

General Meeting November 14, 2024, at 6:00 P.M. (CT)

Join via Microsoft Teams Meeting

or by phone at 561-570-4464 Conference ID: 722 621 099# or in person at 4636 Highway 90, Suite K Marianna, FL 32446 - Community Room Richard - (850) 557-2441; Tabetha - (850) 693-3913

AGENDA

CALL TO ORDER Donnie Read, Chair

INVOCATION / PLEDGE TO FLAG Travis Ephraim

ROLL CALL Tabetha Basford

PUBLIC COMMENTS Donnie Read

EMERGENCY ITEMS Donnie Read

ANNUAL PERFORMANCE PRESENTATION Florida Commerce Pages 3 - 21

CONSENT ITEMS

*General Meeting Minutes Donnie Read Pages 22 - 24

September 12, 2024

STATUS OF FUNDS REPORT Richard Williams

(To be provided)

MISSION MOMENT Debby Wood

COMMITTEE REPORTS (To be provided)

*Program Committee Meeting Donnie Read

October 23, 2024

*Youth Committee Meeting Travis Ephriam

November 8, 2024

ONE-STOP OPERATOR REPORT Donnie Read Pages 25 - 34

*PY 2024-2025 First Quarter

OLD BUSINESS

PY 2022-2023 Programmatic and Monitoring Report Richard Williams Pages 35 - 57

NEW BUSINESS

Conflict of Interest Form Richard Williams

DIRECTOR'S COMMENTSRichard Williams

BOARD MEMBER COMMENTS Donnie Read

ADJOURNMENT Donnie Read, Chair

MARK YOUR CALENDARS

JANUARY 9, 2025

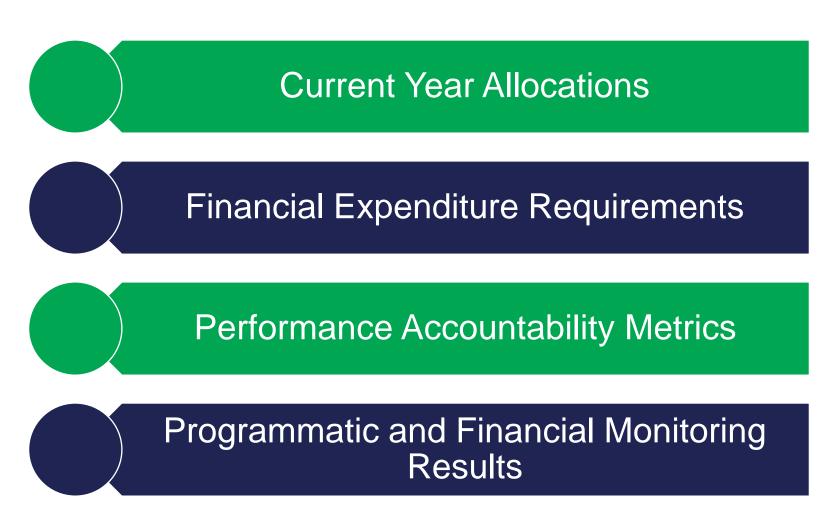


CareerSource Chipola

Annual Performance Presentation

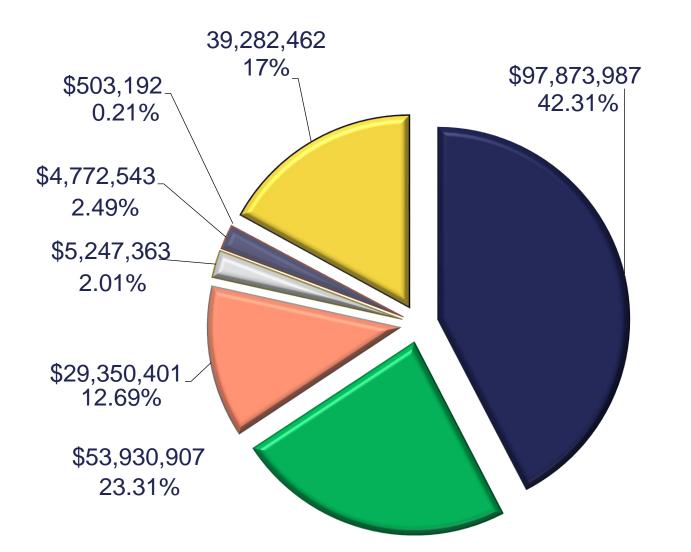
November 2024

Objectives





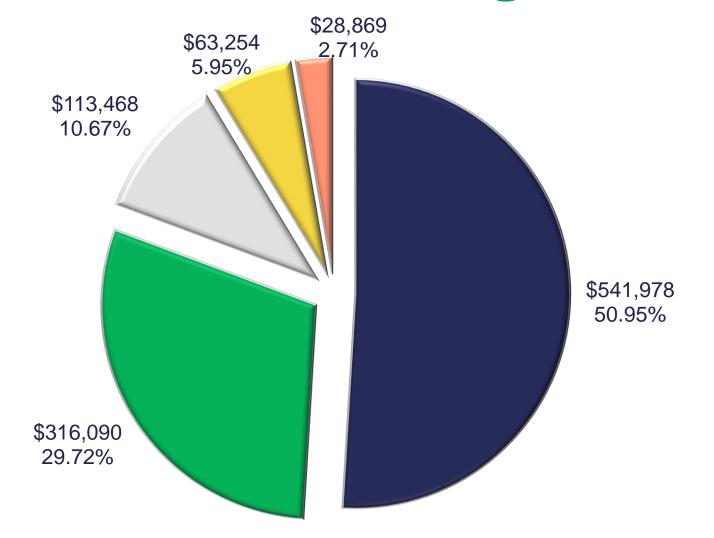
Statewide Funding 2024: \$230,960,855



- Workforce Innovation and Opportunity Act
- Welfare Transition
- Wagner Peyser
- Supplemental Nutrition Assistance Program
- Trade Adjustment Assistance Program
- National Emergency Grant



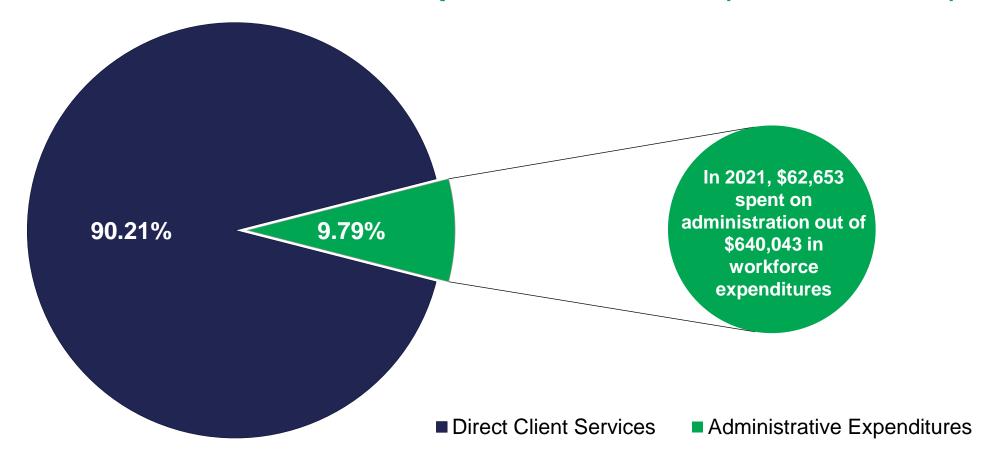
Local Board Funding 2024: \$1,063,659



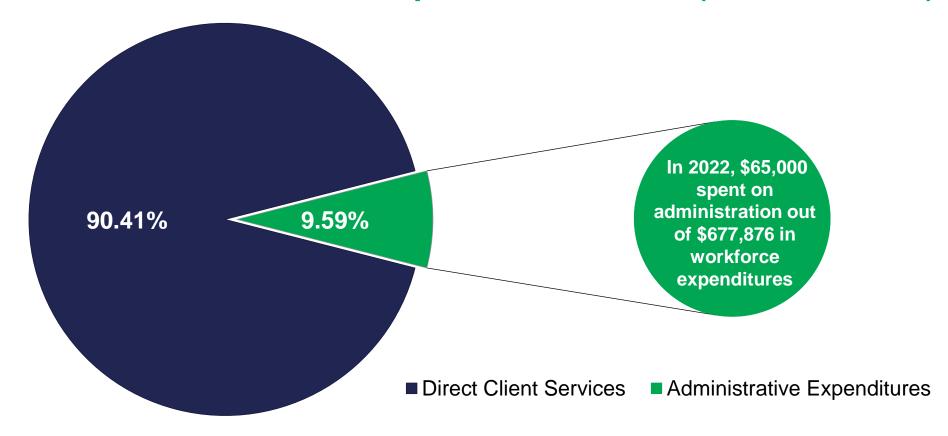
- Workforce Innovation and Opportunity Act
- Welfare Transition
- Wagner-Peyser
- Jobs for Veterans State Grant
- Supplemental Nutrition Assistance Program



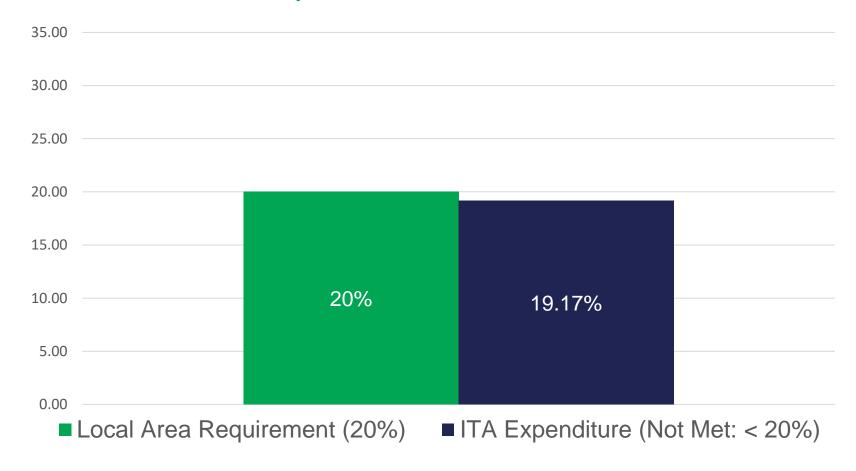
Local Board Direct Client Services and Administrative Expenditures (PY 2021)



Local Board Direct Client Services and Administrative Expenditures (PY 2022)

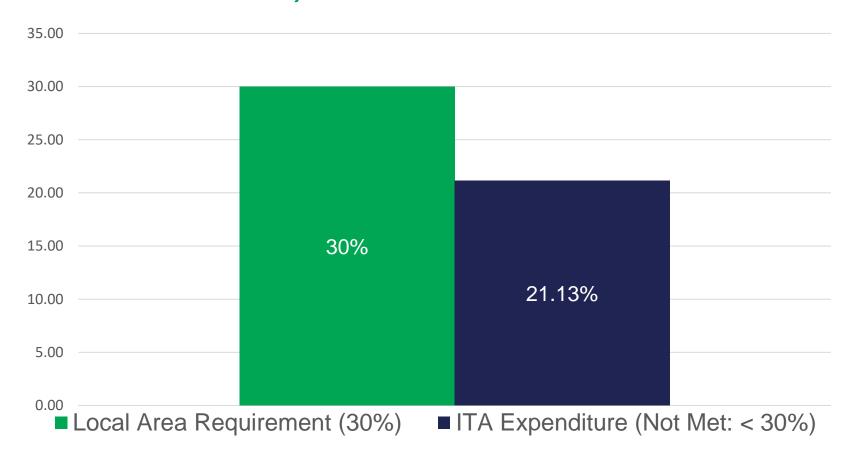


Individual Training Account Expenditures (SFY 2021-2022)

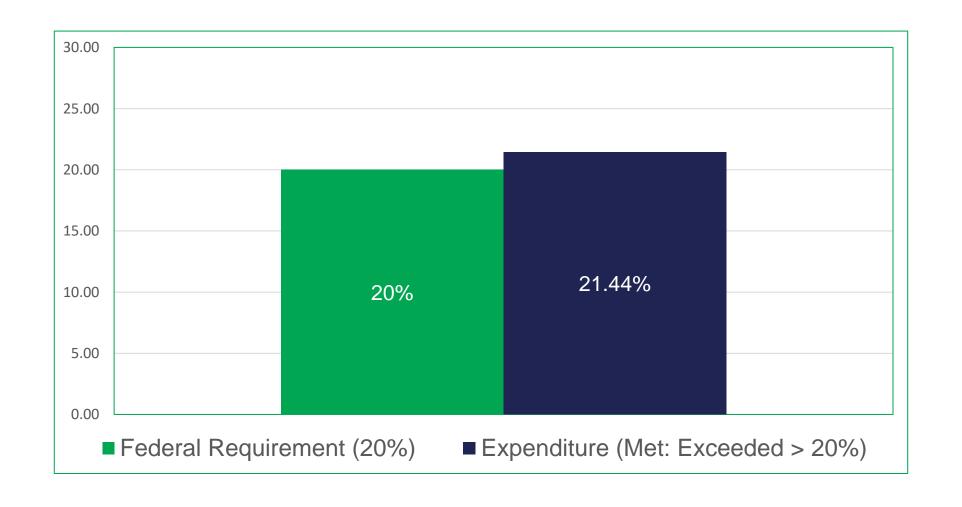




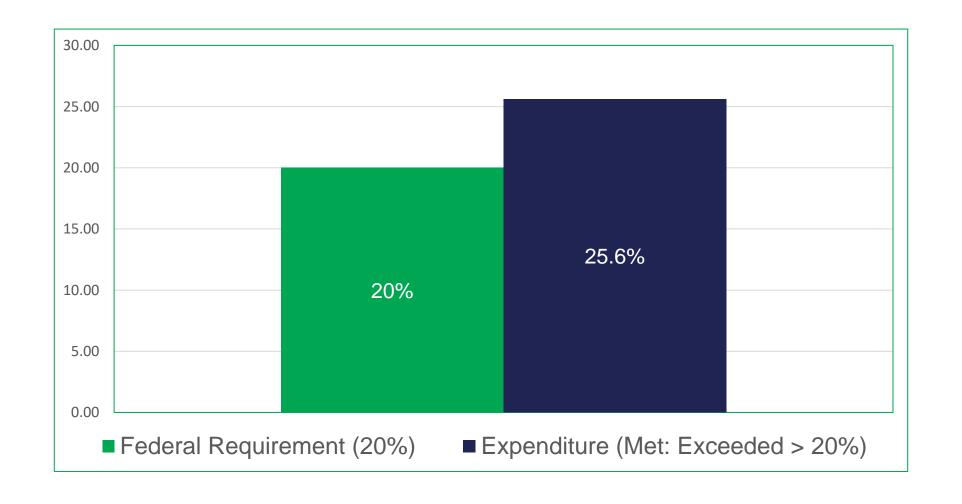
Individual Training Account Expenditures (SFY 2022-2023)



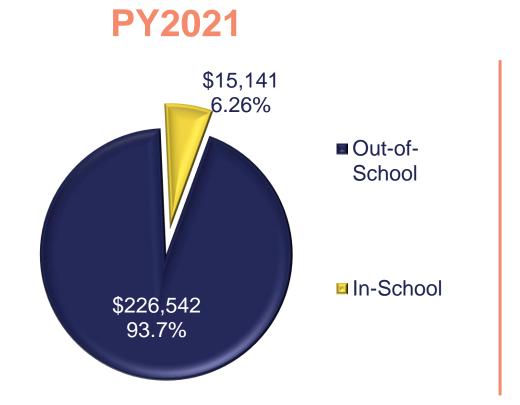
Work Experience Expenditures (FFY 2021)



Work Experience Expenditures (FFY 2022)

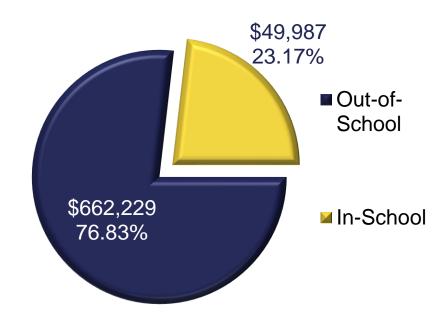


Out-of-School Youth Expenditures



Federal Requirement = 75%

PY2022



Federal Requirement = 50%



Primary Indicators of Performance

Customer Groups

- Adult Metrics (5)
- Dislocated Worker Metrics (5)
- Youth Metrics (5)
- Wagner-Peyser Metrics (3)

Metrics

- 1. Employed in 2nd quarter after exiting the program
- 2. Employed in 4th quarter after exiting the program
- 3. Median wages in 2nd quarter after exiting the program
- 4. Credential attainment rate (Not applicable for Wagner Peyser)
- 5. Measurable Skill Gains (Not applicable for Wagner Peyser)

Primary Indicators of Performance

LWDB 03 Program Year (PY) 2022 & 2023 Performance for July 1– June 30	PY2022 Negotiated Performance Goals	PY2022 Adjusted Performance Goals	PY2022 4th Quarter Performance	PY2023 Negotiated Performance Goals	PY2023 4th Quarter Performance
Adult Programs:					
Employed 2nd Quarter After Exit	94.1	94.7	100.0	94.1	94.7
Median Wage 2nd Quarter After Exit	\$8,215	\$8,965	\$10,227	\$8,215	\$8,148
Employed 4th Quarter After Exit	88.2	89.3	87.8	88.2	100.0
Credential Attainment Rate	86.7	86.6	73.7	86.7	86.7
Measurable Skill Gains	76.0	80.8	65.9	76.0	76.9
Dislocated Workers Programs:					
Employed 2nd Quarter After Exit	72.0	72.3	100.0	72.0	0.0
Median Wage 2nd Quarter After Exit	\$7,682	\$10,980	\$8,005	\$7,682	\$0
Employed 4th Quarter After Exit	71.8	84.1	91.7	71.8	0.0
Credential Attainment Rate	75.0	74.9	80.0	75.0	0.0
Measurable Skill Gains	70.0	73.2	0.0	70.0	100.0
Youth Programs:					
Employed 2nd Quarter After Exit	81.2	79.0	90.0	81.2	92.6
Median Wage 2nd Quarter After Exit	\$3,957	\$3,907	\$4,814	\$3,957	\$4,994
Employed 4th Quarter After Exit	78.7	74.2	70.5	78.7	80.0
Credential Attainment Rate	68.2	57.1	44.7	68.2	56.7
Measurable Skill Gains	34.8	32.3	70.0	34.8	65.0
Wagner Peyser Programs:					
Employed 2nd Quarter After Exit	67.5	69.5	73.7	67.5	72.3
Median Wage 2nd Quarter After Exit	\$4,282	\$4,674	\$5,734	\$4,282	\$5,924
Employed 4th Quarter After Exit	67.5	66.2	68.8	67.5	71.9







Letter Grades

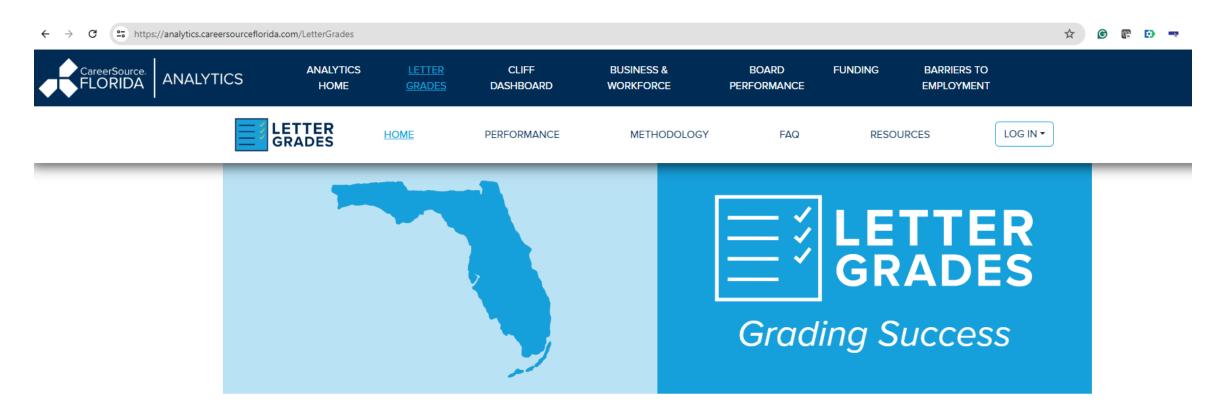
Customer Groups

WIOA (Adult, Dislocated Worker, Youth), Wagner-Peyser, Supplemental Nutrition Assistance Program, Welfare Transition, National Dislocated Worker Grant, Trade Adjustment Assistance, Employers

Metrics

- 1. Participants with Increased Earnings
- 2. Reduction in Public Assistance
- 3. Employment and Training Outcomes
- 4. Participants in Work-Related Training
- 5. Continued Repeat Business
- 6. Year-Over-Year Business Penetration
- 7. Completion-To-Funding
- 8. Extra Credit: Serving Individuals on Public Assistance

Letter Grades, Cont.



Visit: https://analytics.careersourceflorida.com

Programmatic Monitoring Activities

LWDB 03 Program Year (PY) 2022-23	PY 2021-22 Findings	PY 2022-23 Findings
Welfare Transition	2	1
Wagner-Peyser	0	0
Supplemental Nutrition Assistance Program - Employment and Training	3	2
WIOA Adult / Dislocated Worker / Youth / Special Initiatives	1	0
Jobs for Veterans State Grants	0	2
Other: Local Board Governance	0	2
Total Findings	6	7

Financial Monitoring Activities

LWDB 03 Program Year (PY) 2022-23 April 1, 2022 – June 30, 2022	PY 2021	PY 2022
Findings	0	2
Issues of Non-Compliance	2	0
Observations	0	0
Technical Assistance	0	0



Questions & Answers

Contact Us

Thank You.

If you have questions or comments about this presentation, please contact us.



Karmyn Hill

Email: Karmyn.Hill@Commerce.fl.gov

Office: Bureau of One-Stop and Program Support



General Meeting September 12, 2024, at 6:00 P.M. (CT)

MINUTES

CALL TO ORDER

A quorum was present, and Donnie Read, Chair, called the meeting to order. Travis Ephriam led the group in the Invocation and Pledge to the Flag.

The following board members were present:

Mary McKenzie, Janice Sumner, Kyle Coates, Travis Ephriam, Jonathan Fuqua, Kevin Buchanan, Donnie Read, Al Bryant, Tracy Andrews, David Corbin, Dr. Sarah Clemmons Bryan Lee, Penny Bryan

The following board members were absent:

Raymond Russell, Sandy Spear, Debbie Kolmetz, Johnny Eubanks, Kyle Peddie, Justin Stephens, Dr. David Bouvin, Keith Sutton

Others present included:

Richard Williams, Sara Johnson, Deena Johnson, Debby Wood, Melody Wade- CSC Staff

GENERAL MEETING MINUTES

Jonathan Fuqua made the motion, Janice Sumner seconded the motion, and the vote was unanimous to approve the minutes of the May 9, 2024, general meeting.

STATUS OF FUNDS REPORT

Richard Williams and Sara Johnson went over the Status of Funds Report.

MISSION MOMENT

Richard Williams provided a recap of CareerSource Chipola's successful Annual Meeting held on August 8, 2024, at the Marianna Agricultural Conference Center.

COMMITTEE REPORTS

Donnie Read stated the Executive Committee met on August 27, 2024, to discuss action items to be brought to the Board's attention at today's meeting:

2024-2025 BUDGET

The Executive Committee made a motion on August 27, 2024, to approve the CareerSource Chipola drafted 2024-2025 Budget, Al Bryant seconded the motion, and the vote was unanimous to approve the Program Year 2024-2025 Budget.

ITA WAIVER

The Executive Committee made a motion on August 27, 2024, to approve the Individual Training Account Waiver, Dr. Sarah Clemmons seconded the motion, and the vote was unanimous to approve the submission of the ITA Waiver with the Chair's signature.

DRAFTED 4-YEAR PLAN

The Executive Committee made a motion on August 27, 2024, to approve the CareerSource Chipola drafted Four-Year Plan, Bryan Lee seconded the motion, and the vote was unanimous to approve the CareerSource Chipola Four-Year Plan.

PY 2024-2025 TARGETED OCCUPATIONS LIST

The Executive Committee made a motion on August 27, 2024, to approve the CareerSource Chipola Program Year 2024-2025 Targeted Occupations List, David Corbin seconded the motion, and the vote was unanimous to approve the usage of the Program Year 2024-2025 Targeted Occupations List.

ONE-STOP OPERATOR REPORT

Donnie Read commended CareerSource Chipola's fourth quarter one-stop operator report for Program Year 2023-2024.

COMMITTEE STRUCTURE FOR 2024-2025

The Executive Committee met on August 27, 2024, and decided to ask the Board of Directors for input on the structure of the 2024-2025 Program Year Committee membership. Kyle Coates made the motion for the Executive Committee to decide memberships, Mary McKenzie seconded the motion, and the vote was unanimous to approve the Executive Committee to appoint members to the 2024-2025 Program Year Committees.

BOARD TRAINING

Richard Williams discussed updates and reviewed the Board Member Orientation information with the Board of Directors. No action needed.

SUBRECIPIENT AGREEMENT

Jonathan Fuqua made the motion to approve Donnie Read, Chair of CareerSource Chipola's Board of Directors, to sign the agreement with the state to receive funds, Travis Ephriam seconded the motion, and the vote was unanimous to approve the chair's signature on the Subrecipient Agreement.

Director's Comments

The Executive Director noted the LWDB still has not received the final monitoring report from the monitoring that started June 2023 and covered the 2021-2022 program year. After discussion Al Bryant made the motion to have the chair send a letter to the state requesting the report be issued, Brian Lee seconded the motion, and the vote was unanimous to approve the request.

BOARD MEMBER COMMENTS

None.

ADJOURNMENT

Jonathan Fuqua made the motion, Janice Sumner seconded the motion, and the vote was unanimous to adjourn the September 12 Board Meeting.



CareerSource Chipola One-Stop Operator (OSO) Quarterly Review PY 2024-2025 First Quarter *WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) BACKGROUND

(*Located at the End of this Report)

One-Stop Career Center: 4636 Highway 90, Marianna, Florida 32446

Date of Unannounced One Stop Center on Site Review: October

12, 2024 * (Documentation attached of the adjustment of the date of review)

Conducted by Linda Sumblin, CareerSource Chipola contracted One-Stop Operator Consultant

An unannounced onsite review was conducted by the One- Stop Operator (OSO) on October 12, 2024 at the CareerSource Chipola One-Stop Marianna Center. The purpose of the review was to assess the effective delivery of applicable services across program lines and with other organizations as required by WIOA (Workforce Innovation and Opportunities Act)

CareerSource Chipola Staff Met by One-Stop Operator on October 12, 2024:

- Sara Johnson, Finance Director
- Tabetha Basford, Administrative Specialist

As identified by the US Department of Labor and Florida Department of Labor, the One-Stop areas of the OSO review included:

- Flow of Services; Hours of Operation
- Basic Services Available/Program Delivery

- Partner Memorandum of Understandings
- Effectiveness
- OSO General Comments.

CareerSource Chipola – One-Stop Operator PY 2024-2025 1st Quarter Review Summary of Review

Flow of Services

CSC is a partner of the US Department of Labor American Job Centers and CareerSource Florida established under the Workforce Investment Act and reauthorized in the Workforce Innovation and Opportunities Act of 2014, which is designed to provide a full range of assistance to job seekers under one roof. CSC broadly identifies as member of the American Job Center Network as required. CSC offers training referrals, career counseling, job listings, and similar employment-related services to job seekers and the business community as outlined in detail below.

The CareerSource Center delivery of services hours extended to the public are clearly noted at the main entrance and can be found via the CareerSource Chipola website. In addition to the CSC services offered onsite, the services can be accessed via the website 7 days/24 hours at careersourcechipola.com. Holiday Closure (*including "Closed on State Holidays*) is posted via CareerSource Chipola website, multi social media avenues, entrance of facility, and visually displayed in One Stop Center.

The CSC One-Stop Center staff assisting customers with program information/delivery are knowledgeable of local, state, and federal CSC services. Each of the CSC staff observed by the OSO were extremely professional and considerate with co-workers and customers.

As the universal customer enters the One-Stop Center (with customer entrance limitations), customers are directed to the Atlas registration/sign-in system The OSO noted that CSC staff have the expertise to design, administer and deliver all workforce development activities and have demonstrated the ability to adapt and conform to changes in policy, practices, and priorities to meet local community and the universal customer-based needs. The One-Stop Center continues to utilize the ATLAS electronic filing system that provides access to case files and customer activity information through the internet. The electronic system allows staff to engage customers and provide services. Both virtual and center-based service delivery for job seekers, workers, and employers support the talent needs of the regional economy. In addition, the Atlas system allows the CSC to track customer services as well as "waiting time for CSC services" for monitoring of delivery of services.

In addition to the onsite workshops, virtual workshops are also extended to registered users by logging in with assigned kiosk login. All workshops are open to the public and are offered free of charge. The following workshops are available on-line:

- Setting Goals
- Stress & Time Management
- Employ Florida Marketplace

- Dress with Confidence
- Resume Skills
- Interview with Enthusiasm

- Improving Your Memory
- Financial Planning
- Employ Florida Marketplace

During the 2024-2025 OSO 1st Quarter onsite review, it was noted that the Center service delivery system for CSC customers was well thought out and established to meet the goals of the customers. The staff provided excellent and informative customer service.

Flow of Services Comments:

No suggestions/concerns noted.

CareerSource Chipola Marianna One-Stop Center - Hours of Operation

CSC Hours of Operation notices are posted via the Career Source Chipola website, social media platforms, and multi locations at the Center:

Hours of Operation: Monday – Friday 8:00 AM – 5:00 PM Closed on State Holidays

In addition to the CSC services offered onsite, the services can be accessed via website 7 days/24 hours at <u>careersourcechipola.com</u>.

Also posted on the CareerSource Chipola website and Center, "Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers listed on this website may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711".

Hours of Operation Comments:

No suggestions/concerns noted.

Basic Services Available/Program Delivery

CSC Marianna One-Stop Career Center offers a wide range of *job seeker and employer* services including job postings, local and statewide Labor Market Information (LMI), and skill-based job matching available online at Employ Florida Marketplace (EFM) - www.employflorida.com. As noted in the WIOA Legislative Required Partners matrix below, CareerSource Chipola has established program service delivery methods for requirement WIOA partners. The CSC program systems and partner relationships are well developed and internally reviewed ongoing for enhancement and growth. CSC is to be acknowledged for their positive partnerships and performance outcomes.

Additional (but not limited to) resources/referrals CSC extends (as noted in the CSC Center and CSC website):

- Chipola College
- Florida Panhandle Technical College

- Opportunity Florida
- Vocational Rehabilitation
- Tobacco Free Florida

Program Delivery Comments:

No suggestions/concerns noted.

Memorandum of Understandings (MOU)

As noted in prior OSO reports, the Basic elements/description of services as outlined in legislation of the MOU is included with the CSC MOU's:

- *Method/s for referring individuals*
- Duration/Procedures of MOU

- Resolution of MOU Disputes
- Cost Sharing

A matrix (identifying entity delivery services; MOU execution date; and method of delivery of services) of the required WIOA MOU's is noted below.

As shared by Tabetha Basford, Administrative Specialist, there have been no edits to the currently executed CSCMOU's.

Memorandum of Understandings (MOU) Comments

No suggestions/concerned noted.

Effectiveness

One of the outlined elements in WIOA legislation for OSO to review the Center "Effectiveness" as defined below.

The CSC OSO based the Effectiveness ranking of the program/delivery of Center services on a Scale of 1-10 with ten being top performance). Three areas of Effectiveness ranked as defined in the WIOA legislation:

- 1) Provider job seekers with skills and credentials necessary to secure and advance in employment with wages that sustain themselves and their families.
- 2) Provide access and opportunities to job seekers, including individuals with barriers to employment.
- 3) Enable business and employers to easily identify and hire skills workers

CareerSource Chipola One Stop Operator Effectiveness Comments

As a result of the 2024-2025 1st Quarter One-Stop Operator review as outlined, the One-Stop Operator ranked the current Effectiveness for the CareerSource Chipola at 9.5 out of a ranking of 10.0.

General Comments

DEO State Required Program and Fiscal Monitoring Reviews

During the OSO 2024-2025 1st onsite visit, it was noted by CSC staff that the State is in arrears of providing to CSC the previous years' Department of Economic Opportunity (DEO) State Program and Fiscal Monitoring reports. The 2021-2022 and 2023-2024 monitoring schedules are attached to reflect the time delay. Also attached is the current PY Monitoring Schedule noting the CSC State Monitoring is scheduled for March 10th – March 14th, 2025.

CSC Board of Directors – Executive Committee and General Meetings

A review of the 2024-2025 1st Quarter CSC Board of Directors (Executive Committee and General Meetings) agenda/minutes were reviewed via CSC website with no concerns noted. Meetings held the current program year:

- August 27, 2024 Executive Committee
- September 12, 2024 General Meeting

The next 2024-2025 General Meeting is scheduled for November 14, 2024.

DEO Guidance Issued from 7/1/2024 to current date.

The following Department of Economic Opportunity (DEO) Communiques, Administrative policies, or Memorandums posted following the start of the 1st Quarter, PY 2024-2025. It is noted that all DEO Policies/Communiques/Memorada's are being reviewed/implemented by the CSC leadership team as applicable.

Administrative Policies – None Noted on the DEO website

Communiques

Workforce Innovation and Opportunity Act (WIOAh	07/09/2024	2024 Adjusted Lower Living Standard Income Level Wage Rates
Workforce Innovation and Opportunity Act (WIOA)	05/30/2024	2024 Lower Living Standard Income Level for the Workforce Innovation and Opportunity Act

Memoranda

Workforce Opportunity and Innovation Act (WIOA)	10/14/2024	Waivers for Workforce Innovation & Opportunity Act Out-of-School Youth Expenditure Requirement and Use of Individual Training Accounts for In-School Youth
General Information	10/07/2024	Minimum Wage Increase Effective September 30, 2024
Workforce Opportunity and Innovation Act (WIOA)	07/03/2024	Local Targeted Occupations List Annual Submission

CSC Unemployment Data:

Overview of the CareerSource Chipola Region Not Seasonally Adjusted September 20, 2024

The unemployment rate in the CareerSource Chipola region (Calhoun, Holmes, Jackson, Liberty, and Washington counties) was 4.3 percent in August 2024. This rate was 0.6 percentage point greater than the region's year ago rate of 3.7 percent.

The region's August 2024 unemployment rate was 0.6 percentage point above the state rate of 3.7 percent. The labor force was 42,361, down 295 (-0.7 percent) over the year.

There were 1,842 unemployed residents in the region.

Calhoun County had the lowest unemployment rate (4.1 percent) in the CareerSource Chipola region followed by Washington County (4.2 percent), Jackson County (4.4 percent), Liberty County (4.4 percent), and Holmes County (4.5 percent).

Employment by industry in the CareerSource Chipola region totaled 30,085 jobs in March 2024 (the latest available data). CareerSource Chipola region's employment increased by 461 jobs (+1.6 percent) over the year.

*WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) BACKGROUND

Under the Workforce Innovation and Opportunity Act (WIOA), the vision for one-stop career centers is characterized by providing excellent customer service to job seekers and employers, customer-centered service delivery, and continuous improvement. As defined by Florida guidance, identified One-Stop Centers should strive to assure quality services are being delivered in the most efficient and effective ways possible, through full integration and coordination of one-stop career center partners and resources to support seamless service delivery.

Workforce Innovation and Opportunity Act (WIOA)	The goals and format of the One-Stop-Operator are set out in Workforce Innovation and Opportunity Act (WIOA) Section 121 subsection (e) according to PUBLIC LAW 113–128—JULY 22, 2014 (WIOA) Sec. 121(d)(2)(A), Federal Regulation 29 U.S.C. §§ 3151 (d) One-Stop operators.
One-Stop Operator Role and Responsibilities	As outlined and agreed by both parties (CSC and OSO) the 2017-2018 executed OSO contract, was renewed on June 10, 2019, for an additional one-year term for delivery of outlined One-Stop Operator Services for the period PY 2019-2020. The renewed OSO was based on performance, business needs and the availability of funds. As outlined by legislation, the Local Board defines the role and responsibilities of One-Stop career center operators in its local area. The Local Board may vary roles and responsibilities for career centers within its local area.

As defined by CareerSource Chipola and agreed by OSO Contractor for this review as: Conduct program year 2019-2020 quarterly unannounced visits to the Marianna Career Center. Within thirty (30) days of the visit provide a report indicating if the Marianna Career Center is effectively delivering services across program lines and with other organizations as required by WIOA. If it is determined the Center is not effectively providing services, the report must include recommended actions to be undertaken at the Center to correct any issues. Additionally, as part of the required report, the Contractor may include comments on best practices or suggestions for improvement.

CareerSource Chipola Background

The Chipola Regional Workforce Development Board, Inc., dba CareerSource Chipola is the administrative entity/grant recipient for the region (*serving Calhoun, Holmes, Jackson, Washington, and Liberty Counties*). The Chipola Regional Workforce Development Board, Inc., dba CareerSource Chipola has operated as the fiscal agent and administrative entity since 1996 as approved in the approved Interlocal Agreement.

The CareerSource Chipola One-Stop and satellite locations are located to population centers, governmental buildings and shopping centers making them convenient locations for most customers. Centers are connected by a wide area network that spans the three locations providing e-mail, Internet access, state systems access, case management, and data/print sharing. The ATLAS electronic filing system provides access to case file and customer activity information through the internet. This electronic system allows staff(s) at any location to engage customers and provide services. Both virtual and center-based service delivery for job seekers, workers, and employers support the talent needs of the regional economy.

Contracted CareerSource Chipola
One-Stop Operator
Linda Sumblin, Contractor
Execution Date of Renewed
Contract:
June 10, 2019

Credentials: Linda Sumblin was formerly employed with the CareerSource Okaloosa Walton since Board inception in 1996. She was named Executive Director October 2011. Prior to being named the Executive Director, Linda served in many areas for the Board including the Chief Operating Officer/Assistant Director. Linda's career in workforce development began in January 1989 when she joined the Private Industry Council, the predecessor governing board for job training.

As initial contracted OSO for the period July 1, 2017, through June 30, 2018 (*with a 2-year renewal as agreed by both parties*). Linda Sumblin has declared no conflict of interest with any entities of CareerSource Chipola (Board, staff, or

partners) and that firewalls have been established to ensure conflict of interest policies and procedures are adhered.
It is understood and agreed that the One-Stop Operator cannot assist in the development, preparation, and submission of local plans; and that they cannot manage or assist in the competitive process for selecting operators or select or terminate One-Stop Operator, Career Services and Youth Providers.

CareerSource Chipola Memorandum of Understandings

NOTE: NO Changes in the MOU's during the One-Stop onsite review. *Denotes WIOA Legislative Required Partners

Program	Agency Delivering Services	MOU Date Executed (or latest Addendum)	On Site Delivery of Services/ Delivery of Referral Services
*Title I – Adult	CareerSource Chipola	Cooperative Agreement with Department of Economic Opportunity	On Site
*Title I – Dislocated Worker	CareerSource Chipola	Cooperative Agreement with Department of Economic Opportunity	On Site
*Title I – Youth	CareerSource Chipola	Cooperative Agreement with Department of Economic Opportunity	On Site
	Calhoun School Board	Calhoun School Board- 8/14/2017	
	Holmes School Board	Holmes School Board – 9/14/2016	
*Title II – Adult Education and Literacy	Jackson School Board	Jackson School Board – 3/15/2016	Electronic/ Direct Referral
Act Literacy	Liberty School Board	Liberty School Board – 6/07/2016	Direct Referrar
	Washington School Board	Washington School Board – 8/14/2017	
	Florida Panhandle Technical Center (Washington-Holmes Technical Center)	Florida Panhandle Technical Center August 14, 2017	
*Title III - Wagner Peyser Employment Services	CareerSource Chipola/Department of Economic Opportunity (Jointly Managed)	Cooperative Agreement with Department of Economic Opportunity	On Site
*Title IV – Vocational Rehabilitation	Vocational Rehabilitation	February 2, 2017	Electronic Referral
	Division of Blind Services	December 16, 2016	
*Title V – Older American Act (SCSEP)	National Caucus and Center on Black Aged, Inc. (SEP)	May 15, 2016 Cost Sharing with In-Kind Staffing Support	On Site
*Veterans Employment and Training Services Under Chapter 41 of Title 38, U.S.C.	CareerSource Chipola/Department of Economic Opportunity (Jointly Managed)	Cooperative Agreement with Department of Economic Opportunity	On Site
*Trade Adjustment Assistance Act (TAA)	CareerSource Chipola	Master Agreement with Department of Economic Opportunity	On Site

NAFTA Assistance			
*Unemployment Insurance (Note: CareerSource Chipola extends "re- employment assistance)	Department of Economic Opportunity (No DEO staff onsite to extend UI assistance)	Master Agreement with Department of Economic Opportunity	Electronic/ Telephone Referral
*Temporary Assistance For Needy Families (TANF)	CareerSource Chipola Healthy Families North Florida	 Cooperative Agreement with Department of Economic Opportunity (Funded by DCF) Department of Children and Family Services – November 9, 2016 Healthy Families North Florida – April 	On Site Referral
Post Secondary	Chipola College Florida Panhandle Technical Center (Washington-Holmes Technical Center)	11, 2017 (Cost Sharing Cooperative) Chipola College – 10/13/2016 Updated 1/2021 Florida Panhandle Technical Center*– 8/14/2017	
Vocational Education under Carol Perkins Career and Technical Education (CTE)	Calhoun School Board	Calhoun School Board- 8/14/2017	Electronic/ Direct Referral
	Holmes School Board	Holmes School Board* – 9/14/2016	
	Jackson School Board	Jackson School Board – 3/15/2016	
	Liberty School Board	Liberty School Board – 6/07/2016	
	Washington School Board	Washington School Board*– 8/14/2017	
		*Multi-MOU's for varying programs identified	
*Job Corps	Department of Economic Opportunity	Cooperative Agreement with Department of Economic Opportunity	Electronic/ Direct Referral
*Community Services Block Grant (CSBG)	Tri-County Community Council Capital Area Community Action	Tri-County - May 17, 2016 Capital Area Community Action Agenda -	Electronic Referral
*HUD Employment Programs (U.S. Department of Housing and Urban Development)	Agency Tri-County Community Council	May 17, 2017 May 17, 2016	Electronic/ Telephone Referral
*Migrant and *Seasonal Farm Worker	Department of Economic Opportunity	Cooperative Agreement with Department of Economic Opportunity	Electronic Referral
*Native American Program (Tribes, Tribal Organization, Native Hawaiians)	Department of Economic Opportunity (No known sector population identified in Area	Cooperative Agreement with Department of Economic Opportunity	Electronic Referral

It is the opinion of the Chipola CareerSource contracted One-Stop Ope	erator based on legislative review
that the Chipola CareerSource Board and staff are acknowledge and have	we and/or implementing the goals
and format of the One-Stop-Operator requirements as set forth in	the Workforce Innovation and
Opportunity Act (WIOA) Section 121 subsection (e) according to PUE	BLIC LAW 113–128—JULY 22,
2014 (WIOA) Sec. 121(d)(2)(A), Federal Regulation 29 U.S.C. §§ 315	51 (d) One-Stop operators.
1	
Linda Sumblin	October 14, 2024
Linda Sumblin, One-Stop Operator	Date

Programmatic and Financial Monitoring Report

CareerSource Chipola
Local Workforce Development Board – 03

Program Year 2022-2023

October 23, 2024
Prepared by



Division of Workforce Services and Division of Finance and Administration

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Executive Summary

During the period of June 5 - 9, 2023, the Florida Department of Commerce (FloridaCommerce), conducted a joint programmatic and financial monitoring review of CareerSource Chipola (CSC) workforce programs. CSC's service area includes Calhoun, Holmes, Jackson, Liberty, and Washington counties.

Programmatic monitoring was conducted by FloridaCommerce's Bureau of One-Stop and Program Support (OSPS) and financial monitoring was conducted by FloridaCommerce's Bureau of Financial Monitoring and Accountability (FMA) staff through 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 CSC's program operations, management practices, system protocols, internal controls, and financial record keeping and reporting to determine if CSC operated in compliance with each of the programs' laws, regulations, state and local plans, policies and guidance, and any contract or agreement terms. Monitoring also included 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 categorized as Findings, Other Noncompliance Issues (ONIs), Observations, and Technical Assistance based on a scale of high, medium, and low risk factors. High, medium, and low risk factors are used to separate issues that present more of a threat to program operations including issues that may impact the fiscal integrity or delivery of services within program operations.

The review revealed that CSC 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 seven findings, five other noncompliance issues, and several observations. The financial monitoring review resulted in two findings. While no material issues or weaknesses came to the reviewers' attention other than those contained in the report, there is no assurance that other issues do not exist.

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

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

ACRONYM TABLE

ABAWD - Abled Bodied Adult without Dependents

AP - Administrative Policy

ARP - Alternative Responsibility Plan

CAP - Corrective Action Plan

CFR – Code of Federal Regulations

CSC- CareerSource Chipola

DCF - Department of Children and Families

DVOP - Disabled Veterans Outreach Program

DWG - Disaster Recovery Dislocated Worker Grant

DW - Dislocated Worker

EDP - Employability Development Plan

EEO - Equal Employment Opportunity

ES - Employment Service

ETA - Employment and Training Administration

F.A.C. - Florida Administrative Code

FCOP – Farmworker Career Development Program

FG - Final Guidance

FLC – Foreign Labor Certification

FloridaCommerce - Florida Department of Commerce

FLSA – Fair Labor Standards Act

FMA – Bureau of Financial Monitoring and Accountability

F.S. - Florida Statutes

FY - Fiscal Year

IEP - Individual Employment Plan

IRP - Individual Responsibility Plan

IT - Information Technology

ITA - Individual Training Account

IWT - Incumbent Worker Training

JPR - Job Participation Rate

JVA - Jobs for Veterans Act

JVSG – Jobs for Veterans State Grant

LLC – Limited Liability Corporation

LMI - Labor Market Information

LVER – Local Veterans Employment Representative

LWDB - Local Workforce Development Board

MIS - Management Information System

MOU/IFA - Memorandum of Understanding & Infrastructure Funding Agreement

MSFW - Migrant and Seasonal Farmworker

MSG - Measurable Skills Gains

ONI – Other Noncompliance Issue

OSPS - Bureau of One-Stop and Program Support

OSST - One-Stop Service Tracking

OST – Occupational Skills Training

POS - Priority of Service

PY - Program Year

RESEA – Reemployment Services and Eligibility Assessment Program

SBE - Significant Barrier to Employment

SMA – State Monitor Advocate

S.M.A.R.T – Specific, Measurable, Attainable, Realistic, and Time-Bound

SNAP E&T - Supplemental Nutrition Assistance Program Employment and Training

SYEP - Summer Youth Employment Program

TAA – Trade Adjustment Assistance

TANF – Temporary Assistance for Needy Families

TCA – Temporary Cash Assistance

TEGL - Training and Employment Guidance Letter

U.S.C. – United States Code

WDB - Workforce Development Board

WE – Work Experience

WFS - Workforce Services

WIOA – Workforce Innovation and Opportunity Act

WP - Wagner-Peyser

WSA - Work Search Activity

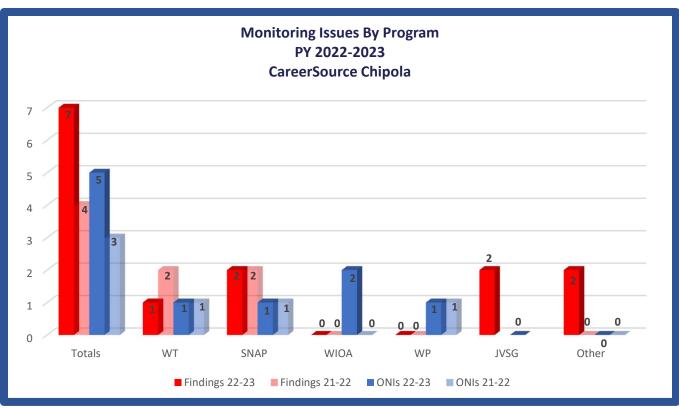
WT - Welfare Transition

*The above table reflects all acronyms that have been used in the PY 2022-2023 monitoring review cycle; however, all acronyms may not be used in this report.

SUMMARY TABLE OF PROGRAMMATIC MONITORING RESULTS

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

PY 2022-23 Programmatic Monitoring Results					
Workforce Program	Issue	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue
WT	There was no evidence of a verbal attempt to contact and/or counsel one participant during the 10-day counseling period when the pre-penalty was initiated.	N	Y		
	One participant's initial assessment did not include one of the three required elements (needs and barriers).			N	Y
WT Totals		0	1	0	1
SNAP E&T	Two participants failed to have a sanction requested timely.	N	Υ		
J. J	One participant case file was missing documentation to support the FSR entered in OSST.	N	Y		
	Four participants did not have their 590-initial appointment service code selected within two-business days of completion of the appointment or "No show" as required. Additionally, two participants did not have the correct appointment status entered in OSST to end the activity.			Y	Y
SNAP Totals	·	0	2	1	1
WIOA Adult/DW	A supportive service recorded in Employ Florida for one participant did not match the supportive service document maintained in the case file. The credential attainment recorded in Employ Florida for one			N	Y
	participant did not match the credential attainment document maintained in the case file.			N	Y
WIOA Totals		0	0	0	2
	Five participant EDPs had work search activities and action steps				
WP - RESEA	that were identical and not individualized to the participants.			N	Y
WP Totals	·			0	1
JVSG	Nine veteran files did not have the Objective Assessment Wizard completed in its entirety.	N	Υ		
	Nine veteran IEPs were either not conducted or not reviewed and updated within 30 days of the IEP creation or every 30 days thereafter; did not include updates and consistent contacts; did not include goals and necessary objectives to reach those goals; and did not include S.M.A.R.T. principles necessary to create goals and objectives.	N	Υ		
JVSG Totals		0	2	0	0
Local Board Governance	CSC's bylaws did not describe the purpose and responsibilities of the local board which include the hiring of the executive director.	N	Υ		
237CTTM/ITCC	The local board did not provide documentation that all board members completed their annual refresher training.	N	Υ		
Other Totals		0	2	0	0
Results – All Programs		0	7	1	5



Note: The above chart reflects a two-year comparison of the number of monitoring issues (PY 2021-22 and PY 2022-23).

DEFINITIONS APPLICABLE TO PROGRAMMATIC MONITORING

- 1. <u>Finding</u> A high risk issue that directly impacts the integrity or effectiveness of program operations or could potentially result in major program deficiencies (e.g., participant ineligibility, missing files, lack of fully executed contracts, issues indicative of systemic problems in program operations, has the appearance of fraud or abuse, possibility of non-conforming services provided to participants, potential questioned costs, etc.). Findings are expected to be responded to in the CAP.
- 2. Other Noncompliance Issue A medium risk finding that results in deviation from process or practice not likely to result in failure of the management system or process but has a direct impact on program operations (data validity, timeliness of entering system information, missing program elements and employment plan information, failure to timely conduct follow-ups, etc.). ONIs could potentially be upgraded to a finding over time based on the nature of the deficiency (e.g., repeat violations, issues indicative of systemic problems in program operations, questioned costs, etc.). ONIs are expected to be responded to in the CAP.
- 3. <u>Observation</u> 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

FY 2022-23 Financial Monitoring Results							
Category	Issue	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue	Observations	Technical Assistance
4.0-Cash Management – Revenue Recognition	Bank reconciliations not timely.	N	Υ	N	N	N	N
7.0-General Ledger and Cost Allocation	MOU IFAs missing multiple required elements.	N	Υ	Y	N	N	N
Results- All Categories		0	2	1	0	0	0

Note: For prior year findings and other noncompliance issues, please see the section on Prior Year Corrective Action Follow-Up.

DEFINITIONS APPLICABLE TO FINANCIAL MONITORING

- 1. <u>Finding</u> A high risk issue that directly impacts the integrity or effectiveness of financial operations or could potentially result in major financial deficiencies (e.g., lack of accounting records or no system of accounting, no documentation to support expenditures, lack of internal controls, lack of fully executed contracts, issues indicative of systemic problems in financial operations, has the appearance of fraud or abuse, potential questioned costs, etc.). Findings are expected to be responded to in the CAP.
- 2. Other Noncompliance Issue A medium risk finding that results in deviation from process or practice not likely to result in failure of the management system or process but has a direct impact on financial operations (e.g., missing financial elements, 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 financial operations, questioned costs, etc.). ONIs are expected to be responded to in the CAP.
- 3. <u>Observation</u> 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 financial outcomes. Observations are not expected to be responded to in the CAP except when requested.
- 4. <u>Technical Assistance</u> Any assistance provided by the financial monitoring team to LWDB staff.

MONITORING REPORT CAREERSOURCE CHIPOLA LOCAL WORKFORCE DEVELOPMENT BOARD - 03

I. DESCRIPTION OF MONITORING APPROACH

Monitoring consisted of a joint programmatic and financial review of CSC's workforce programs. The purpose of the monitoring review was to assess CSC'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 MIS, a review of participant case file documentation provided by CSC from the selected file samples, and a review of local plans, procedures, reports, records, and other abstract information. In some instances, interviews were conducted with CSC staff, employers, and participants to gather information about program processes and service delivery strategies.

The review scope also included an examination of CSC'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 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

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

Compliance Review Abstract Information

- Programmatic and Financial Monitoring Review Dates: June 5, 2023, to June 9, 2023
- Programmatic Monitoring Sample Review Period Dates: April 1, 2022, to March 31, 2023
- Financial Monitoring Sample Review Period Dates: April 1, 2022, to June 30, 2022

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

Programs Reviewed:

- Welfare Transition
- Supplemental Nutrition Assistance Program Employment and Training
- Workforce Innovation and Opportunity Act
- Wagner-Peyser
- Jobs for Veterans State Grant
- Any identified special projects operational during the review period
- Financial management practices, record keeping, safeguards and reporting

Monitoring Review Tools

FloridaCommerce's PY 2022-2023 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 REVIEW

FMA performed financial monitoring procedures based on the elements described in the FY 2022-2023 Financial Monitoring Tool. The results of the financial monitoring testing are described below:

FY 2021 – 2022 Prior Year Corrective Action Follow-Up

FMA identified an area of concern that remains unresolved. Reference to the unresolved prior year concern is contained in the results below.

FY 2022-2023 Financial Monitoring Results

Findings

Finding FMA #3.23.01

Category: 7.0 General Ledger and Cost Allocation

<u>Condition</u>: CSC's Memorandum of Understanding & Infrastructure Funding Agreements (MOU IFA) with The National Caucus on Black Aged, Senior Community Service Employment Program (NCBASCSEP), did not include all required information in accordance with 20 CFR 678.500(b)(4)-(6) and 20 CFR 678.755(a), (d), and (f) as follows:

- Methods to ensure that the needs of workers, youth, and individuals with barriers to employment, including individuals with disabilities, are addressed in providing access to services through the one-stop delivery system;
- The duration of the MOU and procedures for amending it;
- Assurances that each MOU will be reviewed, and if substantial changes have occurred, renewed, not less than once every 3-year period;
- The period of time in which this infrastructure funding agreement is effective;
- Steps the LWDB, chief local elected officials, and one-stop partners used to reach consensus;
- Description of the periodic modification and review process; and
- Remedies for nonperformance.

This issue is consistent with the Program Year 2021-2022 Quality Assurance Report *Issue of Noncompliance FMA* #3.22.01.

<u>Criteria</u>: 20 CFR 678.500(b)(4)-(6) states, in part, "The MOU must include:

- (4) Methods to ensure that the needs of workers, youth, and individuals with barriers to employment, including individuals with disabilities, are addressed in providing access to services, including access to technology and materials that are available through the one-stop delivery system;
- (5) The duration of the MOU and procedures for amending it; and

(6) Assurances that each MOU will be reviewed, and if substantial changes have occurred, renewed, not less than once every 3-year period to ensure appropriate funding and delivery of services."

20 CFR 678.755(a), (d), (f) states, in part, "The MOU, fully described in 20 CFR 678.500, must contain the following information whether the local areas use either the local one-stop or the State funding method:

- (a) The period of time in which this infrastructure funding agreement is effective. This may be a different time period than the duration of the MOU;
- (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; and
- (f) Description of the periodic modification and review process to ensure equitable benefit among one-stop partners."

<u>Cause</u>: The agreement has remained in effect continuously since its execution on December 21, 2017, with no periodic review for updates to applicable MOU IFA requirements.

<u>Effect</u>: CSC is not in compliance with federal requirements pertaining to the execution and administration of MOU IFAs. Absent the required information, such as the required steps used to reach consensus and remedies for nonperformance, CSC's MOU IFA may lack enforceability and creates the risk of reduced accountability and transparency over the use of funds and responsibilities of both parties.

<u>Required Action</u>: CSC must provide a timeline for amending the MOU IFA with NCBASCSEP to be compliant with 20 CFR 678.500 and 20 CFR 678.755. CSC must also ensure the elements stated in 20 CFR 678.500 and 20 CFR 678.755 are included in all MOU IFAs.

<u>Resource</u>: Administrative Policy Number 106, Memorandums of Understanding, and Infrastructure Funding Agreements, dated February 20, 2022 (floridajobs.org).

Finding FMA #03.23.02

Category: 4.0 Cash Management - Revenue Recognition

<u>Condition</u>: The LWDB did not timely complete 9 of the 12 bank reconciliations reviewed for the months of February 2022, April 2022, May 2022, and June 2022 for three bank accounts. The bank reconciliations were completed 44 to 181 business days after receipt of the bank statements.

Additionally, the February 2022 bank reconciliations for all three accounts were not dated by the preparer and approver. The print date of the reconciliation was used as the date the reconciliation was completed. The print date alone is not a good indicator that the reconciliation was completed timely.

<u>Criteria</u>: 2 CFR 200.302 (4) requires "effective control over, and accountability for, all funds, property, and other assets. The non-Federal entity must adequately safeguard all assets and assure that they are used solely for authorized purposes."

CSC's Administrative Plan, Section II Financial Management, Section 7 for Cash Management, indicates bank reconciliations are performed monthly, for the Administrative Plan in effect during the monitoring period.

The days that lapsed between the number of days after receipt of the bank statement and the performance of the bank reconciliation does not constitute a best practice for monitoring bank accounts and is contrary to the LWDB's Administrative Plan and the requirements of 2 CFR 200.302 (4).

Cause: Based on discussions with CSC management, the board was short staffed during the monitoring period.

<u>Effect</u>: Failure to timely reconcile and approve bank reconciliations could result in inaccurate financial reporting. Accurate and timely reconciliations of bank statements is a critical part of maintaining proper internal controls over financial integrity and enables effective financial decision-making.

Required Action: During the review, FMA conducted additional testing to determine if CSC had corrected the timeliness of bank reconciliations. Although CSC has been completing their reconciliations timely since 2022, CSC must strengthen their internal controls by updating their bank reconciliation policies and procedures and ensure alternative (backup) personnel is available to assist with the preparation of bank reconciliations. The updated procedures should specifically address the due dates for completion of monthly bank reconciliations. We recommend that the due dates for completion do not exceed 30 days. CSC must provide a timeline for the submission of the procedures.

<u>Corrective Action Taken</u>: Subsequent to monitoring, CSC stated that it has updated its bank reconciliation process. A backup person has been assigned to follow-up with reconciliations to ensure the reconciliation is made in a timely fashion when the primary reconciler is unable to timely complete the task. CSC further stated that updated written bank reconciliation policies and procedures will be provided by September 12, 2024.

Other Noncompliance Issues

There were no ONIs identified during the financial monitoring review period of April 1, 2022, to June 30, 2022.

Observations/ Technical Assistance

There were no observations identified or technical assistance provided during the financial monitoring review period of April 1, 2022, to June 30, 2022.

III. PROGRAMMATIC MONITORING REVIEW

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

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

General Program CAP Requirements

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

WELFARE TRANSITION

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

Findings

Finding WT #03.23.01 Category: Sanctions

<u>Condition</u>: Of the 13 case files reviewed of participants who did not comply with work requirements or failed to comply with their signed IRP, there was no documented attempt made by CSC staff to orally contact and counsel one (7.7 percent) participant prior to the sanction.

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

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

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

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

<u>Required Action:</u> CSC must provide documentation showing that staff have attempted to contact the participant to explain adverse actions which may be taken for noncompliance and enter counseling case notes of this action in OSST if the case is still open. CSC must also provide an assurance with the CAP that all subsequent pre-penalty and/or sanction requirements will be followed when processing a sanction in the future. Documentation of staff training and written notification to staff informing them of the requirements must also be provided with the CAP.

Other Noncompliance Issues

ONI WT #03.23.01

Category: Initial Assessment

<u>Condition:</u> Of the 17 mandatory assessment files reviewed, one (5.9 percent) assessment was missing the employability needs and barriers element.

<u>Criteria:</u> 45 CFR 261.11-12 and 14; the TANF State Plan; and CareerSource Memorandum entitled "Individual Responsibility Plan, Alternative Responsibility Plan, and Initial Assessment in OSST" dated October 22, 2014 requires, in part, that all mandatory files have an initial assessment of the skills, prior work experience, and

employability of each recipient who is at least age 18 or who has not completed high school (or equivalent) and is not attending secondary school" completed including all required elements.

Cause: Insufficient staff training, guidance, and procedures may be a factor in incomplete assessments.

<u>Effect:</u> Absence of an initial assessment without all required elements could eventually lead to a participant being placed in activities not conducive to overcoming barriers leading to employment and self-sufficiency.

<u>Required Action:</u> Documentation must be provided with the CAP of CSC's attempts to develop and include the missing elements on the assessment if the case is still open. Additionally, CSC must provide an assurance with the CAP that staff will review all future assessments recorded in OSST to ensure completion including all required elements within 30 days of the case becoming mandatory. Documentation of staff training and written notification to staff informing them of the requirements must also be provided with the CAP.

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM - EMPLOYMENT AND TRAINING

The sample size consisted of 17 participant case files. The following issues were identified:

Findings

Finding SNAP #03.23.02 Category: Sanctions

<u>Condition</u>: Of the 15 case files reviewed where a sanction was warranted for not meeting the 80-hour work requirement, sanctions for two (13.3 percent) participants were not requested by CSC and communicated to the Department of Children and Families.

<u>Criteria</u>: 7 CFR 273.7 (n)(ii) states, in part, that individuals must participate in activities no less than 20 hours per week for the purposes of this provision (20 hours a week averaged monthly means 80 hours a month).

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

<u>Effect</u>: Not following appropriate procedures and requirements during the penalty process could potentially result in overpayment of food assistance benefits to an ineligible individual that should have been sanctioned.

Required Action: CSC must provide documentation showing that a sanction request has been initiated for the individual identified or good cause action has been taken if the case file is still open. CSC must remind staff that when a participant fails to meet SNAP E&T work requirements within the time periods established by federal law, CSC must report the noncompliance to DCF by timely entering a sanction request in OSST and documenting the reasons via case notes. Documentation of staff training and written notification to staff informing them of the requirements must be provided with the CAP.

Finding SNAP #3.23.03

Category: Food Stamp Reimbursement

<u>Condition</u>: Of the 16 case files reviewed where an FSR was issued, one (6.3 percent) case file was missing documentation to support the FSR provided.

<u>Criteria</u>: <u>7 CFR 273.7(d)(4)(i)</u> states, in part, that "The State agency will reimburse the actual costs of transportation and other costs it determine to be necessary and directly related to participation in the E&T program up the maximum level of reimbursement established by the State agency. 7 CFR 273.7 <u>paragraphs (d)(4)(ii)</u> further states that "The State agency must inform each E&T participant that allowable expenses up to the amounts specified will be reimbursed by the State agency upon presentation of appropriate documentation".

<u>Cause</u>: CSC failed to obtain documentation from the participant to support the FSR for transportation cost prior to the request being entered into OSST.

<u>Effect</u>: Failure by CSC to adhere to federal requirements regarding the FSR process could be viewed as potential questioned costs if the participant was not determined eligible for the reimbursement(s).

Required Action: CSC must provide documentation showing that the FSR was requested by the participant and CSC staff have verified the need for the FSR. Additionally, CSC must provide an assurance with the CAP that staff will review all future FSR requests to ensure they meet the documentation requirements. A check and balance system should also be put in place to ensure documentation is provided before release of the approved reimbursement. Documentation of written notification to staff informing them of the requirements must also be provided with the CAP.

Other Noncompliance Issues

ONI SNAP #3.23.02

Category: Initial Engagement Process

<u>Condition</u>: Of the 13 case files reviewed where a 590 – appointment setting code was entered in OSST, four (30.8 percent) did not have their initial appointment status selected within two business days of completion of the appointment or have "No show" recorded as required. Additionally, two participants did not have the correct appointment status entered in OSST to end the activity.

This is a repeat issue and is consistent with the PY 2021-2022 Monitoring Report.

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

<u>Cause</u>: CSC did not follow-up or maintain a tickler system for the closure of the 590-code within two business days of completion or No-show.

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

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

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

OBSERVATION

A common use of an outdated O&O form was being used by CSC staff that did not include all updated standards and requirements related to grievance and FSR requirements. Pursuant to food and nutritional services guidelines, O&O forms were to be revised to clarify and/or update the grievance process and participant reimbursement requirements. It should be noted that CSC staff updated the O&O form during the review. Going forward, CSC must ensure that the updated form is consistently used and maintained in participant case files throughout the service area.

WORKFORCE INNOVATION AND OPPORTUNITY ACT

WIOA ADULT AND DISLOCATED WORKER PROGRAM

The sample size consisted of 22 Adult participant case files. The following issues were identified:

Other Noncompliance Issues

ONI WIOA #3.23.03

Category: Supportive Services

<u>Condition</u>: Of the 10 participants who received supportive services, the date of the transportation supportive service activity as entered in Employ Florida for one (10.0 percent) participant did not match the date of the supportive service documentation maintained in the participant's case file.

<u>Criteria</u>: CareerSource Florida Supportive Services and Needs-Related Payments Policy Number 109, Section (D)(3) states, in part, "At a minimum, documentation must include:

(1) Records of payments to vendors, including date of receipt, the amount of payment, check/voucher number, etc.;"

CSC Local Operating Procedure WIOA - #6 Supportive Services states, in part, "WIOA Success Coaches will ensure that all participants are notified that the services are to be used for the intended purpose and should document such in the case note entered in Employ Florida at the time the Need for Supportive Services form is completed."

WIOA Section 3 (59) and Section 134 (d)(2); and 20 CFR 680.900-970 also set forth requirements for WIOA eligibility and performance.

<u>Cause</u>: The difference in dates could be attributed to staff data entry errors. The issue could also be attributed to staff not following CSC's Supportive Services local operating procedure.

<u>Effect</u>: Failure to enter and accurately record the date of the supportive service provided to participants may negatively impact performance accountability and reporting.

Required Action: CSC must provide an assurance with the CAP that supportive services will be recorded in Employ Florida to match the support service documentation maintained in the participant's case file. CSC's supportive services system must ensure that funds to participants are provided in the actual amount of the expenditure, are based on need, approved and allowable, are of the proper type, and the service activity and the amount matches what is entered in Employ Florida. Documentation of written notification to staff informing them of the requirements must also be provided with the CAP.

ONI WIOA #3.23.04 Category: Credentials

<u>Condition</u>: Of the nine participants who attained a recognized credential, the credential attainment date as entered in Employ Florida in one (11.1 percent) participant's case file did not match the date on the credential.

<u>Criteria</u>: WIOA Participant Individual Record Layout (PIRL) data element 1801, Date Attained Recognized Credential, states that "Record the date on which the participant attained a recognized credential."

<u>Cause</u>: The difference in dates could be attributed to staff data entry error. The issue could also be attributed to lack of awareness and understanding of the requirements outlined in the WIOA PIRL.

<u>Effect</u>: Failure to enter and accurately record credential attainment information in Employ Florida negatively impacts performance and data validity results.

<u>Required Action</u>: CSC must provide an assurance that credential attainment information will be maintained in participant case files and cross-referenced with the data entered in Employ Florida for accuracy in the future. Documentation of written notification to staff informing them of the requirements must also be provided with the CAP.

WIOA YOUTH PROGRAM

The sample size consisted of 13 WIOA youth participant case files (12 Out of School and one In-School).

The review did not reveal any Findings or ONIs; however, the following Observation was identified:

OBSERVATION

The following common observations were observed with recording of Measurable Skill Gains.

- Of the 22 Adult/DW case files reviewed of participants enrolled in an education or training program, one (4.5 percent) did not have an MSG recorded in Employ Florida within the applicable program year. Additionally, documentation to support the MSG recorded in Employ Florida was missing in seven (31.8 percent) participant case files.
- Of the three Youth Worker case files reviewed of participants enrolled in an education or training program, one (33.3 percent) did not have an MSG recorded in Employ Florida within the applicable program year.

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

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

WIOA SPECIAL PROJECTS

The sample size consisted of six Dislocated Worker participant case files (three COVID-19 Public Health Emergency and three Hurricane Michael).

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

WAGNER-PEYSER PROGRAM

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

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

OBSERVATION

One Manually Obtained Employment file did not document that the obtained employment service was not a duplicate of a previously documented placement. A manual obtained employment is a form of capturing job seeker employment and has specific guidelines that must be followed by staff. For future reference, prior to manually recording an obtained employment, CSC must document the employers name, source of verification, certification that the service is not a duplicate of a previously documented placement, the actual job start date, and CSC office information.

REEMPLOYMENT SERVICES AND ELIGIBILITY ASSESSMENT PROGRAM

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

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

Other Noncompliance Issue

ONI WP #03.23.05

Category: Employability Development Plans

<u>Condition</u>: All five EDPs reviewed were not individualized for the participants. Each EDP had identical work search activities and action steps to reach their respective occupational goals.

<u>Criteria</u>: CareerSource Florida Administrative Policy 68 states, in part, that "The development of an EDP or Reemployment Plan must be unique to the REA [RESEA] participant's challenges, skills and goals discovered during the initial assessment." The policy further states that the EDP must "...identify specific work search activities applicable to the participant's needs, such as resume writing, interviewing skills, etc.".

<u>Cause</u>: The combination of a heavy reliance on templated documents and lack of staff training negatively impacted EDP development and maintenance.

<u>Effect:</u> CSC's absence of specific and individualized action steps and work search activities 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 short-term and long-term occupational goals.

Required Action: CSC must provide an assurance with the CAP that all future EDPs will be documented, meet the definition of an EDP, and contain all required elements. All future EDPs must be personalized for each participant to address their specific needs including individualized short-term and long-term occupational goals, the action steps needed to achieve those goals, and the assignment of work search activities specific to each participant. The EDPs must also be based on an assessment of the job seeker's skills, prior work experience, employability, barriers and weaknesses, employment goals, and services needed to overcome employment barriers. Because of the number of instances this issue occurred, CSC must evaluate the cause and provide a plan of action or process with the CAP for preventing a recurrence of this issue in the future including more in-depth monitoring, documentation of staff training, and written notification to staff informing them of the requirements.

CAREER CENTER CREDENTIALING

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

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

JOBS FOR VETERANS STATE GRANT PROGRAM

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

Findings

Finding JVSG #03.23.04

Category: Objective Assessments

<u>Condition</u>: Of the 15 veteran case files reviewed, nine (60.0 percent) veterans had objective assessments that were not completed in their entirety using the Objective Assessment Summary Wizard in Employ Florida.

<u>Criteria</u>: CareerSource Florida AP 117 IV(B)(4)(a) states that "The IEP must be created using the Employ Florida IEP/Service Strategy wizard."

<u>Cause</u>: Staff training in the collection of the required elements during the objective assessment process, as well as a lack of familiarity on the use of the Employ Florida Objective Assessment Wizard could be factors for noncompliance.

<u>Effect</u>: Failure to complete the assessment can result in staff's inability to work effectively and efficiently with participants and may also have an impact on veteran service delivery and performance which may result in a negative federal review of the Veterans Program.

Required Action: CSC must provide documentation that staff have attempted to complete the Objective Assessment wizard in Employ Florida for the identified participants if the cases are still active. CSC must also provide an assurance that DVOP staff will include a case note (located on the Objective Assessment Summary General tab) that includes the SBE or special population group which affirms the participants' eligibility for DVOP specialist services, as well as a summary of the assessment findings. Documentation of staff training and written notification to staff informing them of the requirements must also be submitted with the CAP.

Finding JVSG #03.23.05

Category: Veteran IEP Updates and Contacts

<u>Condition</u>: Of the 15 veteran case files reviewed, nine (60.0 percent) participant IEPs did not include or specify one or more of the following requirements:

- Did not document that the IEPs were reviewed with the veterans within 30 days of the IEP creation to ensure the veterans progress in completing the objectives.
- Did not have documentation recorded in Employ Florida (service codes V09) indicating consistent contact from a DVOP specialist at least once every 30 days during the review period.
- Did not include the necessary goals and objectives or did not follow the S.M.A.R.T. principles necessary to complete the employment goals.
- Did not include IEP updates (service code V04) when the IEP was modified.
- There were also significant gaps between services provided.

<u>Criteria</u>: CareerSource Florida AP 117 IV(B)(4)(c) states "At a minimum, the IEP must be reviewed with the participant every 30 days to ensure the participant's progress in completing objectives. The IEP must be amended, as appropriate when additional needs are identified, or objectives are achieved". AP 117 further states that "Successful consistent contact must be recorded by service code V09 (JVSG – Consistent Contact) 7 and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide." Additionally, AP 117 states that "An effective IEP should use the S.M.A.R.T. principle to create specific, measurable, attainable, relevant, and time-bound goals and objectives, as described below:"

<u>Cause</u>: Failure to schedule, regularly review, calendar, and record necessary veteran file IEPs adjustments as well as follow-through on code entry into Employ Florida may be the cause for noncompliance.

<u>Effect:</u> Absence of identified and specific goals and objectives and a regular review of a veteran's IEP and subsequent progress reduces staff's ability to work effectively and efficiently with veterans in delivering services, tracking employability goals, completion of objectives, and determining what additional steps the veteran is required to do to attain their goals. Noncompliance may also lead to veteran complaints, negative results of federal audits, and inaccurate or invalid state or federal reporting.

Required Action: CSC must provide an assurance that DVOP staff will review and ensure that all subsequent IEPs will be updated within 30 days of creation and, at a minimum, every 30 days thereafter and that case notes will be recorded identifying all contact and required elements of the service(s) provided. The updates to the IEP must be recorded by service code V04 (JVSG – Individual Employment Plan Update) and include a case note that describes the updates made to the employment plan (e.g., objective added/completed, additions to goal/objective description, etc.). CSC must also ensure that staff create effective IEPs that follow the S.M.A.R.T.

principles to create goals and objectives that assist the veteran in reaching their employment goal. Because of the number of instances these issues occurred, CSC must provide a plan of action or process with the CAP outlining actions taken or to be taken to prevent future occurrences including routine monitoring, staff training, and written notification to staff informing them of the requirements.

COMPLAINT SYSTEM

The sample size consisted of 42 complaint logs.

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

IV. FINANCIAL DISCLOSURE REVIEW

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

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

V. COLLECTION OF DEMOGRAPHIC DATA

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

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

VI. MANAGEMENT REVIEW PROCESS

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

The following issues were identified:

Finding #03.23.06

Category: Board Governance

<u>Condition</u>: CSC's Bylaws did not fully describe the purpose, roles and responsibilities of the LWDB particularly the hiring of an executive director.

<u>Criteria:</u> Section 679.400(a) provides that: WIOA sec. 107(f) grants LWDBs authority to hire a director and other staff to assist in carrying out the functions of the local board. FloridaCommerce AP 110 E (2)(c) requires the inclusion in the Bylaws of the Board's authority to "recommend, select, and hire an Executive Director to perform operational and administrative functions of the board".

<u>Cause:</u> CDC failed to review and periodically amend the boards bylaws and ensure compliance with FloridaCommerce policy and Florida Statutes.

<u>Effect:</u> Outdated bylaws that fail to provide consistency, clarification, and authority of the LWDB could lead to possible violations in the operational and administrative functions of the board.

<u>Required Action:</u> CSC must update/amend the bylaws to include the purpose and responsibilities of the local board as well as other necessary requirements enumerated in statutes and FloridaCommerce AP. A copy of the updated/amended bylaws must be provided with the CAP or, in the alternative, a plan of action or process for amending the bylaws including timelines and board notification.

Finding #03.23.07

Category: Local Board Member Training

<u>Condition:</u> CSC failed to provide documentation to verify that all board members had completed their annual refresher training.

<u>Criteria:</u> Florida Administrative Policy 110 G (2) states that "Board members will complete an annual refresher training..." The policy also states that "The LWDB must retain and provide to FloridaCommerce, upon request, attendance records and dates of completion."

<u>Cause:</u> Difficulty in assembling divergent members of the board to complete annual refresher training results in partial success, but often partial failure.

<u>Effect:</u> Absence of board member training may affect a board member's decision-making process and understanding of the purpose of their participation to effectively serve on the board. Additionally, board members may not be aware of policies, procedures, best practices, and requirements of the local board or board members.

Required Action: CSC must provide documentation with the CAP that refresher training has been or will be provided to all outstanding board members including a timeline for completion. CSC must also provide an assurance that all board members will complete annual training by the specified deadlines in the future. Additionally, CSC must develop or update their procedures, processes, and/or guidelines on board governance requirements including developing a matrix for tracking and timely advising board members of training as well as other requirements and following up to ensure this has been done. A copy of the procedures must be provided with the CAP.

VII. MANAGEMENT INFORMATION SYSTEMS

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

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

VIII. TRAINING AND TECHNICAL ASSISTANCE

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

- WT WTProgram@commerce.fl.gov
- SNAP SNAPETProgram@commerce.fl.gov
- WIOA WIOA@commerce.fl.gov
- TAA TAA@commerce.fl.gov
- WP <u>Wagner.Peyser@commerce.fl.gov</u>
- RESEA RESEA@commerce.fl.gov
- FLC H-2A.JobOrder@commerce.fl.gov and H-2BJobOrder@commerce.fl.gov
- MSFW <u>State Monitor Advocate (via direct email)</u>
- JVSG –<u>VETS@commerce.fl.gov</u>

Additional training can be requested by sending a <u>Training Request Form</u> to WFSTraining@commerce.fl.gov.

CORRECTIVE ACTION PLAN REQUIREMENTS

A CAP is required to address how the CSC will correct any programmatic and financial management findings and other noncompliance issues identified in the report. For the noted deficiencies, corrective actions and recommendations have been provided to help respond to the issues identified, develop and implement processes that result in positive program practices and performance outcomes 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 CSC staff was conducted on June 5, 2023. The programmatic exit conference was conducted on June 9, 2023; however, the financial monitoring exit conference was conducted August 1, 2024. The entrance/exit conference attendees are listed below.

NAME	Agency	Entrance Conference	Exit Conference
India Prehay	FloridaCommerce (Review Lead)	х	Х
Matrecia Bryant	FloridaCommerce	X	X
Yolanda Garcia	FloridaCommerce	X	X
Sanchez Emanuel	FloridaCommerce	x	Х
Vincent Lynn	FloridaCommerce	x	Х
Minerva Figueroa	FloridaCommerce	x	Х
Raymond Isham	FloridaCommerce	X	X
Andrew Merchel	FloridaCommerce	x	Х
Andy Windsor	FloridaCommerce	x	Х
Terry Wester- Johnson	FloridaCommerce	х	Х
Lorena Clark	FloridaCommerce	X	Х

Iryna Mills	FloridaCommerce	Х	Х			
Tameka Austin	FloridaCommerce	х	Х			
Tawanza Johnson	FloridaCommerce	X	Х			
Richard Williams	CSC	X	Х			
Debby Wood	CSC	х	Х			
Rose Adams	CSC	х	Х			
Deena Johnson	CSC	х	Х			
Sara Johnson	CSC	X	Х			
Myra Rowe	CSC	X	Х			
Tabetha Smith	CSC	х	Х			
Tammy Pumphrey	CSC	х	Х			
Melody Wade	CSC	х	Х			
The financial monitoring exit conference was conducted on August 1, 2024. The exit conference participants						
are listed below:						
Yvette McCullough	FloridaCommerce		х			
Kim Ferree	FloridaCommerce		Х			
Robert Meadows	FloridaCommerce		Х			
Richard Williams	CSC	х	х			
Sarah Johnson	CSC	х				