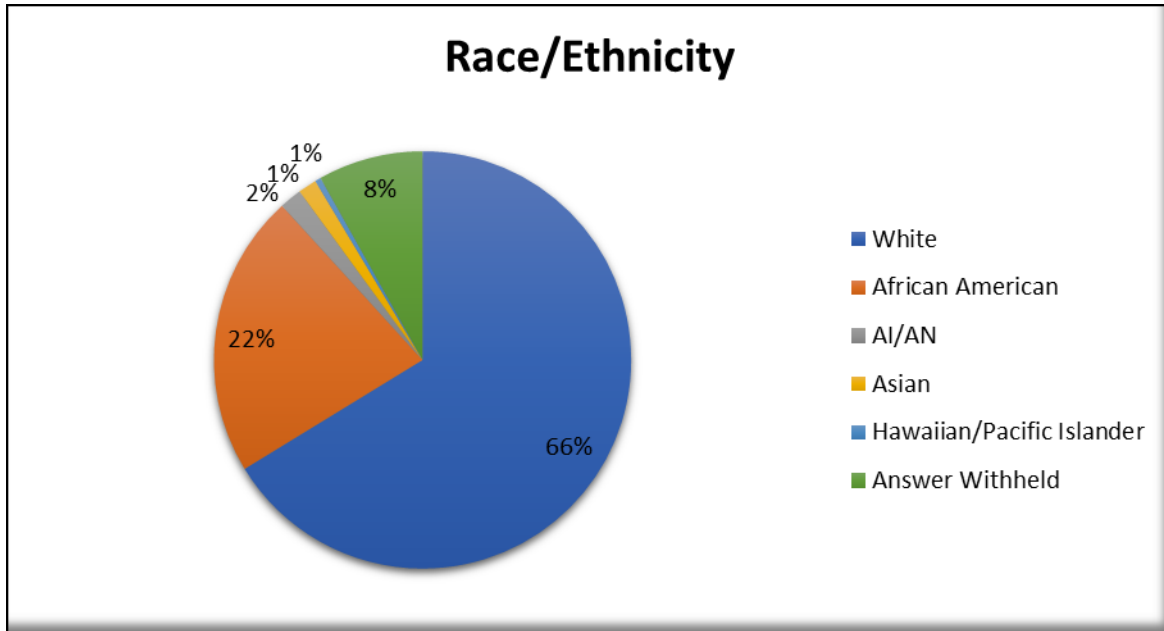
GENDER CHARACTERISTICS



Overall assessment

- 42% of the Region's participants were male.
- 58% of the Region's participants were female.

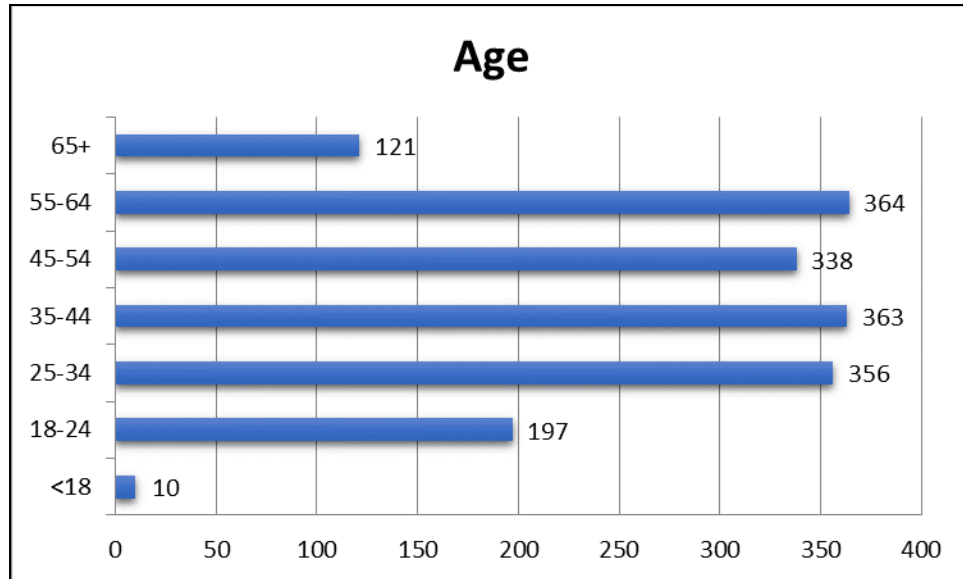
RACE/ETHNICITY CHARACTERISTICS



Group	White	African American	AI/AN	Asian	Hawaiian/ Pacific Islander	Answer Withheld
# of Applicants	1149	381	30	25	8	141
% of Total Applicants	66.2%	22.0%	1.7%	1.4%	0.5%	8.2%

- Hispanic applicants, 293, represented 17% of all applicants.

AGE CHARACTERISTICS



Age Group	<18	18-24	25-34	35-44	45-54	55-64	65+	Total
Count	12	177	344	339	323	416	123	1,734
%	0.69%	10.21%	19.84%	19.55%	18.63%	23.99%	7.09%	100%

Overall assessment

- 99.3% of applicants were over the age of 18.
- Applicants age 55 and older represented 31.1% of the applicants.

VETERANS

Overall assessment

- Veteran applicants, 163, accounted for 9.4% of the total number of applicants.
- Male veteran applicants, 131, represented a larger group than female veteran applicants, 32.

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAMS

Overall assessment

- Female WIOA participants, 80, outnumbered male WIOA applicants 63.

Group	Count	% of Total Count	Numerator*	Denominator**
White	75	55.5%	9	18
African American	43	31.9%	10	10
American Indian/ Alaska Native	1	0.7%	0	0
Asian	1	0.7%	1	1
Hawaiian/Pacific Islander	0	0.0%	0	0
More than 1 Race	8	5.9%	0	0
Answer Withheld	7	5.2%	1	2
*Numerator = Number of participants who enter employment after exiting a program.				
** Denominator = Total number of exiting participants.				

- Hispanic participants, 27, represented 20% of all applicants. Of the five Hispanic participants that exited, four cases have exited with employment.

Group	Count	% of Total Count	Numerator	Denominator
<19	40	29.6%	4	8
19 – 24	43	31.9%	8	14
25 – 32	22	16.3%	3	3
33 – 44	20	14.8%	4	4
45 – 54	6	4.4%	0	0
55 – 64	4	3.0%	2	2
65+	0	0.0%	0	0

WELFARE TRANSITION

Overall assessment

- 296 female applicants represented 86% of WT applicants.
- 48 male participants represented 14% of WT applicants.
- The average placement wage recorded for female participants is \$13.25/hour, and \$13.00/hour for male participants.

Group	White	African American	Asian Pacific	Asian	Hispanic	Indian	Other	Not Provided
# of Applicants	195	74	0	0	43	0	18	14
% of Total Applicants	56.69%	21.51%	0.00%	0.00%	12.5%	0.00%	5.23%	4.07%

SNAP (FOOD STAMPS)

Overall assessment

- 562 female applicants represented 41% of WT applicants.
- 803 male participants represented 59% of WT applicants.
- The average placement wage recorded for female participants is \$13.00/hour, and not enough wages to calculate placement rate for male participants.

Group	White	African American	Asian Pacific	Asian	Hispanic	Indian	Other	Not Provided
# of Applicants	841	298	1	2	132	5	57	29
% of Total Applicants	61.61%	21.83%	0.07%	0.15%	9.67%	0.37%	4.18%	2.12%

NET PROMOTER

Transactional Net Promoter Cumulative Report - January 2022 to December 2022

Job Seeker Report

Region 10 Net Promoter Score Calendar Year 2022

Net Promoter Score—Area/Region

► 75 (Up 6 Points Over CY 2021)

Some Context on the Score: This score is based on a survey taken approximately 1 to 4 weeks after the first service. Net Promoter scores range between -100 and +100. Based on global NPS standards, any score 0 to 49 would be considered “Good” – scores between 50 and 69 are “Excellent” and scores 70 and above are considered “World Class” or “Exceptional”. Simply put, any positive score means that you have more promoters (advocates willing to recommend you) than detractors (unhappy or dissatisfied customers).

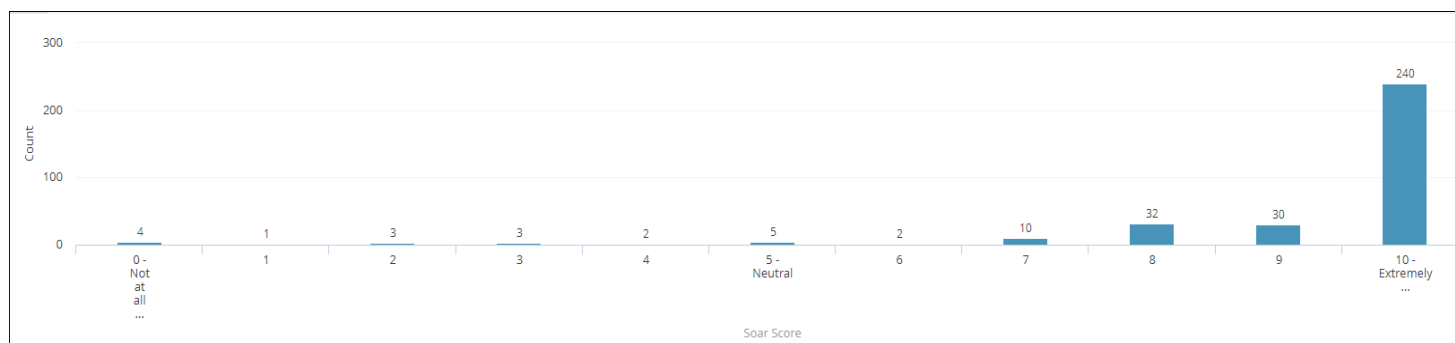
Percent



Count



Transactional Net Promoter Score Distribution By Rating



Transactional Net Promoter Score By Office – By Count

City	NPS	Detractors	Passives	Promoters
Chiefland	87	3	20	
Lecanto	75	6	10	74
NULL	50		1	1
Ocala	75	14	28	175

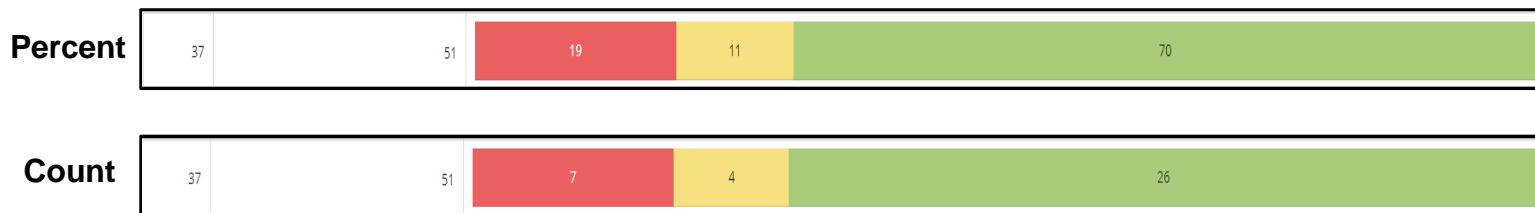
Transactional Net Promoter Age – By Percent

Age Group	NPS	Detractors	Passives	Promoters
A (0 TO 16)	0		100	
B (17 TO 24)	76	6	12	82
C (25 TO 34)	57	14	14	71
D (35 TO 44)	70	6	18	76
E (45 TO 54)	80	10		90
F (55 TO 64)	78	6	10	84
G (65 TO 74)	60	10	20	70
H (75 TO 84)	86	1	11	87
I (85 TO 94)	90	5		95
J (95 TO 100)	77	5	13	82

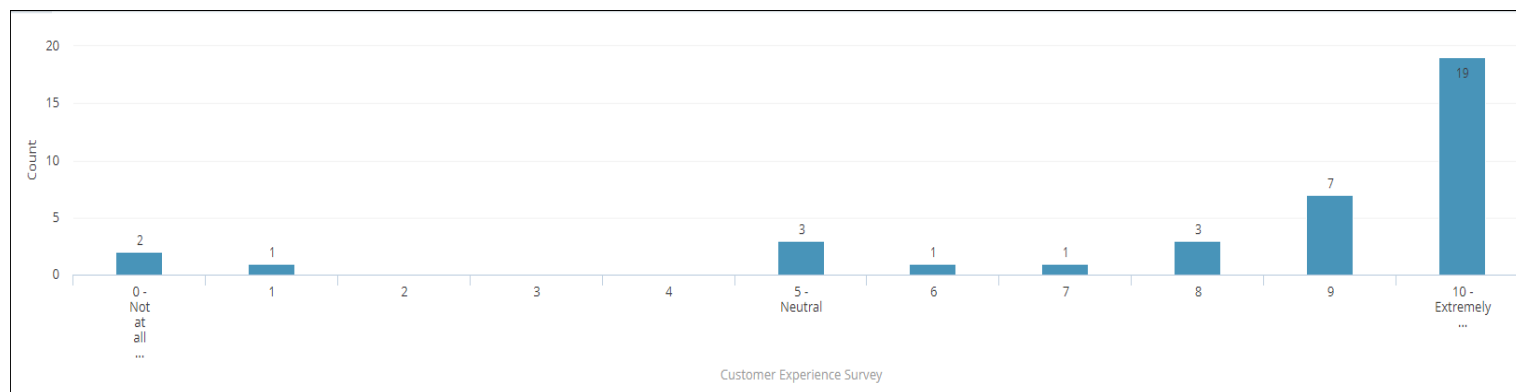
Business Net Promoter Cumulative Report – January 2022 to December 2022

Employer - Business Report	Region 10 Business Net Promoter Score CY 2022
Net Promoter Score–Area/Region	►51 (Down 1 Point Over CY 2021)

Some Context on the Score: This score is based on a survey taken approximately 2 weeks to 1 month after the first service. Net Promoter scores range between -100 and +100. Based on global NPS standards, any score 0 to 49 would be considered “Good” – scores between 50 and 69 are “Excellent” and scores 70 and above are considered “World Class” or “Exceptional”. Simply put, any positive score means that you have more promoters (advocates willing to recommend you) than detractors (unhappy or dissatisfied customers).



Business Net Promoter Score Distribution By Rating



Business Net Promoter Score Distribution By Service Type – By Count

Trigger Event		NPS		Distribution
Provided Job Fair Services	2	50		1 Detractors, 1 Promoters
Provided Job Order Follow-up	33	49		7 Detractors, 3 Passives, 23 Promoters
Provided Other Training Service Not Otherwise Classified	2	100		2 Promoters

Talent Center Cumulative Report Calendar Year 2022

Job Candidate Report	Talent Center Net Promoter Score (January 22 to December 22)
Net Promoter Score	<div></div> +100

Some Context on the Score: **This score is based on a survey taken approximately 1 to 4 weeks after the first service. Net Promoter scores range between -100 and +100.** Based on global NPS standards, any score 0 to 49 would be considered “Good” – scores between 50 and 69 are “Excellent” and scores 70 and above are considered “World Class” or “Exceptional”. Simply put, any positive score means that you have more promoters (advocates willing to recommend you) than detractors (unhappy or dissatisfied customers).

