



Thursday, July 18, 11:00 AM  
 9215 N. Florida Ave., Ste. 101, Tampa FL

## Board of Directors Agenda

11:00- 11:25 AM	<b>I. Welcome and Introductions</b> .....Sean Butler  <b>II. Public Comments</b>  <b>III. Awards and Recognition</b>  <b>IV. Guest Speakers / Presentation</b>  <b>V. Consent Agenda</b> .....Sean Butler 1. Approval of May 16, 2019 Board of Director Minutes ..... Page 2  <b>VI. Chair’s Report</b> ..... Sean Butler, Page 10  <b>VII. Board Counsel Report</b> ..... Charlie Harris  <b>VIII. CEO Report</b> .....John Flanagan
11:25- 12:10 PM	<b>IX. Action/Discussion Items</b> 1. Vendor Recommendations - Workforce Consultant ..... John Flanagan, Page 16 2. RFP Issuance – Financial Consultant ..... Anna Munro, Page 18 3. PY 19-20 Nominating Committee Board Officers ..... John Howell, Page 19 4. Policies: ..... Jody Toner, Page 20 a. Ethics and Transparency..... Page 21 b. Incumbent Worker Training (IWT) ..... Page 25 c. Employed Worker Training ..... Page 36 d. Paid Work Experience ..... Page 41 e. Jobseeker Registration ..... Page 51 f. Job orders and Placement ..... Page 58 g. Employer Services ..... Page 68 h. On The Job Training (OJT) Revision ..... Page 73
12:10- 12:30 PM	<b>X. Information Items</b> 1. Interlocal Agreement Extension / Modification ..... John Flanagan, Page 85 2. USDOL Compliance Review Update .....John Flanagan, Page 86 a. DEO Corrective Action Plan ..... Page 87 3. 2019-2020 Committee Assignments .....John Flanagan, Page 131 4. Summer Job Connection ..... Jody Toner, Page 132 5. 2019-2020 Performance Dashboard ..... Jody Toner, Page 133 6. JA STEM Tec ..... Jody Toner, Page 134 7. 19-20 Workforce Solutions & One-Stop Strategic Goals ..... Jody Toner, Page 135 8. Ad Hoc By-Laws Update .....Michael Bach, Page 138 9. Compensation and Benefits Study – Update and Timeline ..... Mimi Tran, Page 139 10. Public Relations/ Marketing Update .....Doug Tobin, Page 140  <b>XI. Committee Reports</b> 1. One-Stop Committee .....John Flanagan  <b>XII. Future Business</b>
12:30 PM	<b>XIII. Adjournment</b>

Next Meeting Board of Directors Meeting / Retreat– September 19, 2019

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**CareerSource Tampa Bay  
Minutes of Meeting of the Board of Directors**

**Date:** May 16, 2019  
**Location:** 9215 N. Florida Ave., Ste. 101, Tampa, FL

**Call to Order**

Chair Sean Butler called the meeting to order at 11:00 a.m. There was a quorum present with the following Board Members participating.

**Board Members in attendance**

Tom Aderhold, Michael Bach, Leerone Benjamin, Stephanie Brown-Gilmore (via phone), Sean Butler, Michelle Calhoun, Ginger Clark, Richard Cranker, Gail Fitzsimmons (via phone), Elizabeth Gutierrez, Mireya Hernandez, Benjamin Hom, John Howell, Lindsey Kimball, Randall King, Jasiel Legon (via phone), April May, Earl Rahn (via phone), Commissioner Sandra Murman, Don Noble (via phone), Michael Ramsey, Yanina Rosario (via phone), Susan Skiratko, Michael Smith, and Roy Sweatman.

**Board Members not in attendance**

Judson Cook, Robert Coppersmith, Randall Hassen, Cally Kushmer, Paul Orvosh, and Sophia West.

**Staff Present**

John Flanagan, Juditte Dorcy, Jody Toner, Sheila Doyle, Anna Munro, Mimi Tran, Michelle Schultz, Christina Witt, Doug Tobin, Tammy Stahlgren, and Joe Vitale.

**Board Counsel**

Charlie Harris

**BOCC Liaison**

Kenneth Jones

**Others**

Dan McGrew  
Nancy Brown

The items are listed in the order of discussion.

- ▶ Indicates Board Action
- Indicates Action Needed

**Public Comments**

There were none.

**Presentation: Board Recognition**

The following Board members were recognized for their services and contributions over the past year. Mike Smith, Randall Hassen, Judson Cook, and Cally Kushmer, Ken Jones, County Liaison was recognized for his outstanding professionalism and contributions' over the past Program Year.

▶ **Approval of Minutes**

- A motion to approve the minutes of March 21, 2019 Board of Directors meeting.
- Motioned: Lindsey Kimball
- Seconded: Michael Smith
- There was no further discussion. The motion carried.

## ► Consent Agenda of March 21, 2019 Executive Committee Meeting

The Following Discussion occurred

John Flanagan advised the Board that all CareerSource Tampa Bay Board meetings, consent agenda items will be identified in the agenda, and the opportunity to address items outside of consent will be afforded in the July meeting and moving forward. Additional language in By-Laws will also be added as the Ad Hoc Committee creates new proposed By-Laws for review and approval.

## Consent Agenda of March 21, 2019 Executive Committee Meeting

- **A motion to approve the Consent Agenda of April 18, 2019 Executive Committee Meeting except for the Bylaws / Ad Hoc Consent Process.**
- Motioned: Commissioner Sandra Murman.
- Seconded: Randall King.
- The motion carried. There was no further discussion.
- A revised motion to approve the Consent Agenda of April 18, 2019 Executive Committee Meeting
- **Meeting Bylaws / Ad Hoc Process removing the silent consent process, and consent agenda is moved to full board for approval.**
- Motioned: Commissioner Sandra Murman.
- Seconded: Tom Aderhold.
- The motion carried. There was no further discussion.

## CEO Report

### Key Initiatives / Events

Comments by CEO John Flanagan:

We are engaged in a process of total organizational realignment. We looked at goals of programs like Business Services and looked at what their metrics were, and we are moving those metrics from specific replacement to business attraction. Currently we engage less than 1% of registered businesses in Hillsborough County. Goals for next year would be to increase the market penetration to 2% or 2,000 businesses using our services through Employ Florida, as well as other job posting assistance and job service programs. In the past years, CareerSource Tampa Bay methodology was a placement methodology – job seekers coming in the door and placing them into employment.

The issue became that CareerSource Tampa Bay does not work with enough employers to place all the people needing services, so we need to refocus Business Services to do true business engagement. We should be working with more than 1% of our business community, especially in these times where there are more jobs than people to fill them.

We will also be engaging business by industry sectors rather than zip code. In the past we also took a zip code approach where we would canvas that zip code area(s) to engage employers and job postings. We would like to create some Industry experts, so we are going to focus on Manufacturing, Healthcare, IT, Finance, Insurance, Hospitality and Tourism which are the predominate industry clusters in Hillsborough County.

We will also move away from Employed Worker Training (EWT) and move toward Incumbent Worker Training (IWT) to help businesses upscale their workforce. We can do that with significantly less documentation and eligibility standards that apply to Employed Worker Training.

Placements will occur under the WIOA and Career Services program. Those are frontline staff that work with the job seekers that come through our doors every day. They know best what is needed for a specific job placement, as well as what is required for retention. We need to be thinking about our

success in two ways. We have to be thinking about not just getting someone into a job, but also a year out, that they will still be at that job. That's a very important metric for how we should be measured in our organizational effectiveness.

#### Summer Job Connection

Summer Job Connection program continues to fill participant and employer slots. To date, we have interviewed more than 672 youth applicants for over 450 placement opportunities and over 51 employers.

Craig Richard, my counterpart at Hillsborough EDC sent an email out to his investors promoting the Program to help us get over the finish line for our placements goal.

We received an additional \$500,000 in TANF funding from DEO to expand the Summer Job Connection Program.

Hillsborough County Commissioners have approved additional funding in the amount of \$150,000 to provide opportunities for up to 100 youth who do not meet TANF requirements (200% of federal Poverty Level based on family size). We currently have 84 youth who fall into that category.

We had some really good media coverage regarding the Summer Job Connections, we spoke with the people at Morning Blend and Bay News 9 about some of the great things we do around here, they did some really great coverage on us.

Program Summit and Employer Expo for Summer Job Connection will take place on June 4, 2019 at the Double Tree Hotel – Westshore Location.

Michael Ramsey and John Flanagan attended the CareerSource Florida Executive Committee meeting where strategic budget discussions occurred, where we lobbied for our desire for talent pipeline development and youth pipeline development, this is one of their budget priorities and strategic goals going forward in the year.

#### Upcoming Events:

Business Summit - We are planning a business summit in 2020, sometime in February. We'll be starting the process of looking for speakers, keynotes and industry experts, and the theme will be around engaging talent and finding your workforce.

FWDA Annual Conference in September – Jody Toner and John Flanagan will be speaking on the successes of the Summer Job connection as session presenters.

Mr. Flanagan hopes to speak at Ignite Tampa Bay event on June 6<sup>th</sup> to talk about the future workforce of the Tech Sector.

Commissioner Sandra Murman's Annual Job Fair is scheduled for Thursday August 8, 2019, from 8:30 a.m. to 12:00 p.m.

#### **Chair's Report**

Chairman Sean Butler's Chair Report was provided in the packet and there was no discussion. Chair's Report can be found in the May 16, 2019 Board of Directors Meeting Agenda Packet. Refer to Pages 13 – 21 of the Agenda Packet.

**Board Counsel Report** - Charlie Harris.

No news on the investigation or interviews since last meeting.

Charlie Harris reminded the Board of the Sunshine Laws:

It is my responsibility and the person who will replace me as Board Council to remind the Board Members that part of the privilege of serving on the Board is the duty to keep mindful of the Sunshine

Law. What it means of course is that you can certainly speak to people that are on this Board with you. The Sunshine Law applies to Voting Members of the Board, not to non-voting members like John (Flanagan), myself, or other members of the staff. When you speak to Voting members of the Board, you are precluded from discussing anything that could come before the Board for a vote. So, I just want to caution you this is something that can have personal ramifications for you as a voting member, and also for the agency.

### Action/Discussion Items

▶ Action Item #1: FY 2019-2020 Schedule of Board & Committee Meetings.

- **A Motion to approve the FY 2019- 2020 Schedule of Board & Committee Meetings.**
- Motioned: Commissioner Sandra Murman.
- Seconded: Randall King.
- The motion carried, there was no further discussion.

▶ Action Item #2: FY2019 – 2020 Planning Budget.

A complete FY 2019-2020 Planning Budget Narrative was reviewed by Sheila Doyle, and can be found on pages 23-28, and the Planning Budget can be found on page 29, in the May 16, 2019 Board of Directors Meeting Agenda Packet.

- **A Motion to approve the FY2019 – 2020 Planning Budget.**
- Motioned: Commissioner Sandra Murman.
- Seconded: Randall King.
- The motion passed carried. There was no further discussion.

▶ Action Item #3: Cost of Living Adjustment (COLA).

- **A Motion to approve the Cost of Living Adjustment (COLA).**
- Motioned: Commissioner Sandra Murman.
- Seconded: Stephanie Brown-Gilmore.
- The motion carried, there was no further discussion.

▶ Action Item #4: Related Party Contracts – Enterprising Latinas Inc. (ELI).

- **A two-third board approval was requested for the following contract:**

The following points of discussion ensued:

The financial impact to CSTB is a little under \$12,000. This would provide one staff for 8 hours per week. The MOU would become effective May 17, 2019 after Board approval. The MOU would be good for three years, this is not a new position, rather an existing employee will co-locate once a week.

- Elizabeth Gutierrez declared a conflict of interest and abstained from voting.
- Motioned: Commissioner Sandra Murman
- Seconded: Leerone Benjamin
- **The Board approved the Related Party Contracts with Enterprising Latinas, by a two-third vote, when a quorum had been established.**

- The motion carried, there was no further discussion.

► **Action Item #5** Inter-local Agreement

Commissioner Murman provided a description of the Interlocal Agreement. Refer to pages 34-55 of the May 16, 2019 Board of Directors Agenda for the complete Agreement.

The following points of discussion ensued:

Charlie Harris – Board Council,

- A motion to approve the Inter-local Agreement between Hillsborough County and CareerSource Tampa Bay for the period July 1, 2019 through June 30, 2022 subject to the Indemnification Language to be resolved. Amended to reflect indemnification language for the CareerSource Tampa Bay Board.
- Motioned: Commissioner Michael Bach
- Seconded: Stephanie Brown-Gilmore

Further discussion regarding a possible conflict of interest that occurs in ARTICLE XVI, 16.1, iii, which lists the County -Personnel (name withheld), Director, Economic Development Department, as the Custodian of Public Records. Council Harris weighed in on the matter indicating it is not necessary for this person, a Board Member to abstain because he views this as a check and balance included by the county Attorney rather than a conflict, therefore the member should vote.

- The motion carried, there was no further discussion.

► **Action Item #6** Regional Targeted Occupations List PY 19-20

- A motion to approve the Regional Targeted Occupations List PY 2019-2020 as written.
- Motioned: Randall King
- Seconded: Michael Ramsey

Discussion on the motion was extensive with many viewpoints about whether CSTB should be subsidizing the training of jobseekers sought by employers who continue to pay at below living wage rates. Other discussion revolved around the fact that the red listed occupations fail to meet the previously agreed upon mean average wage of \$14.64 which was the target set by this board. The measures of DOL were discussed and how although in theory it would be nice to tell employers they are underpaying; it must be a market driven choice to pay more. It was noted that it could work against this board relative to criteria DOL judges them on, to add the red listed jobs back onto the list. There was a reminder that the substantial number of placements by CSTB in higher wage occupations will help the average wage performance metric.

The sentiment of most of the Board was that many people who need services in Hillsborough county have challenges to being employable at higher paying occupations and to avoid being left behind in a robust economy, they need the opportunity that the lower wage positions offer as a starting point upon which they can build some skills, gain some work history, and become reliable for a more desirable position in the future. A failure to get this class of worker into the marketplace now may lead to being dependent on assistance.

This discussion led to a decision that the red listed occupations should be added back on, due to ongoing demand for services in those occupations and the considerations listed above. Refer to page 60 in the Board agenda for Occupations highlighted in RED, to be reintroduced to the Regional TOL.

Due to the fact that there was already a motion to accept the RTOL as presented, that motion was voted.

- The motion failed. There were 3 yes votes in favor: Randall King, Tom Arnold, and Richard Cranker.

A second motion that represented the position of many Board members after all the discussion immediately followed the failed motion with no discussion in between.

- A motion to approve the Regional Targeted Occupations List PY 2019-2020 with the following change, reinserting all Occupations labeled in Red back on the list (refer to page 60 of the Board Agenda)
- Motioned: Commissioner Sandra Murman
- Seconded: Roy Sweatman
- The motion carried, Randall King, Tom Arnold, and Richard Cranker were opposed. No further discussion.

► **Action Item #7** Eligible Training Provider Policy

Workforce Solutions Committee Recommendation:

The Eligible Training Provider Policy will be modified to include the waiver language:

Discussion: Language to be added to the motion – “Motion to approve with the stipulation that If the CEO/Designee who is providing the waiver will provide this Board a list of any approvals they make based on this waiver provision”.

- Workforce Solutions Committee recommends approval to modify the Eligible Training Provider Policy to include the waiver language “The Chief Executive Officer and his/her designee will have the authorization to provide a waiver to approve a training program or provider that is not listed on the local EPTL or approved list of training programs based on need/justification,” with the stipulation: CEO/Designee will provide a list to the Board for any approvals that are made with this waiver provision.
- Motioned: Commissioner Sandra Murman
- Seconded: Michael Smith

Further Discussion Ensued:

Waivers are granted on a case by case basis, and their term depends on the specific training needs involved. Examples of why a waiver is necessary would be: if sought after training was not available in Hillsborough County, or if an existing program were at capacity. A training provider that has been added, can be dropped if they're not doing a good job using noncompliance as a basis and means. This policy is already available as CareerSource Florida policy, CSTB is simply wishing to add it to their policy.

- The motion carried; Ginger Clark opposed. There was no further discussion.

► **Action Item #8** Formal Procurement: Provider of Legal Services

The following three top ranked legal firms were recommended out of the Ad Hoc Committee, for CSTB to interview and make a final selection:

Hillsborough County  
 GrayRobinson, P.A.  
 Bennet, Jacobs & Adams, P.A.

The following points of discussion ensued:

It was discussed whether it is a conflict of Interest for Hillsborough County to be considered.

- The Ad Hoc committee said they initially questioned it but was unsure.



- Charlie Harris strongly recommended to the board that he believes that it is a conflict of interest. He gave the example of the contracted Hillsborough County Commission attorney representing CSTB, sitting down across the table from the Hillsborough County Commission attorney to the County, negotiating the recent Interlocal Agreement. He reminded the board that CareerSource is a separate board, and we contract with Hillsborough County. He closed his statements with, "I would recommend to the Board, that if you've got two qualified firms and they're in the running with the County, that you might consider one of those two.
- Commissioner Sandra Murman and Lindsey Kimball expressed that they do not believe it is a conflict of interest. It was stated that Hillsborough County Legal firm will save us a lot of money, they have a wide range of attorneys with different experience. They are bound by professional code. They represent a number of Boards upon which they have a seat.

Chair requested a motion to approve the Ad Hoc Committee recommendation of the three named firms to be interviewed by CSTB for a final selection.

- [Motion to approve the Formal Procurement: The Ad Hoc Committee recommends the above three named firms to be interviewed by CSTB staff for a final selection.](#)

Discussion: There was discussion about whether the CSTB staff were making the final decision, or whether their recommendation is coming back the Board for final approval?  
The Chair withdrew the motion on the table and replaced it updated.

- [Motion to approve the Formal Procurement: The Ad Hoc Committee recommends the above three named firms to be interviewed by CSTB staff, to then put forth a final recommendation for Board approval.](#)
- [Motioned: Michael Bach](#)
- [Seconded: Tom Aderhold](#)
- [The motion carried, there was no further discussion.](#)

## Information Items

### Information Item #1 RFP Update

Updates were provided and timelines shared on: IT, EDMS, Website; Legal Service; Consultant Services; Career Services; and Audit Services.  
Career Services procurement is being held pending the results coming in from the consultant for review.

### Information Item # 2 Performance Reports: Dashboard and WIOA Primary Indicators

Performance Dashboard - Director Toner presented recent performance measures that were positive. The dashboard created provides high level information. In accordance with the plan to reduce the underreporting of cases that should be closed, these are the people who have failed to maintain contact for the last 90 days but the jobseeker fails to complete the exit process, we have closed out 736 negative case closure exits. We have exited out 673 positive exit cases.

### Information Item # 3 Summer Job Connection

No additional update or discussion

### Information Item # 4 Public Relations/Marketing Update

Director Doug Tobin gave a brief overview of marketing campaigns, and hopes to get the new website up and running by July or August.

### Information Item # 5 Expenditure Reports for the Period Ended 3/31/2019



Members were referred to the expenditures report for review. It was explained that we are 75% through the fiscal year and have expended about 48% of our current budget, compared to about 55% expended at this time in FY18 and about 54% expended at this time in FY17.

## **Committee Reports**

### Executive Committee

Thirteen Board Members have been reappointed.

### Workforce Solutions Committee

The Committee met on May 10, 2019

Two action items were approved and discussed in today's meeting

- Eligible Training Provider Policy
- Regional Targeted Occupations List PY 19-20
- **The Committee reviewed 2019-2020 Strategic Goals. It was recommended to distribute to all Board of Directors.**

### Finance Committee

The Committees met on May 9, 2019. We discussed the following action items that were brought to the full board today.

- PY 2019-2020 Planning Budget
- Cost of Living Adjustment (COLA)

CEO Flanagan sent out a statement of work to the Finance Committee to review and approve as it relates to our Compensation Analysis, and we'll wait for the responses in order to get out bids, with an end date before open enrollment.

### Future Business of Importance

Asking for volunteers for the Ad Hoc Nominating Committee, Mr. Howell, Mr. Aderhold, and Mr. Ramsey have volunteered, there were not any other members interested in volunteering.

### **Adjournment**

The meeting was adjourned at approximately 1:05 p.m.

Minutes prepared by Tammy Stahlgren, Administrative Services Coordinator.

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## Key Regional Workforce / Demographic Indicators

- In May 2019, the unemployment rate in Hillsborough County was 3.0 percentage points, a 0.2 percentage point reduction from May of 2018. Labor force for the region in May 2019 was 740,059, up from 5,033 (+0.7 increase) over the year. There were 22,140 unemployed residents in the region in May.
- Leisure and Hospitality industry (+4.4%) and Financial Services (+3.5%) metro job growth outpaced statewide growth
- Industries gaining jobs over the year were:
  - Professional and Business Services: +8,200
  - Leisure and Hospitality Services: +3,600
  - Financial Activities: +4,300
  - Construction and trades: +2,200
  - Education and Health Services +5,500
  - Manufacturing: +2,100
- Declining job growth was noted in Government Services (-400); information (-200); trade, transportation, and utilities (-100); and other services (-100) occurred over the year.

## Key Initiatives/ Events

### Summer Job Connection

- Summer Job Connection program is underway. 539 youth started their work experiences on June 11, 2019, with 90 employers participating. Of the 90 employers, 84 had not partnered with CareerSource Tampa Bay in the past. We will provide a 2 week extension to select youth in the program, based on need and availability of funding, based on employer requests. To date, 539 participants are continuing in SJC, with a success rate currently of 96%. A comprehensive analysis of the Summer Job Connection program will be presented at the September or November CSTB meetings.

### Agency Re-alignment

- Business Services Department has been re-aligned to focus primarily on Business Engagement by Industry Sectors. Sector Strategists will focus on 5 key areas:
  - Manufacturing
  - Finance/Insurance
  - Hospitality/Tourism
  - Healthcare
  - IT
  - Building/Trades
  - Retail
- Transitions and employer outreach have begun. This realignment will create more comprehensive goals and outreach strategies to ensure robust business engagement.

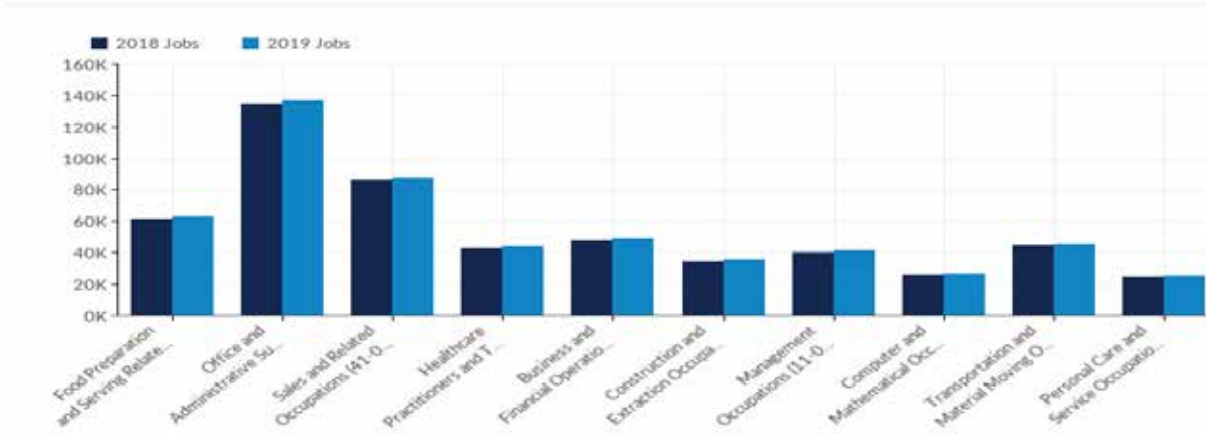
## Data Analysis – Top 20 Jobs – Hillsborough County

Largest Occupations



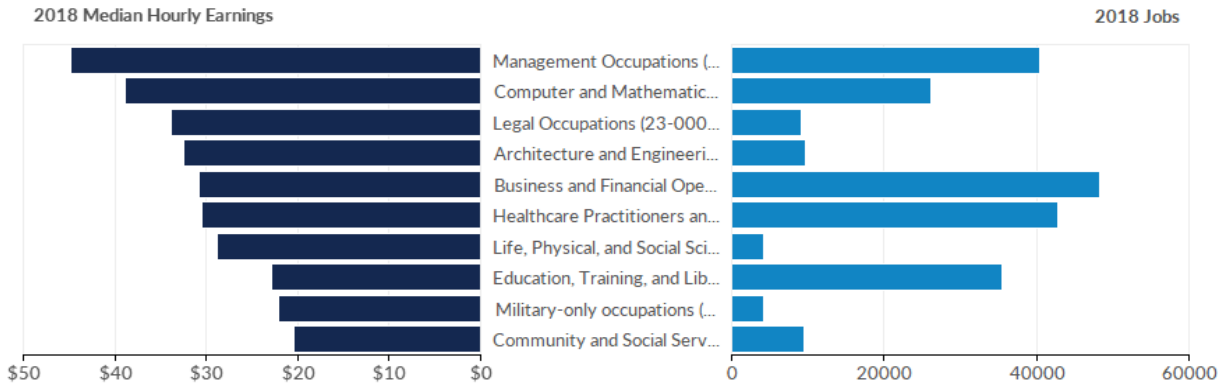
Occupation	2018 Jobs	2019 Jobs	Change in Jobs (2018-2019)	% Change	2018 Median Hourly Earnings
Office and Administrative Support Occupations	135,036	136,394	1,358	1%	\$16.71
Sales and Related Occupations	86,204	87,420	1,216	1%	\$15.00
Food Preparation and Serving Related Occupations	61,363	62,995	1,632	3%	\$10.43
Business and Financial Operations Occupations	48,201	49,235	1,034	2%	\$30.78
Transportation and Material Moving Occupations	44,409	45,093	684	2%	\$14.33
Healthcare Practitioners and Technical Occupations	42,761	43,902	1,141	3%	\$30.56
Management Occupations	40,397	41,195	798	2%	\$44.86
Education, Training, and Library Occupations	35,515	35,808	293	1%	\$22.87
Construction and Extraction Occupations	34,586	35,503	917	3%	\$17.97
Installation, Maintenance, and Repair Occupations	28,003	28,319	316	1%	\$20.29
Production Occupations	26,977	27,097	120	0%	\$15.41
Computer and Mathematical Occupations	26,136	26,845	709	3%	\$38.80
Building and Grounds Cleaning and Maintenance Occupations	26,135	26,773	638	2%	\$12.20
Personal Care and Service Occupations	24,822	25,495	673	3%	\$10.86
Protective Service Occupations	16,936	17,029	93	1%	\$18.61
Healthcare Support Occupations	16,803	17,433	630	4%	\$14.42
Arts, Design, Entertainment, Sports, and Media Occupations	11,943	12,071	128	1%	\$19.67
Architecture and Engineering Occupations	9,784	10,021	237	2%	\$32.43
Community and Social Service Occupations	9,432	9,654	222	2%	\$20.35
Legal Occupations	9,159	9,227	68	1%	\$33.87




## Fastest Growing Occupations



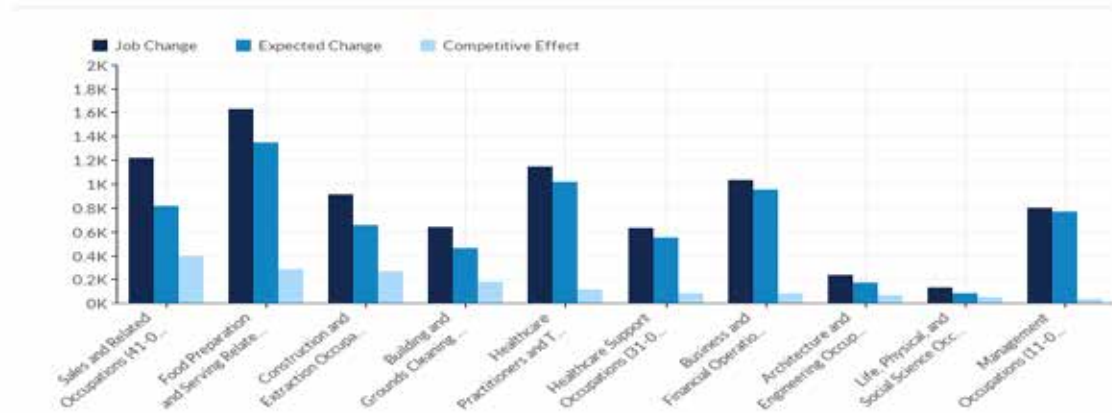
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Community and Social Service Occupations	9,432	9,654	222	2%	\$20.35
Life, Physical, and Social Science Occupations	4,228	4,359	131	3%	\$28.85
Arts, Design, Entertainment, Sports, and Media Occupations	11,943	12,071	128	1%	\$19.67
Production Occupations	26,977	27,097	120	0%	\$15.41
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## Highest Paying Occupations



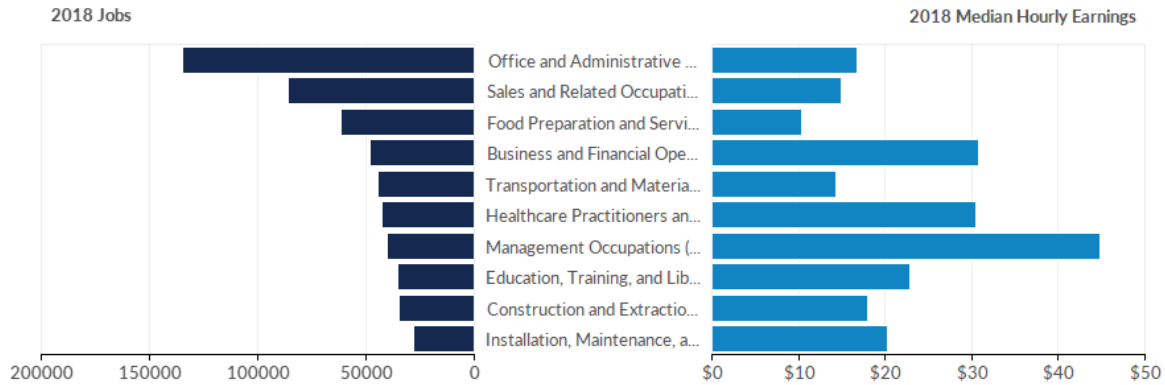
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 Business and Financial Operations Occupations	48,201	49,235	1,034	2%	\$30.78
 Healthcare Practitioners and Technical Occupations	42,761	43,902	1,141	3%	\$30.56
 Life, Physical, and Social Science Occupations	4,228	4,359	131	3%	\$28.85
 Education, Training, and Library Occupations	35,515	35,808	293	1%	\$22.87
 Military-only occupations	4,154	4,160	6	0%	\$22.10
 Community and Social Service Occupations	9,432	9,654	222	2%	\$20.35

## Highest Performing Occupations



Occupation	Job Change	Occ Mix Effect	Nat Growth Effect	Expected Change	Competitive Effect	2018 Median Hourly Earnings
Sales and Related Occupations (11.0...)	1,216	-665	1,483	818	398	\$15.00
Food Preparation and Serving Related Occupations	1,632	292	1,056	1,348	283	\$10.43
Construction and Extraction Occupations	917	58	595	653	264	\$17.97
Building and Grounds Cleaning and Maintenance Occupations	638	11	450	461	177	\$12.20
Healthcare Practitioners and Technical Occupations	1,141	288	736	1,024	117	\$30.56
Healthcare Support Occupations	630	261	289	550	80	\$14.42
Business and Financial Operations Occupations	1,034	125	829	954	79	\$30.78
Architecture and Engineering Occupations	237	4	168	172	64	\$32.43
Life, Physical, and Social Science Occupations	131	6	73	79	52	\$28.85
Management Occupations	798	74	695	769	29	\$44.86
Military-only occupations	6	-84	71	-13	19	\$22.10
Unclassified Occupation	0	0	0	0	0	\$0.00
Office and Administrative Support Occupations	1,358	-957	2,324	1,367	-8	\$16.71
Community and Social Service Occupations	222	71	162	233	-12	\$20.35
Legal Occupations	68	-70	158	88	-20	\$33.87
Computer and Mathematical Occupations	709	285	450	735	-25	\$38.80
Arts, Design, Entertainment, Sports, and Media Occupations	128	-28	206	178	-49	\$19.67
Production Occupations	120	-263	464	201	-82	\$15.41
Protective Service Occupations	93	-100	291	191	-98	\$18.61
Personal Care and Service Occupations	673	362	427	789	-117	\$10.86

## Largest Occupations



Occupation	2018 Jobs	2019 Jobs	Change in Jobs (2018-2019)	% Change	2018 Median Hourly Earnings
 Office and Administrative Support Occupations	135,036	136,394	1,358	1%	\$16.71
 Sales and Related Occupations	86,204	87,420	1,216	1%	\$15.00
 Food Preparation and Serving Related Occupations	61,363	62,995	1,632	3%	\$10.43
 Business and Financial Operations Occupations	48,201	49,235	1,034	2%	\$30.78
 Transportation and Material Moving Occupations	44,409	45,093	684	2%	\$14.33
 Healthcare Practitioners and Technical Occupations	42,761	43,902	1,141	3%	\$30.56
 Management Occupations	40,397	41,195	798	2%	\$44.86
 Education, Training, and Library Occupations	35,515	35,808	293	1%	\$22.87
 Construction and Extraction Occupations	34,586	35,503	917	3%	\$17.97
 Installation, Maintenance, and Repair Occupations	28,003	28,319	316	1%	\$20.29
 Production Occupations	26,977	27,097	120	0%	\$15.41
 Computer and Mathematical Occupations	26,136	26,845	709	3%	\$38.80
 Building and Grounds Cleaning and Maintenance Occupations	26,135	26,773	638	2%	\$12.20
 Personal Care and Service Occupations	24,822	25,495	673	3%	\$10.86
 Protective Service Occupations	16,936	17,029	93	1%	\$18.61
 Healthcare Support Occupations	16,803	17,433	630	4%	\$14.42
 Arts, Design, Entertainment, Sports, and Media Occupations	11,943	12,071	128	1%	\$19.67
 Architecture and Engineering Occupations	9,784	10,021	237	2%	\$32.43
 Community and Social Service Occupations	9,432	9,654	222	2%	\$20.35
 Legal Occupations	9,159	9,227	68	1%	\$33.87





## **Action Item # 1**

### **Vender Recommendations – Workforce Development Consultant**

A RFP for Consulting Services was issued on April 12, 2019 to solicit proposals from qualified and experienced individuals to provide workforce development consultant services. This RFP was promulgated via multiple avenues, including notices in the Tampa Times and to interested bidders. The proposals were due on May 31, 2019. Six proposals were received.

The Consulting Services Review Committee consisting of Career Source Tampa Bay staff members met on June 10, 2019 to discuss their independent evaluations. A minimum score of 65 is required to be considered. The Top Three Ranking firms are listed below:

#### **Community Workforce Advancement -88.62**

- **Expertise and Prior Experience** – Eleven (11) previous projects nationwide and specific services directly related to the scope of the CSTB RFP and realized successes identified. Twenty-one (21) previous LWDB projects with contract dates, services and summaries. Seven (7) examples of successes related to implementation. 4 references provided.
- **Staff Qualifications** -3 key staff with 25-40 years of workforce development experience each. Resumes and bios provided.
- **Work Plan** - Integrated data analysis, background research and interviews. Key elements of RFP outlined in section III. Scope of Work, Specific Activities and Deliverables addressed. Detailed timeline provided including a weekly timeline analysis.
- **Cost of Services** - \$132,625; cost reflective of experience delineated in the response

#### **Maier & Maier- 77.85**

- **Expertise and Prior Experience** - 4 previous projects nationwide and specific services directly related to the scope of the RFP and successes listed. 16 previous LWDB projects with contract dates and services. Successes not provided separately, integrated into examples. 4 references.
- **Staff Qualifications**- 9 key staff with 10-36 years of workforce or program management experience each. Resumes and bios provided.
- **Work Plan**- Detailed assessment, background research and agency involvement. Key elements of RFP section III. Scope of Work, Specific Activities/Deliverables addressed. Detailed monthly timeline provided.
- **Cost of Services**- \$232,110; does not include additional costs such as printing, facility rent, etc.

**WorkED Consulting LLC – 69.18**

- **Expertise and Prior Experience** – Five (5) previous projects nationwide with some of the specific services related to the scope of the RFP listed. Some specific contract dates not listed. Specific successes related to implementation not specified separately. 3 references.
- **Staff Qualifications** - 4 key staff with a combination of education and workforce experience, bios and resumes provided.
- **Work Plan** - Interviews, organizational profile development, process maps and service delivery. Emphasis on service delivery. Timeline provided within the work plan.
- **Cost of Services** -\$59,250; cost reflective of response

<b>CRITERIA</b>	<b>WEIGHT FACTOR</b>
<b>Expertise and Prior Experience</b>	25 Points
<b>Staff Qualifications</b>	30 Points
<b>Work Plan</b>	25 Points
<b>Cost Proposal</b>	20 Points
<b>TOTAL SCORE</b>	100 Points

<b>RFP: Consulting</b>	<b>Community Workforce Advancements</b>	<b>Maher &amp; Maher</b>	<b>Work ED</b>
Rater 1	88.00	81.30	81.30
Rater 2	87.80	80.25	42.75
Rater 3	90.05	72.00	83.50
Overall Score	88.62	77.85	69.18

The Career Source Tampa Bay staff scored independently in the following areas:  
Expertise and Prior Experience, Staff Qualifications, Work Plan and Cost of Services.

**RECOMMENDATION**

CareerSource Tampa Bay Staff have reviewed the proposals and recommends the above vendors to the Executive Committee for their final selection.



## Action Item # 2

### RFP Issuance: Financial Consultant

#### Background

The U.S. Department of Labor/Employment and Training Administration (USDOL/ETA) has been conducting a compliance review of CareerSource Tampa Bay (CSTB) and CareerSource Pinellas (CSPIN) based on previous allegations of misconduct. On May 16, 2019, the USDOL/ETA provided the Florida Department of Economic Opportunity a report summarizing the results of the review.

The areas which resulted in questioned costs are listed in the below table. ETA questioned 100% of the payments that occurred in the review period. The results of the review identified a combined total of \$17,643,409.87 in questioned costs that is subject to disallowance for CSTB and CSPIN. Except for Business services staff incentive compensation and Executive Director and Management compensation, the questioned costs were identified by region. The questioned costs are as follows:

Area	Review Period	CSTB	CSPIN	CSTB/CSPIN Totals
On-the-job training	7/1/2013-6/30/2018	\$5,602,503.13	\$4,151,420.62	\$9,753,923.75
Supportive service visa and gas cards	7/1/2013-6/30/2017	\$4,043,065.00	\$1,406,048.00	\$5,499,113.00
Business services staff incentive compensation	7/1/2013-6/30/2017			\$2,031,886.12
Executive Director and Management compensation	10/16/2002-12/31/2017			\$408,487.00
				\$17,643,409.87

#### Information

To mitigate the extent of the questioned costs, CareerSource Tampa Bay would like to issue an RFP to engage a consultant. The role of the consultant will include but is not limited to conducting a thorough review of all transactions in each area that produced questioned costs; in order to support, to the extent possible, those costs that are allowable and in accordance with applicable Federal statutes, regulations or the terms and conditions of a federal award.

#### Recommendation

Approval to issue a Request for Proposal (RFP) for the provision of a consultant to assist CareerSource Tampa Bay with the review of questioned costs.



## **Action Item # 3**

### **Ad Hoc Nominating Committee 2019-2020 Board Officers**

**Background:** On June 13, 2019 the Ad Hoc Nominating Committee met to discuss 2019-2020 Board Officers.

A list of nominees were presented for consideration. After much discussion and taking into consideration their experiences and expertise, the slate of nominees was created as noted below. Staff was directed to contact these nominees asking if they are willing to serve when elected by the Board. Should any of the members have expressed they are not able to serve, the alternate nominee will be contacted.

**Chair:** Sean Butler, Executive Vice President of People, A-Lign - **Accepted**.

**Chair-Elect:** Benjamin Hom, Vice President Human Resources, McKibbon Hospitality- **Accepted**

**Secretary:** Ginger Clark, Campus President, Hillsborough Community College- **Declined**  
Ginger has declined to accept the Secretary position because of other obligations.

**Alternate Secretary:** Michael Ramsey, General Director, Hillsborough County-**Accepted**

**Treasurer:** Sophia West, Partner, C.S. West & Associates – **Accepted**

**Alternate Treasurer:** Don Noble, Chief Financial Officer, VetCor, LLC

### **Recommendation:**

Executive committee is recommending that the Board of Directors approve the proposed slate of officers for Program Year 2020.



## **Action Item # 4**

### **Policies**

#### **Background:**

CareerSource Florida Strategic Policies are high level principles or directional statements to inform or clarify federal or state legislation, policies or workforce system strategies that are approved by the Board.

CareerSource Florida Administrative Policies are business rules, requirements, processes and responsibilities that expand, explain or further specify federal or state legislation or policies developed by the Florida Department of Economic Opportunity.

As CareerSource Florida (CSF) approves new Administrative and/or Strategic Policies, CareerSource Tampa Bay will review to determine necessary action for creation of new policy or policy revision. Additionally, CareerSource Tampa Bay is in the process of reviewing all existing CSF policies against our current CSTB Board Policies to identify discrepancies and required action.

Outlined below and contained in your packet are eight (8) critical CSTB Board Policies for your review. Unless otherwise noted, policies are new:

- a. Ethics and Transparency
- b. Incumbent Worker Training (IWT)
- c. Employed Worker Training
- d. Paid Work Experience
- e. Jobseeker Registration
- f. Job orders and Placement
- g. Employer Services
- h. On-the-Job Training (OJT) - Revision

#### **Recommendation:**

Staff is recommending approval of the CareerSource Tampa Bay Board Policies as listed above.



## Policy

<b>SECTION: PROGRAMS</b>	<b>POLICY#018-C0014</b>	<b>PAGE: 1 of 4</b>
<b>TITLE: Ethics and Transparency Policy</b>		<b>EFFECTIVE DATE: TBD</b>
<b>REPLACES: N/A</b>		<b>DATED:</b>

### **DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF**

**PURPOSE:** To effectively fulfill the mission of the CareerSource Florida network, volunteer leaders and workforce professionals statewide must ensure ethics and transparency guide their decision-making. This CareerSource Tampa Bay Board of Directors policy communicates expectations about ethics and transparency in Region 15’s workforce system to maintain integrity, accountability and transparency in decisions and actions that earn and protect the public trust. Florida’s workforce system consists of CareerSource Florida, which provides policy oversight; the Florida Department of Economic Opportunity, the administrative entity for state workforce programs; and our local workforce development board, to include the chief elected official and board of directors, as well as the career centers they direct.

### **BACKGROUND:**

At every level of the workforce system, there must be a unified commitment to conduct work in a manner that is business-driven, focuses on talent and continuous improvement, and assures accountability to public and private stakeholders including businesses, workers and job seekers.

State and local workforce development boards must conduct business in an open manner, comply with federal and state laws and ensure the public has electronic or simplified access to information including but not limited to:

- Information about state and local plans;
- Professional employment of workforce development board members;
- Selection of one-stop operators;
- Awards of grants or contracts to eligible training providers of workforce investment activities;
- Minutes of formal meetings of workforce development boards; and,
- Workforce development board by-laws.

State and local workforce development boards are expected to create and enforce policies about the importance of ethics in operations and transparency in public meetings. Boards must ensure these policies align with federal and state laws and communicate clear expectations to board members, their designees, employees and other stakeholders.

## **REGULATOR EXPECTATIONS FOR ETHICS AND TRANSPARENCY:**

Chapter 445, Florida Statutes, creates the Florida workforce system. This law implements Public Law 113-128, the Workforce Innovation and Opportunity Act of 2014 (WIOA), and creates CareerSource Florida, Inc., the state workforce investment board, as the principal workforce policy organization for the state. The purpose of CareerSource Florida, Inc., is to design and implement strategies that help Floridians enter, remain and advance in the workplace so they may become more highly skilled and successful, benefiting these Floridians, Florida businesses and the entire state, and fostering development of the state's business climate.

It is the intent of the Florida Legislature that CareerSource Florida, Inc., operate in the most open and accessible manner consistent with its public purpose. The expectation of the CareerSource Florida Board of Directors is that the following laws, rules, and regulations referenced and described below are included in local policies and guide organizational decisions and professional actions.

U.S. Department of Labor Employment and Training Administration Advisory System Training and Employment Guidance Letter No. 35-10 was issued on June 16, 2011. The guidance letter (TEGL 35-10) states that providing responsible stewardship for and oversight of publicly funded workforce programs must be accomplished in a way that demonstrates strong integrity, accountability and transparency to preserve the public trust. The responsibility for this stewardship and oversight is shared in the public workforce system by federal, state and local entities.

Public Law 113-128, the Workforce Innovation and Opportunity Act, was signed into law on July 22, 2014. WIOA is designed to help job seekers access employment, education, training and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy. WIOA Section 107(e) and 20 CFR 679 require local workforce development boards to make certain information available to the public, on a regular basis through electronic means, open meetings and upon request. Additional measures may be taken by state and local policymakers to ensure such information is readily accessible to the public.

The Code of Ethics for Public Officers and Employees, adopted by the Florida Legislature as Chapter 112, Part III, Florida Statutes, contains standards of ethical conduct and disclosures applicable to public officers, employees, candidates, lobbyists and others in state and local government. Workforce development board members and their designees are subject to the Code of Ethics for Public Officers and Employees.



The Florida Legislature specifically declared that CareerSource Florida, Inc., its board, councils, and any advisory committees or similar groups created by CareerSource Florida, Inc., are subject to the provisions of Chapter 119 relating to public records, and those provisions of Chapter 286 relating to public meetings (Chapter 445.004(1), Florida Statutes). Local workforce development boards are subject to Chapter 119, Florida Statutes and Chapter 286, Florida Statutes. Local workforce development boards also are subject to Section 24, Article I of the State Constitution, which describes Access to Public Records and Meetings.

Chapter 119, Florida Statutes, commonly known as Florida's Public Records Law, provides information on public records in Florida, including policies, definitions, exemptions, general information on records access, inspection, examination and duplication. It is the policy of the state of Florida that "all state, county, and municipal records are open for personal inspection and copying by any person. Providing access to public records is the duty of each agency" (Chapter 119.01, Florida Statutes). Included agencies are "public or private agencies, persons, partnerships, corporations or business entities acting on behalf of any public agency" (Chapter 119.011, Florida Statutes), "or other separate unit of government created or established by law" (Chapter 119.0701, Florida Statutes).

Chapter 286, Florida Statutes, also known as Florida's Sunshine Law, establishes a basic right of access to meetings of boards, commissions and other governing bodies of state and local governmental agencies or authorities. The law describes how boards conduct public meetings, how these meetings are noticed, who may attend, and how they may be accessed. This law also describes what records must be kept and made available to the public upon request.

CSF Strategic Policy # 2018.09.26.A.1- CareerSource Florida Ethics and Transparency Policy was adopted and effective on 9.26.19.

CareerSource Florida and the Department of Economic Opportunity will collaborate with local workforce development boards to support best practices in organizational ethics and implementation of federal and state transparency requirements. CareerSource Tampa Bay Board of Directors, board staff and employees will support organizational ethics and the implementation of federal and state requirements.

#### **Authorities:**

- [U.S. Department of Labor, Employment and Training Administration Advisory System, Training and Employment Guidance Letter No. 35-10](#)
- [Public Law 113-128, the U.S. Workforce Innovation and Opportunity Act of 2014 \(WIOA\), Sections 106-110](#)
- [20 CFR Part 679—Statewide and Local Governance of the Workforce Development System Under Title I of the Workforce Innovation and Opportunity Act](#)
- [Chapter 445.003-445.007, Florida Statutes](#)
- [Chapter 112, Florida Statutes](#)
- [Chapter 119, Florida Statutes](#)

- [Chapter 286, Florida Statutes](#)

**Inquiries:** Any questions about this policy should be directed to the Chief Operating Officer and/or her designee.



## Policy

<b>SECTION: WIOA and Business Services</b>	<b>POLICY#018-C0015</b>	<b>PAGE: 1 of 11</b>
<b>TITLE: Incumbent Worker Training (IWT)</b>	<b>EFFECTIVE DATE: TBD</b>	
<b>REPLACES: N/A</b>	<b>DATED: N/A</b>	

### **DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF**

**PURPOSE:** To provide guidance to CSTB WIOA and Business Services staff on administering Incumbent Worker Training program services.

#### **BACKGROUND:**

Incumbent Worker Training (IWT) is training designed to meet the needs of an employer or group of employers to retain a skilled workforce or avert layoffs, and increases both participants' and companies' competitiveness. Incumbent worker training is developed with an employer or employer association (group of employers) to retain a skilled workforce or avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment.

Workforce Innovation and Opportunity (WIOA) now allows the use (without a waiver) of local funds for Incumbent Worker Training. Under section 134(d)(4) of WIOA, local boards can use up to 20 percent of their WIOA Adult and Dislocated Worker funds to provide for the federal share of the cost of providing IWT such training services. LWDBs cannot use IWT funds for administrative activities such as office supplies. Incumbent Worker training needs to take into account the following factors:

- The characteristics of the participants in the program;
- The relationship of the training to the competitiveness of a participant and the employer; and
- Other factors the State or local boards may determine appropriate (e.g., the number of employees participating in the training, wage and benefit levels of those employees (both pre- and post-participation earnings), and the existence of other training and advancement opportunities provided by the employer).

Employers are required to pay for a significant cost of the training for those participants in incumbent worker training; this can be done through both cash and/or in-kind payments. The

wages paid to participants, while in training, may be considered as a source of matching funds. Rules for matching funds are provided in the Uniform Guidance and DOL exceptions at 2 CFR 200.306 and 2 CFR 2900.8, respectively. Under section 134(d)(4)(D) of WIOA, the minimum amount of employer share in the Incumbent Worker Training depends on the size of the employer:

<b>Employer non-Federal Contribution -% of Cost</b>	<b>Employers/ # of Employees</b>
At least 10 percent	Employers with 50 or fewer employees
At least 25 percent	Employers with 51 to 100 employees
At least 50 percent	Employers with more than 100 employees

The non-federal share provided by an employer participating in the program may include the amount of wages paid by the employer to a worker while the worker is attending a training program under IWT. The employer may provide the share in cash or in kind, fairly evaluated.

The Florida Legislature has established a statutory commitment to provide incumbent worker training for the purpose of assisting with the continuing education and training needs of existing Florida business. CSTB’s IWT Policy meets all of the requirements outlined in the CareerSource Florida Administrative Policy – FG- OSPA Employed and Incumbent Worker Training 89 revised 1.11.16 and the CareerSource Florida Work-Based Training policy #100 dated 6.11.19.

**PROCEDURE:**

The Incumbent Worker Training (IWT) Program, funded by the federal Workforce Innovation and Opportunity Act (WIOA) is administered by the CareerSource Tampa Bay (CSTB) Business Services Department. The IWT Program was created for the purpose of providing grant funding for continuing education and training of incumbent employees at existing Florida businesses. The program will provide reimbursement grants to businesses that pay for preapproved, direct, training related costs.

Incumbent Worker training provides both workers and employers with the opportunity to build and maintain a quality workforce. Incumbent Worker training can be used to help avert potential layoffs of employees, or to increase the skill levels of employees so they can be promoted within the company and create backfill opportunities for the employers. Such training is meant to assist with expansion, new technology, retooling, new services/product lines, and/or new organizational structuring, or to be used as part of a layoff aversion strategy. As a result, IWT is not intended to fund the periodic safety and refresher courses necessary for a business to continue to operate (i.e. First Aid, CPR, and hazardous material handling training and Occupational Safety and Health Administration OSHA certifications) or the occupational training a new hire would need.

The program will help established Hillsborough County businesses upgrade the skills of their current employees which provides enormous benefits to include:

**For employers:**

- Increased Competitiveness
- Skilled Workforce
- Increased Productivity
- Increased Profits
- Company Growth
- Reduced Turnover

**For employees:**

- Advancement Opportunities
- Increased Job Opportunities
- Industry Recognized Credentials
- Job Retention
- Transportable/Transferrable Skills

CSTB must work with employer to identify skill gaps in their workers and develop a strategy to effectively engage the workers in a training that will provide the knowledge needed to increase competitiveness of the employees and/or employers. CSTB must determine an employer's eligibility for participating in IWT based on the following factors which help to evaluate whether training would increase competitiveness of the employees and/or employers:

- a) The characteristics of the individuals employees
- b) The relationship of the training to the competitiveness of the individual and employer;
- c) Other factors the Local Workforce Development Board (LWDB) may determine appropriate, which may include but not limited to:
  - a. The number of employees identified to participate in the training;
  - b. The employees' advancement opportunity, along with wages and benefits (both pre- and post- training earnings);
  - c. The availability of other training and advancement opportunities provided by the employer;
  - d. Credentials and skills gained as a result of training;
  - e. Layoffs averted as a result of training;
  - f. Utilization as part of a larger sector and/or career pathway strategy; and
  - g. Employer size.

For an employer to receive IWT funds, CSTB must ensure that individuals who receive training:

1. Are at least 18 years of age
2. Are a Hillsborough County resident employed with a business whose physical location is in Hillsborough County;
3. Meet the Fair Labor Standards Act (FLSA) requirements for an employer-employee relationship
4. At least one employee of the applicant business and/or a person working for the business as a staffing agency employee, working at least 37.5 hours per week and receives a W2;
5. Are a citizen of the United States or a non-citizen whose status permits employment in the United States;
6. Have established employment history with the employer for six months or more. Pursuant to Training and Employment Guidance Letter 19-16, there is one exception to the six-month requirement; which is in the event that the incumbent

worker training is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for six months or more as long as a majority of those employees being trained meet the employment history requirement.

### **Incumbent Worker Participant Eligibility**

Participants in IWT are not required to meet WIOA eligibility criteria or priority of service unless they are also enrolled as a participant in the WIOA Adult or Dislocated Worker program. CSTB must record participant demographic information in EmployFlorida (EF) such as: SSN, age, citizenship/right to work, and compliance with the Selective Service registration requirements as this information must be reported to United States Department of Labor USDOL.

Additionally, IWT participants are subject to selection for the WIOA federally mandated data validation. Therefore, all eligibility documentation requirements apply to incumbent workers.

### **Company Eligibility**

Companies applying for an IWT grant must meet the following criteria:

- Be a “for-profit” company in the Hillsborough County
  - Generally, IWT should be provided to private sector employers; however, there may be instances where non-profit and local government entities may be recipients of IWT funds. For example, IWT may be used in the health care industry where hospitals are operated by non-profit or local government entities and a nursing upskilling opportunity is available.
- In operation for a minimum of one (1) year prior to the application date (as verified on sunbiz.org)
- Provide a description of how the training is related to the competitiveness of both the business and the employee receiving training.
  - Businesses in a qualified targeted industry
- Demonstrate a commitment to retain or avert the layoff of employees receiving training.
- Demonstrate financial viability by providing FEIN and W9
- Have at least one full-time employee (must be Hillsborough Resident AND W-2 employee). For a sole-proprietor where the business owner is the only employee, the sole- proprietor may be considered as the full-time employee.
- Have not received an IWT award in the previous or current program year.
- Have not received CareerSource Florida IWT funds in the current year for the same type of training or for different employees being requested as this would be a duplication of services.
- Identify the receipt of local, state or federal training funds through CareerSource Florida or other funders must be disclosed. Organizations receiving training cannot use grant funds to subsidize other training and/or cover the same training.

**The following businesses are not eligible to apply for funds under this program:**

- Entities whose administrations are comprised only of volunteers
- Workforce Development Boards and their administrative entities
- Labor unions
- Businesses that received an IWT award in the current or previous program year

### Available Funding & Maximum Award Amounts

IWT applications are reviewed on a first-come/first served basis until available funding has been awarded. Funding allocations will vary each Program Year. A notification will be posted on [www.careersourcetampabay.com](http://www.careersourcetampabay.com) when funds are no longer available.

The maximum amount is \$50,000 per grant per company. Additionally, the cost per trainee cannot exceed \$3,500. Companies may only apply for one IWT grant during a program year (July 1 – June 30<sup>th</sup>).

### Training Services

The IWT Program provides flexibility regarding the type(s) of training and the training provider(s). Based upon the needs of the company and their overall workforce development needs, the company chooses its own training and training provider.

More specifically, the training can be:	The following are examples of trainings that cannot be funded:
<ul style="list-style-type: none"> <li>• provided by Florida’s public or private educational institution, a <i>private training company</i> or <i>private instructor</i>*, a company employee, or a combination of training providers</li> <li>• at the company’s facility, at the training provider’s facility, online or remotely, or a combination of sites</li> <li>• occupational skills training designed to meet the special requirements of a business or Industry professional development (i.e., leadership training)</li> <li>• training in strategies to improve efficiency of business operations</li> <li>• technical/hard skills training such as computer software training</li> </ul>	<ul style="list-style-type: none"> <li>• CPR and First Aid</li> <li>• Hazardous material handling training, Occupational Safety and Health Administration OSHA certifications</li> <li>• New hire orientation</li> <li>• Diversity and Sexual Harassment</li> <li>• English as a Second Language</li> <li>• Degree programs</li> <li>• Workplace literacy or soft skills</li> <li>• Training that takes places where food and/or beverages are included</li> <li>• Training that includes the purchase of equipment (such as iPads or other equipment/supplies/devices that can be used outside of training) in the cost of the training</li> </ul>

*\* Private training companies, institutions and instructors may be utilized upon a review that includes, but is not limited to, accreditation and licensure and prior approval by CareerSource Tampa Bay. The training provider’s website address and instructor’s resumes must be provided.*

### Costs

Reimbursable Training Expenses	Non-Reimbursable Costs
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<ul style="list-style-type: none"> <li>• <i>With proper documentation, the following direct training costs/expenses are reimbursable through the IWT grant:</i></li> </ul>	
<ul style="list-style-type: none"> <li>• <b>Tuition/Training/Course Cost</b></li> <li>• <b>Instructors' Wages</b> capped at: <ul style="list-style-type: none"> <li>• \$35/hour for company employees delivering the training,</li> <li>• \$200/instructor hour for vendor training</li> </ul> </li> <li>• Other Costs: (limited to copies or slides at \$.03 per copy, training DVD's or tapes)</li> <li>• <b>Textbooks/Manuals:</b> (limited to course content only – no certification or exam preparation materials, capped at \$100/textbook and/or manual)</li> <li>• <b>Curriculum Development:</b> (limited to two hours for every one hour of training) The majority of the grant amount will be dedicated to the actual training. No more than 25 percent of the entire grant will be allowed for curriculum development.</li> </ul>	<ul style="list-style-type: none"> <li>• Compensation or consultant fees not directly related to the provision of training</li> <li>• Costs incurred prior to the signing of the contract</li> <li>• Capital improvements</li> <li>• Travel</li> <li>• Training equipment</li> <li>• Food</li> <li>• Membership fees/dues</li> <li>• Conferences</li> <li>• Test/Exam Fees</li> <li>• Company web site design and development, web site hosting, and maintenance, software upgrade, advice on computer selection for purchase and upgrade</li> <li>• Purchase of any item or service that may be used outside of the training project (including computer equipment and non-training related software)</li> <li>• Costs incurred prior to CSTB's approval of the IWT application/agreement</li> </ul>

### Reimbursement Rate and Process

Adequate documentation of the training is required for all expenses incurred and paid. ***Businesses must provide the required documentation for reimbursement based on the % of costs outlined in the table on page 2, i.e. instructor's wages/tuition, curriculum development, and textbooks and manuals.*** \*Please note that if the instructor is a business employee, the business will be required to provide a minimum of 50 percent of the \$35/hour cap.

### Application Process

The IWT Program Application must be completed online (emailed, mailed or faxed applications will not be accepted). The online application is the only document that may be utilized to apply for the IWT grant.

Employers are strongly encouraged to submit their IWT application a minimum of 30 business days prior to the desired start date of training. Failure to submit the IWT application within 30 business days prior to the desired start date of training may cause valuable training to be missed. Submittal within this timeframe doesn't guarantee approval of the IWT Application.

### Funding Criteria

The application along with supporting documentation will be reviewed by the IWT staff to ensure that:

1. The IWT application is complete and required supporting documents have been submitted (as outlined in the checklist). *Please note that incomplete IWT applications (those missing required information and documentation) will not be processed until all required information is received.*
2. The proposed training is reimbursable training.
3. The program objectives and outcomes (avert layoffs, retain trained employees, increase competitiveness of business and trained employees achieve certifications, create new jobs, develop transferable skills, increase profitability, etc.) are clearly stated.
4. The application clearly describes the training to be delivered and clearly states the training objectives noted above.

### **Notification of IWT Grant**

Once the application has been reviewed, an email will be sent to the company contact listed in the IWT Application advising of the pre-approval, and the pre-approved grant amount.

### **Grant Contract**

Within a few weeks of the grant approval, the contract between CareerSource Tampa Bay and the employer will be prepared and sent electronically. The contract will then be returned via email to CareerSource Tampa Bay designated IWT staff. Once received, CSTB staff will review and execute the contract. The executed contract will then be emailed to the company.

No training can occur and no reimbursements will be made until the contract is fully executed and participant eligibility is fully documented. Training which began prior to the execution of the IWT Training contract cannot be reimbursed.

All grant projects shall be performance based with specific measurable performance outcomes – including the completion of the training project and number of employees trained.

### **Contract Terms**

The contract will set forth all processes and expectations for administering, implementing and completing the IWT training. If the contract is not executed within the 30-day time frame, the grant award becomes null and void unless permission is granted by the CEO or his/her designee.

### **Length of Contract**

Training must be completed within 6 months from the date of approval. From there, the company will have 45 days to submit final reimbursement requests for training completed during the contract period.

## Extensions

There is no provision in the contract for extensions. A business is expected to have carefully assessed its training needs so that it will apply only for funds needed for training that can be completed in a six (6) month period.

## Reporting Requirements

- **Training Progress Reporting:** The IWT program staff expects to have ongoing communication with businesses regarding the progress of training. If training is occurring this is sufficient. However, if no training has occurred, then on a monthly basis, businesses are expected to have some form of communication with IWT program staff, which may include course substitution requests, e-mails or phone calls. If no communication has occurred, the Business Services IWT designated staff will reach out to the company contact to inquire regarding the status of the training project.
- **3-Month Status Report:** Businesses are required to submit a 3-month status report regarding their usage of funds and training plans for the remainder of the grant period. Failure to submit this report to the Business Service IWT designated staff on or before the 3-month mark may render the contract null and void. The IWT staff will advise of the specific requirements of this report, to include content, time frame, and other matters with information to be included with a copy of the executed contract.
- **Final Training Evaluation:** At the completion of the grant, a final report on the training is due no later than 45 days from the end of training. The final training evaluation will be included with the reimbursement instructions. Once this is received, the final reimbursement will be released. (Businesses will also need to keep accurate records of the project's implementation process to certify that all information provided for the purpose of requesting reimbursements and reporting training activity is accurate and true for a period of at least five (5) years.)

## Trainee Information

In addition to the reporting requirements listed above, there are specific reporting requirements regarding the individual employees who have received training.

The information, at a minimum, will include:

- Legal Name of Trainee
- Social Security Number
- Verification of Citizenship Status/Authorization to Work
- Age
- Selective Service Registration Status
- Hourly Wage
- Date of Hire

## Employer Reporting Requirements

Throughout training, the business must provide and maintain sufficient documentation of outcomes of training including:

Title and a description of training	Number of employees who earned a promotion
Type and a description of the credential(s)	Number of new jobs created
Number of employees who completed the training program	Number of existing jobs saved
Number of employees who earned a credential	Layoff or closure
Dates of training	Other outcomes
Number of employees who earned a wage increase	

As outlined above the employer is required to submit program reports at various intervals throughout the program and a final program report within 45 days of the training Actual End Date. The information listed above will be required for submission of these reports and data entry, and may be needed for any additional reporting required by CSTB.

The final payment for expenditures incurred as a result of the IWT program must be withheld until the Final program Report is submitted and all documentation of performance criteria specified in the agreement have been received.

### Substitution Requests

The business is expected to assess its immediate training needs and apply only for funds needed to meet those needs within a 6-month time frame. The application is approved based on the training outlined in the proposal. If the approved training needs change, a substitution can be requested on the provided form to change the course or the training provider. There is a maximum of two substitution requests per lifetime of the grant. The IWT staff will evaluate the request and the business will be notified via email of the approval or denial of the substitution. Please note for any substitution requests being made the training cannot start prior to the authorization of substitution by CareerSource Tampa Bay IWT program staff.

### Reimbursement Process

Businesses may request reimbursement at the end of each training program or hold until the end of all training programs during the 6-month period/training contract. Reimbursements will be made in direct correlation with the business's training progress. The percent of funds reimbursed must stay equal to or less than the percent of trainees that have been trained to date. All reimbursement must be submitted within 45 days of the contract end date. Reimbursement requests received after the 45-day cutoff will not be processed as they are considered null.

## **Invoicing and Payment**

Business Service IWT program staff will track the completion of IWT trainings and work directly with employers to ensure that required IWT reimbursement forms and supporting documentation is submitted timely for processing.

## **Monitoring**

Monitoring and evaluation of the IWT program plays a critical role in insuring that the goals of the IWT are achieved. Any IWT Agreement deviations noted should be dealt with promptly, either with a corrective action plan or by suspension or termination of the agreement if serious violations have occurred. All visits to the business should be documented in the business EF account file and electronic file. The entry should identify when the visit was made, what was observed, who was interviewed, a synopsis of the content of the conversation, and any items of concern that need to be addressed.

Additional programmatic monitoring will be conducted throughout the PY by our internal Program Monitor under the direction of our Director of MIS and Data. Financial monitoring will be handled by our Director of Fiscal Compliance.

Participating employers must agree to cooperate with monitoring efforts by the US Department of Labor, state Department of Economic Opportunity and Career Source Tampa Bay. Employers must also adhere to all other applicable local, state and federal rules and regulations.

## **Modifications**

Modifications to the IWT contract may be needed. The Business Services IWT staff would be required to submit a CSTB Agreement Modification IWT Agreement and specify the purpose of the modification, total training hours and maximum reimbursement. This requires the CSTB CEO or designee signature approval before any agreement modifications can be fully executed.

- The Chief Executive Officer, Chief Operating Officer and designee are hereby authorized to execute IWT Agreements.
- If necessary during the IWT process, CSTB will accept electronically submitted scanned or faxed documents with signatures of the representatives that have legal authority to contract and bind the respective organization in their capacity as a signatory official.

## **Authority**

- Workforce Innovation and Opportunity Act, Title I, Public L. No 113-128 Section 134(d)(4)
- Workforce Innovation and Opportunity Action: Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions, Vo. 80, No. 73 Fed. Reg., 20573 (proposed April 16, 2015) (to be codified at 20 C.F.R. pts. 680.780, 680.790, 680.800, 680.810, 680.820, 682.210(b) and 682.320(b)(3).

- TEGL 3-15 Guidance on Services Provided through the Adult and Dislocated Worker Program under the Workforce Innovation and Opportunity Act (WIOA) and Wagner Peyser, as Amended by WIOA, Guidance for Transition to WIOA Services
- Uniform Guidance and DOL exceptions at 2 CFR 200.306 and 2 CFR 2900.8

**INQUIRIES:** Any questions about this policy should be directed to the Chief Operating Officer or Director of Business Services.



## Policy

<b>SECTION: Business Services</b>	<b>POLICY#019-C0020</b>	<b>PAGE: 1 of 5</b>
<b>TITLE: Employed Worker Training</b>		<b>EFFECTIVE DATE: TBD</b>
<b>REPLACES:</b>		<b>DATED: 2016; PY 18-19</b>

### **DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF**

**Purpose:** To provide guidance in the utilization of CareerSource Tampa Bay’s Employed Worker Training Program and the established limits on the amount of EWT funds that can be spent per Employer.

#### **BACKGROUND:**

The Employed Worker Training (EWT) Program is a training strategy designed to meet the special requirements of a single employer or group of employers. As such, it may be provided to a single employee or a group of employees. The program is designed to assist employees in developing higher skills and receiving increased wages. This program is also designed to improve workforce availability and skills to support targeted sectors identified. The employer may be in the for-profit, the non-profit, or the public sector, and are required to provide a minimum of a 50% match to be eligible for funding.

Designed to assist existing employees in developing higher technical skills and receiving increased wages, this program is not intended for onboarding, new hire, or soft skills training. This program is also designed to improve workforce availability and skills to support the identified targeted sectors within Hillsborough County. This strategy serves to promote business retention and contribute to the overall economic growth of the region.

**POLICY:** Funding will be limited to an amount not to exceed \$25,000 per qualified organization. However, should funding permit, proposals that exceed \$25,000 will be considered based on the cost per trainee and type of training proposed, up to \$50,000. Training must lead to a certification as defined by the USDOL in the Definitions section on page two of this document. Training in “soft skills” as defined on page three will not be considered for funding.

**Employed Worker** - For the purposes of this program, an employed worker is defined as meeting all of the below requirements:

- At least one employee of the applicant business working at least 37.5 hours per week and receives a W-2;
- At least 18 years of age;

- A citizen of the United States or a non-citizen whose status permits employment in the United States;
- A Florida resident working at a physical location in Florida; and
- Employed six months before the signature date of the application.

All training provided through the program must continue to meet the U.S. Department of Labor Employment and Training Administration's definition of a certificate or credential.

CSTB's EWT program will be made available through an Invitation to Negotiate (ITN). The ITN is used to elicit responses from qualified employers, entities that carry out programs under the National Apprenticeship Act, and/or public institutions of higher learning located in Hillsborough County Florida, for the provision of training for their existing workforce in alignment with our organization's workforce initiatives. This program will provide reimbursement to pay for pre-approved, direct training costs of industry and occupation specific training at a rate of up to 50 percent of the actual costs of training.

**OVERVIEW:** Periodically, CareerSource Tampa Bay updates its Employed Worker Training Directive primarily by increasing the per hour threshold of allowable earnings in order for individuals to be served. At any time an updated directive is published by our Administrative Entity, staff will be provided the new policy and will refrain from utilizing previous versions.

The Employed Worker Policy shall only be utilized by front line WIOA staff when completing intake and eligibility for assisted core, intensive enrollments or special training projects such as EWT. Common uses of the Employed Worker Policy are to assist with supportive services in order to retain or upgrade employment. Some of the types of services available are as follows but not limited to: licensure and exam fees, certifications, tools, equipment, supplies, EWT, etc.

This policy is used primarily for Adult but can also be used for Dislocated Workers. No Youth will be served under this policy. The overall use of this policy for training assistance is at the discretion of CareerSource Tampa Bay.

**Credentials and use of the Employed Worker Policy:** It is necessary to reinforce the importance of an Adult employed at enrollment that a nationally recognized-credential is required under TEGL 10-16. The credential for an employed worker must be obtained after enrollment and prior to request for case closure.

In accordance with CareerSource Florida Administrative Policy FG-OSPS 89 – Employed and Incumbent Worker Training, WIOA distinguishes employed worker in several ways.

#### Employed Worker

1. An employed worker is an individual currently working who has been determined by a one-stop operator to be in need of employment and services in order to obtain employment that allows for self-sufficiency, in accordance with locally established guidelines.
2. An employed worker who currently meets the local definition of self-sufficiency, but needs services in order to retain their self-sufficient employment, also may be served if documentation is obtained from the employer that the employee will not be retained unless additional training or services are received.
3. Dislocated workers who have become re-employed in "income maintenance" job (a job with a lower rate of pay than the job of dislocation) if training is determined necessary in order to obtain or retain employment that leads to economic self-sufficiency.
4. Employed workers must have the skills and qualifications to successfully participate in the selected program of training services.



5. CSTB must complete a WIOA application and enter participation information into EmployFlorida (EF), the state's management information system.

### Employed Worker Training

1. WIOA employed worker services primarily are for the benefit of the employed worker but is recognized that these services may also benefit the employer.
2. Employed workers must be given the same customer choice options as other WIOA clients (except for eligible employed workers who are enrolled in customers training with their employers).
3. Training must be provided in compliance with the Eligible Training Provider and Individual Training Account (ITA) requirements unless it is customized training or On-the-Job Training.

**Eligibility:** Validation of current wage rate is of utmost importance when utilizing this policy. A copy of a recent paycheck stub with the customer's name and hourly wage is required. In the absence of a recent pay check stub, validation from the employer would be required. An acceptable document would be written notification on the employer's letterhead stating the customer's name, SSN, their present employment status and hourly wage. A means of last resort would be that of an applicant statement/self-attestation itemizing the name of the employer, address, phone number, contact person and their present employment status along with their hourly wage rate. WIOA staff shall also telephonically validate the required detail when basing eligibility via an applicant statement. Preference is still that of a valid recent pay check stub.

As with all other intake packets requesting services under the WIOA program, all required forms will be necessary, including proof of right to work in the United States and validation of Selective Service for those applicable. A copy of the most recent threshold wage rate will be included in all intake packets when utilizing the Employed Worker Policy.

When intake is based on the Employed Worker Policy, validation of the self-sufficiency wage rate for the given program year will be in the WIOA customer's file. Hourly earnings on behalf of the customer are not to exceed the allowable wage rate.

A waiver may be requested and with appropriate justification be approved by the CEO or designee.

CSTB's definition of self-sufficiency outlined in our local area allowable in WIOA §108(b)(1) is defined as:

- Self-sufficiency for dislocated workers is defined as having a job with a wage that is at least 80% of the dislocated worker's pre-layoff wage. This definition of self-sufficiency does not apply when serving an individual who will lose their job without training as training is integral to job retention. Self-sufficiency for employed adults is defined as a wage that is equal to or above \$26/hour or a family income above 250% of the Lower Living Income Standard Level (LLSIL), whichever is higher. If the self-sufficiency wage level is above 250% of the LLSIL and above the average wage in this region, the Board will include justification in the individual's file that the level is required to provide for the individual and his/her family.

**QUALIFICATIONS:** CareerSource Tampa Bay intends to individually select and negotiate a formal agreement with multiple qualified organizations within the following parameters:

1. Organizations and entities eligible to apply must fall under at least one of the following three categories:
  - Employer
  - Entity that carries out programs under the National Apprenticeship Act
  - Public Institution of Higher Learning located in Hillsborough County.
2. Respondent employers, entities that carry out programs under the National Apprenticeship Act registered apprenticeship programs, and public institutions of higher learning must be approved to do business in the State of Florida and have not been suspended or debarred from doing business with the state or federal government.
3. Training must meet the USDOL guidelines for a certificate/credential. Additional points will be awarded to organizations who will provide training that results in a degree, industry certification, and/or license. Examples of industry certifications include CompTIA certification or NIMS credentials. Examples of occupational licenses include Pharmacy Technician and Registered Nurse.
4. The CSTB board reserves the right to request a detailed curriculum for each proposed training program for evaluation prior to approval of funding.
5. Trainees must be existing full-time employees as specified in the Definitions section above. Trainee wages cannot fall below \$12.00 per hour after training or exceed \$26.00 per hour before training.
6. Adequate documentation of the training is required for all expenses incurred and paid. Organizations will be required to provide a minimum of up to 50 percent of the requested direct training costs, i.e. instructor's wages/tuition, textbooks and manuals.
7. Employers requesting reimbursement for internal training are required to clearly identify how the requested reimbursement amount of direct training costs is determined/calculated with their response. The CSTB board reserves the right to request documentation to support the determination/calculation of the actual direct training costs prior to approval of funding. Proper documentation to support actual direct training costs/expenses will be required to issue reimbursement.
8. Reimbursement is limited to a maximum of 50 percent of direct training costs. All respondents will be required to provide resources and/or leveraged funds equivalent to a minimum of 50 percent of the total funding. With proper documentation, up to 50 percent of direct training costs/expenses are reimbursable through the grant, i.e. instructors' wages, tuition, textbooks, materials and supplies. Additional resources and/or leveraged funds can include trainee wages, facility usage if training occurs at the employer's work site, prorated training equipment purchase, and travel costs if applicable. Proper documentation to support direct training costs/expenses and leveraged resources inclusive of the above items as applicable will be required by the employer with the submission of each invoice.
9. Examples of disallowed costs for reimbursement include:
  - a. Employee/trainee wages and fringe benefits (can be reported as leveraged resources)
  - b. Compensation or consultant fees not directly related to the provision of training
  - c. Costs incurred prior to the date of the contract
  - d. Capital improvements, travel, food, or membership fees/dues
  - e. Purchase of employee assessment systems or systems usage licenses
  - f. Equipment

10. Eligible respondents must be in good financial standing and be able to provide a DUNS number and/or most recent financial statements.
11. The receipt of other local, state or federal training funds through CareerSource Florida or other funders must be disclosed in the respondent's application. Organizations receiving training cannot use grant funds to subsidize other training and/or cover the same training.
12. If awarded, respondents will be required to maintain compliance under the Workforce Innovation and Opportunity Act (WIOA) as guidance and implementation are ongoing.

**SUBMISSION OF RESPONSES:** Qualified employers, entities that carry out programs under the National Apprenticeship Act and/or public institutions of higher learning located within Hillsborough County, Florida interested in submitting a response to an Invitation to Negotiate must submit their proposal electronically via the following link: <https://ewt.careersourcetampabay.com>. Responses submitted in hard copy, email or any other means other than the above link will not be accepted, be considered non-responsive and/or not considered for funding.

Failure to submit the application at least 30 business days prior to the desired start date of training may cause valuable training to be missed. Please note, however, that submittal within this timeframe does not guarantee that the approval date will be on or before your training start date.

Submission of the response is solely and strictly the responsibility of the Respondent. Responses received once funding is obligated will not be funded and the sender will be notified via email.

CareerSource Tampa Bay reserves the right to reject any or all responses, to re-advertise an ITN, to postpone or cancel this process, to waive irregularities in the process or in responses thereto; and to change or modify the project schedule at any time. Any responses received that do not include resources and/or leveraged funds of a minimum of 50 percent of direct training costs will be considered non-responsive and will not be included with the proposals to be reviewed by the committee.

**SELECTION:** CareerSource Tampa Bay will enter into negotiations with multiple organizations. The selection committee, comprised of CareerSource Tampa Bay staff will review and score each response. Any organization that scores below a 70 will not be considered for funding. Only scores 70 and above will be considered for funding.

The EWT Selection Committee reserves the right to request clarification on submitted responses. Should CareerSource Tampa Bay be unable to negotiate a final contract, negotiations with that organization will be formally ended.

**NOTIFICATION:** Once the application has been reviewed, an email will be sent to the contact listed in the application advising of approval or requesting additional information.

**INQUIRIES:** Any question about this policy should be directed to the CEO, COO, Director of Business Services or his/her designee.



## Policy

<b>SECTION: WIOA Youth</b>	<b>POLICY#019-C0016</b>	<b>PAGE: 1 of 10</b>
<b>TITLE: CSTB Paid Work Experience (PWE)</b>		<b>EFFECTIVE DATE: TBD</b>
<b>REPLACES: N/A</b>		<b>DATED: N/A</b>

### **DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF**

**PURPOSE:** To provide a policy that clearly delineates the processes and procedures associated with the Paid Internship & Work Experience Training Services funded under the Workforce Innovation and Opportunity Act (WIOA).

**BACKGROUND:** CareerSource Tampa Bay (CSTB) connects businesses and applicants around the notion that businesses need skilled workers; people need good jobs; and communities need strong economies. Internship/work experience participation is a viable option to resolve the barriers of “lack of experience” and “workplace essential soft skills” that exist between employers, applicants, and employment.

WIOA section 129(c)(4) prioritizes work experiences with the requirement that local areas must spend a minimum of 20 percent of non-administrative local area funds on work experience. Under WIOA, paid and unpaid work experiences that include as a component academic and occupational education may have the following four categories: summer employment opportunities and other employment opportunities available throughout the school year; pre-apprenticeship programs; internships and job shadowing; and on-the-job training opportunities.

Local Workforce Development Boards (LWDBs) must spend at least 20 percent of its Title I Youth funds for work experience. Funds spent for Summer Youth Employment Programs (SYEP) work experiences may be included in the required minimum 20 percent of youth funds on work experience. LWDBs must track program funds spent on youth program paid and unpaid work experiences, including wages and staff costs for the development and management of work experiences, and report such expenditures as part of the local WIOA youth financial reporting. The percentage of funds spent on work experience is calculated based on the total local area youth funds expended for work experience rather than calculated separately for in-school and out-of-school youth. LWDB administrative costs are not subject to the 20 percent minimum work experience expenditure requirement.

Work-based training provides WIOA-eligible participants an opportunity to engage in work experiences where they develop employability skills, acquire job-specific knowledge and gain work experience in an

area that helps prepare them for self-sufficient employment. LWDBs must ensure that work-based training is only offered for occupations that are in demand in the local area in which the participant receives training.

## **PROCEDURE:**

Work experiences are planned and structured learning experiences which take place at a work site for a limited period of time. Work experience sites may be in the private, for-profit sector; the non-profit sector; or the public sector. Work experiences are designed to enable youth to gain exposure to the world of work and its requirements as well as providing opportunities for career exploration. Work experiences should help youth acquire the personal attributes, knowledge, and skills needed to obtain and retain a job and advance in employment. Work experiences may be subsidized or unsubsidized and may include the following elements:

- Instruction in employability skills or generic workplace skills
- Exposure to various aspects of an industry / occupation
- Progressively more complex tasks
- Internships and job shadowing
- Integration of basic academic skills into work activities
- Supported work, work adjustment, and other transition activities
- Entrepreneurship
- Service learning
- Paid and unpaid community service
- Other elements designed to achieve the goals of work experience

Work experience worksites may be businesses or organizations that are private-for-profit, not-for-profit and government organizations in Hillsborough County. Priority will be placed on our current focus industry sectors of Manufacturing/Construction/Building Trades, Hospitality/Travel Tourism, Transportation & Logistics and Retail, Financial Shared Services, Healthcare, and Information Technologies (IT).

Work experience trainees will also be paid the standard hourly minimum wage.

Generally, work experience services are intended for individuals who fit the following categories:

- Have little or no prior experience in the workplace;
- Have experienced difficulty in maintaining employment in the past due to barriers that can best be addressed and overcome through work experience enrollment;
- Have a need to experience the fundamentals of maintaining consistent employment;
- In most cases, have little or no previous experience in a new occupation of choice;
- Can be placed at a worksite that will provide occupation specific knowledge and experience in their area of occupational choice toward meeting their specific career goals

The work experience agreement must be in place prior to the internship or work experience trainee beginning the career training. The agreement must contain all of the applicable provisions and a copy must be maintained in the trainee and employer file. The agreement must also contain the specific dates of enrollment (beginning and ending dates); a complete job description including specific skills to be obtained; a training plan agreed upon by the employer and the CSTB representative; a statement as to the amount of wage to be paid; and be signed by the employer and CSTB CEO or COO. Labor

standards apply in any work experience where an employee/employer relationship exists, defined by the Fair Labor Standards Act.

Work experiences must include academic and occupational education components. The academic and occupational education as a component is a requirement for WIOA Youth. It is not a requirement for WIOA Adults and Dislocated Workers. The academic and occupational education components refer to contextual learning that accompanies a work experience. It includes the information necessary to understand and work in specific industries and/or occupations. For example, if a youth is in a work experience in a hospital, the occupational education could be learning about the duties of different types of hospital occupations such as a phlebotomist, radiology tech, or physical therapist. Whereas, the academic education could be learning some of the information individuals in those occupations need to know such as why blood type matters, the name of a specific bone in the body, or the function of a specific ligament. CSTB program staff have the flexibility to determine the appropriate type of academic and occupational education necessary for a specific work experience. Additionally, the educational component may occur concurrently or sequentially with the work experience. This is documented through the Training Plan.

For youth, work experiences may also include:

- a. Pre-apprenticeship programs;
- b. Summer employment and other employment activities available throughout the school year;
- c. Internships and job shadowing; and
- d. On-the-job training.

### **Youth Employment**

Youth who participate in work experience programs gain numerous skills which have a positive impact on their future and lifelong employment opportunities. Youth with employment experience are more likely to see the connection between school and career success, in addition to increasing their employability skills. Among low-income youth, higher employment rates have been associated with higher rates of high school graduation and lower teen pregnancy rates.

One of the primary focuses of the WIOA youth program is helping youth gain skills from work experience which can assist them in transitioning into full-time, unsubsidized employment with benefits. The advantages that the Work Experience program brings to the community is the provision of youth who are mature and work ready to employers. The community benefits further as money earned by the youth is put back into the local economy.

The intent of the WIOA Youth PWE program is to assist unemployed youth (ages 16-24) in gaining skills for their first job, enhancing skills they already possess, and preparing them with job retention skills in order to maintain employment. Job retention skills include punctuality, career seeker service, and work ethics. If participants develop all of the skills needed by employers through their work experience, there is an increased potential to gain unsubsidized employment with their current employer or be connected to another employer who is seeking to hire workers. Regardless of employment outcomes following participation, youth will be able to identify paid work experience on their resume. Another goal of the program is to create a pipeline of skilled workers who will be ready to join the workforce as the economy continues to improve.

### **Engaging the Community and Employers**

Employers and the general public throughout Hillsborough County will be made aware of the CSTB Work Experience program through a variety of methods. Primary outreach will be conducted by the Business Services and Program Department staff. The CareerSource Tampa Bay website will be used to engage the community and employers with specific information about the program and the opportunities offered.

### **Eligibility and Intake System**

CSTB Career Counselors will be responsible for completing WIOA Youth eligibility on all participants. Enrollment will be scheduled after the WIOA Youth Program Coordinator and/or Work-Based Learning Coordinator has reviewed all documents.

MIS Department shall be responsible for inputting data into the state's EmployFlorida (EF) Management Information System (MIS) within applicable timeframes to meet CSTB standard of acceptance.

### **Worksite Training Program Rules and Regulations:**

Each perspective trainee will be provided the Worksite Training Program Rules and Regulations that will include all pertinent information regarding the Work Experience Training Services. The trainee will be required to sign and date the document attesting they have received, read and understand all the rules and regulations.

### **Agreement for Background Check**

Each perspective trainee will be provided a background check form for signature. All trainees will be screened prior to being referred to an employer work site. The background check will be completed by CSTB or a contracted provider prior to being marketed to a potential training work site. It is the responsibility of CSTB or provider to discuss with the Worksite Employer any acceptable background issues prior to marketing and/or referring any candidates. No work experience participant should be referred to an employer if the candidate has any prior criminal issues that are not acceptable based on the employer's preference. Background results will be reviewed by CSTB HR Director. This staff member will make the judgment call as to whether the individual should be referred to a work site if background issues are identified. No background results will be discussed by staff. Staff coordinating the Work Experience/Internship opportunity will be informed to either 'proceed' or 'not proceed' based on results. The PWE employer can run their own background check, as necessary based on their organizational standards however, they would incur these costs.

### **Employer Selection**

CSTB is responsible for providing interested employers with eligible and suitable interns and/or work experience prospects. The employer is responsible for interviewing and making the final selection of the trainee they would like to select for their worksite.

Businesses that meet the following criteria are considered eligible and may, subject to available funding, enter into a PWE agreement:

1. Physical company is located in Hillsborough County;
2. Business must legally have operated at current location for at least 120 days.
3. Hold valid business tax receipt (formally an occupational license) and/or zoning permit; (google search and printout included)
4. Active business as verified by Florida Department of State Division of Corporations ([www.sunbiz.org](http://www.sunbiz.org)) and provide W-9.

5. Hasn't experienced any layoffs in the past six months verified by DEO WARN site.
6. Must develop a detailed PWE Training Plan Outline that identifies the specific occupation, educational, job specific skills that will be learned and estimated time required for each skill.
7. Agrees to routine monitoring and communication with the CSTB Work-Based Learning Program Staff regarding the progress of the program participant relating to the PWE Training Plan, progress reports, midpoint in training and completion of the PWE to capture measurable skills gained during participation.

### **Occupation Eligibility**

All PWEs must be for occupations that are in demand in the local area and are appropriate for the program. Occupations not suitable for PWE:

- Less than part-time
- Principle source of income is tips, commissions or piecework;
- Intermittent or seasonal in nature;
- Shown as in decline on the Hillsborough County Demand/Decline List.

### **Prohibitions**

1. Participants shall not be employed to carry out the construction, operation, or maintenance of any part of any facility that is used or to be used for sectarian instruction or as a place for religious worship (except with respect to the maintenance of a facility that is not primarily or inherently devoted to sectarian instruction or religious worship, in a case in which the organization operating the facility is part of a program or activity providing services to participants).

2. A participant in a program or activity authorized under Title I of WIOA must not displace (including a partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits) any currently employed employee (as of the date of the participation).

3. A PWE funded agreement must not impair existing contracts for services or collective bargaining agreements. When a program or activity authorized under Title I of WIOA would be inconsistent with a collective bargaining agreement, the appropriate labor organization and employer must provide written concurrence before the agreement is initiated.

4. A PWE participant may not be employed in or assigned to a job if: (a). Any other individual is on layoff from the same or any substantially equivalent job; (b). The employer has terminated the employment of any regular, unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy so created with the PWE participant; (c). The job is created in a promotional line that infringes in any way on the promotional opportunities of currently employed workers; (d). job opening that is vacant because the former occupant is on strike or involved in a labor dispute that may lead to a strike.

5. PWE funds shall not be used for any political activity, lobbying of federal, state or local legislators, or to promote or oppose unionization.

6. PWE funds may not be used to directly or indirectly assist, promote or deter union organizing.

7. PWE participants shall not be placed in a home-based business.



## **Conflict of Interest**

1. The CSTB will not favor a referral from or to a member of the CSTB Board over another business in the community. PWE placements shall be made based upon what will be most beneficial to the participant.
2. The CSTB CEO/COO shall be notified whenever the PWE Agreement is connected to a CSTB Board member or employee.
3. CSTB are prohibited from recommending an agreement or making PWE referrals to businesses who are members of their immediate family or members of families of other CSTB staff.
4. The contracted PWE business shall not hire a participant who is a relative (member of the family) of the business. Relative is defined as: father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, or half-sister. (Section 112.3135, Florida Statutes).

## **Individual Employment Plan (IEP)**

CSTB must develop an individual service strategy for each participant. A service strategy is a document created jointly by the participant and case manager, and is based on career planning and the results of the objective assessment. The service strategy includes a summary of the jobseeker's strengths, barriers, services needed, education and employment goals, and services provided. The IEP will be updated during a one-on-one appointment between the trainee and a CSTB Career Specialist. This process will also define the short and long term goals of the work experience opportunity as well as future employment plans of the trainee. The trainee's IEP must identify their internship/work experience field of training while outlining goals and objectives with defined timelines and projected completion dates.

When selecting work-based training for a participant, the WIOA Career Specialist must include the following in the service strategy:

1. A determination that a work-based training activity is appropriate to meet the participant's needs;
2. The specific work-based training most appropriate for the participant based on an assessment of the participant's needs, skill set, and other characteristics necessary to determine the best activity for the participant;
3. The specific short and long-term goals for the work-based training activity, by identifying the purpose of the activity and outcomes expected;
4. The employer with whom the activity will be done and other information relevant to the work-based training activities;
5. Responsibilities of the CSTB, employer and participant; and
6. Other activities necessary to support the work-based training activity.

## **Employment Wages**

Paid work experience will be limited to a maximum of 24 hours per week and a six-week duration per youth. Participants will be paid the going minimum wage rate per hour based on a 24-hour work week.

PWE trainees who actively engage in work experience activities will earn minimum wage. Wages may be issued using direct deposit or check and will be issued on a bi-weekly basis by the contracted staffing agency, if CSTB exercises this option, or internally by CSTB's agreed upon practices/policies.

## **Worksite Agreement**

Paid Work Experience activities require a Worksite Agreement/Worksite Agreement in the customer file. The Worksite Agreement will establish the parameters wherein a customer will gain the job-readiness skills necessary to obtain unsubsidized employment, and must be secured prior to the participant beginning their Work Experience assignment.

Each employer participating in work-based training must develop a CSTB PWE Agreement. The worksite agreement must include:

1. A job description and/or training outline
2. Contact information for the supervisor
3. Record-keeping and payroll information,
4. Process to monitor the participant's worksite activities and ensure adherence to the records retention requirements, as applicable.
5. Worksite agreements for work-based training. For agreements with a staffing agency, the worksite agreements must include signatures of both the worksite employer and the staffing agency.

CSTB will maintain information on each job placement in the form of an agreement signed by all parties. Each employer partner will receive a copy of the fully executed PWE agreement.

## **Employer of Record**

CSTB is the employer of record and participants must receive no less than the applicable minimum wage, and payroll taxes will be deducted. The employer of record will be responsible for paying all taxes.

## **Supportive Services**

Support Services provide a safety net to trainees as they enter or re-enter the labor market. Limited support services may be made available to trainees on an individualized case-by-case basis. The trainee must verify that a need exists and cannot be met by other community resources. The provision of such support services must be documented in the individual service strategy. Support service needs are identified through the assessment process and outlined in the service strategy. Support services may be provided pursuant to ***CSTB Supportive Service and Incentive Policy - #018-C0012b***.

## **Workers' Compensation**

In accordance with Section 445.009, Florida Statutes (F.S.), a participant in an adult or youth work experience activity administered under this section will be deemed an employee of the state for purposes of workers' compensation coverage. In determining the average weekly wage, all remuneration received from the employer shall be considered a gratuity, and the participant shall not be entitled to any benefits otherwise payable under s. 440.15, F.S., regardless of whether the participant may be receiving wages and remuneration from other employment with another employer and regardless of his or her future wage-earning capacity.

**AmeriSys** is the state's Workers' Compensation Provider and should be contacted using the toll free #1-800-455-2079, in case of a work-related injury.

## **Incident Reports**

CSTB will provide employers with an Incident Report Form to document all injuries or other incidents which need to be reported, such as loss of property, etc. CSTB will maintain Incident Reporting Forms and notify the CEO and/or their designee immediately of any incident. CSTB will notify the HR Director immediately of any incident or accident involving PWE Youth.

## **Recording of Worksite, Provider and O\*Net Code Information**

When a participant is enrolled into a PWE training activity, staff must record in Employ Florida, the address and location of the worksite where the participant will work.

- For other work-based training activities, such as work experiences, temporary jobs (including temporary disaster-relief jobs), registered apprenticeships, and pre- apprenticeships (when applicable), the actual location where the participant will report for work worksite must be recorded as part of the enrollment process.

When a participant is enrolled in a work-based training activity, the provider and O\*Net Code for the occupation in which the participant will engage or receive training must be entered into Employ Florida as part of the enrollment process.

## **Participant Evaluations**

In order to ensure that participants gain the required skills for their assigned work experience activity, formal evaluations must be conducted using the Work Experience Activity Training Plan. These evaluations are used to assess the participant's skill level at the beginning of the training period and also to evaluate the participant's skill progression at the mid-point of the training period and upon completion of the training period. The evaluation should be reviewed by the supervisor with the participant by the designated due dates. Feedback will also be collected from the participant regarding their experience.

## **Work Site Supervisory Evaluations of Youth Participants**

The worksite supervisor will complete an evaluation which assesses critical work readiness topics. The employer, or the employer's designee, will discuss the result of the evaluation with the participant. CSTB Career Counselor will distribute evaluation forms to the employers. Evaluations can be included as part of the time records or separately with the most efficient method to be determined by the provider. CSTB will collect the evaluation forms and include them in the participant hard copy case record. All Employer PWE evaluations will be documented in EmployFlorida case notes.

## **Monitoring**

Monitoring and evaluation of the program plays a critical role in insuring that the goals of the PWE are achieved. The on-site monitoring is essential and must include documenting information received directly from the PWE trainee and should capture the trainee's supervisor's perspective about how the training is progressing. In addition to this, the monitoring should examine the process of compliance with the PWE Agreement, training plan, the regulations, payment of wages, and the maintenance of records and working conditions in keeping with Federal requirements.

Any Agreement deviations noted should be dealt with promptly, either with a corrective action plan or by suspension or termination of the agreement if serious violations have occurred. All visits to the business should be documented in the business EF account file and electronic file. The entry should identify when

the visit was made, what was observed, who was interviewed, a synopsis of the content of the conversation, and any items of concern that need to be addressed.

Additional programmatic monitoring will be conducted throughout the program year by our internal Program Monitor under the direction of our Director of MIS & Data Services. Financial monitoring will be conducted by our Director of Fiscal Compliance.

### **Post-Exit Follow-up**

Closed and exited youth will receive follow-up support for a minimum of 12 months to sustain engagement. CSTB WIOA Program staff must provide participants with at least 12 months of follow-up support. Follow-up services should be intensive enough to provide the support necessary to enable participants to achieve their educational goals or gain unsubsidized employment. CSTB will serve as a resource in identifying and addressing issues which arise for participants, employers, and educators in those placement settings. CSTB staff will be required to report on the follow-up services participants receive and enter all results into EmployFlorida (EF).

### **Terminations**

The occasion may occur when a trainee is not satisfied with an employer location or an employer may be dissatisfied by a trainee's progress or ability. Terminations may result in suspension of trainees and participating employers from the receipt of internship/work experience services for a period of time or indefinitely based on the situation.

The duration of suspension is at the discretion of CSTB management. Each case will be reviewed before a determination is made. The CSTB Representative along with the Work-Based Learning Coordinator should make all efforts to salvage a work experience assignment and location when possible. Suspension may be caused by several factors as listed below:

#### **Trainee suspension may occur due to factors such as:**

- An established pattern of tardiness or absenteeism
- Termination from a worksite due to negligent, malicious or unethical behavior
- Failure to comply with an employer's rules and regulations
- Substandard performance
- Failure to comply with CSTB rules and regulations
- Any action that could jeopardize the employer worksite or CSTB in any manner

#### **Employer Suspension may occur due to factors such as:**

- Failure to adhere to the developed training plan
- Termination of a trainee without good cause
- Failure to comply with applicable labor laws
- Failure to comply with contracted staffing agency's employment practices, if CSTB utilizes this option; or CSTB employment practices and/or other traditional employment practices
- Any action that could jeopardize the trainee or CSTB in any manner

### **Modifications**

Modifications to the PWE contract and PWE Work Based Training Plan Outline may be needed. The Work Based Learning Program staff would be required to submit a CSTB Agreement Modification PWE Agreement and specify the purpose of the modification, total training hours and maximum

reimbursement. This requires the CSTB CEO or designee signature approval before any agreement modifications can be fully executed.

### **Authorized Signatories**

- The Chief Executive Officer, Chief Operating Officer and designee are hereby authorized to execute PWE Agreements.
- If necessary during the PWE process, CSTB will accept electronically submitted scanned or faxed documents with signatures of the representatives that have legal authority to contract and bind the respective organization in their capacity as a signatory official.

### **References**

- Workforce Innovation & Opportunity Act (WIOA) Section 129(C) (2)(C)
- 20 Code of Federal Regulation (CFR) 681.600 – 681.630, 20 CFR 680-700, 20 CFR 681.480
- TEGL 15-10 Increasing Credential, Degree, and Certificate Attainment by Participants of the Public Workforce System
- TEGL 17-05, Change 2 Common Measures Policy for the ETA's Performance Accountability System and Related Performance Issues
- TEGL 21-16: WIOA Youth Formula Program Guidance:
- TEGL 23-14: WIOA Youth Program Transition

**INQUIRIES:** Any questions about this policy should be directed to the COO or Programs Director.



## POLICY

<b>SECTION: Wagner Peyser</b>	<b>POLICY#019-C0017</b>	<b>PAGE: 1 of 7</b>
<b>TITLE: Jobseeker Registration</b>		<b>EFFECTIVE DATE: TBD</b>
<b>REPLACES: N/A</b>		<b>DATED: N/A</b>

### **DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF**

**PURPOSE:** To provide CareerSource Tampa Bay (CSTB) Region 15 employees with minimum requirements for jobseeker registration in Employ Florida (EF).

**BACKGROUND:** The Wagner-Peyser Act, as amended by the Workforce Innovation and Opportunity Act of 2014 (WIOA), provides specific guidelines for jobseeker registration. 20 CFR 652.207 requires labor exchange services be made available to all jobseekers, including Reemployment Assistance claimants, veterans, migrant and seasonal farmworkers, and individuals with disabilities. As described in the Wagner-Peyser Act, the state must have the capacity to deliver statewide labor exchange services through self-service, facilitated self-help service, and staff-assisted service.

The purpose of the Labor Exchange Employment Service system is to improve the functioning of the nation's labor markets by bringing together qualified jobseekers and employers who are seeking workers. States are required to administer a labor exchange system that can:

- Assist jobseekers in finding employment, including promoting their familiarity with Employ Florida (EF).
- Assist employers in filling jobs.
- Facilitate the match between jobseekers and employers.
- Participate in a system allowing for the movement of labor among the states, including the use of a standardized classification system.
- Meet the work test requirements of the Reemployment Assistance program.
- Provide labor exchange services as identified in Section 7(a) of the Wagner-Peyser Act.

CSTB's Jobseeker Registration Policy meets all of the requirements outlined in the CareerSource Florida Administrative Policy #096 Jobseeker Registration dated 5.24.19.

## PROCEDURE:

### Jobseeker Registration Requirements

Jobseekers receiving Wagner-Peyser funded facilitated self-help and staff-assisted services must complete either a partial or full registration in [EmployFlorida \(EF\)](#), [state labor exchange system](#). Jobseekers who use self-service may be registered, but registration is not required. Part of the registration process for jobseekers enrolled as participants in Wagner-Peyser (WP) or Workforce Innovation and Opportunity Act (WIOA) includes a full registration in Employ Florida (EF) prior to receiving any service.

Two methodologies are allowable: jobseeker conducts self-registration or CSTB staff completes job seekers registration in EF. Our preferred methodology is to have the jobseeker complete their self-registration and allow staff to provide assistance as necessary. We believe this sets the foundation for jobseekers to understand navigation in EF and maximize utilization in their job search needs.

Before beginning the EF registration process, the job seeker or CSTB staff must first check to see if the jobseeker is already registered in EF. If the jobseeker is not registered, then the jobseeker can proceed with registration. If the CSTB staff is completing the EF registration process, then the staff must ensure that they have obtained the jobseeker's permission to assist with creating the EF WP Registration prior to creating a new registration. The CSTB staff would enter a detailed EF case note on the jobseeker's account indicating the jobseeker granted staff permission to create the EF WP Registration account.

### Migrant and Seasonal Farmworker (MSFW) Registration

Migrant and Seasonal Farmworkers may complete either a partial or full registration in Employ Florida to receive services in accordance with [Administrative Policy 03-040](#).

### Recording Services Provided to Jobseekers

EF displays the jobseeker's activity history/service plan outlining a record of all services received, including job referrals and placements. The main focus of providing EF jobseeker services is to enhance the jobseeker's ability to become employed. CSTB staff must record services provided to jobseekers timely as defined within three business days. Every effort should be made by CSTB staff to record real time service provision and case notes in EF. *NOTE: DEO allows for staff to capture the transaction of services in EF for the job seeker within fifteen days of the date the service was provided.*

### Use of Pseudo Social Security Numbers

Staff are allowed to create pseudo social security numbers (SSNs) for the sole purpose of registration in Employ Florida. The only reasons for which a pseudo SSN may be created are when an individual requests not to use his/her SSN or when a duplicate registration exists. Pseudo SSNs cannot be created by a jobseeker, they can only be created by CSTB staff.

To create a pseudo SSN in Employ Florida, staff must enter information on the jobseeker as follows:

- Enter "9" as the first digit.
- Enter the last two digits of the jobseeker's birth year as the next two digits.
- Enter "00" as the two middle digits.
- Enter the month and date of birth sequentially as the last four digits.

### **Example**

- Date of Birth: February 6, 1977
- Pseudo SSN: 977 00 0206

If the pseudo SSN is already being utilized, a unique number may be created by altering the middle two digits consecutively from “00” until an unassigned number is found. Once the pseudo number is created, it is the responsibility of staff to enter the registration for the jobseeker.

Upon completing the registration of the jobseeker, staff must enter a case note in the jobseeker’s case file stating the reason a pseudo SSN was used. CSTB staff must utilize the CSTB Procedure - #018-C008 – Creating Psuedo SSN effective 5.29.19 which outlines the procedure for obtaining SSN, creating a Pseduo SSN, approval process and EF case notes.

### **Procedures for Correcting Social Security Number Errors in Employ Florida**

If a jobseeker tries to register in EF and reports that his/her SSN is already in use by another individual, or if CSTB staff identify a duplicative registration for a jobseeker with a different SSN, staff must resolve the issue utilizing the steps outlined below.

1. Staff must verify there is an issue with the SSN or verify a duplicate registration exists in EF for the jobseeker.
2. Staff must request the jobseeker produce an original social security card, or certified copy if the original is unobtainable, and match it with the appropriate picture identification. If the jobseeker does not provide a social security card, staff must request the jobseeker to provide original documentation issued by a state or federal governmental entity that documents the SSN and match it with the appropriate picture identification. If the jobseeker is unable to produce the original (s) documentation, staff must request the jobseeker to provide certified copy(ies). CSTB staff must make every effort to review original documentation as the primary source; however, staff are allowed to use verifiable third-party resources to verify the true owner of the SSN in the absence of such documentation. Third party resources include, but are not limited to: SUNTAX, CONNECT and/or the Department of Children and Families’ records.
3. Staff must review the documentation provided by the jobseeker to confirm ownership of the SSN.
4. Once the SSN is confirmed, staff must allow the jobseeker to register under the correct SSN.
5. Staff must review reemployment assistance records, if they have access to CONNECT, to determine whether wage records exist or whether a claim has been filed against the SSN in question. If staff find wage records exist or that a Reemployment Assistance claim has been filed by a person with an incorrect SSN, staff must immediately notify the Bureau of Reemployment Assistance by email at: [escalated.claimants@deo.myflorida.com](mailto:escalated.claimants@deo.myflorida.com). If staff does not have access to CONNECT, an email must be sent to Reemployment Assistance explaining the issues identified with the SSN. Due to PII, staff cannot include the SSN in an email.



6. Staff must document EF case notes in the jobseeker's record regarding all actions that occurred and document he/she verified the source documentation.
7. Staff must review the EF file for the jobseeker to whom the SSN was assigned in error to determine whether activities or services have been documented in the file during the most recent four quarters.
  - a. If no activity has been documented for the jobseeker in the most recent four quarters, a case note must be recorded to document the SSN error and a pseudo SSN must be created and assigned.
  - b. If activities or services have been documented for the jobseeker in the most recent four quarters, staff must determine whether the jobseeker using the incorrect SSN resides in a different Local Workforce Development Board (LWDB). If so, CSTB staff will be required to contact the appropriate LWDB and explain the SSN error. If the jobseeker is in CSTB Region, appropriate steps can be taken to correct the error.
  - c. Staff in the appropriate LWDB must attempt to contact the jobseeker to whom the SSN is assigned in error and case note the efforts in EF.
    - i. Upon making contact with the jobseeker, staff must request the jobseeker provide appropriate documentation of their correct SSN. If the jobseeker refuses to or is not able to provide the correct documentation, a pseudo SSN must be issued and a detailed case note must be entered into the EF.
    - ii. If the jobseeker cannot be contacted, the incorrect SSN must be changed to a pseudo number using the date of birth provided on the account and a case note entered into EF documenting the action until such time the correct SSN is provided and confirmed.

## **Procedures for Handling Duplicate Registrations and Merging Accounts**

Staff may occasionally discover duplicate EF registrations for a particular jobseeker. These must be corrected when identified and verified that the duplicative registrations are the same jobseeker. The account containing the correct SSN for the jobseeker must be recognized as the correct account. The information from the account with the incorrect SSN must be merged to the correct account. Staff must obtain the assistance of their Regional Security Officer (RSO) to merge accounts, as only the RSO is allowed to merge accounts. CSTB has two RSO's in our region they are the Director of MIS & Data Services and Lead MIS Tech. An email would need to be sent to Outlook MIS Mailbox outlining the issue and requesting the required action by the RSO.

When the accounts are ready to be merged, the RSO must archive or delete the account with the incorrect SSN. Prior to merging the accounts, RSO must ensure the name, gender and date of birth are the same in both accounts. If an issue is identified, staff must notify DEO by sending an email to [Wagner.Peyser@deo.myflorida.com](mailto:Wagner.Peyser@deo.myflorida.com) and case note this issue in Employ Florida. DEO staff will review and take appropriate steps to resolve the issue.

1. Staff must provide the RSO with the usernames, state IDs and last four digits of the SSN for the two accounts that need to be merged.

2. Staff must explain why the accounts need to be merged and enter a case note to both files.
3. A second level review must be done by the RSO for all changes identified to be made to the accounts due to SSN errors or duplicative registrations.
4. The RSO must then enter a ticket into the Online Project Communication (OPC) system requesting the accounts be merged.
5. The language for the request must state: "Please merge username XXXX, state ID 11111 and username YYYYY, state ID 22222 into correct account username XXXX state ID 11111, where this is the account to remain."
6. Once the RSO verifies the account has been merged, the RSO must advise the requesting staff.
7. In all cases, the name of the staff member requesting the SSN change and/or assignment of a pseudo SSN should be documented in a case note for the affected case files. Staff must also enter a case note into the correct account in Employ Florida describing all actions taken.
8. Staff must record new program services and activities into the merged account.

## **Veterans' Priority of Service**

Veterans or other covered persons, as defined in 20 CFR Part 1010.110, enrolled in the Wagner-Peyser program or receiving services must receive priority of service (POS) at the point of entry. Points of entry include physical locations, such as AJC, as well as web sites and other virtual service delivery resources. Upon registration in EF, or at the initial point of contact with career center staff, CSTB staff must notify veterans or other covered persons of their priority of service (POS). The notification of POS must be documented on the veteran's activity service plan.

Furthermore, POS must be provided to a veteran at least once per WP application. Staff must check the veteran's current WP application activities screen to verify whether or not previous POS notification had occurred either automatically with a system-generated service code 089, or in person with a staff-generated service code 189. If there is no POS notification on the current WP application activities screen, staff must verbally provide POS, case note the provision, and record EF service code 189 on the veteran's current WP application activities screen. It is not permissible for staff to only provide handouts regarding POS to record the service code – verbal notification must occur.

Notification of POS can be provided by any CSTB staff member, not just veteran staff Local Veterans Employment Representatives/LVERs or Disabled Veterans Outreach Program/DVOP specialists.

## **Wagner-Peyser Application Exit**

A jobseeker is considered to have exited the program when the jobseeker has not received, for at least 90 consecutive days, a service that triggers or extends participation, and does not have a future service that triggers or extends participation scheduled. In this instance, the jobseeker is referred to as having "soft exited." Additionally, a jobseeker may be "hard exited" from the program if the jobseeker:

- Has become incarcerated in a correctional institution or has become a resident of an

- institution or facility providing 24-hour support.
- Is receiving medical treatment that is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
  - Is deceased.
  - Is a member of the National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days.

A case note must be entered on the jobseeker's case file indicating why the hard exit was done.

## Monitoring

CSTB will conduct programmatic monitoring throughout the program year by our internal Program Monitor(s) under the direction of our Director of MIS & Data Services. This will include a formal review of WP services and activities to ensure compliance with federal, state and local policies and procedures. Financial monitoring will be handled by our Director of Fiscal Compliance.

## Definitions

**Covered Persons** – As defined in section 2(a) of the Jobs for Veterans Act of 2002 (38

1. U.S.C. 4215(a)) means a veteran or eligible spouse. Covered person is also defined in
2. 20 CFR 1010.110.

**Facilitated Self-Help Service** – Program services provided that do not require significant staff involvement.

**Jobseeker** – An individual actively seeking employment.

**Participant** – A participant is a reportable individual who has received services other than the services described in 20 C.F.R. 677.150(a)(3) after satisfying all applicable programmatic requirements for the provision of services, such as an eligibility determination. As set forth in more detail in 20 C.F.R. 677.150(a)(3), the following individuals are not participants:

- a. Individuals in an Adult Education and Family Literacy Act (AEFLA) program who have not completed at least 12 contact hours.
- b. Individuals who only use the self-service system.
- c. Individuals who receive information-only services or activities, which provide readily available information that does not require an assessment by a staff member of the individual's skills, education, or career objectives.

**Priority of Service** – With respect to any qualified job training program, a covered person shall be given priority over non-covered persons for the receipt of employment, training, and placement services provided under a federally funded employment program.

**Registration** – The entering and submission of personal information in Employ Florida in order to create an account.

**Partial Registration** – A registration that includes the elements necessary to establish a record and basic demographic data, but an Occupational Information Network (O\*NET) code, background wizard, or resume has not been completed.

**Full Registration** – A registration where all elements of a partial registration have been completed and the jobseeker has been assigned an O\*NET code, completed the background wizard, or entered a resume on their personal profile to include additional essential employment-related information such as licenses or certifications that will enhance the placement of the jobseeker.

**Self-Service** – Occurs when individuals independently access the workforce development information system and activities. This can be done in either a physical location, such as a career center resource room or partner agency, or remotely via the use of electronic technologies.

**Staff-Assisted Services** – Program services provided that require significant staff involvement.

### References

- Wagner-Peyser Act of 1933, as amended by the Workforce Investment Act of 1998 and the Workforce Innovation and Opportunity Act of 2014
- Workforce Innovation and Opportunity Act of 2014
- 20 CFR 652.207, 652.3, 677.150(a)(3), 1010
- Training and Employment Guidance Letter Number 10-16 Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs
- Training and Employment Guidance Letter Number 17-05 Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues
- TEGL 5-08 Policy for Collection and Use of Workforce System Participants' Social Security Numbers

**INQUIRIES:** Any questions about this policy should be directed to the Chief Operating Officer or his/her designee.



## Policy

<b>SECTION: Wagner Peyser</b>	<b>POLICY#018-C0019</b>	<b>PAGE: 1 of 10</b>
<b>TITLE: Job Orders and Placements</b>		<b>EFFECTIVE DATE: TBD</b>
<b>REPLACES: N/A</b>		<b>DATED: N/A</b>

### **DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF**

**PURPOSE:** To provide CareerSource Tampa Bay (CSTB) employees and other workforce system partners the minimum requirements for documenting and recording job orders and placements in Employ Florida (EF).

**BACKGROUND:** The purpose of the Employment Service system is to improve the functioning of the nation's labor markets by bringing together qualified jobseekers and employers who are seeking workers. Additionally, each state must administer a labor exchange system that can:

- Assist jobseekers in finding employment, including promoting their familiarity with Employ Florida.
- Assist employers in filling jobs.
- Facilitate the match between jobseekers and employers.
- Participate in a system for clearing labor among the states, including the use of a standardized classification system.
- Meet the work test requirements of the Reemployment Assistance (RA) program.
- Provide labor exchange services as identified in Section 7(a) of the Wagner-Peyser Act.

### **PROCEDURE:**

#### **Job Orders (JO)**

Job orders are records of job openings containing the material terms and conditions of employment related to wages, hours, working conditions, worksite and other benefits, submitted by an employer. A job order will only be listed in Employ Florida (EF) when:

- It will employ a worker who is legally authorized to work in the United States.
- There is an employer-employee relationship, unless the job order is for an independent contractor or unpaid internship position. Generally, an employer- employee relationship exists when a person, firm, corporation or other association or entity hires, fires, pays, supervises and otherwise controls the work of the employee.
- There is a currently available and non-duplicative position.

- There is a detailed description of the work to be performed.
- There are specific hiring requirements a job seeker must meet.
- There are referral instructions.
- CSTB has authorization from the employing entity to post the open position.
- The posting party has authorization from the employing entity to post the open position when it is being posted by a third-party poster.
- The job order is verifiable through email, telephone, online or as otherwise determined.
- The employing entity has not yet selected a candidate to hire, except in the case of job development.

### Description and Types of Job Orders

The following are descriptions and types of job orders:

Affirmative Action	JO's that seek qualified applicants who are members of a specified group that, for non-occupationally valid purposes, have been discouraged from entering certain occupations.
Agricultural Recruitment System (ARS)	JO's designed to help agricultural employers recruit qualified agricultural workers on a temporary or seasonal basis using a system for the orderly movement of workers within and between states.
Foreign Labor Certification (FLC)	JO's for employers who seek to hire foreign workers to work on a permanent, temporary or seasonal basis when there are not sufficient U.S. workers available.
	<ul style="list-style-type: none"> <li>• H-2A Job Orders – Job orders to recruit workers for employers who seek to hire foreign workers on a temporary basis to perform agricultural work when there are not sufficient U.S. workers available.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ H-2B Job Orders – Non-agriculture job orders to recruit workers for employers who seek to hire foreign workers to work on temporary or seasonal basis when sufficient U.S. workers are not available.</li> </ul>
Permanent Employment Certification (PERM) Job Orders	JO's for employers who seek to hire foreign workers on a permanent basis to perform work when there are not sufficient U.S. workers available.
Apprenticeship	JO's that combine on-the-job training and related instruction in which workers learn the practical and theoretical aspects of a highly skilled occupation.
Federal Contractor Job Listings	JO's for a contracted position with the United States government to perform a specific job, supply labor and materials, or for the sale of products and services. The affirmative action provision of the <a href="#">Vietnam Era Veterans ' Readjust tent Act of 1972</a> requires employers (and their subcontractors) with government contracts of \$100,000 or more to list their job openings with EF. These Federal Contractor Job Listings provide protected veterans with priority referrals to such jobs.
Independent Contractor	JO's for positions in which an employer- employee relationship does not exist. These positions provide a job opportunity for a jobseeker without a guarantee of wages.
Internship	Job orders for a planned, structured learning experience that may be paid or unpaid and takes place in a workplace for a limited period of time.
Job Development	JO's entered by CSTB staff due to staff securing a job interview with a public or private employer for a specific applicant for whom CSTB has no suitable opening on file.
Mass Recruitment	JO's for events such as job fairs or employer hiring events.

Private Agency/Staffing Agency	JO's to fill positions through private agencies or staffing companies. A fee cannot be charged to the applicant and job orders must state "position offered by a no-fee staffing agency."
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**Job Order Entry**

Job orders can be posted by an employer, CSTB staff or spidered into EF from external job posting websites. Additionally, under the *Employ Florida Terms and Conditions of Use*, third-party companies (referred to as "third-party agents") may post job orders to EF on behalf of employers under certain conditions as outlined in this policy. Job orders posted by CSTB staff are included in the count of job openings reported to the United States Department of Labor (USDOL).

CSTB Job Orders are managed by a dedicated team of Job Order Support Specialists. This team is managed by the Director of MIS & Data Services. CSTB staff are not allowed to post a job order to EF until the appropriate authorization has been received from the employer to do so. Authorization includes but is not limited to staff obtaining a completed job order form submitted by the employer or an email from the employer outlining the position's requirements or authorization by phone. In the event the employer provides the authorization by phone, staff must document the position's requirements on a CSTB job order form and document the employer's authorization by recording a case note in EF. Staff are not allowed to post open positions to EF obtained from other job boards, the employer's website, a classified advertisement, or other resources, unless authorized to do so by the employer.

CSTB staff must conduct an independent verification of a newly registered employer in EF prior to the new employer being able to create a job order, in accordance with the DEO Employer Services policy dated 5.24.19 and local CSTB Employer Services Policy.

Job orders received by staff must be entered in EF within one business day of receipt from an employer or third-party agent. Job orders posted by employers or third-party agents in *Employ Florida* must be reviewed and verified within two business days of posting into *Employ Florida*. CSTB staff must case note their review and verification of the job order.

Withholding job orders from timely entry into EF, or otherwise preventing the sharing of job order information throughout the system, is prohibited.

**Job Order Compliance Review and Approval**

All job orders entered into EF must strictly comply with Equal Employment Opportunity and Immigration and Nationality Act laws, regulations and guidance as well, as the *Employ Florida Terms and Conditions of Use*. All job orders must be reviewed by CSTB Job Order Support Specialists staff for compliance.

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

If the job order does not meet all compliance requirements, CSTB staff must place it "On Hold" and contact the employer or third-party agent to request a revision to the job order. If the employer or third-party agent agrees to comply with the requested revision, staff may make the change to the job order based upon the feedback received or allow the employer to incorporate their feedback and re-submit the job order. If the employer or third-party agent does not comply with the requested revision, CSTB staff must close the EF job order with a case note detailing the reason for closing the job order.

If CSTB staff discovers that duplicate positions are being posted in order to advertise a position for which an EF job order is about to expire, they must contact the employer or third-party agent to explain the process for extending existing EF job orders. If staff is unable to contact the employer or third-party agent, or does not receive a response within a reasonable timeframe defined as two business days, the duplicate job order must be closed with a case note detailing the reason.

### **Third-Party Agent Job Order Verification**

Third-party agents posting job orders on the behalf of employers must obtain written consent from the employer and provide it to CSTB staff electronically through EF or via email to the CSTB Job Order Support Specialists staff before a job order can be approved and made visible to the job seeker. Written consent may be in the form of a letter drafted on the employer's letterhead or an email that originates directly from the employer. The written consent must authorize the third-party agent to post open and available positions on the employer's behalf. The written consent must be stored electronically in EF or as a hard copy at CSTB and properly documented in the case notes in Employ Florida. NOTE: If a hard copy is obtained this documentation must be scanned into ATLAS, our EDMS system.

In addition, when a new job order is entered by a third-party agent, CSTB staff are required to verify the position with the primary contact listed on the job order prior to approval. If CSTB staff is unable to reach the primary contact listed on the job order, CSTB staff may employ means such as accessing the employer's corporate website to verify the job listing. If staff is not able to verify the job order through the job order's primary contact or other approved means within two business days, staff must close the affected job order and case note the reason for closing the job order. Staff may not close the employer's entire account due to the inability to verify a particular job order with an employer.

Note: Verification is not required by the employer if the third-party agent verifies the job openings as required.

### **Using O\*NET Occupational Groups for Coding Job Orders**

Pursuant to 20 CFR 652.3, staff must ensure the O\*NET code used for a specific job opening matches the job description. If no match can be found, staff must use the title the employer or third-party agent provided. Only one O\*NET code may be used per job order. Placement into job openings that do not match the description in the job order or O\*NET code is not permissible. Correct coding by CSTB Job Order Support Specialists staff is critical as this is a compliance indicator.

### **Recording Wages on Job Orders**

It is prohibited to post job orders that pay less than the Florida minimum wage or pay commission only, unless minimum wage is guaranteed in accordance with federal or state law, or the employer is exempt per the [Fair Labor Standards Act](#).

The actual wage or wage range must be listed on all job orders entered into EF. Employers that choose not to enter actual wage information must enter a minimum value of (\$0.00) on the job order form, as the field cannot be left blank. In instances where a value less than minimum wage is entered, CSTB staff must verify that the job pays at least the Florida minimum wage and document it in the EF case notes.

If it is determined that the job seeker was hired and went to work at a higher wage, the higher wage should be entered on an EF case note on either the hired jobseeker's placement information or the EF job order. In the case of multiple positions being filled on one job order, staff should enter an EF case note for each hired customer stating their name and the wage at which he/she was hired.

### **Labor Disputes in Progress**

CSTB

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CSTB is not allowed to make a job referral on job orders which will aid directly or indirectly in the filling of a job opening which is vacant because the former occupant is on strike, or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage. When a job order is received from an employer reportedly involved in a labor dispute involving a work stoppage, CSTB must verify the existence of the labor dispute and determine its significance with respect to each vacancy involved in the job order.

CSTB must document the information in an EF case note with the job order, including the name of the person with whom they spoke, the date of contact, and any other pertinent information related to the dispute and how it affects the job order in question. They must also notify all potentially affected staff concerning the labor dispute. Furthermore, written notice must be provided to all applicants referred to jobs not at issue in the labor dispute that a labor dispute exists in the employing establishment and that the job to which the applicant is being referred is not at issue in the dispute. CSTB shall resume full job referral services after they have been notified of, and have verified with the employer and workers' representative(s), that the labor dispute has ended.

### **Nondiscrimination Requirement**

Job orders discriminating against individuals based on race, color, religion, gender, pregnancy, national origin, age, handicap or marital status cannot be accepted, except where the stated requirement is a bona fide occupational qualification (BFOQ) pursuant to [42 U.S.C. 2000\(e\)-2\(e\)](#), [29 CFR 1604](#), [1605](#), [1606](#), and [1625](#), and [Chapter 760 Florida Statutes](#). If an employer claims a BFOQ, CSTB staff should advise management prior to listing the job order and the BFOQ status must be documented in the job order's case notes.

### **Availability to Migrant and Seasonal Farmworkers (MSFWs)**

CSTB must provide adequate staff assistance to MSFWs to access job order information easily and efficiently. Assistance must be provided to MSFWs in their native language, whenever requested or necessary.

### **Agricultural Recruitment System (ARS)**

The Wagner-Peyser Act requires the United States Employment Service maintain a system for the orderly movement of workers within and between States. The ARS helps agricultural employers recruit qualified workers on a temporary or seasonal basis to meet employer needs. The ARS provides protection to the workers who are not seeking permanent relocation, but rather temporary agricultural employment. Through the ARS, the Department of Economic Opportunity (DEO) can systematically recruit and refer qualified workers from within Florida and from other states when there is an anticipated shortage of workers. Job orders listed pursuant to the ARS request workers for less than one year of employment. The DEO MSFW Senior Monitor Advocate is responsible for operating the ARS. If an employer presents with an identified need between states LWDBs must refer employers to DEO for job order posting as this can only be handled by the DEO MSFW Senior Monitor Advocate.

### **Job Order Retention**

The record retention requirement for job orders is three years. An electronic copy of the job order documentation can be uploaded to the employer's account in Employ Florida, or the hard copy can be kept in the employer's physical file.

### **Job Referral**

A WP staff-assisted job referral is the act of CSTB staff facilitating the match between qualified job seekers and employers with job openings; and the recording of such referral in EF. Prior to referring a jobseeker to a job opening, CSTB staff must ensure the job seeker's qualifications in their EF account match the minimum requirements listed in the job order by reviewing the jobseeker's skills, abilities, prior work experience, education and training, certifications/licensure against the requirements of the job order. To support staff's ability to adequately assess the job seeker's qualifications, staff must

ensure the job seeker has completed a full WP registration in EF, prior to the referral being made.

At no time should staff provide a job referral to a job seeker who has not completed a full WP registration and/or does not meet the minimum requirements of the job order. Additionally, staff must obtain the consent of the jobseeker prior to making any job referral.

### **Referrals Pending Review**

When a job seeker applies for a position in EF, it is called a self-referral. If the employer's information has been suppressed on the job order to which the individual applies, a message appears informing them that CSTB will contact them within 72 hours. A list of these individuals appears on the "Manage Labor Exchange" section of EF under "Referrals Pending Review." CSTB staff must view this listing on a daily basis to determine the qualification of the individual, whether their qualifications meet the requirements of the job order, and to complete the referral process if the individual is qualified. Once the screening is accomplished or if further information is needed, staff must contact the individual for the missing information or to either inform them they are not qualified for the job or to provide the information in order for them to complete the application process.

### **Job Placements**

A placement means the hiring by a public or private employer of an individual referred by CSTB or self-referred for a job or an interview, and where CSTB staff completed each of the following steps:

- Prepared a job order form, or reviewed and approved a job order form entered into EF by an employer, prior to referral or prior to the position being filled, except in the case of a job development contact on behalf of a specific individual.
- Made prior arrangements with the employer for the referral of an individual or individuals.
- Obtained the individual's consent to be referred to the job order in EmployFlorida.
- Referred an individual who had not been specifically designated by the employer, except for referrals on agricultural job orders for a specific crew leader or worker.
- Verified from a reliable source, preferably the employer, the individual was hired and started work.

When CSTB staff record a placement against a job order for which a referral was made, EF will assign the appropriate service code through an automated process. Staff must verify the customer began working prior to recording the appropriate placement code. Verification information must be documented and must include: 1) a case note identifying the customer's name, 2) the name of the employer, 3) the source of verification, and 4) the date the customer started working at the designated jobsite. Notification of an upcoming start or hire date is not acceptable for recording a placement.

While verifying a customer's employment from the employer is the preferred source of information for placement credit, staff should use the least intrusive process for obtaining the verification information.

*Note: If during the process of verifying a job placement staff determines the individual was placed in a job other than the one they were referred, placement credit cannot be taken against the job order to which they were originally referred (unless both job openings match the description in the job order or O\*NET code). If the job description or O\*NET code for the position in which the individual was placed is different than the job description or O\*NET code for the position to which they were referred, staff must record an Obtained Employment - Manual and not a placement. Further, staff must not enter an additional job order for the different position.*

### **Job Development Hires**

The Code of Federal Regulations at Title 20 Part 651.10 specifies that a job development means the process of securing a job interview with a public or private employer for a specific customer for whom the local office has no suitable opening on file.

If there is no suitable opening on file with CSTB, staff should make job development attempts (contacts) on behalf of the customer by contacting the hiring authority for an employer to discuss the customer's qualifications and employment interests. The job development attempt should be recorded on the job seeker's activity service plan in EF. Staff must include a case note listing the employer's name, phone number, address, date of contact, and position/title of job staff is seeking for the customer.

If staff later learns that the customer was hired on the job to which a job development attempt was made, then the staff person should write a job order and take credit for the placement. At a minimum, the job development job order must contain in the job description the phrase "job development." Once the job order is written to reflect the hire, it must be matched against the job development referral that was previously entered on the job seeker's services screen.

### **Obtained Employment**

Obtained employment refers to those individuals who secure employment within 180 calendar days of receiving one or more services that either trigger or extend program participation, which are fully or partially funded under the Wagner-Peyser program, and where the placement does not meet the federal definition for a "job placement." An obtained employment can be entered onto a job seeker's service plan either manually by staff or automatically by EF. All obtained must have the 880 or 882 code recorded within 180 days of the employment start date.

### **Manual Obtained Employment**

When staff manually records an obtained employment on a job seeker's service plan, they must verify when the last service that either triggered or extended program participation was recorded. If the jobseeker secured employment within 180 days of receiving said last service, staff must select Service Code 880 – Obtained Employment Manual. If the jobseeker has not received a service that either triggered or extended program participation for at least 90 days, has exited the system and the secured employment does not meet the federal definition of a placement, staff must select Service Code 882, Obtained Employment – Post Exit – Manual.

Prior to manually recording an obtained employment, CSTB staff must:

- Confirm the jobseeker received a service that either triggers or extends program participation.
- Confirm that employment began within 180 calendar days of receiving the last service that either triggers or extends program participation.
- Verify that there is no placement recorded for the employment.
- Confirm that the obtained employment is unique and has not been previously recorded.
- Verify from a reliable source, preferably through the employer, the jobseeker has started working.
- Document the following for an obtained employment:
  - o Employer's name.
  - o Source of verification.
  - o Certification the service is not a duplicate of a previously documented placement.
  - o Actual start date.

- o CSTB/office information.

Sources of documentation used to verify obtained employment may also include hire data obtained from third party resources including but not limited to CONNECT and/or the Department of Children and Families' records. Information obtained from sources where quarterly data is reported may be used as a starting point from which to gather a start date. However, quarters in which wages were reported are not sufficient as documentation of a start date nor will notification of a hire date.

It is not allowable to record a placement when a manual obtained employment service code has already been recorded or to take credit for a manual obtained employment where a placement has already been recorded in the system for the same customer, and the same position and start date with the same employer. This would constitute a duplicate placement in the system which is not allowable.

In the event staff verifies an individual has been placed against a job order, but an obtained employment has already been recorded for the same position and start date with the same employer, staff may void the obtained employment by changing the Completion Code within the service code entry from Successful Completion to Voided and record the placement. If "Voided" is not available in the drop-down menu, staff do not have the privileges to perform this action and must request CSTB's Regional Security Officer (RSO) to void the entry. A case note must be added to the obtained employment service code entry explaining why the code was voided.

More than one obtained employment credit per customer is possible in the same program year, provided it is not duplicating employment already recorded, and the customer has not exited. Obtained employment must be documented on the activity history/service plan in EF using the appropriate service code and must include the following:

- Employer's name.
- Source of verification.
- Certification the service is not a duplicate of a previously documented placement.
- Actual start date.
- CSTB/office information.

**Automated Obtained Employment**

A New Hire File from CONNECT, Florida's Reemployment Assistance claims system, interfaces with EF daily. The file contains new wage information for every individual who has secured a new job. The interface checks for matches between the SSNs in the file with the job seekers' SSNs in EF. When a match is made, EF verifies when the jobseeker last received a service that either triggered or extended program participation.

If the jobseeker secured employment within 180 days of receiving said last service	EF will record Service Code 881 – Obtained Employment Automated
If the job seeker has not received a service that either triggered or extended program participation for at least 90 days, has exited the system and the secured employment does not meet the federal definition of a placement	EF will record Service Code 883, Obtained Employment – Post Exit – Automated.

**Post Exit Manual Obtained Employment**

Post exit manual obtained employment refers to those individuals who meet the definition of an obtained employment, have gone at least 90 days without a service that either triggers or extends

program participation and have exited the system.

For any participant who has received any Wagner-Peyser service(s) that either triggered or extended program participation, and has a job start date, where both service and start dates fall within 180 days from the date the post exit manual obtained employment is recorded.	Credit for a post exit manual obtained employment
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Staff must verify, preferably through the employer, the customer has started working prior to taking credit for a post exit manual obtained employment. Notification of a hire date or an anticipated future start date is not acceptable for securing obtained employment credit.

The post exit manual obtained employment must be created as a Wagner-Peyser follow-up service to the last Wagner-Peyser application.

Post exit manual obtained employment requires entry and verification of the following:

- Employer's name.
- Source of verification.
- Certification the service is not a duplicate of a previously documented placement.
- Actual start date.
- CSTB/office information.

### Monitoring

CSTB will conduct programmatic monitoring throughout the program year through our internal Program Monitor(s) under the direction of our Director of MIS & Data Services. This will include a formal review of WP services, activities including job orders and placements to ensure compliance with federal, state and location policies and procedures.

### Definitions

**Bona Fide Occupational Qualification (BFOQ)** – This is an employment decision or request based on race, color, religion, gender, pregnancy, national origin, age, handicap or marital status that is based on a finding that such characteristic is necessary to the individual's ability to perform the job in question. Since a BFOQ is an exception to the general prohibition against discrimination based on race, color, religion, gender, pregnancy, national origin, age, handicap or marital status, it must be interpreted narrowly in accordance with the Equal Employment Opportunity Commission regulations set forth at 29 CFR parts 1604, 1605, 1606 and 1625.

**Employer** – As defined in 20 CFR 651.10, a person, firm, corporation, or other association or organization which currently has a location within the United States to which U.S. workers may be referred for employment, and which proposes to employ a worker and which has an employer relationship with respect to employees under this subpart as indicated by the fact that it hires, pays, fires, supervises, and otherwise controls the work of such employees. An association of employers is considered an employer if it has all of the indicia of an employer set forth in this definition.

**Full Registration** – A registration where all elements of a partial registration have been completed and the jobseeker has been assigned an O\*NET code, completed the background wizard, or entered a resume on their personal profile to include additional essential employment-related information such as licenses or certifications that will enhance the placement of the jobseeker.

**Hire Date** – The date an individual accepts a job offer from an employer.

**Job Opening** – A single job opportunity for which the CSTB has on file a request to select and refer participants.

**Occupational Information Network (O\*NET)** – An online reference database which contains standardized detailed descriptions of U.S. occupations, distinguishing characteristics, classification codes, and information on tasks, knowledge, skills, abilities, and work activities as well as information on interests, work styles, and work values.

**Start Date** – The first day an employee actually begins working for and earning wages from an employer.

**Third-Party Agent** – A person, firm, corporation, other association or entity which posts job orders on behalf of another person, firm, corporation, other association or entity.

### References

- Wagner-Peyser Act of 1933, as amended by the Workforce Investment Act of 1998 and the Workforce Innovation and Opportunity Act of 2014
- Workforce Innovation and Opportunity Act of 2014
- 20 CFR 651.10, 652, 653.501
- 29 CFR 1604, 1606, 1625
- 42 U.S.C. 2000
- Fair Labor Standards Act
- Vietnam Era Veterans' Readjustment Act of 1972
- Chapter 760 Florida Statutes
- Employ Florida Terms and Conditions of Use

**INQUIRIES:** Any questions about this policy should be directed to the Chief Operating Office or his/her designee.



## Policy

<b>SECTION: Wagner Peyser</b>	<b>POLICY#019-C0018</b>	<b>PAGE: 1 of 5</b>
<b>TITLE: Employer Services</b>		<b>EFFECTIVE DATE: TBD</b>
<b>REPLACES: N/A</b>		<b>DATED: N/A</b>

### **DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF**

**PURPOSE:** To provide CareerSource Tampa Bay (CSTB) staff employees and other workforce system partners the minimum requirements for employer services in the Wagner-Peyser (WP) labor-exchange system.

**BACKGROUND:** The purpose of the Employment Service system is to improve the functioning of the nation's labor markets by bringing together qualified jobseekers and employers who are seeking workers. Section 7(a) of the Wagner-Peyser Act requires labor exchange services be provided to employers that:

1. Assist employers in filling jobs.
2. Facilitate the match between jobseekers and employers
3. Maintain a system of clearing labor between the States, including the use of a standardized classification system.

### **PROCEDURE:**

#### **Services to Employers**

CSTB staff will facilitate the match between job seekers and employers by matching job seeker skills and interests with employer job openings. Upon the employer's request, staff may:

1. Advertise employer job openings through Employ Florida (EF).
2. Assist in the development of job order requirements.
3. Refer qualified job seekers to available job openings.
4. Conduct job seeker screening.
5. Provide recruitment assistance.
6. Assist with organizing and conducting job fairs.
7. Assist with filling hard-to-fill job orders.
8. Assist with job restructuring.
9. Provide rapid response to layoffs and business closures.
10. Provide assessment and testing.

CSTB Business Services staff may also provide the following customized services upon the

employer's request:

1. Customized screening and referral of qualified participants for training services.
2. Human resource consultation services, which may include:
  - i. Writing and/or reviewing job descriptions and employee handbooks.
  - ii. Assisting with developing performance evaluation and personnel policies.
  - iii. Creating orientation sessions for new workers,
  - iv. Honing job interview techniques for efficiency and compliance.
  - v. Analyzing employee turnover.
  - vi. Creating job accommodations and using assistive technologies.
  - vii. Explaining labor and employment laws to help employers comply with discrimination, wage/hour and safety/health regulations.
3. Providing customized labor market information for specific employers, sectors, industries or clusters.
4. Providing other customized services, as available.

### **Employer Account Verification in Employ Florida**

CSTB staff must conduct an independent verification of a newly registered EF employer account prior to enabling an employer account or releasing any job order to job seekers. CSTB has local policies and procedures in place to ensure sufficient vetting of employer accounts and job orders. Additionally, CSTB Job Order Support Specialists staff must:

1. Verify the employer's registration information to include the business name, address, contact person and contact information. Methods of verification must include a phone call using the contact number listed on the company's website (not the one provided in the registration as it could be fraudulent), email inquiry, website review, and State of Florida's Department of State, Division of Corporations. If the employer fails to respond to the CSTB's phone call and email, CSTB may conduct an onsite in person review. Verification of the registration must be documented in an EF case note.
2. For in-state employers, verify the Federal Employer Identification Number (FEIN)/Tax Identification Number (TIN) and entity's name on the [Department of State, Division of Corporation's Sunbiz website](#) ("Sunbiz"). If the business is not registered in Sunbiz as required, staff will not enable or approve the employer's EF registration until such information is available for verification.
3. For out-of-state employers, verify the FEIN/TIN and entity's name using the appropriate state's division of corporation's website. If the information is unavailable for verification, staff will not enable the registration until such information is available for verification.
4. For in-state and out-of-state employers and government organizations that are not registered in Sunbiz or the appropriate state's division of corporation's website, CSTB must request the employer or organization to provide official documentation from the Internal Revenue Service (IRS) showing the FEIN/TIN. Upon receipt, staff must case note the specific documentation provided and proceed with their normal verification process. An electronic copy of the documentation can be uploaded to the employer's account in EF or the hard copy can be kept in the physical file. NOTE: If hard copy is obtained this documentation must be scanned into ATLAS, our EDMS system.
5. For staff assisted registration of employer accounts, staff must conduct a follow-up and final review via email or telephone with the employer to confirm the information listed in the registration is accurate and document the method used for



the approval process in case notes for all staff assisted registration of employer accounts.

6. Review all submitted job orders for compliance with federal and state laws, and the *Employ Florida Terms and Conditions of Use*.

Staff must enter a case note when verifying an employer that, at a minimum, includes the method of contact, the name and title of the contact (if applicable), whether the employer is registered in the appropriate state's corporations website, and the method used to verify the employer before an employer account is enabled in the system.

When an employer completes their registration in EF, the account status is automatically set to "Pending Verification". Employer accounts must be verified within two business days of the date of the initial registration. However, if the verification process cannot be completed within two business days, staff must place the employer's account in a "Not Verified" status. Upon placing an employer's account in a Not Verified status, staff must notify the employer of the action and ask the employer to correct the missing/needed information as soon as possible. The account must remain in Not Verified status until the employer's information is properly reviewed and verified in accordance with state and local policy. If the validity of an employer cannot be verified or if staff believes the account is suspicious in nature, staff must alert the CSTB Job Order Support Specialist Manager. CSTB JO Support Specialist Manager must immediately elevate concerns of suspicious activity in EF to the Department of Economic Opportunity via email at: [EFAccountReferral@deo.myflorida.com](mailto:EFAccountReferral@deo.myflorida.com).

### **Third-Party Agent Verification**

CSTB must ensure job orders posted by third-party agents are in accordance with the *Employ Florida Terms and Conditions of Use*. Third-party agents that use the EF system to post job openings for an employer must:

1. Obtain the employer's written consent to post job orders on the Employ Florida website and provide it to CSTB prior to posting an open position. Upon receipt of the written consent, the CSTB must upload an electronic copy to the account and enter a case note stating the specific documentation provided and uploaded.
2. Use only the employer's name and FEIN to register an account, unless the third-party agent is the employing entity.
3. List the employer's address of record and contact information as the primary contact and list the third-party agent's address of record and contact information as the secondary contact for verification purposes. Note: the employer's address may be suppressed and hidden from job seekers.
4. Meet the same verification requirements listed above under section on Employer Account Verification in EF.

### **Discontinuation of Services**

Pursuant to [20 C.F.R. 658](#), a CSTB staff must initiate procedures to discontinue services to an employer or third-party agent in certain instances. Some reasons for discontinuing services include, but are not limited to, an employer or third-party agent who:

1. Submits and refuses to alter or withdraw job orders containing specifications which are contrary to employment-related laws.
2. Submits job orders and refuses to provide assurances, in accordance with Agricultural Recruitment System requirements, that Agricultural Recruitment jobs offered are in compliance with employment-related laws.

3. Is found through field checks or otherwise to have either misrepresented the terms or conditions of the employment opportunity specified on job orders or failed to comply fully with assurances made on job orders.
4. Is found by an appropriate enforcement agency to have violated any employment-related laws and notification of the finding has been provided to the U.S. Department of Labor or the career center by that enforcement agency.
5. Is found to have violated Employment Service (ES) regulations pursuant to sec. 658.411.
6. Refuses to accept qualified workers referred through the clearance system.
7. Refuses to cooperate in the conduct of field checks conducted.
8. Repeatedly causes the initiation of the procedures for discontinuation of services.
9. Refuses to cooperate with the CSTB's staff request for verification.

CSTB management must, after consultation with the Department of Economic Opportunity (DEO), discontinue services immediately if exhaustion of above procedures 1 – 7 would cause substantial harm to a significant number of workers.

CSTB staff must also initiate procedures to discontinue services if the employer or third-party agent violates the *Employ Florida Terms and Conditions of Use*.

When discontinuing services, the CSTB staff must notify the employer in writing all employment services will be terminated within 20 working days, unless the employer satisfactorily addresses the concerns of the career center within the 20 days. If services are discontinued to an employer subject to Federal Contractor Job Listing Requirements, the career center must notify DEO immediately at [Wagner.Peyser@deo.myflorida.com](mailto:Wagner.Peyser@deo.myflorida.com).

Services must be reinstated to an employer after discontinuation:

1. If the state is ordered to do so by a Federal Administrative Law Judge (ALJ) or Regional Administrator; or
2. If the employer provides adequate evidence that any policies, procedures or conditions responsible for the previous discontinuation of services have been corrected and that the same or similar circumstances are not likely to occur in the future; and
3. The employer has responded adequately to any findings of an enforcement agency, CSTB, career center, or ETA, including restitution to the complainant and the payment of any fines, which were the basis of the discontinuation of the services.

The CSTB staff must notify the employer requesting reinstatement within 20 working days whether his/her request has been granted. If the CSTB staff denies the request for reinstatement, the basis for the denial must be specified and the employer must be notified that he/she may request a hearing within 20 working days.

The CSTB staff must reinstate services to an employer if ordered to do so by a state hearing official, Regional Administrator, or Federal ALJ as a result of a timely hearing request.

### **Monitoring**

CSTB will conduct programmatic monitoring throughout the program year through our internal Program Monitor(s) under the direction of our Director MIS & Data Services. This will include a formal review of WP services, activities including job orders and placements to ensure compliance with federal, state and local policies and procedures.

## Definitions

**Employer** – As defined in 20 C.F.R. 651.10, a person, firm, corporation, or other association or organization which currently has a location within the United States to which U.S. workers may be referred for employment, and which proposes to employ a worker at a place within the United States and which has an employer relationship with respect to employees under this subpart as indicated by the fact that it hires, pays, fires, supervises and otherwise controls the work of such employees. An association of employers is considered an employer if it has all of the indicia of an employer set forth in this definition.

**Job Opening** – A single job opportunity for which the career center has on file a request to select and refer participants.

**Job Referral** - The act of facilitating the match between qualified job seekers and employers with job openings; and the recording of such referral in EF.

Prior to referring a job seeker to a job opening, CSTB staff must ensure the job seeker's qualifications match the minimum requirements listed in the job order by reviewing the jobseeker's skills, abilities, prior work experience, education and training, certifications/licensure against the requirements of the job order.

**Third-Party Agent** – A person, firm, corporation, other association or entity which posts job orders on behalf of another person, firm, corporation, other association or entity.

## References

- Wagner-Peyser Act of 1933, as amended by the Workforce Investment Act of 1998 and the Workforce Innovation and Opportunity Act of 2014
- Workforce Innovation and Opportunity Act of 2014
- 20 Code of Federal Regulations (C.F.R.) Part 651.10, 652.207, 652.3, 678.435, 658.501, 658.502, 658.503, 658.504

**Inquiries:** Any questions about this policy should be directed to the Chief Operating Officer and/or her designee.



## Policy

<b>SECTION: WIOA, WTP and Business Services</b>	<b>POLICY#018-C0011</b>	<b>PAGE: 1 of 12</b>
<b>TITLE: On-the-Job Training (OJT)</b>		<b>EFFECTIVE DATE: 3.2019</b>
<b>REPLACES: OJT Policy 2.21.2014</b>		<b>DATED: N/A; Revised <span style="color: red;">XX.XX.XXXX</span></b>

### **DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF**

**PURPOSE:** To provide guidance to CSTB WIOA, WTP and Business Services staff on administering On-the-Job Training program services.

**BACKGROUND:** On-the-Job Training (OJT) is a work-based training that provides WIOA eligible participants occupational skills essential to the performance of a specific job.

OJT addresses critical workforce needs, enhances skills of eligible participants and aids eligible employers in attaining qualified, skilled workforce with competencies needed to meet employer’s needs. OJT is an “earn and learn” employment model where eligible participants may upgrade, retool and increase employability skills. OJT is most appropriate for adults and dislocated workers in need of new employer-based skills, and individuals with barriers to employment including, but not limited to, unemployed workers, underemployed workers, and out-of-school-youth. Individuals must meet WIOA eligibility criteria to participate in OJT programs.

OJT is one of the allowable program activities authorized by the Workforce Innovation and Opportunity Act (WIOA) as established in WIOA section 134(c)(3)(D) and the Welfare Transition program (WTP).

On-the-Job Training is defined as training by an employer that is provided to a paid participant while engaged in productive work in a job that:

- (a) Provides knowledge or skills essential to the full adequate performance of the job;
- b) Is made available through a program that provides reimbursement to the employer of up to 50 percent of the wage rate of the participant, except as provided in WIOA Section 134(c)(3)(H), (see note below) for the extraordinary costs of providing the training and additional supervision related to the training; and
- (c) Is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate.

OJT is conducted by public, private not-for-profit and private for-profit businesses. It occurs while an individual is engaged in productive work learning the skills and information necessary for full and adequate performance on the job.

The two unique features of the OJT program are:

1. The individual begins training as a new employee.
2. The individual receives training at the workplace, under appropriate supervision, thus acquiring occupational skills and knowledge in an “on-the-job” training environment.

An OJT agreement is appropriate for businesses who have difficulty filling their skilled labor force needs with qualified, experienced workers, or who want to upgrade their current workforce. Businesses may use an OJT in these instances by training eligible WIOA or WTP customers. Reimbursement is provided to the business to pay for the extraordinary costs of such training because these costs exceed the expenses normally incurred in training individuals normally hired for the position.

Despite the benefits to businesses who participate as an OJT business, the focus of the OJT program is on the individual. OJT is designed to provide an opportunity for WIOA/WTP eligible individuals to receive the training necessary to acquire skills and knowledge that will enable them to maintain unsubsidized employment and/or job advancement.

#### **PROCEDURE:**

The OJT Program is sponsored and administered by CareerSource Tampa Bay (CSTB) Business Services department. The service is designed to assist businesses with the training and employment needs of their workforce meeting specific guidelines so that the business and employee can maintain a competitive edge in the marketplace. OJT is eligible to businesses that meet the eligibility criteria in this policy that hire a WIOA/WTP eligible participant from Hillsborough County.

#### **Participant Eligibility**

On-the-Job Training (OJT) may be provided to eligible WIOA Adult, Dislocated Worker or Youth participants who are assessed and found to be in need of and suitable for training services in order to obtain or retain employment that leads to self-sufficiency. **CSTB defines the initial assessment to include both informal and structured assessments conducted by the WIOA Program Recruiter. CSTB offers a variety of online career assessments including: My Next Move, My Skills My Future, Career Scope and additional assessments deemed appropriate. These assessments measure the job seeker’s career interests and aptitude, identify transferrable skills and provide career guidance that is essential for the job seekers transition to employment or reemployment.**

The participants must demonstrate a need for training as recorded on the Career Plan. OJT may also be provided to eligible Welfare Transition program participants who are deemed appropriate candidates for consideration.

Suitability is established when an OJT opportunity aligns with a customer’s existing skill set or educational background and the customer is deemed to have the core competencies to be successful in the position and likely to attend and complete all training based on current needs and barriers.

Employers will have the final selection authority for individuals to be hired. All participants must meet certain WIOA eligibility criteria before training can begin. Only those individuals who meet the

eligibility requirements for individual career services, who have received an assessment and for whom a career plan has been developed may be considered for OJT.

Consideration should be given to the skill requirements of the occupation, academic and occupational skill level of the participant, prior work experience, and the participant's Career Plan. The results of the objective assessment, as documented on the individual's Career Plan, must indicate that the participant is in need of, and can benefit from, the activity of OJT. The Career Plan and application must capture the past work history of the applicant from the official file, assess the test results, capture additional information from the applicant about past work experience, volunteer experience, and identify strengths and weaknesses of the applicant. The OJT Training Outline must include documentation as to the new skills to be acquired during training and how skill gap deficiencies will be overcome with the training.

There are occasions when a WIOA/WTP participant may participate in multiple OJT Agreements if the first Agreement should fail at no fault of the applicant. The provisions outlined below should apply:

1. The new Agreement with a different business is for upgraded skills or a different position but related to the first position in terms of career path and skills.
2. The approved training hours for the second OJT agreement will be re-evaluated based on the training received in the first OJT agreement (commensurate with experience learned in the previous OJT agreement).
3. No applicants shall participate in more than two (2) OJT agreements unless plant closures or layoffs occur that are out of the control of the applicant and occur in progression. Any additional agreements must be approved by the CEO, COO or designee.

### **Business Eligibility**

The hiring and training may begin after the OJT Work-Based Training Onsite Assessment form has been completed and the OJT Employer Agreement has been signed by all the parties. The Business Services Account Executive completes these documents with the employer.

The participant becomes an employee of the company on the day the OJT begins. Staff should give careful consideration when selecting a suitable employer for OJT. General business practices in terms of working conditions (safety, health), the availability of health benefits, sustainable wage structure, turnover rates, adequate staff and equipment to carry out the training, and whether the employer is in compliance with federal, state and local laws are factors to consider while completing the OJT Work-Based Training Onsite Assessment form.

When considering an employer to participate as an OJT worksite, staff should carefully review and determine the nature of the employment to ensure the employment is on-going and not temporary, probationary or intermittent employment.

Prior to entering into an agreement for OJT services with a business, the CSTB Business Services staff shall ensure that the business is eligible.

Businesses that meet the following criteria are considered eligible and may, subject to available funding, enter into an OJT agreement:

1. Physical company is located in Hillsborough County;
2. Business must legally have operated at current location for at least 120 days.

3. Hold valid business tax receipt (formally an occupational license) and/or zoning permit; (google search and printout included)
4. Active business as verified by Florida Department of State Division of Corporations ([www.sunbiz.org](http://www.sunbiz.org)) and provide W-9.
5. Hasn't experienced any layoffs in the past six months verified by DEO WARN site (<http://www.floridajobs.org/office-directory/division-of-workforce-services/workforce-programs/reemployment-and-emergency-assistance-coordination-team-react/warn-notices>)
6. Maintains Workers Compensation Insurance (if applicable);
7. OJT position requested is on the R15 Targeted Occupation List (TOL).
8. Must develop a detailed OJT Training Plan Outline that identifies the specific occupation, job specific skills that will be learned and estimated time required for each skill.
9. Agrees to routine monitoring and communication with the CSTB Business Services Staff regarding the progress of the program participant relating to the OJT Training Plan, progress reports, midpoint in training and completion of the OJT to capture measurable skills gained during participation.
10. Commit to hiring and retaining customers who successfully complete their training program.

### **Demand for Occupation in Labor Market**

OJT must be for training in occupations that are in demand in the local area and listed on the regional Targeted Occupational List (TOL). OJTs that occur in small businesses where the OJT training covers a relatively broad range of functions that draw from several occupations are generally considered as a unique occupation for labor market demand purposes. With these unique occupations, the fact that an opening exists for the occupation at the business presupposes the existence of a demand for the occupation. Any OJTs for positions not on the TOL must be approved by the CEO, COO or designee.

### **Occupation Eligibility**

All OJTs must be for occupations that are in demand in the local area and are appropriate for the program. Occupations not suitable for OJT:

- Less than part-time
- Principle source of income is tips, commissions or piecework;
- Intermittent or seasonal in nature;
- Shown as in decline on the Hillsborough County Demand/Decline List.

### **PROHIBITIONS**

1. Participants shall not be employed to carry out the construction, operation, or maintenance of any part of any facility that is used or to be used for sectarian instruction or as a place for religious worship (except with respect to the maintenance of a facility that is not primarily or inherently devoted to sectarian instruction or religious worship, in a case in which the organization operating the facility is part of a program or activity providing services to participants).

2. OJT agreements shall not be written for part-time employment. Proof of full-time employment shall be established and documented by the business. Whether the participant is categorized as full-time

shall be verified by the CSTB Business Services staff. CSTB Business Services staff may submit a written request to the CSTB CEO or designee for an exception to this rule prior to execution of an OJT agreement.

4. The CSTB shall not enter into agreement with a business who has previously exhibited a pattern of failing to provide OJT participants with continued long-term employment with wages, benefits, and working conditions that are equal to those provided to regular employees who have worked a similar length of time and are doing the same type of work.

5. No officer, employee, agent, or representative of the Business or CSTB may charge a participant a fee for the placement or referral of such individuals in or to a training funded under an OJT agreement or amendments thereof.

6. A participant in a program or activity authorized under title I of WIOA must not displace (including a partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits) any currently employed employee (as of the date of the participation).

7. An OJT funded agreement must not impair existing contracts for services or collective bargaining agreements. When a program or activity authorized under Title I of WIOA would be inconsistent with a collective bargaining agreement, the appropriate labor organization and employer must provide written concurrence before the agreement is initiated.

8. An OJT participant may not be employed in or assigned to a job if: a. Any other individual is on layoff from the same or any substantially equivalent job; b. The employer has terminated the employment of any regular, unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy so created with the OJT participant; or c. The job is created in a promotional line that infringes in any way on the promotional opportunities of currently employed workers.

9. OJT funds shall not be used for any political activity, lobbying of federal, state or local legislators, or to promote or oppose unionization.

10. OJT funds may not be used to directly or indirectly assist, promote or deter union organizing.

11. OJT participants shall not be placed in a home-based business.

12. OJT funds shall not be used to encourage or induce a business, or part of a business, to relocate from any location in the United States, if the relocation results in any employee losing his or her job at the original location.

13. OJT funds cannot be utilized to pay for the following:

- Paid or unpaid holidays
- Sick leave
- Vacation
- Overtime hours
- Fringe benefits; and/or
- Training related supplies and/or equipment
- Work performed outside of the OJT contract.

### **Duration and Rationale of OJT Training**

An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which training is being provided. Traditionally, OJT is limited to a maximum of six



(6) months or 1,040 hours. The length of the training, which will be determined by CSTB Business Services staff, should take into consideration the amount of time required for a participant to become proficient in the occupation for which training is being provided (skill requirements of the occupation, the academic and/or occupational skill level of the participant, and prior work experience). The length of the OJT will be documented in the OJT contract with the employer and the participant's individual career plan.

The rationale for the length of the training should take into consideration the following:

1. amount of time required for a participant to become proficient in the occupation for which training is being provided
2. skill gaps that exist
3. skill requirements of the occupation
4. the academic and/or occupational skill level of the participant
5. prior work experience of the participant
6. barriers to employment
7. any disability and need for reasonable accommodations; and,
8. the availability of programmatic funding.

Staff will also consider results attained from assessments as well as referencing additional materials such as O\*Net (<https://www.onetonline.org/find/>) which list a Specific Vocational Preparation (SVP) Code. SVP Codes should be used as the baseline for duration determination. The baseline hours listed should not prohibit on-the-job training agreement durations and may be adjusted depending on the individual's skills gap. The chart below is to be used as a baseline reference.

SVP Code	Level Time Explanation	Estimated Hours
1	Short demonstration only	160
2	Anything beyond short demonstration up to and including 1 month	240
3	Over 1 month up to and including 3 months	320
4	Over 3 months and including 6 months	500
5	Over 6 months and including 1 year	640
6	Over 1 year up to and including 2 years	800
7	Over 2 years up to and including 4 years	960
8	Over 4 years up to 10 years	1040

### Skills Gap Analysis (SGA) / OJT Training Plan Development

Following the execution of the OJT Employer Agreement, an individualized OJT Training Plan must be developed for the acquisition of skills that the trainee does not already possess. The plan is a formal and written program of a structured job training, which will provide participants with an orderly combination of instruction in observable, and measurable job-ready skills, general employment

competencies and occupational skills that will enable the participant to work towards self-sufficiency. **The OJT Training Plan must be agreed upon and signed by the employer and CSTB. The customer and CSTB staff sign off on the IEP/Career Plan documenting provision of OJT service.**

An analysis of the trainee's prior work history, transferrable work skills and the job skills gained must be compared to the job skills/job description the employer requires in the OJT occupation. The resulting gap in skills will be the basis for the development of the OJT Training Plan. Each skill description should be concise and the individual tasks should be measurable and observable. The specific types and sources of information used to identify the scope of the skills gap must be included in the participant's case file.

### **OJT Contract Requirements**

CSTB's OJT contract meets all of the requirements outlined in the CareerSource Florida Administrative Policy – OJT.

### **Reimbursement:**

Participating businesses will receive a fifty percent (50%) reimbursement for eligible OJT participants. In accordance with CareerSource Florida Administrative Policy on OJT LWDB's may increase the reimbursement rate for OJT up to 75% for OJT contracts when the following factors have been evaluated:

1. The characteristics of the participants;
2. The size of the employer, with an emphasis on small businesses; and
3. The quality of employer- provided training and advancement opportunities, e.g. the OJT contract is for an in-demand occupation that leads to an industry-recognized credential.

A 75% reimbursement rate will be established when a business enters into an OJT agreement where the employer has 50 or less employees.

All training assistance awards are based on eligibility and available funding as well as:

- agree to enter into an OJT Agreement;
- agree to provide on-the-job skills training for the new employee(s) selected, and
- agree to retain the employees(s) upon successful completion of training.

### **Conflict of Interest**

1. The CSTB will not favor a referral from and/or to a Board member of the CSTB over another business in the community. OJT placements shall be made based upon what will be most beneficial to the participant.
2. The CSTB CEO/COO shall be notified whenever the OJT Agreement is connected to a CSTB Board member or employee.
3. CSTB are prohibited from recommending an agreement or making OJT referrals to businesses who are members of their immediate family or members of families of other CSTB staff.
4. The contracted OJT business shall not hire a participant who is a relative (member of the family) of the business. Relative is defined as: father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law,

brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, or half-sister. (Section 112.3135, Florida Statutes).

5. No participant is placed in an OJT where a member of that person's immediate family is directly supervised by or directly supervises the participant. Family means two or more persons related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:
  - a. A married couple and dependent children;
  - b. A parent or guardian and dependent children; or
  - c. A married couple.

### Reverse Referrals

In very limited circumstances OJT initiated through "reverse referral" may be permitted. Reverse referral occurs when an individual is referred to CSTB from a prospective employer (under either formal or informal agreement) for assessment as to whether the individual meets the employer's hiring requirements for a specific position. **Employers must not make or have made a hiring decision prior to the participant becoming eligible for the OJT program through CSTB.** Development of an OJT for an individual referred by the employer may be permitted only when:

1. the individual progresses through the intake process as with any other CSTB customer and meets all WIOA eligibility and suitability requirements;
2. the completed individual career plan/**service strategy** indicates training is necessary for the individual to perform the work associated with the position for which the employer has an opening;
3. justification for WIOA training services outlines OJT is most appropriate, needed and identifies participant skill gap analysis;
4. the employer meets all the eligibility criteria outlined in this policy; and
5. the employer has not made a hiring decision prior to the individual referral to CSTB (If so, OJT cannot occur)
6. the employer provides assurance that the individual has not previously been employed by the employer in the same or similar position.

A reverse referral is when the business has identified someone they would like to hire but the individual has demonstrated skills deficiency related to the position's requirements. A business may refer a job applicant to CSTB for potential OJT enrollment. In the case of reverse referrals, the candidate must schedule an eligibility determination and assessment appointment with CSTB and must be eligible for WIOA as a dislocated worker or adult. CSTB must utilize normal eligibility assessment and enrollment procedures. Participant's eligibility must be determined prior to employment; no pre-hires or period of employment prior to the execution of an OJT agreement and participant training plan are acceptable.

### Individual Employment Plan (IEP)

**CSTB must develop an individual service strategy for each participant. A service strategy is a document created jointly by the participant and case manager, and is based on career planning and the results of the objective assessment. The service strategy includes a summary of the jobseeker's strengths, barriers, services needed, education and employment goals, and services provided. The IEP will be updated during a one-on-one appointment between the trainee and a CSTB Career Specialist. This process will also define the short and long term goals of the work experience opportunity as well as future employment plans of the trainee. The trainee's IEP must identify their internship/work experience field of training while outlining goals and objectives with defined timelines and projected completion dates.**

When selecting work-based training for a participant, the WIOA Career Specialist must include the following in the service strategy:

1. A determination that a work-based training activity is appropriate to meet the participant's needs;
2. The specific work-based training most appropriate for the participant based on an assessment of the participant's needs, skill set, and other characteristics necessary to determine the best activity for the participant;
3. The specific short and long-term goals for the work-based training activity, by identifying the purpose of the activity and outcomes expected;
4. The employer with whom the activity will be done and other information relevant to the work-based training activities;
5. Responsibilities of the CSTB, employer and participant; and
6. Other activities necessary to support the work-based training activity.

### **Worksite Agreement**

OJT activities require a Worksite Agreement in the customer file. The Worksite Agreement will establish the parameters wherein a customer will gain the job-readiness skills necessary to obtain unsubsidized employment, and must be secured prior to the participant beginning their OJT assignment.

Each employer participating in work-based training must develop a CSTB OJT Agreement. The worksite agreement must include:

1. A job description and/or training outline
2. Contact information for the supervisor
3. Record-keeping and payroll information,
4. Process to monitor the participant's worksite activities and ensure adherence to the records retention requirements, as applicable.
5. Worksite agreements for work-based training. For agreements with a staffing agency, the worksite agreements must include signatures of both the worksite employer and the staffing agency.

CSTB will maintain information on each job placement in the form of an agreement signed by all parties. Each employer partner will receive a copy of the fully executed OJT agreement.

### **Work-Based Training Employ Florida Service Codes**

Each work-based training activity is assigned a unique service code in Employ Florida service codes identified and described in the Employ Florida Service Code Guide. CSTB must assign the appropriate code to each individual engaged in a work-based training activity. The details of the work-based OJT activity must be included in the service strategy.

### **Recording of Worksite, Provider and O\*Net Code Information**

When a participant is enrolled into a work-based training activity, staff must record in Employ Florida, the address and location of the worksite where the participant will work. For OJT, the worksite is the same as the employer and the actual location where the participant will report for work. When a participant is enrolled in a work-based training activity, the provider and O\*Net Code for the occupation in which the participant will engage or receive training must be entered into Employ Florida as part of the enrollment process.

## Trainee Skill Evaluation

On a monthly basis, the trainee's acquisition of the required occupational skills on the Training Plan will be evaluated by the employer/supervisor using the OJT Training Monthly Progress Report. This is an opportunity for the employer/supervisor and the trainee to interact and review the skills progress made during the review period. The OJT Training Monthly Progress Report will also be used at the conclusion of training to document the mastery of the required skills. **This will be utilized to document Measurable Skills Gained for WIOA program participants as it outlines the validation of skills and competency attainment for participants.**

The trainee's progress under an OJT contract will be formally monitored by the CSTB Business Services staff on a monthly basis during participation in the OJT program. Periodic communication with the OJT employer/supervisor and the trainee during the training period is required to insure the successful completion of the training.

## Modifications

Modifications to the OJT contract and OJT Work Based Training Plan Outline may be needed. The Business Services staff would be required to submit a CSTB Agreement Modification OJT Agreement and specify the purpose of the modification, total training hours and maximum reimbursement. This requires the CSTB CEO or designee signature approval before any agreement modifications can be fully executed.

## Invoicing and Payment

**CSTB WIOA Programs Recruiter** will track the completion of OJT positions and work directly with employers to ensure that required OJT reimbursement forms and supporting documentation is submitted timely for processing.

Employers will be required to complete Attachment II – Individual OJT Reimbursement Form. The form identifies the employer name, # of weeks, hours and total reimbursement amount being requested. The form along with supporting documentation is submitted to [OJTinvoice@careersourcetampabay.com](mailto:OJTinvoice@careersourcetampabay.com) or fax to 855.484.6949. Supporting documentation includes the following:

1. Payroll Documents shall include paystubs showing pay period dates, pay date, type of hours worked, rate of pay, deductions, etc.
2. Timesheet Detail for only the FIRST and Last week worked of the OJT/PWE Training Period.
3. W9 Form for employers receiving OJT Reimbursement.

The **CSTB WIOA Programs Recruiter** will notify the Finance Department and submit completed OJT Reimbursement forms for processing.

## Monitoring

Monitoring and evaluation of the program plays a critical role in insuring that the goals of the OJT are achieved. The on-site monitoring is essential and must include documenting information received directly from the OJT trainee and should capture the trainee's supervisor's perspective about how the training is progressing. **Onsite monitoring will include site visits to the worksite and interviews of participants and supervisors by the OJT Program staff and internal CSTB Program Monitors.** In addition to this, the monitoring should examine the process of compliance with the OJT Agreement, training plan, the regulations, payment of wages, and the maintenance of records and working conditions in keeping with Federal requirements. **At a minimum CSTB must conduct an in-person visit to each worksite where an OJT participant is placed at least once per year.**

Any Agreement deviations noted should be dealt with promptly, either with a corrective action plan or by suspension or termination of the agreement if serious violations have occurred. All visits to the business should be documented in the business EF account file and electronic file. The entry should identify when the visit was made, **the name of the CSTB staff member conducting the visit**, what was observed, who was interviewed, a synopsis of the content of the conversation, any items of concern that need to be addressed **and the outcome of the visit**.

Additional programmatic monitoring will be conducted throughout the PY by our internal Program Monitor under the direction of our Director MIS and Data Services. Financial monitoring will be handled by our Director of Fiscal Compliance.

### **Supportive Services**

Support services are available for Adult, Dislocated Worker and Youth work-based training participants. Limited support services may be made available to trainees on an individualized case-by-case basis. The trainee must verify that a need exists and cannot be met by other community resources. The provision of such support services must be documented in the individual service strategy. Support service needs are identified through the assessment process and outlined in the service strategy. Support services may be provided pursuant to **CSTB Supportive Service and Incentive Policy - # #018-C0012b**.

### **Performance**

**A.** All businesses must be deemed eligible to participate in the OJT program. The eligibility status will be determined by CSTB a Business Service Account Executive Onsite Assessment as well as outcome and retention performance from previous OJT Agreements.

**B.** CSTB will monitor OJT Agreements for performance. Businesses are expected to maintain a specific OJT completion rate and a retention ratio as defined herein. Businesses who do not meet these performance measures will be suspended from additional OJT opportunities for a period of (6) months.

1. **OJT Completion and Retention - WIOA:** at least 80% of OJTs executed must be successful (to completion) in order for businesses to continue to participate in the OJT program. This means the entire OJT period is completed and the trainee is retained after the training period.
2. **OJT Completion and Retention - WTP:** at least 60% of OJTs executed must be successful (to completion) in order for the business to continue to participate in the OJT program. This means the entire OJT period is completed and the trainee is retained after the training period.
3. Exceptions to the OJT completion rate may be made for a trainee's release involving mitigating circumstances that may result in a "neutral termination." Mitigating circumstances may include circumstances such as the OJT trainee resigns for higher wage employment; death of OJT trainee; or extreme circumstances out of the business's control. Neutral terminations will not be considered in determination of retention ratio and must be clearly documented and approved.
4. Retention is measured on OJT agreements based on completion dates within the previous twelve (12) months. Failure to meet performance standards may result in a business's suspension from the OJT program.
5. A suspended business may be considered for additional OJT's in one of two ways (whichever occurs first):
  - a. After six (6) months from exit date of most recent unsuccessful OJT or non-retained OJT trainee, OR
  - b. Business demonstrates a willingness to allow CSTB to screen and place

candidates to non-OJT jobs, and those hires result in a positive retention at the end of six (6) months from hire date.

**Authorized Signatories**

- The Chief Executive Officer, Chief Operating Officer and designee are hereby authorized to execute OJT Agreements.
- If necessary during the OJT process, CSTB will accept electronically submitted scanned or faxed documents with signatures of the representatives that have legal authority to contract and bind the respective organization in their capacity as a signatory official.

**INQUIRIES:** Any questions about this policy should be directed to the Chief Operating Officer and his/her designee.



## **Information Item # 1**

### **Extension- CareerSource Tampa Bay / Hillsborough County Interlocal Agreement**

#### **Background:**

**The Current Inter-local Agreement between CareerSource Tampa Bay and Hillsborough County expired on 7/1/2019.**

#### **Information:**

The Hillsborough County Board of Commissioners approved a 60 day extension of the current Inter-local Agreement, through August 29, 2019. To ensure that all items outlined in the USDOL program audit are sufficiently addressed, as well as questions related to the proposed new agreement that were discussed at the May 16, 2019 Board of Directors meeting.





## Information Item # 2

### USDOL/ DEO Compliance Review

**Background:** CareerSource Tampa Bay received the U.S. Department of Labor Employment and Training Administration (USDOL/ETA) Compliance Review of CareerSource Tampa Bay (CSTB) and Career Source Pinellas (CSPIN) on May 16, 2019. The report was submitted to Ken Lawson Executive Director Florida Department of Economic Opportunity (DEO) and was issued by the Atlanta Regional Office on May 15, 2019. The Compliance Review Report consisted of 50 pages with a synopsis of Findings outlined on page 6 and Appendices of Findings Summary Chart with questioned costs on page 45.

In response to the USDOL/ETA Compliance Review Report, the DEO issued a formal corrective action plan (CAP) on June 28, 2019. The CAP formally responds to each of the findings and questioned costs. In addition, the CAP includes corrective actions of DEO, CSTB and CSPIN that have already been taken or are in progress.

Outlined below is a summary timeline:

- 5.21.19 – CareerSource Tampa Bay participated in an initial call with DEO.
- 5.22.19- CareerSource Tampa Bay conducted a conference call with DEO, senior leadership team and Hillsborough County Liaison to discuss scope of the required preliminary corrective action plan and initial timeline.
- CareerSource Tampa Bay conducted several internal key senior leadership meetings to review and analyze the entire report, findings, required action, proactive steps, current action steps, completed action steps, status of each item and actual or anticipated completion dates.
- CareerSource Tampa Bay CEO worked closely with Hillsborough County Liaison to obtain responses for findings warranting their input on corrective action.
- 5.24.19- CareerSource Tampa Bay submitted the initial draft corrective action response- LWDB 15 USDOL Compliance Review Response to DEO.
- 5.30.19 – CareerSource Tampa Bay updated the matrix and uploaded documentation to DEO SharePoint.
- CareerSource Tampa Bay has responded and continues to respond to clarifying questions that DEO leadership staff have presented over the past few weeks. As necessary our corrective action response- LWDB 15 USDOL Compliance Review Response has been updated to reflect our position and supporting documentation uploaded to DEO SharePoint.
- 6.28.19 – DEO issued formal corrective action plan to USDOL/ETA in response to the USDOL/ETA Compliance Review Report issued on May 15, 2019. Certain actions noted in this CAP will require revisions to CSTB By-laws and will be addressed by the CSTB Ad Hoc By-laws Committee in conjunction with Hillsborough County Board of County Commissioners to ensure compliance.



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**U.S. Department of Labor  
Employment and Training Administration**

**Compliance Review of CareerSource Tampa Bay and CareerSource Pinellas  
Corrective Action Plan**

**June 28, 2019**

**Submitted to:**

Mr. Winston Tompoe  
Acting Regional Administrator  
U.S. Department of Labor  
Employment and Training Administration  
Atlanta Regional Office, Region 3  
61 Forsyth St., SW, Rm 6M12  
Atlanta, Georgia 30303

The United States Department of Labor (USDOL) Employment and Training Administration (ETA) conducted a compliance review of Florida's Workforce Investment Act (WIA) and Workforce Innovation and Opportunity Act (WIOA) programs as a result of allegations made against two of Florida's Local Workforce Development Boards (LWDBs) – CareerSource Tampa Bay and CareerSource Pinellas. On May 15, 2019, USDOL issued a report to the Florida Department of Economic Opportunity (DEO) detailing the results of WIA and WIOA compliance review. The report identified 17 findings of non-compliance and three areas of concern.

DEO is required to submit a Corrective Action Plan (CAP) that formally responds to each of the 17 findings and questioned costs. This CAP includes corrective actions of DEO, CareerSource Tampa Bay and CareerSource Pinellas that have already been taken or are in progress. The corrective action responses are separated by finding and, where multiple elements have been identified within the finding, individually numbered to ensure that each element is clearly addressed.

## **1 Finding 1: Falsified Placements; Fabrication of Information and Records**

### **1.1 The State and local areas must evaluate and implement appropriate internal controls in response to the findings in this report. They must discontinue the practices that allowed the falsification of participant records and data.**

**The revision of internal controls will help safeguard assets properly. This will help with grant activities being in compliance with the Federal statutes, regulations and the terms and conditions of the grants; that all data and reporting are valid and reliable; and that the State and local areas have sufficient evaluating and monitoring procedures in place to ensure effective and compliant implementation of the programs.**

**CAP Response:** DEO has taken a phased approach to ensuring that falsified placements and fabrication of information and records are eliminated by introducing enhanced measures to prevent the ability of local staff to falsify participant records and data. Additionally, CareerSource Pinellas and CareerSource Tampa Bay have taken steps to ensure that staff no longer follow the previously adopted practices. To date, the following actions have been taken:

DEO enhanced its statewide management information system to increase direct jobseeker and employer communication to confirm the accuracy of activities and services provided.

- DEO updated the state's labor exchange system (Employ Florida) to alert jobseekers upon their registration in Employ Florida. The system update sends a message to the job seeker to confirm the jobseeker's registration. The message also includes the DEO Customer Information Center's contact information and informs job seekers to contact DEO if they did not initiate or authorize their Employ Florida registration (Attachment 1.1) – **completed May 2019.**

- DEO updated Employ Florida to immediately alert employers when a hire is recorded on their job orders in Employ Florida. The message also includes the DEO Customer Information Center’s contact information and employers are informed to notify DEO if they did not authorize the posting of a position in Employ Florida and/or did not fill the position (Attachment 1.1) – **completed May 2019.**
- DEO is reviewing the existing state level performance incentive policy and methodology to ensure that it does not incentivize boards to falsify performance.
- DEO updated the annual financial monitoring internal control questionnaire, requiring both the Executive Director and the LWDB Chair to sign the completed form indicating his or her review and approval of the responses to the questionnaire (Attachment 1.2) – **completed September 2018.**
- CareerSource Tampa Bay has completed the following corrective actions toward compliance:
  - Developed an outreach plan for the universal job seeker on how to register on Employ Florida for job search assistance – **completed January 2019.**
  - Ceased acquisition and use of all new hire lists for all programs associated with Business Services – **completed February 2018.**
- CareerSource Pinellas has completed the following corrective actions toward compliance:
  - Reviewed the hire list process and no longer uses hire lists for placements (Attachment 1.3) – **completed July 2018.**
  - Procured a One-Stop Operator whose role, in part, is to conduct monitoring of all programs bi-annually and report those findings to the Board of Directors. (Attachment 1.4) – **completed November 2018.**
  - Made immediate changes to program activities as identified by USDOL ETA and DEO to include discontinuation of staff incentives, revised procedures/guidebooks, and provision of additional programmatic staff trainings (Attachment 1.3) – **completed May 2019.**

The following corrective actions are in progress:

- DEO is developing a LWDB data dashboard designed to help identify data anomalies, such as missing/suspicious contact information, incomplete/missing background information and/or resume, and a short time span between registration and job placement, which will be analyzed by the DEO and LWDBs. An explanation will be required from the LWDB staff to determine if the anomaly reflects local operational processes or if a data anomaly reflects an issue which needs to be addressed. DEO will use this information to identify opportunities to provide training and technical assistance to LWDBs if needed. The goal is to decrease and eliminate future

errors/anomalies associated with data and to address data anomalies timely. DEO will adopt a process to share data anomalies with the LWDBs for review and require corrective actions, as needed. The dashboards will also be a data tool for LWDBs to use to quickly identify data gaps and anomalies.

- DEO will review and update the financial monitoring tools and/or internal control questionnaire to include the following:
  - Bonuses – to assist the LWDBs in identifying any bonus programs that may be unknowingly incentivizing employees to commit fraud.
  - Pay raises – to ensure that all raises are reasonable and approved by the appropriate staff including the Board of Directors, as needed, prior to the raise becoming effective;
  - Expanded disbursement sampling to include payments for participant program services – to ensure the disbursements are adequately supported through documentation of participant eligibility. DEO’s programmatic monitors will confirm participants included in the sample are eligible for the services received.
  - Positive confirmation - DEO will contact a sample of participants to ensure they received services from the LWDBs career center.
  - Related party agreements – DEO will review 100 percent of all agreements made with related parties and sample payments to ensure payments are fully supported.
  - Analytical procedures – to determine whether certain employers receive a disproportionate share of funding for participants as compared to the total participants receiving services.

**1.2 The State and local areas must also review internal policies, processes, and training to ensure that activities permitted under the law are carried out in accordance with the statute, regulations, and ETA guidance. At a minimum, this must include adherence to participant eligibility, job order, and placement requirements and provisions.**

**CAP Response:** Prior to the issuance of the report, DEO evaluated the guidance provided in the current state policies. DEO identified and implemented opportunities to strengthen and clarify policy language in state-level policies to lessen ambiguity and support consistency across the state. Additionally, DEO used the policy evaluation process to identify if additional WIOA policies to provide guidance needed to be developed. The following policies were either updated, revised, or developed, and finalized prior to the issuance this corrective action plan:

- [Administrative Policy 009 – On-the-Job Training](#) (Attachment 1.5)
- [Administrative Policy 096 – Jobseeker Registration](#) (Attachment 1.6)
- [Administrative Policy 098 – Employer Services](#) (Attachment 1.7)
- [Administrative Policy 099 – Job Orders and Placements](#) (Attachment 1.8)

DEO provided intensive, on-site programmatic training and technical assistance to the staff at CareerSource Tampa Bay and CareerSource Pinellas in January 2019. The training provided an opportunity for all LWDBs to attend training and to ensure the local service delivery strategies and processes align with state and federal guidelines. Additionally, DEO has completed the following actions:

- Provided hands-on demonstrations on the correct use of Employ Florida – **completed February 2019.**
- Implemented a statewide training schedule and provided in-person training for all LWDBs for programs administered by the LWDBs, including Wagner Peyser, WIOA, Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T), Federal Bonding and Welfare Transition (WT). DEO will develop and implement a consistent annual statewide training schedule for programs administered by the LWDBs. Conducted WIOA statewide training series during the months of March and April 2019, as outlined in the table below:

<b>Day 1 Training Topic</b>	<b>Training Elements</b>
<b>WIOA Youth Program Overview</b>	<ul style="list-style-type: none"> <li>• History</li> <li>• Populations (OSY and ISY)</li> <li>• Eligibility</li> <li>• Barriers</li> <li>• Supportive/Follow-up Services</li> <li>• Low Income</li> </ul>
<b>WIOA Youth Program Design</b>	<ul style="list-style-type: none"> <li>• Objective Assessment</li> <li>• Individual Service Strategy</li> <li>• 14 Program Elements</li> </ul>
<b>WIOA Adult and Dislocated Worker Eligibility</b>	<ul style="list-style-type: none"> <li>• Eligibility Criteria</li> <li>• Source Documentation</li> </ul>
<b>WIOA Adult and Dislocated Worker Program Design</b>	<ul style="list-style-type: none"> <li>• Basic Career and Individualized Services</li> <li>• Training Services</li> </ul>
<b>Documenting in Employ Florida/Walk through</b>	<ul style="list-style-type: none"> <li>• Pre/Post-tests</li> <li>• Measurable Skill Gain</li> <li>• Credential Attainment</li> <li>• Other</li> </ul>

<b>Day 2 Training Topic</b>	<b>Training Elements</b>
<b>WIOA Adult and Dislocated Worker Program Design</b>	<ul style="list-style-type: none"> <li>• Support Services</li> <li>• Follow-up Services Pre-and Post-Exit</li> <li>• Co-enrollment</li> <li>• Exit Requirements</li> <li>• ETPL</li> <li>• TOL</li> </ul>
<b>Measurable Skill Gains</b>	<ul style="list-style-type: none"> <li>• Who is in the measure and when</li> <li>• Types of Skill Gains</li> <li>• How to record Skills Gains in Employ Florida</li> </ul>
<b>Service Code Review</b>	<ul style="list-style-type: none"> <li>• Review of the most frequently used Service Codes</li> </ul>
<b>Work-Based Training</b>	<ul style="list-style-type: none"> <li>• Identifying the types of work-based training</li> <li>• Service codes associated with each type of work-based training</li> <li>• Recording of worksite, provider and O*Net code information</li> </ul>
<b>On-the-Job Training</b>	<ul style="list-style-type: none"> <li>• Eligibility</li> <li>• Defining on-the-job training</li> <li>• Employed workers</li> <li>• OJT Training Plan</li> <li>• OJT Contract Requirements</li> <li>• Payments to workers</li> <li>• Reverse Referral</li> <li>• OJT, Registered Apprenticeships and Pre-Apprenticeships</li> </ul>
<b>Workforce Statistics and Economic Research</b>	<ul style="list-style-type: none"> <li>• Overview</li> </ul>

- Partnered with CareerSource Florida and Maher and Maher to implement a comprehensive WIOA program performance metrics training series (Attachment 1.9) The training series offered LWDBs a closer look at WIOA’s Primary Indicators of Performance, ways to measure and improve performance for Business Services and suggestions for aligning strategies to performance. The trainings were conducted through a blended approach using webinars, in-person meetings and other learning tools. The modules and topics covered during the training sessions include:

WIOA Performance Metrics Course or Workshop	Method	Delivered
1. WIOA Overview and Performance Training	Webinar	June 2018
2. Interactive Performance Workshop	In-Person	September 2018
3. Measuring & Improving Performance for Business Services	Webinar	October 2018
4. Approaches to Aligning Strategies to Performance	In-Person	December 2018

The training sessions and workshops were recorded and are accessible at any time to the LWDB staff in the DEO Learning Management System.

CareerSource Tampa Bay has taken the following corrective actions toward compliance:

- Created a policy/performance position dedicated to providing additional local guidance and training for staff on TEGs, DEO policies, and policy changes - **completed prior to May 2019.**

CareerSource Pinellas has taken the following corrective actions toward compliance:

- Revised internal policies and processes (Attachments 1.10, 1.11, 1.12, 1.13) to include placements, job orders, and eligibility – **completed May 2019.**

The following corrective actions are in progress:

- CareerSource Tampa Bay will prepare policy and procedures on each of the three areas: job seeker registrations, job orders, and placements to comply with the following DEO Policies:
  - Administrative Policy 096 – Job Seeker Registration
  - Administrative Policy 098 – Employer Services, and
  - Administrative Policy 099 – Job Orders and Placements.
- CareerSource Tampa Bay will develop a training plan by department (program and fiscal) to incorporate essential job functions to ensure staff understand compliance requirements.
- CareerSource Pinellas will work with DEO and the One-Stop Operator to review and finalize revised policies and processes before conducting the necessary trainings and distribution to staff.
- CareerSource Pinellas will develop a Policy, Reports and Quality Assurance Lead position dedicated to focusing on providing local guidance and training for staff on



TEGLs, DEO policies and policy changes. This position was approved by the Board of Directors on June 5, 2019 and will be effective July 2019.

- CareerSource Pinellas' One-Stop Operator will assist in reviewing desk guides and developing a plan to ensure the process for reviewing policies & procedures are updated (Attachment 1.14).
- CareerSource Pinellas is conducting on-going internal monitoring (Attachment 1.15).
- DEO is developing a comprehensive performance policy that will provide guidance to LWDBs on proper reporting of services and data validation, as well as information on how DEO and LWDBs will work together to ensure performance goals are met while maintaining ethical practices.

**1.3 The State should assess and determine the impact of falsified placements on performance data. The State must report results of this assessment and FLDEO must work with the ETA performance team to determine how to adjust reporting and statistical models appropriately.**

**CAP Response:** DEO requests technical assistance from the USDOL ETA regional team to examine the back-up documentation (criteria, listing of falsified placements, work papers, sampling list, etc.) used by USDOL ETA to develop the compliance review report. DEO requests that USDOL ETA provide the specific records and files used to identify all individuals in CareerSource Tampa Bay and CareerSource Pinellas workforce board areas reviewed by USDOL and used to asserted to be the subject of falsified placements as well as USDOL ETA's methodology for calculating the questioned costs. Once the review and assessment of falsified placements are completed and validated, DEO will work with the USDOL ETA performance team to adjust reporting and statistical models, as deemed appropriate.

**2 Finding 2: Lack of Documented Program and Service Eligibility for On-the Job Training (OJT) Participants**

**2.1 The local areas must abide by eligibility requirements of the OJT program and ensure that their policy, instructions, and processes comply with the criteria for program eligibility.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions relating to the OJT program eligibility requirements prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until DEO determines they are satisfactorily resolved.

CareerSource Tampa Bay has taken the following actions towards compliance:

- Participated in WIOA technical assistance conducted by DEO – **completed March 2019.**

CareerSource Pinellas has taken the following actions towards compliance:

- Participated in WIOA technical assistance conducted by DEO – **completed March 2019.**
- CareerSource Pinellas drafted and updated a desk guide for all programs that fund OJT/Paid Work Experience (PWE) programs, such as TANF, WIOA, and TAA and will submit the desk guide to DEO for review and approval (Attachment 2.1).

The following corrective actions are in progress:

- DEO will also enhance programmatic monitoring tools to ensure that all WIOA training services documentation is compliant with WIOA law.
- DEO will update the internal control questionnaire to require annual review of board policies, instructions and processes based on the WIOA criteria for OJT program eligibility.
- CareerSource Tampa Bay is conducting an organizational re-alignment with Business Services and Program Services. This re-alignment shifts OJT eligibility and placements from Business Services staff to Program Services staff. Business Services staff will focus on attracting and engaging businesses.
- Upon approval and implementation of the desk guides, CareerSource Pinellas will hold training to ensure staff understand the requirements and intent of OJT and how to communicate the program to employers.

DEO will ensure that CareerSource Tampa Bay and CareerSource Pinellas update their policies, instructions, and processes to comply with the criteria for OJT program eligibility.

## **2.2 The local areas should provide training for all staff, both case managers and Business Services staff. Both local areas must ensure the staff understand the requirements and intent of OJT, including how to communicate and explain the program to employers.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has taken the following actions toward compliance:

- Modified OJT, Employed Worker Training (EWT), and PWE agreement templates to reflect ETA and DEO best practices – **completed March 2019.**
- Added a year-end date to the OJT, EWT, and PWE agreements to establish a financial period end with an annual term limit – **completed March 2019.**
- The LWDB attorney reviewed and edited the OJT/PWE agreement and provided suggested modification to strengthen the existing language to the applicant and employer – **completed March 2019.**

- Modified processes in order to comply with job order and candidate referrals related to OJT and PWE. The LWDB no longer completes Employ Florida referrals (Attachment 2.2) – **completed prior to May 2019.**

CareerSource Pinellas has taken the following actions toward compliance:

- Modified OJT, EWT and PWE processes and drafted new desk guides. These will be submitted to DEO for review – **completed prior to May 2019.**

The following corrective actions are in progress for this finding:

- CareerSource Pinellas is currently conducting a full review of the local area’s desk guides for all programs that fund OJT/PWE. Upon approval and implementation of the desk guides, training will be held to ensure staff understand the requirements and intent of OJT and how to communicate the program to employers.
- CareerSource Tampa Bay will conduct a joint training session with the Business Services team and Program Services team to review local policies and procedures.

DEO will ensure that both CareerSource Tampa Bay and CareerSource Pinellas provide training for all staff, both case managers and Business Services staff, to ensure that staff understand the requirement and intent of OJT, including how to communicate and explain the program to employers. DEO programmatic monitoring will include interviews of LWDB staff to ensure an adequate understanding of the requirements and intent of OJT.

**2.3 The LWDA’s must reevaluate and revise, as necessary, their current local OJT policy on assessing participants and developing documentation that supports the need for OJT training. This should include the use of assessment results, Individual Employability Plans (IEPs), case notes, and follow-up services to support the need for training and to ensure the participants’ success in the program.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective actions toward compliance:

- Reviewed the USDOL toolkit on OJT policy and researched other national/statewide best practices to develop local policy – **completed December 2018.**
- Revised WIOA/OJT enrollment, follow-up and monitoring forms to ensure compliance – **completed March 2019.**
- Modified the OJT Staffing Structure:
  - Integrated Business Services OJT team with the WIOA Program team; and

- Implemented process for the use of OJT job orders with WIOA occupational skills training completers (90 days prior to completion) and job search – **completed prior to May 2019.**
- Implemented staff policies and procedures on OJT (Attachments 2.3, 2.4) – **completed March and May 2019.**

CareerSource Pinellas has completed the following corrective actions towards compliance:

- Reviewed the hire list process for determining OJT/PWE and immediately directed that staff no longer utilize hire list for reverse referrals, based on USDOL ETA and DEO guidance relating to OJT/PWE.

The following corrective actions are in progress:

- CareerSource Tampa Bay is conducting an organizational re-alignment with Business Services and Program Services, to include shifting OJT eligibility and placement from Business Services to Program Services and shifting Business Services' focus to attracting business and business engagement.
- CareerSource Pinellas is currently conducting a full review of desk guides. Upon approval and implementation of the desk guides, training will be held to ensure staff understand the requirements and intent of OJT and how to communicate the program to employers.
- CareerSource Pinellas will conduct a full review of OJT/PWE policy and will make additional changes as necessary.

DEO will ensure that both CareerSource Tampa Bay and CareerSource Pinellas will reevaluate and revise, as necessary, their current local OJT policy on assessing participants and developing documentation that supports the need for OJT training, the use of assessment results, IEPs, case notes, and follow-up services to support the need for training and to ensure the participants' success in the program. Further, DEO will update the financial monitoring tool to ensure that adequate documentation supports the need for participant program service, including but not limited, to OJT training. Monitoring procedures will test for the existence of assessment results, IEPs, case notes, and follow-up services.

**2.4 FLDEO must work with the local areas to ensure that all program participants have documented assessments, present a need for OJT services with a well-developed IEP to support enrollment in program activities.**

**CAP Response:** DEO has taken the following corrective actions to resolve the noted issue:

- Enhanced the OJT sections of the programmatic monitoring tool to ensure that beginning in the Program Year 2018-2019 monitoring cycle, OJT participant files examined meet all necessary federal and state requirements for eligibility and training – **completed August 2018.**

- Provided on-site technical assistance for CareerSource Tampa Bay and CareerSource Pinellas for the OJT program – **completed February 2019.**
- Conducted statewide training for all LWDBs on the OJT Program during the months of March and April 2019 – **completed April 2019.**
- Revised Administrative Policy 009 – On-the-Job Training by strengthening the policy to ensure all federal and state guidelines are clearly stated – **completed June 2019.**

The following corrective action is in progress:

- DEO will update the financial monitoring tool to ensure that adequate documentation supports the need for participant program service, including but not limited to OJT training. Monitoring procedures will test for the existence of assessment results, IEPs, case notes, and follow-up services.

**2.5 The local area staff must verify that all required actions are recorded, legible, accurate upon enrollment, and implemented in full compliance with program eligibility requirements.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective actions toward compliance:

- Eliminated the process of WIOA eligibility on all universal customers and transitioned to a process of determining eligibility for those who request WIOA-funded assistance – **completed March 2018.**
- Incorporated the OJT team into the business services model, requiring Account Executives and Recruiters to recruit for OJT job orders by targeting WIOA and WT program participants as potential OJT candidates, as well as utilizing Employ Florida and Monster resources to source candidates. The Management Information System (MIS) provides monthly updated lists – **completed prior to May 2019.**

CareerSource Pinellas has completed the following corrective actions towards compliance:

- Incorporated the OJT team into the Business Services model, requiring Account Executives and Recruiters to recruit for OJT job orders sourcing WIOA, and Welfare Transition program completers, Employ Florida and Monster resources. The Management Information System (MIS) provides monthly updated lists – **completed prior to May 2019.**

The following corrective actions are in progress:

- CareerSource Pinellas plans to hire a consultant or assign staff to review the OJT files to help determine compliance with program eligibility requirements and potentially address questioned costs.

DEO will ensure that both CareerSource Tampa Bay and CareerSource Pinellas area staff verify that all required actions for OJT participants are recorded, legible, accurate upon enrollment, and implemented in full compliance with program eligibility requirements.

**2.6 FLDEO must review and determine that participants enrolled in the OJT program from July 1, 2013, through June 30, 2018, were eligible and suitable for the OJT program by following WIOA requirements. Reimbursement payments made to employers for OJT program services during the period July 1, 2013, through June 30, 2018, in the amount of \$9,753,923.75 are questioned and subject to disallowance.**

**CAP Response:** In August of 2018, DEO enhanced the OJT sections of the programmatic monitoring review tool to expand the participant file review process for Program Year 2018-2019 and future year monitoring review cycles. This further ensures that OJT participant files being examined are meeting all necessary federal and state requirements. Additionally, the OJT policy was revised to further clarify management review oversight and practices in administering the OJT program statewide.

The following corrective actions are in progress:

- DEO fiscal and programmatic monitoring staff will jointly take the following steps:
  - Identify all OJT participants from CareerSource Tampa Bay and CareerSource Pinellas for Program Years 2013 through 2018 and their related payments.
  - Review and evaluate all OJT eligibility documentation provided by CareerSource Tampa Bay and CareerSource Pinellas to determine whether the participants were eligible.
  - Verify whether reimbursements made to employers were valid.
  - Prepare the final report identifying individuals deemed ineligible and recalculate questioned costs.
- CareerSource Tampa Bay will procure an independent external firm to assist in the review of question costs.

**3 Finding 3: Supportive Services Payments Potentially Issued to Ineligible Participants**

**3.1 Both CareerSource Tampa Bay and CareerSource Pinellas must develop supportive services policies and procedures that include appropriate assessment of participant need for supportive services and establish a supportive services system that provides for assistance in the actual amount of need.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective actions towards compliance:

- Revised the supportive service policies and procedures to ensure appropriate and sufficient internal controls are in place regarding eligibility, issuance, storage and reconciliation of supportive service throughout the local area in August 2018. The policy was subsequently revised and approved by the Board of Directors (Attachment 3. 1) – **completed March 2019.**
- Developed staff procedure desk guide to support the supportive service policy (Attachment 3. 2) – **completed March 2019.**
- Updated their desk guides to reflect updated policies and changes. CareerSource Tampa Bay changed the Statement of Needs policy for WIOA and WT/SNAP E&T programs to include exclusion of benchmarks and reduced dollar amount of support service per need, based on transportation research – **completed March 2019.**

CareerSource Pinellas has completed the following corrective actions toward compliance:

- Supportive services changes were implemented by the Interim Executive Director which immediately discontinued several, if not all, mentioned previous practices. These changes were communicated to all CareerSource Pinellas staff via email as well as directions were further clarified for all Programs staff (Attachment 1.3) – **completed July 2018.**
- Launched an updated participant Statement of Need form to ensure services offered were in line with all immediate changes (Attachment 3.3) – **completed July 2018.**
- Updated the Support Service standard operating procedures (Attachments 3. 4 and 3.5). Implementation of policy changes ensured:
  - Appropriate and compressive assessment of participant needs were completed prior to issuance of services;
  - Removed all programmatic benchmarks and incentives;
  - Reemphasized and established, where needed, annual service caps; and
  - Realigned determination of eligibility to be in full compliance with WIOA regulations – **completed July 2018.**
- Implemented a process to review the supportive services cap to ensure a participant is not allowed to exceed the set cap for every supportive service issuance. Review of the dollar cap is completed by two staff members within the customer tracking systems (One-Stop Service Tracking and Employ Florida) (Attachment 3. 6) – **completed July 2018.**

The following corrective actions are in progress:

- CareerSource Tampa Bay is seeking guidance from CareerSource Florida regarding specific language contained in their draft supportive service policy.
- DEO will update the financial monitoring tool to ensure a sampling of issuance of prepaid gas/VISA gift cards are supported by documentation indicating the participant's eligibility and need for the supportive services. DEO is also updating the Grantee-Subgrantee Agreement with all LWDBs to include the following language:

*"The Board hereby certifies to DEO that written administrative procedures, processes, and fiscal controls are in place for the payment of supportive services including, but not limited to prepaid gas and/or VISA cards. Controls must address issuance, storage, and reconciliation of prepaid gas/VISA cards. The Board must maintain documentation supporting the eligibility of the receipt of supportive services and that the value of the supportive service is consistent with the documented need(s) of the participant(s)."*

DEO will ensure that both CareerSource Tampa Bay and CareerSource Pinellas develop supportive services policies and procedures that include appropriate assessment of participant need for supportive services and establish a supportive services system that provides assistance in the actual amount of need. Additionally, DEO will ensure that LWDB policies follow federal law and state policy/guidance.

**3.2 Both local areas must also document that they expended funds based on actual participant need. The gas/VISA cards issued in both local areas for supportive services from July 1, 2013, through June 30, 2017 in the amount of \$5,449,113 are questioned and subject to disallowance.**

**CAP Response:** The PY 2018-19 financial monitoring tool was updated to include walkthroughs of controls surrounding the prepaid gas/VISA cards at each workforce board to verify proper internal controls surrounding issuance, storage, and reconciliation of these cards.

The following corrective actions are in progress:

- The DEO fiscal monitoring tool will be updated to include the following:
  - Ensure that the existence of adequate documentation supports the eligibility for the receipt of supportive services including, but not limited to gas/VISA cards.
  - Evaluate whether the value of the supportive service provided is consistent with the documented need of the participant.
  - Select a sample of participants to contact to ensure they received services from the local board's career center.



- DEO fiscal and programmatic monitoring staff will jointly take the following steps:
  - Identify all gas/VISA cards issued for supportive services by CareerSource Tampa Bay and CareerSource Pinellas for program years 2013 through 2018.
  - Review and evaluate eligibility documentation for each participant.
  - Determine whether value of the gas/VISA cards provided was supported by the participant's documented need.
  - Identify individuals deemed ineligible.
  - For eligible participants, compare documented need to the value of the gas/VISA cards provided.
  - Recalculate questioned costs.
- CareerSource Tampa Bay will procure an independent external firm to assist in the review of questioned costs.
- CareerSource Pinellas plans to hire a consultant or assign staff to review the gas VISA cards issued for supportive services to determine compliance with program eligibility requirements.

#### **4 Finding 4: Improper Business Services Staff Incentive Compensation**

##### **4.1 The structure of the incentive plans in place emphasized performance results in ways that contributed to unethical behavior and the fabrication of records that the two local areas should not have reported as positive outcomes. The LWDBs must put the incentive plans on hold until the issues identified in this report are resolved.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed corrective actions prior to the issuance of the compliance review report:

- CareerSource Tampa Bay has discontinued all monetary incentives based on performance – **completed August 2018.**
- CareerSource Pinellas has eliminated the Business Services incentive program – **completed August 2018.**

The following corrective action is in progress:

- DEO will include the review of bonuses, pay raises, and benefits in the fiscal monitoring tool to ensure that the costs are reasonable, necessary for the performance of the award, and are a prudent use of federal funds. The monitoring tool will also ensure compliance with local policy.
- CareerSource Tampa Bay is in the process of engaging with a Human Resource Consultant to review the current compensation and benefits for LWDB staff are reasonable for the performance of the award.

**4.2 Additionally, the LWDBs should review and revise these benefits to ensure that costs are reasonable, necessary for the performance of the award, and are a prudent use of federal funds.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective actions toward compliance:

- Modified the business services compensation structure. The incentive structure was removed and the compensation of business services staff were adjusted. Ninety-five percent of the 2017 incentive earned by Business Services and Account Executive and Recruiters was used as a benchmark for the compensation adjustment – **completed August 2018.**

CareerSource Pinellas has completed the following corrective actions toward compliance:

- Eliminated the Business Services incentive program in August 2018. On September 18, 2018, the Board of Directors voted to increase the base salaries for Business Services Account Executives to the current established range (Attachment 4.1) – **completed September 2018.**

**4.3 While making sure to follow union agreements and local employment laws, the State should work with both local areas to reprimand or terminate employees who falsified records.**

**CAP Response:** DEO will require CareerSource Tampa Bay and CareerSource Pinellas to work with DEO staff to identify all employees who falsified records. Upon the identification of all employees who falsified records, DEO will ensure the appropriate disciplinary action is taken.

**4.4 For the period of July 1, 2013 to June 30, 2017, ETA questions the Business Services staff incentives totaling \$2,031,886.12, subject to disallowance.**

**CAP Response:** The following corrective actions are in progress:

- DEO fiscal and programmatic monitoring staff will jointly take the following steps:
  - Identify all Business Services staff who received bonuses from CareerSource Tampa Bay and CareerSource Pinellas from July 1, 2013 to June 30, 2017.
  - Identify all Business Services staff who falsified records.

- Analyze bonuses for staff who did not falsify records to determine whether they were reasonable, necessary for the performance of the award, and were a prudent use of federal funds.
- Recalculate questioned costs.
- CareerSource Tampa Bay will procure an independent external firm to assist in review of questioned costs.
- CareerSource Pinellas plans to address the findings of questioned costs by hiring a consultant or assigning staff to review the Business Services Staff incentives in order to determine compliance.

## 5 Finding 5: Improper Executive Director and Management Compensation Salary Increases

### 5.1 The CareerSource Tampa Bay and CareerSource Pinellas LWDBs should have ensured that they paid salary increases and cost of living adjustments in accordance with each entity's personnel policy and procedures.

The LWDBs must review their personnel policies and ensure that the administrative entity is abiding by these personnel policies and procedures regarding personal compensation paid to staff.

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective actions toward compliance:

- Established itself as the employer of record – **completed September 2018.**
- Had employee handbook reviewed by legal counsel and third-party HR consultant and adopted by CareerSource Tampa Bay – **completed August 2018.**

CareerSource Pinellas has completed the following corrective actions toward compliance:

- Provided the new salary cap for Florida chief elected officials to the board of directors for reference in establishing the salary range for the CEO position – **completed prior to May 2019.**

The following corrective actions are in progress:

- DEO will update the financial monitoring tool to include:
  - A review of personnel policies and procedures to ensure compensation paid to staff are reasonable, necessary for the performance of the award, and are a prudent use of federal funds.

- A review to determine whether the board is in compliance with the policies and procedures.
- DEO is updating the Grantee-Subgrantee Agreement to include the following language:

*“No changes to compensation for executive staff of the board are allowed without documented board approval and must be in alignment with local policies and procedures.”*

- The CareerSource Pinellas Board approved the Compensation Review that will be completed in June 2019. CareerSource Pinellas is moving toward clear job titles that reflect the functions of the position and compensation. In conjunction with the benefit and stipend outlined in Finding 4.2, CareerSource Pinellas will present a clear and current picture of total compensation.
- CareerSource Pinellas is working with the Compensation Committee to conduct a full compensation/benefits review in the spring of 2019, including a review of the benefits stipend, compensation, benefits and salary ranges. The Compensation Committee is chaired by a Board member appointed by the Board Chair and responsible for:
  - Reviewing and evaluating employee performance review process.
  - Reviewing, evaluating and making recommendations to the Board of Directors relating to the approval of employee pay and compensation plans.
  - Reviewing and evaluating employee benefits programs and making recommendations to the Board of Directors relating to the approval of these programs.
  - Evaluating and approving training policies to ensure that employees meet the necessary requirements under the Workforce Innovation and Opportunity Act.
  - Providing assistance with planning, operational and other issues relating to the provision of fair labor practices in the workplace.

**5.2 The CEO’s salary increased seven (7) times between September 2006 and December 2017 without formal approval by the CareerSource Pinellas or CareerSource Tampa Bay. Costs totaling \$408,487, equivalent to the increase in salary not formally approved by the LWDBs, are therefore questioned and subject to disallowance.**

**CAP Response:** The following corrective actions are in progress:

- DEO fiscal and programmatic monitoring staff will jointly take the following steps:
  - Review CEO’s personnel file;

- Review board meeting minutes, including compensation committee, executive committee, and full board meeting minutes;
  - Review other documentations and paperwork such as emails from the board chair that approve the raises in question;
  - Recalculate questioned costs.
- DEO will include the review of bonuses, pay raises, and benefits in the fiscal monitoring tool to ensure that the costs are reasonable, necessary for the performance of the award, and are prudent use of federal funds. The monitoring tool will also ensure compliance with local policy and that all bonuses, pay raises, and benefits paid to executive staff are approved by the Board.
  - DEO is updating the Grantee-Subgrantee Agreement to include the following language:

*“No changes to compensation for executive staff of the board are allowed without documented board approval and must be in alignment with local policies and procedures.”*

- CareerSource Pinellas plans to address the findings of questioned costs by hiring a consultant or assigning staff to review the CEO's salary increases in order to determine compliance.

**5.3 In addition, bonuses paid to four (4) individuals, totaling \$59,430, are questioned and subject to disallowance, since they exceeded reasonable salary increases approved by the LWDBs. These four individuals also received substantial salary increases in addition to the annual bonuses.**

**CAP Response:** The following corrective actions are in progress:

- DEO fiscal and programmatic monitoring staff will jointly take the following steps:
  - Review each individual's personnel file for supporting documentation for pay raises and bonuses.
  - Identify if any of these staff were involved with falsifying records.
  - If the individuals were not involved in falsifying records, determine what a reasonable bonus/pay raise would have been.
  - Recalculate questioned costs.
- CareerSource Pinellas plans to address the findings of questioned costs by hiring a consultant or assigning staff to review the bonuses paid to four staff in order to determine compliance.

## 6 Finding 6: Lack of Staff Grievance Procedures and Equal Opportunity Representation

### 6.1 The two local areas must ensure grievance procedures and EO representation is available and made known to staff, participants, and other interested parties in the local workforce development system.

**CAP Response:** Grievance procedures are made available to all staff as part of their onboarding process and is included in both CareerSource Tampa Bay's and CareerSource Pinellas' policy manuals. Additionally, these procedures are available in both hardcopy and via both LWDB's intranets. Each LWDB has their own Equal Opportunity (EO) Officer whose other duties do not present a conflict of interest. Their names and contact information are prominently posted in all Career Centers and are made available to all employees. Both LWDBs have received training from DEO's Office for Civil Rights (OCR) in equal opportunity matters to ensure that they are knowledgeable and able to assist employees and customers as needed. The OCR conducted onsite monitoring for both LWDBs on April 6, 2019. This monitoring was done in accordance with 29 CFR Part 38 which is the implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act.

CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective actions toward compliance:

- Role of EO Officer was moved from Director for Audits, Contracts and Procurements to Director of Public Relations/ Marketing – **completed March 2019.**
- CareerSource Tampa Bay Board appointed a Board member to receive notification of each ethics complaint filed through the EthicsPoint hotline – **completed March 2019.**
- Updated the grievance and complaint procedure form with the new EO Officer's information – **completed March 2019.**

CareerSource Pinellas has completed the following corrective actions toward compliance:

- Appointed a senior-level employee who does not administer any programs and services as the EO Officer – **completed prior to May 2019.**
- Announced the EO Officer and contact information was promulgated via multiple communications channel to include email notices to staff and partners. The "Equal Opportunity is the Law" posters containing the EO Officer's contact information are conspicuously posted at all career centers and offices, and on CareerSource Pinellas website for external customers and partners (Attachments 6.1, 6.2, 6.3) – **completed prior to May 2019.**

The following corrective actions are in progress:

- DEO is updating the Grantee-Subgrantee Agreement with the boards to include the following language:

*“The Board must ensure grievance procedures and Equal Opportunity representation, consistent with 20 CFR 683.285, is available and made known to staff, participants, and other interested parties in the local workforce development system. The board must also adopt a whistle blower policy that facilitates the reporting of violations of policy or law without fear of retaliation.”*

DEO will work with CareerSource Tampa Bay and CareerSource Pinellas to ensure that both local areas have updated grievance procedures in place.

**6.2 The State and local areas should revisit their responsibilities under 2 CFR § 200.300, statutory and national policy requirements, including Whistleblower protections for reporting fraudulent activity.**

**CAP Response:** DEO outlines general compliance requirements with federal programs in the Grantee-Subgrantee Agreement with each LWDB. Additionally, DEO published several programmatic policies which outline policy requirements on the DEO website, [www.floridajobs.org](http://www.floridajobs.org). Each LWDB is monitored annually to ensure compliance with regulatory and financial rules. Whistleblower protections are monitored by the financial monitoring team using their current [2018-19 Financial Monitoring Tool](#) (Attachment 6.4).

DEO’s Office of Civil Rights has directed the EO Officer in each local area to conduct Equal Opportunity training for their employees which will include information on Whistleblower protections.

CareerSource Tampa Bay has completed the following corrective actions toward compliance:

- Launched an anonymous reporting hotline operated by a neutral third-party company, EthicsPoint, to ensure thorough and fair review of complaints and concerns – **completed June 2018.**
- Communicated the anonymous reporting hotline, EthicsPoint, to staff via email. An EO page was added to the intranet. In addition, an EthicsPoint brochure (Attachment 6.5) is provided as part of the onboarding of new hires – **completed June 2018.**
- Made a link to EthicsPoint accessible via the organization’s intranet. (Attachment 6.6) – **completed June 2018.**

CareerSource Pinellas has completed the following corrective actions toward compliance:

- Provided staff associates with easy access to EO-related policies, procedures, and forms to include Whistleblower and grievance on the intranet and the ADP portal at all times – **completed May 2019.**

The following corrective actions are in progress:

- CareerSource Pinellas will work with DEO and the Office of Civil Rights to ensure compliance with federal and state requirements including Whistleblower protections for reporting fraudulent activity.

### **6.3 They should ensure all staff and boards are aware and familiar with the requirements and ensure a transparent process is in place for reporting such activity.**

**CAP Response:** DEO’s Office of Civil Rights has directed the Equal Opportunity Officer in each local area to conduct equal opportunity training for their employees which will include information on Whistleblower protections.

CareerSource Tampa Bay has completed the following corrective actions toward compliance:

- Assigned a new CareerSource Tampa Bay Board member to receive notification of each ethics complaint filed through the EthicsPoint hotline – **completed March 2019.**

CareerSource Pinellas has completed the following corrective actions toward compliance:

- To ensure a transparent process, the Board of Directors and staff were made aware of the requirement of reporting such activities during Board and staff meetings – **completed prior to May 2019.**
- Communication to CareerSource Pinellas staff was provided in weekly newsletters, team meetings and staff town hall meetings – **prior to May 2019.**

The following corrective actions are in progress:

- DEO is updating the Grantee-Subgrantee Agreement with the LWDBs to include the following language:

*“The Board must ensure grievance procedures and Equal Opportunity representation, consistent with 20 CFR 683.285, is available and made known to staff, participants, and other interested parties in the local workforce development system. The board must also adopt a whistle blower policy that facilitates the reporting of violations of policy or law without fear of retaliation.”*

- CareerSource Tampa Bay will provide to the Hillsborough County liaison formal grievances, as needed, per Interlocal Agreement – **effective July 1, 2019.**



DEO will require CareerSource Tampa Bay and CareerSource Pinellas to have a policy and/or process in place to ensure all staff and Board Members are aware and familiar with the requirements and ensure a transparent process is in place for reporting such activity.

## **7 Finding 7: Lack of Firewalls and Internal Control at CareerSource Tampa Bay and CareerSource Pinellas**

**The State, in collaboration with Chief Local Elected Officials (CLEOs) in CareerSource Tampa Bay and CareerSource Pinellas, must provide a corrective action plan that ensures: 1) appropriate internal controls are put in place if multiple functions are allowed to be performed by a single entity; and 2) separate entities are designated, or procured, to perform the three functions (fiscal agent, staff to the board, and direct service provider). This corrective action plan must conform to the requirements of 20 CFR § 679.410-430.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective actions toward compliance:

- The once combined local area operations are now separate – **effective September 1, 2018.**
- Established a new organizational structure that includes a Chief Executive Officer (CEO), Chief Operating Officer and Chief Financial Officer (CFO). The new CEO started January 21, 2019 (Attachment 7.1).
- CareerSource Pinellas and CareerSource Tampa Bay transitioned from a shared services model to a non-shared services model – **effective September 1, 2018.**
- Reviewed and completed the internal control questionnaire (Attachment 7.2) – **completed January 2019.**

CareerSource Pinellas has completed the following corrective actions toward compliance:

- Selected a new CEO at the October 2018 Board meeting.
- The Board of County Commissioners (BOCC) engaged a consultant to conduct a review of the current organizational structure and governance model for CareerSource Pinellas and make recommendations for improvement (Attachment 7.3). The BOCC requested the CareerSource Pinellas Board form an Ad Hoc Committee to review the Interlocal Agreement (Attachment 7.4) – **completed prior to May 2019.**
- Established a new organizational structure that was approved by the Board of Directors on June 5, 2019 (Attachment 7.5) – **completed June 2019.**
- Reviewed and completed the Internal Control Questionnaire and Assessment (ICQ). DEO and the Bureau of Financial Monitoring and Accountability used the ICQ as a self-assessment tool for evaluating internal controls (Attachment 7.6) – **completed prior to May 2019.**

- Reviewed CareerSource Florida policy and the Local Workforce Development Plan 2018-2020 outlining how CareerSource Pinellas carries out multiple responsibilities. This includes how CareerSource Pinellas develops appropriate firewalls to guard against conflicts of interest – **completed prior to May 2019.**
- The CareerSource Pinellas Executive Committee approved Kaiser Group Inc. to be contracted as the new One-Stop Operator (Attachment 7.7) – **completed September 2018.**
- The CareerSource Pinellas Board of Directors approved a new Interlocal Agreement between the LWDB and the Pinellas County CLEO (Attachment 7.8). This agreement established CareerSource Pinellas as fiscal agent, administrative entity and direct service provider. However, the Pinellas County BOCC can withdraw its approval of the LWDB performing those functions at any time. The new Interlocal Agreement also specified that performance and/or compliance audits are to be conducted by an independent firm selected by the full Board of Directors, or by the County's Division of Inspector General. Additionally, as the designated fiscal agent, the LWDB must submit for approval to the county an annual budget for the allocation and expenditure of all funds. CareerSource Pinellas must also report budget modifications to the county on a quarterly basis – **completed February 2019.**

The following corrective actions are in progress:

- DEO will review and evaluate current policies and guidance. DEO will revise applicable policies to ensure that, in conformance with requirements in 20 CFR 679.410-430, appropriate internal controls are in place for multiple functions performed by a single entity. Policy updates and guidance will:
  - Define internal controls and require components of internal control structures;
  - Strengthen conflict of interest standards; and
  - Strengthen firewall standards.
- DEO will update the financial monitoring tool to review the WIOA local plan for the following:
  - Separate entities are designated, or procured, to perform the three functions (fiscal agent, staff to the board, and direct service provider).
  - If the board performs more than one of these functions, DEO will verify that the local plan includes proper internal controls and these controls have been implemented.
- CareerSource Tampa Bay will engage an experienced workforce development consultant to work with Hillsborough CLEO, Board and CareerSource Tampa Bay to review current service delivery methods and structure to identify and help implement industry recognized firewalls and internal controls.
- The CareerSource Tampa Bay CLEO will retain services of an experienced workforce development consultant to provide a workshop to the Hillsborough CLEO and Board

on their requirements, roles and responsibilities, and appropriate systems of firewalls and internal controls.

- The CareerSource Tampa Bay CLEO is reviewing the Interlocal Agreement to ensure the inclusion of requirements to identify and monitor compliance of proper firewalls and internal controls for performance of multiple functions by a single entity.

## **8 Finding 8: Board Recruitment, Vetting, Nomination, and Appointment Inconsistent with WIOA Provisions**

**The chief elected officials in both local areas, in consultation with the State, must develop and implement clear processes and procedures for recruiting board members and documenting their qualifications in alignment with the requirements of WIOA, the regulations, and State policy. These processes and procedures should ensure that the board staff does not influence the selection of board members.**

**CAP Response:** DEO requests technical assistance from the USDOL ETA regional team regarding the proposed state-corrective actions proposed for this finding. Additionally, CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective actions toward compliance:

- Reconstituted the Board using a formal nomination and appointment process that ensured procedures used and documentation of candidate qualifications aligned with requirements of WIOA, the regulations, and state policy. Appointed business representatives were nominated by local business organizations. Board staff were not involved in this process – **completed July 2018.**
- Board member appointments are made at the discretion of the Hillsborough BOCC. Eligible candidates are appointed based on the level of expertise, skillset and representation that may be needed in a particular industry to fulfill the requirements of the Board composition/structure – **completed July 2018.**
- All Board members are required to complete a questionnaire and standards of conduct form provided by Hillsborough County – **completed July 2018.**

CareerSource Pinellas has completed the following corrective actions toward compliance:

- Since July 2018, the LWDB replaced approximately 60 percent of its board members. The Pinellas County BOCC or CLEO reviewed and approved these members. CareerSource Pinellas held a Board Orientation for new and current Board Members – **completed July 2018.**
- In an effort to enhance public accountability and transparency, the BOCC specifically asked that the new By-laws include appointment of a CareerSource Pinellas Board

member position from the current Pinellas County School Board – **completed June 2019.**

- Board recruitment and membership application is now handled through the Pinellas County online portal and by Pinellas County staff. Through various press releases, available online, the county informs the public of vacancies on the CareerSource Pinellas Board of Directors and informs applicants on steps needed to apply (Attachments 8.1, 8.2). Representatives of business must be recommended by a Chamber of Commerce or another business organization. The Pinellas County BOCC appoints all Board members and is also in charge of any reappointments or removals. Pinellas County staff are charged to notify board members of term expiration, and provide re-application channels (Attachment 8.3)

The following corrective actions are in progress:

- DEO will convene the state’s CLEOs as the starting point to address the issues identified in this finding. During the convening, DEO intends to accomplish the following:
  - Provide an overview of the purpose and functions of the workforce development boards;
  - Provide detailed information about establishing a WIOA compliant board, including
    - The roles and responsibilities of the:
      - CLEO
      - Board Chair
      - Executive Director
      - Board Staff
    - Recruiting board members and membership compliance;
    - The nomination process; and
    - Establishing the local area’s By-laws.
- DEO anticipates that the convening will be held before December 31, 2019; the official date is to be determined. CLEOs, Board Members, and Board staff will be required to attend an annual training.
- DEO will review and evaluate current policies and guidance and revise applicable policies and/or develop local governance, oversight and administrative policies.
- CareerSource Pinellas’ CLEO is in the process of appointing new Board Members for the upcoming program year 2019-2020.
- The new CareerSource Pinellas By-laws were approved by the Board of Directors on June 5, 2019 and will be presented to the CLEO on July 23, 2019.

DEO will ensure that CareerSource Tampa Bay and CareerSource Pinellas develop and implement clear processes and procedures for recruiting, nominating, and appointing Board Members as well as documenting their qualifications in alignment with the requirements of

WIOA and state policy. These processes and procedures must guard against Board staff influencing the selection of Board members.

## 9 Finding 9: Chief Elected Officials Improperly Delegated Key Roles and Responsibilities

**The State must work with both local areas to ensure that chief elected officials, not the boards or staff in CareerSource Tampa Bay and CareerSource Pinellas, are properly functioning as the authoritative governing bodies responsible for establishing the local areas' By-laws. The boards and the staff may assist and provide support in the process; however, the chief elected officials should perform this function to constitute an effective LWDB.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective actions toward compliance:

- The CLEO is in the process of revising the local area's Board By-laws to ensure proper checks and balances, voting membership guidelines, clearly define roles and responsibilities, and appropriate internal controls. Board staff are not involved in this process. Upon completion, the revised By-laws will be presented to the Hillsborough County CLEO for approval and adoption.
- The CLEO will retain services of an experienced workforce development consultant to provide a workshop to the Hillsborough CLEO on their requirements, roles and responsibilities to ensure they are functioning as the authoritative governing body for the local area.

CareerSource Pinellas has completed the following corrective actions toward compliance:

- The CareerSource Pinellas draft By-laws have been modified to explicitly list the roles/responsibilities of Board Members and sub-committees of the Board. All current Board members have been made aware of those roles/responsibilities and a copy of the By-laws was given to all Board Members (Attachment 9.1) – **completed February 2019.**
- At Pinellas County's request, an Ad Hoc Committee was formed to review the Interlocal Agreement and By-laws for LWDB 14. This Committee was made up of Board Members, including the assigned County Commissioner serving on the LWDB Board of Directors. This Ad Hoc Committee accepted the modifications directed by the CLEO, and those changes were approved by the Board (Attachment 7.8) – **completed February 2019.**

The following corrective actions are in progress:

- DEO will convene the state’s CLEOs as the starting point to address the issues identified in this finding. During the convening, DEO intends to accomplish the following:
  - Provide an overview of the purpose and functions of the workforce development boards;
  - Provide detailed information about establishing a WIOA compliant board, including
    - The roles and responsibilities of the:
      - CLEO
      - Board Chair
      - Executive Director
      - Board Staff
    - Recruiting board members and membership compliance;
    - The nomination process; and
    - Establishing the local area’s By-laws.
- DEO anticipates that the convening will be held before December 31, 2019; the official date is to be determined. CLEOs, Board Members, and Board staff will be required to attend an annual training.
- The new CareerSource Pinellas By-laws were approved by the Board of Directors on June 5, 2019 and will be presented to the CLEO on July 23, 2019.

DEO will ensure that the CLEOs and Board Members are educated about their roles and responsibilities. DEO will revise applicable policies and/or develop local governance, oversight and administrative policies and monitor for compliance.

## **10 Finding 10: Non-Compliant with WIOA Transparency and Sunshine Provisions**

### **10.1 CareerSource Tampa Bay and CareerSource Pinellas must post, and make available electronically to the public, all minutes of formal meetings.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay completed the following corrective actions toward compliance:

- Updated their website, which now addresses transparency and WIOA Sunshine provisions, and includes Board and committee meeting agendas and minutes – **completed July 2017.**
- Legal counsel provided an overview of Sunshine Laws to Board Members – **completed August 2018.**

CareerSource Pinellas has completed the following corrective actions towards compliance:

- The Board of Directors adopted CareerSource Florida’s Ethics and Transparency policy (Attachment 10.1) – **completed October 2018.**
- Updated their website, which now addresses transparency and WIOA sunshine provisions. The website now includes all updated Board and committee meeting minutes and agendas (Attachments 10.2, 10.3, and 10.4) – **completed February 2018.**
- Publicly notices meetings in advance to allow for the provisions of Sunshine Law.

The following corrective actions are in progress:

- CareerSource Tampa Bay will develop an ethics and transparency policy to be considered for approval at the July 2019 board of directors meeting.

## **10.2 The State must also ensure that all local areas are compliant with these provisions**

**CAP Response:** DEO completed several corrective actions prior to the issuance of the compliance review report. The following steps were taken to ensure local areas are compliant with these provisions.

- DEO issued a reminder memorandum to the LWDBs entitled, [Requirement to Post LWDB Meeting Minutes to Website](#) (Attachment 10.5) – **completed May 2018.**
- DEO evaluates LWDB compliance regarding posting formal meeting minutes during each local area’s yearly programmatic monitoring review.

The following corrective actions are in progress:

- DEO will update the financial monitoring tool to include a review of compliance with WIOA Transparency and Sunshine Provisions.
- DEO is updating the Grantee-Subgrantee Agreement to include a section on transparency. The agreement will require LWDBs to post meeting minutes on their websites.

## **11 Finding 11: CareerSource Tampa Bay and CareerSource Pinellas Lack Evidence of LWDBs Fulfilling Required Functions**

**The State must verify and ensure that the LWDBs are fulfilling their responsibilities under WIOA sec. 107(d) and Title 20 CFR § 679.370.**

**CAP Response:** As required in 107(d), all LWDBs must develop and submit a four-year local plan, in partnership with the CLEO, and consistent with WIOA section 108. Each local area’s plan must include local strategies and assurances of actions LWDBs will take to ensure requirements in 107(d) are met, including, but not limited to:

- Convening local workforce development system stakeholders;
- Leading efforts to engage with a diverse range of employers;

- Developing strategies for using technology to maximize the accessibility and effectiveness of the local workforce development system for employers, and workers and jobseekers;
- Assessing the physical and programmatic accessibility of all one-stop centers in the local area; and
- Certification of one-stop centers.

Upon submission of each LWDBs' plan or modification, DEO reviews the plans in accordance with the requirements outlined in WIOA section 107(d) and Title 20 CFR § 679.370 as well as with requirements outlined in [Administrative Policy 93 – One-Stop Career Center Certification Requirements](#) (Attachment 11.1) – **issued February 2, 2017.**

CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective actions toward compliance:

- Conducted Board orientation to include an overview of several programs and administrative areas: Wagner-Peyser; WIOA; WT; SNAP E&T; Finance; Program Monitoring; DEO monitoring; Sunshine Law; and committee formation and attendance. Additionally, training regarding the roles and responsibilities for the LWDB and board staff, CLEO, DEO, CareerSource Florida, and Hillsborough County was completed. Board Orientation also included an in-person special presentation by Ron Painter, President of the National Association of Workforce Boards, who provided additional dialogue on LWDB member roles and responsibilities and shared several workforce development best practices. (Attachment 11.2) – **completed August 2018.**
- Updated the Board Orientation Toolkit for onboarding new members – **completed August 2018.**

CareerSource Pinellas has completed the following corrective actions toward compliance:

- Completed a Board Orientation for all Board Members (Attachment 11.3) This orientation provided an overview of workforce throughout the state of Florida, the role of the DEO and the CareerSource Florida network. Additionally, this orientation provided a comprehensive summary of the LWDB finances, an overview of Board governance, the various sub-committees and the role of the CLEO – **completed July 2018.**
- Updated the Board Orientation Toolkit for onboarding new members – **completed prior to May 2019.**



- Board Counsel provided an overview of the Sunshine Law. Shila Salem, Bureau Chief of One-Stop and Program Support, gave an overview of Board Members' responsibilities and authority – **completed July 2018.**

The following corrective actions are in progress:

- CareerSource Pinellas is working with DEO to verify and ensure that the LWDBs are fulfilling their responsibilities under WIOA sec. 107(d) and Title 20 CFR § 679.370.
- CareerSource Tampa Bay and the CLEO will be retaining services of an experienced workforce development consultant to provide a workshop to Board members to ensure they are aware of and fulfilling their responsibilities under WIOA sec. 107(d) and Title 20 CFR § 679.370. This training will be conducted annually with periodic updates as needed, and imbedded in the local area's training for new Board members going forward.

## **12 Finding 12: One-Stop Competitive Procurement Not Compliant**

### **12.1 The LWDBs must conduct a competitive procurement as required by WIOA Section 121, 20 CFR§ 678.605, and 2 CFR § 200.319.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective actions towards compliance:

- Reissued the One-Stop Operator RFP:
  - Increased the value of the contract to meet the deliverables and intent of the One-Stop Operator; and
  - Expanded the scope of contracted services deliverables including establishing a Memorandum of Understanding database - **completed June 2019.**
- Secured Kaiser Group d/b/a Dynamic Workforce Solutions as the One-Stop Operator (Attachment 12.1).

CareerSource Pinellas has completed the following corrective actions towards compliance:

- Reissued the One-Stop Operator RFP:
  - Reissued RFP 18-0428 for One-Stop Operator services – **completed June 2018.**
  - Board approved recommendation to contract with Kaiser Group, Inc. d/b/a Dynamic Workforce Solutions as the One-Stop Operator – **completed July 2018.**

- Secured Kaiser Group, Inc. d/b/a Dynamic Workforce Solutions as the One-Stop Operator. Deliverables to include customer service training and bi-annual programmatic monitoring using DEO's monitoring tool (Attachment 12.2) – **completed November 2018.**

The following corrective actions are in progress:

- DEO will update the financial monitoring tool to include a review of the procurements of all One-Stop Operators. This will ensure that random sampling does not exclude One-Stop Operator Procurements. Compliance with the Uniform Guidance procurement requirements is currently included in the Financial Monitoring Tool.

## **12.2 The State must ensure that the LWDBs comply with the competitive procurement requirements in selecting the One-Stop Operator.**

**CAP Response:** DEO completed several corrective actions prior to the issuance of the compliance review report. The following information was issued to the local areas regarding One-Stop Operator procurements:

- [Memorandum: Workforce Innovation and Opportunity Act \(WIOA\) and One-Stop Operator Provisions](#) – **issued June 9, 2015.**
- [Memorandum: Workforce Innovation and Opportunity Act One-Stop Career Center Operators Procurement Questions and Answers](#) – **issued August 31, 2016.**
- [Administrative Policy 97 – One-Stop Operator Procurement](#) (Attachment 12.3) – **issued September 25, 2017.**

The following corrective actions are in progress:

- DEO will work with CareerSource Tampa Bay, CareerSource Pinellas and CareerSource Pasco Hernando to ensure that One-Stop Operator competitive procurements comply with WIOA Section 121, 20 CFR§ 678.605, and 2 CFR § 200.319.
- DEO is including language in the updated Grantee-Subgrantee Agreement that reinforces the requirement to comply with 2 CFR 200.318-326. Compliance with the Uniform Guidance procurement requirements is currently included in the Financial Monitoring Tool.

## **13 Finding 13: Conflict of Interest Policies Not Compliant**

### **13.1 The State must review and ensure that both local areas bring their conflict of interest policies into compliance with WIOA regulations and the Uniform Guidance requirements.**

**CAP Response:** CareerSource Pinellas completed corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Pinellas has completed the following corrective actions towards compliance:

- Reviewed CareerSource Florida Policy and the Local Workforce Development Plan 2018-2020 outlining how CareerSource Pinellas carries out multiple responsibilities. This includes how CareerSource Pinellas develops appropriate firewalls to guard against conflicts of interest – **completed July 2017.**
- CareerSource Florida amended its Board Contracting Conflict of Interest Policy and applicable forms in May 2017. CareerSource Pinellas has been using the updated forms since July 2017, for the submission of its Board Members related party contracts (Attachments 13.1, 13.2, 13.3, 13.4) – **completed July 2017.**

The following corrective actions are in progress:

- DEO is currently revising the policy related to contracts made between the LWDB and Board Members or an entity for which that Board Member represents. The new policy requires the Board to send DEO a contract information form, conflict of interest statement signed by Board Member for which the conflict of interest exists, voting record, a draft of the entire agreement, documentation supporting the method of procurement (if applicable), and Board meeting minutes. The revised policy will also include a requirement that the Board Member for which the conflict exists, must abstain from voting and be required to leave the room during discussion and vote on the contract. This policy will be included within the updated Grantee-Subgrantee Agreement.
- CareerSource Tampa Bay's conflict of interest policy will be updated to include: "Board Members with a conflict of interest will be prohibited from participating in the decision-making process. This will require the Board Member to be excused from the board/committee meeting during any discussions involving their organization or funding prior to any voting".

### **13.2 The State should take additional steps to make sure CareerSource Tampa Bay and CareerSource Pinellas revise their conflict of interest policies and should conduct follow-up monitoring.**

**CAP Response:** The following corrective actions are in progress:

- DEO is currently revising the policy related to contracts made between the Board and Board Members or an entity which that Board Member represents. The new policy will require LWDBs to send DEO the following information:
  - Contract information form;

- Conflict of interest statement signed by board member for which the conflict exists;
- Voting record;
- A draft of the entire agreement (new requirement);
- Documentation supporting the method of procurement (if applicable), (new requirement); and
- Board meeting minutes (new requirement).

The revised policy will also include a requirement that the Board Member for which the conflict exists, must not only abstain from voting, but will be required to leave the room during the discussion and vote on the contract. The policy will be included within the updated Grantee-Subgrantee Agreement.

- DEO/CSF requires a conflict of interest to be declared and if the contract is more than \$25,000, it must be approved by DEO/CareerSource Florida prior to execution. DEO's financial monitoring team will review all related party contracts to ensure that the boards comply with this policy prior to execution. This new monitoring procedure will become effective upon the issuance of the updated Grantee-Subgrantee Agreement.

#### **14 Finding 14: CareerSource Tampa Bay and CareerSource Pinellas LWDB Compositions Not Compliant**

##### **14.1 The State must work with chief elected officials in both local areas to appoint new members that bring the boards into compliance with the business majority requirement.**

**CAP Response:** Prior to the issuance of the compliance review report, all LWDBs were required to submit local Board Member rosters to DEO by April 15, 2019. Both CareerSource Tampa Bay and CareerSource Pinellas submitted their updated LWDB rosters. Upon DEO's review of the roster, CareerSource Tampa Bay's board met the business majority requirement at 51.6 percent and CareerSource Pinellas met the business majority requirement at 53.1 percent.

DEO's review of all the LWDB rosters and compositions included the following compliance elements:

- Business represented a majority of the board;
- At least 20% of the Board Members represented workforce; and
- The Board met the minimum representation requirements (education, vocational rehabilitation and other partners).

DEO will continue to review LWDB compliance with this requirement. DEO is also updating the Grantee-Subgrantee Agreement with the LWDBs to reinforce local board compliance with this requirement.

**14.2 The board should fill vacancies as quickly as possible to ensure full and adequate participation of both public and private sectors in the local workforce systems.**

**CAP Response:** DEO requests technical assistance from the USDOL ETA regional team regarding the proposed state-corrective actions proposed for this finding. Additionally, CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay completed the following corrective actions towards compliance:

- The Board of Directors was reconstituted by the Hillsborough County CLEO which complies with majority business and other composition requirements (Attachment 14.1).
- Local elected officials continuously monitor Board composition and work diligently to fill vacancies as quickly as possible to ensure full and adequate participation of both public and private sectors in the local workforce system.
- Board Member appointments are made at the discretion of the Hillsborough County Commissioners.
- Eligible candidates are appointed based on level of expertise, skillset and representation that may be needed in a particular industry to fulfill the requirements of the Board composition structure.

CareerSource Pinellas completed the following corrective actions towards compliance:

- Formed an Ad Hoc Committee to review the Interlocal Agreement and the LWDB By-laws – **completed February 2019.**
- The Board composition of CareerSource Pinellas is approved by the Governor for up to 45 seats (Amendment 14.2).
- The CLEO determined that CareerSource Pinellas can maintain compliance with fewer board members by maintaining the percentage balance of 50% business representatives and 20% Labor/Apprenticeship. The Board of Directors, in agreement with the CLEO, have agreed to reduce the size of the board to around 31 members (Attachment 9.1).
- Received confirmation from DEO that the LWDB was in compliance with LWDB composition requirements (Attachments 14.3, 14.4).

The following corrective actions are in progress:

- DEO will convene the state’s CLEOs as the starting point to address the issues identified in this finding. During the convening, DEO intends to accomplish the following:
  - Provide an overview of the purpose and functions of the workforce development boards;
  - Provide detailed information about establishing a WIOA compliant board, including

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- The roles and responsibilities of the:
  - CLEO
  - Board Chair
  - Executive Director
  - Board Staff
- Recruiting board members and membership compliance;
- The nomination process; and
- Establishing the local area's By-laws.

## **15 Finding 15: Non-Compliant with Stevens Amendment**

### **15.1 The State must work with all local areas to incorporate the Stevens Amendment provisions into their policies, processes, and monitoring procedures.**

**CAP Response:** The following corrective actions are in progress:

- DEO is amending the Grantee-Subgrantee Agreement to include the requirement to incorporate the Stevens Amendment within all statements, press releases, procurements, and contracts.
- DEO will work with all LWDB Executive Directors and Chief Financial Officers or Finance Directors to make them aware of this provision. All LWDBs will be required to incorporate the Stevens Amendment provisions into their policies, processes, and monitoring procedures. The DEO financial monitoring tool will be updated to include this requirement.

### **15.2 The State must also monitor all local areas to ensure the implementation of the Stevens Amendment.**

**CAP Response:** The following corrective action is in progress:

- The DEO financial monitoring tool will be updated to include compliance with the Stevens Amendment. When the DEO financial monitoring team selects an expenditure for testing during fiscal year 2019-2020 and subsequent years, the staff will also request and test the procurement documents, press releases, contract, and any other statement to ensure compliance with this provision.

## **16 Finding 16: State Did Not Conduct Adequate and Effective Oversight**

### **16.1 The State must conduct more in-depth monitoring of the local areas to ensure compliance with provisions of WIOA, including governance structures, internal controls, and separation of duties.**

**CAP Response:** DEO completed several corrective actions prior to the issuance of the compliance review report. DEO enhanced its process for programmatic monitoring of the LWDBs for Program Year 2018-2019 with the following actions:

- Increased the number of on-site programmatic monitoring reviews from five in 2017-2018 to 12 in 2018-2019 (Attachment 16.1).
- Revised the program monitoring participant file sampling methodology going to a random, stratified, and targeted approach to ensure every population served by the LWDB is represented in the sample (Attachment 16.2.).
- The programmatic monitoring team partnered with the data analysis team to conduct a data anomaly review prior to each monitoring visit. If areas were identified as needing further review, they were included in the monitoring sample. This process has been incorporated for all future monitoring visits.
- Revised its programmatic monitoring processes based on lessons learned and further strengthened both the Wagner Peyser and OJT Training monitoring questions (Attachment 16.3). The questions on the programmatic monitoring tools ensure that essential core functions are in place at the LWDB level within the boundaries established by law, regulation and state guidance. They also ensure that participant files being examined meet all necessary requirements for eligibility and training. Development of the PY 2019-2020 tools in September 2019 will allow an even greater focus on the most important aspects of the WIOA workforce programs' operations, services and activities. The tools will further clarify and/or better align questions with higher risk issues associated with WIOA law, state guidance or other cite reference changes made during the prior year. Other internal control steps for corrective action will be coordinated with DEO's financial monitoring staff and CareerSource Florida to develop and implement additional internal controls and increased monitoring of the boards' structure and responsibilities. To further improve on internal processes and strengthen state oversight, DEO will explore technology options that may be used to enhance tracking and monitoring governance compliance.
- DEO is updating the Grantee-Subgrantee Agreement with the LWDBs to address compliance with provisions of WIOA, governance structures, internal controls, and separation of duties.  
DEO's financial monitoring tool will be updated to address compliance with the provisions of WIOA, governance structures, internal controls, and separation of duties.

**16.2 As appropriate, the State should develop guidance and policies related to local governance, oversight, and proper administration at the local level.**

**CAP Response:** The following corrective action is in progress:

- DEO will review and evaluate current policies and guidance and revise applicable policies and/or develop local governance, oversight and administrative policies.

**16.3 The State should provide training and appropriate technical assistance to help local boards.**

**CAP Response:** DEO completed several corrective actions prior to the issuance of the compliance review report:

- Provided intensive, on-site programmatic training and technical assistance on WIOA, Wagner-Peyser and the correct use of the Employ Florida system for the staff at CareerSource Tampa Bay and CareerSource Pinellas to ensure compliance with state and federal requirements – **completed February 2019.**
- Partnered with CareerSource Florida and Maher and Maher to implement a comprehensive WIOA program performance metrics training series (Attachment 1.9). The training series offered LWDBs a closer look at WIOA’s Primary Indicators of Performance, ways to measure and improve performance for Business Services and suggestions for aligning strategies to performance. The trainings were conducted through a blended approach using webinars, in-person meetings and other learning tools.
- Implemented a statewide training schedule to provide on-going training and technical assistance to the LWDBs. Trainings were held for all programs that are administered by the LWDBs including Wagner Peyser, WIOA, WT and SNAP E&T. This annual training schedule will ensure all LWDBs have an opportunity to attend training yearly and that services provided to job seekers follow federal and state guidelines – **implemented January 2019.**
- Completed a WIOA statewide training series during the months of March and April 2019. DEO held two, in-person training sessions with each session lasting two days. Multiple topics were covered during the training sessions.

Day 1 Training Topic	Training Elements
WIOA Youth Program Overview	<ul style="list-style-type: none"> <li>• History</li> <li>• Populations (OSY and ISY)</li> <li>• Eligibility</li> <li>• Barriers</li> <li>• Supportive/Follow-up Services</li> <li>• Low Income</li> </ul>
WIOA Youth Program Design	<ul style="list-style-type: none"> <li>• Objective Assessment</li> <li>• Individual Service Strategy</li> </ul>



	<ul style="list-style-type: none"> <li>• 14 Program Elements</li> </ul>
<b>WIOA Adult and Dislocated Worker Eligibility</b>	<ul style="list-style-type: none"> <li>• Eligibility Criteria</li> <li>• Source Documentation</li> </ul>
<b>WIOA Adult and Dislocated Worker Program Design</b>	<ul style="list-style-type: none"> <li>• Basic Career and Individualized Services</li> <li>• Training Services</li> </ul>
<b>Documenting in Employ Florida/Walk through</b>	<ul style="list-style-type: none"> <li>• Pre/Post-tests</li> <li>• Measurable Skill Gain</li> <li>• Credential Attainment</li> <li>• Other</li> </ul>

<b>Day 2 Training Topic</b>	<b>Training Elements</b>
<b>WIOA Adult and Dislocated Worker Program Design</b>	<ul style="list-style-type: none"> <li>• Support Services</li> <li>• Follow-up Services Pre-and Post-Exit</li> <li>• Co-enrollment</li> <li>• Exit Requirements</li> <li>• ETPL</li> <li>• TOL</li> </ul>
<b>Measurable Skill Gains</b>	<ul style="list-style-type: none"> <li>• Who is in the measure and when</li> <li>• Types of Skill Gains</li> <li>• How to record Skills Gains in Employ Florida</li> </ul>
<b>Service Code Review</b>	<ul style="list-style-type: none"> <li>• Review of the most frequently used Service Codes</li> </ul>
<b>Work-Based Training</b>	<ul style="list-style-type: none"> <li>• Identifying the types of work-based training</li> <li>• Service codes associated with each type of work-based training</li> <li>• Recording of worksite, provider and O*Net code information</li> </ul>
<b>On-the-Job Training</b>	<ul style="list-style-type: none"> <li>• Eligibility</li> <li>• Defining on-the-job training</li> <li>• Employed workers</li> <li>• OJT Training Plan</li> <li>• OJT Contract Requirements</li> <li>• Payments to workers</li> <li>• Reverse Referral</li> </ul>

	<ul style="list-style-type: none"> <li>• OJT, Registered Apprenticeships and Pre-Apprenticeships</li> </ul>
<b>Workforce Statistics and Economic Research</b>	<ul style="list-style-type: none"> <li>• Overview</li> </ul>

**17 Finding 17: Lack of Internal Controls Over Supportive Services & Prepaid Credit Cards**

**17.1 Both the CareerSource Tampa Bay and CareerSource Pinellas must develop supportive services systems that provide funds to participants in the actual amount of need.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective action towards compliance:

- Researched alternatives to bank visa cards for supportive service items provided to eligible participants, including gas cards, bus passes, direct billing with select vendors, online ordering and reloadable debit cards – **completed October 2018.**

CareerSource Pinellas has completed the following corrective actions towards compliance:

- Stopped issuing visa cards to customer for supportive services other than transportation – **completed prior to May 2019.**
- Adopted a “pay the vendor” approach by using the local MICROIX system to process support service requests via voucher or check. By using a voucher or check, the exact dollar amount could be issued and both methods are payable directly to the vendor – **completed prior to May 2019.**

The following corrective action is in progress:

- DEO monitoring tool will be updated to include the following:
  - Review to determine if there is adequate documentation to support the eligibility for the receipt of supportive services including, but not limited to gas/VISA cards.
  - Evaluation of whether the value of the supportive service provided is consistent with the documented need of the participant.

**17.2 The local areas should document that the participants’ expenditures are approved and allowable.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will

continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay completed the following corrective actions towards compliance:

- Reviewed and revised the supportive service policy (Attachment 3.1) – **completed August 2018.**
- The policy was approved by the CareerSource Tampa Bay Board of Directors – **completed March 2019.**

CareerSource Pinellas completed the following corrective actions towards compliance:

- Adopted a two-tier approval process for all issuance for support services - **completed prior to May 2019.**
- Supportive Service desk guides were updated to ensure all allowable services are clearly outlined (Attachments 3.4 and 3.5) – **completed prior to May 2019.**

### **17.3 Local areas should establish additional controls to safeguard both the number of cards issued and the funds available on the cards.**

**CAP Response:** DEO, CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved. DEO began monitoring compliance with internal controls related to the storage, reconciliation, and access to gas cards/gift cards during the fiscal monitoring year 2018-19.

CareerSource Tampa Bay has completed the following corrective actions towards compliance:

- Revised the supportive service policies and procedures to ensure appropriate and sufficient internal controls are in place regarding eligibility, issuance, storage, and reconciliation of supportive service throughout the area – **completed March 2019.**
- Ceased the mail-out process of supportive service cards – **completed June 2018.**
- Developed staff procedure desk guide of the supportive service policy – **completed March 2019.**

CareerSource Pinellas has completed the following corrective actions towards compliance:

- Revised all supportive service policies and procedures to ensure appropriate and sufficient internal controls are in place regarding eligibility, issuance, storage and reconciliation of supportive service cards throughout the region – **completed prior to May 2019.**
- Modified its bank Visa distribution process and implemented additional internal controls to maintain the cards – **complete prior to May 2019.**
- Created desk guides to outline the internal monitor’s responsibility for completing center on-site reviews of issuance of support services, storage of supportive services

as well as completing a check of card balance on a random sample of supportive service cards – **completed prior to May 2019.**

- Ceased the mail-out process for all supportive services cards for all programs – **completed prior to May 2019.**

The following corrective actions are in progress:

- DEO programmatic monitors will begin monitoring internal controls regarding participant eligibility and issuance during fiscal year 2019-2020.
- The financial and programmatic monitoring teams will work together to ensure that supportive services were provided based on need, were reasonable and necessary, and participants receiving these services were eligible.
- DEO is updating the Grantee-Subgrantee Agreement to include the following certification by the LWDBs:

*“The Board hereby certifies to DEO that written administrative procedures, processes, and fiscal controls are in place for the payment of supportive services including, but not limited to prepaid gas and/or VISA cards. Controls must address issuance, storage, and reconciliation of prepaid gas/VISA cards. The Board must maintain documentation supporting the eligibility of the receipt of supportive services and that the value of the supportive service is consistent with the documented need(s) of the participant(s).”*

**17.4 The State must conduct a full review of all credit card balances to determine the actual amount of cash on hand and ensure supportive service payments were based on actual needs.**

**CAP Response:** The following corrective action is in progress:

- The DEO financial monitoring team will conduct a full review of the prepaid gas/VISA card balances to determine the actual amount of cash on hand. DEO financial monitoring team will review each board’s policies and procedures to ensure the board is performing a reconciliation of the prepaid gas/VISA card balances.

**17.5 The LWDBs must also establish adequate internal controls to safeguard these funds.**

**CAP Response:** CareerSource Tampa Bay and CareerSource Pinellas completed several corrective actions prior to the issuance of the compliance review report. Both areas will continue to work towards steps to fully comply with report findings until they are satisfactorily resolved.

CareerSource Tampa Bay has completed the following corrective actions towards compliance:

- Imposed stricter requirements on monitoring procedures – **completed prior to May 2019.**
- Revised the supportive service monitoring procedures – **completed March 2018.**
  - In addition to scheduled bi-monthly inventory counts, the local area added unannounced periodic reviews of supportive service cards. The local area also continues its regular, on-going monitoring of supportive service cards, which includes:
    - Verifying of on-hand inventory;
    - Performing a physical count of the inventory and verifying card amounts back to the card tracker (system that tracks support service cards);
    - Performing a reverse check to ensure cards listed on the card tracker are physically located in the safe;
    - Confirming cards have not been used prior to issuance by selecting a sample of cards and verifying the full balance of the card is intact; and
    - Monitoring the quantity on-hand to avoid surplus of on-hand inventory.

CareerSource Pinellas has completed the following corrective actions towards compliance:

- Imposed stricter requirements on monitoring procedures. In addition to scheduled bi-monthly inventory counts, the local area added unannounced periodic reviews of supportive service cards. The local area also continues its regular, on-going monitoring of supportive service cards and sufficient internal controls are in place regarding eligibility, issuance, storage and reconciliation of supportive service throughout the LWDB – **completed prior to May 2019.**



## Information Item # 3

# 2019 – 2020 Committee Assignments

<b>Executive Committee (Bi-Monthly)</b>	
<ol style="list-style-type: none"> <li>1. Sean Butler, EVP People, A-Lign, CSTB Board Chair (<i>Committee Chair</i>)</li> <li>2. <b>Vacant (CSTB Chair-Elect) (Committee Co-Chair)</b></li> <li>3. Sandra Murman, Hillsborough Board of County Commissioners, CSTB Vice Chair</li> <li>4. Sophia West, Partner, CS West &amp; Assoc., CSTB Treasurer (Finance &amp; Audit Committee Chair)</li> <li>5. <b>Dr. Ginger Clark, President, HCC Ybor City Campus, Secretary</b></li> </ol>	<ol style="list-style-type: none"> <li>6. Mike Ramsey, General Director, Career Technical &amp; Adult Education, Hillsborough County Public Schools (Workforce Committee Chair)</li> <li>7. Randall King, Business Manager, IBEW (Member-at-Large)</li> <li>8. Roy Sweatman, President, Southern Manufacturing Technologies (Member-at-Large)</li> <li>9. <b>Vacant (One-Stop Committee Chair)</b></li> </ol>
<b>Finance Committee</b>	<b>Audit Committee</b>
<ol style="list-style-type: none"> <li>1. Sophia West, Partner, CS West &amp; Assoc., CSTB Treasurer (<i>Committee Chair</i>)</li> <li>2. Randall King, Business Manager, IBEW</li> <li>3. Jasiel Legon, SVP, HR Officer, GTE Financial</li> <li>4. Don Noble, CFO, VetCor</li> <li>5. <b>Vacant</b></li> <li>6. <b>Vacant</b></li> <li>7. <b>Vacant</b></li> </ol>	<ol style="list-style-type: none"> <li>1. Sophia West, Partner, CS West &amp; Assoc., CSTB Treasurer (<i>Committee Chair</i>)</li> <li>2. Sandra Murman, Hillsborough Board of County Commissioners, CSTB Vice Chair (<i>Committee Co-Chair</i>)</li> <li>3. Ken Jones, Manager, Economic Development Department, Hillsborough County</li> </ol>
<b>One-Stop Committee</b>	
<ol style="list-style-type: none"> <li>1. <b>Vacant (Committee Chair)</b></li> <li>2. Tom Aderhold, President, Veterans Council of Hillsborough County</li> <li>3. Stephanie Brown-Gilmore, Director Program &amp; Property Services, Tampa Housing Authority</li> <li>4. Dr. Ginger Clark, President, HCC Ybor City Campus, CSTB Secretary (Representative: Ryan Buckthorpe, Director, ICCE at HCC)</li> <li>5. Richard Cranker, Training Director, Plumbers &amp; Pipefitters</li> <li>6. Mireya Hernandez, District Administrator, Florida Division of Blind Services</li> <li>7. Elizabeth Gutierrez, CEO, Enterprising Latinas</li> </ol>	<ol style="list-style-type: none"> <li>8. Leerone Benjamin, Regional Job Recruiter, AMI Kids</li> <li>9. John Howell, Area Director, Florida Division of Vocational Rehabilitation</li> <li>10. Paul Orvosh, Coordinator, Florida Finishing Tracks Institute IUPAT</li> <li>11. Mike Ramsey, General Director, Career Technical &amp; Adult Education, Hillsborough County Public Schools</li> <li>12. <b>April May, Community Development Director, Florida Department of Children &amp; Families (Vacant)</b></li> <li>13. <b>Vacant</b></li> <li>14. <b>Vacant</b></li> <li>15. <b>Vacant</b></li> <li>16. <b>Vacant</b></li> </ol>
<b>Workforce Solutions Committee</b>	
<ol style="list-style-type: none"> <li>1. Mike Ramsey, General Director, Career Technical &amp; Adult Education, Hillsborough County Public Schools (<i>Committee Chair</i>)</li> <li>2. Robert Coppersmith, Executive Manager, National Electrical Contractors Association</li> <li>3. Benjamin Hom, VP Human Resources, McKibbon Hospitality</li> <li>4. Lindsey Kimball, Director, Economic Development Department, Hillsborough County</li> </ol>	<ol style="list-style-type: none"> <li>5. Yanina Rosario, Associate Director, Florida Small Business Development Center at USF</li> <li>6. Earl Rahn, President, New South Window Solutions</li> <li>7. Gail Fitzsimmons, HR &amp; Benefits Administrator, Advanced C4 Solutions</li> <li>8. Michael Bach, General Partner, Bach &amp; Partners</li> <li>9. <b>Vacant</b></li> <li>10. <b>Vacant</b></li> <li>11. <b>Vacant</b></li> </ol>



## Information Item # 4

### Summer Job Connection (SJC) Update

#### Key Program Dates:

- 04.01.19 – Program Application Launched for Youth & Employers
- 04.15.19 – Youth Registration/Intake Sessions Began & Employer Worksite Screenings
- 06.04.19 – Youth Summit Event at Double Tree Hilton located at 4500 W. Cypress Street
- 06.10.19 – Participants first day of work
- 06.10.19 – 7.19.19: SJC Career Specialist conduct onsite weekly monitoring
- 07.19.19 – Participants last day of work

#### Stats:

- Youth: 587 served; 560 placed into paid work experience positions
  - As of 7.11.19 – 539 youth are still actively participating in the program (96% rate)
- Employers: 90 unique host worksites

#### Program Updates:

- **Bi-Weekly Newsletter** publication to youth, employers and partners
- **Site Visits & Videos**- this past week conducted two great site visits consisting of interviews with youth, employers, direct supervisor and obtained video footage.
- **SJC Extension** approved for Track 1 youth - two week extension based on recommendation of worksite supervisor (work ethic, commitment, contributions, attendance, i.e.) that will push end date to 8.2.19.
- **SJC Portfolio Contest** - Top 3 prizes will be awarded to youth who embraced the activities and assignments.
- **Training Scholarships – 75 scholarships** will be awarded to SJC youth pursuing post-secondary education.
- **SJC CSTB Intern Project** - 2020 Portfolio Design
- **Program End Awards Celebration** - To recognize outstanding employer champions, key partners and youth; *Tentative date 8.23.19.*
- **Program End Report** – working with marketing team on final close out report
- **Preliminary Planning for SJC 2020** – anticipated goal to serve 1,200 youth

***One Summer Can Change your Future – We are making connections that matter!***



## Information Item # 5

CSTB Performance Dashboard 7.8.19

Active			PY 18-19 Totals												
Adult <b>806</b>	OST <b>884</b>	OJT <b>1</b>	<p><b>Median Wages</b></p> <table border="1"> <tr><th>Category</th><th>Median Wage</th></tr> <tr><td>Adult</td><td>17.40</td></tr> <tr><td>Dislocated Worker</td><td>17.00</td></tr> <tr><td>Youth</td><td>11.00</td></tr> <tr><td>WP</td><td>8.46</td></tr> </table>	Category	Median Wage	Adult	17.40	Dislocated Worker	17.00	Youth	11.00	WP	8.46	Employers Served <b>1,057</b>	Individuals Served <b>38,033</b>
Category	Median Wage														
Adult	17.40														
Dislocated Worker	17.00														
Youth	11.00														
WP	8.46														
DW <b>432</b>	Apprenticeship <b>290</b>		Direct Placements <b>2,265</b>	Staff Assisted <b>24,095</b>											
Youth <b>325</b>	Work Experience <b>2</b>		Returning Employers <b>528</b>	Self Assisted <b>13,948</b>											
			Returning % <b>49.95%</b>	Individuals Employed <b>11,752</b>											
			Job Orders <b>1,356</b>	WP Median Wage <b>\$8.46</b>											
<b>WIOA AD</b>		<b>WIOA DW</b>		<b>WIOA Youth</b>											
Adult EE <b>443</b>	Adult Non-EE <b>248</b>	DW EE <b>298</b>	DW Non-EE <b>204</b>	Youth Closed Positive <b>167</b>	Youth Closed Non-Positive <b>288</b>										
Adult EE Rate <b>64 %</b>		DW EE Rate <b>59 %</b>		Youth PO Rate <b>37 %</b>											
Adult Average Wage <b>\$18.00</b>	Adult Median Wage <b>\$17.40</b>	DW Average Wage <b>\$22.11</b>	DW Median Wage <b>\$17.00</b>	Youth Average Wage <b>\$12.38</b>	Youth Median Wage <b>\$11.00</b>										





## Information Item # 6

### Junior Achievement of Tampa Bay, Inc.- STEM TEC 2019 Program

**Overview:** CareerSource Tampa Bay is in the 3<sup>rd</sup> and final year of the contract with Junior Achievement to provide STEM TEC services for youth. For the 2019 STEM Tec program, Junior Achievement Summer Career Institute's theme was "Start with the End in Mind". Below is a summary of this year's highlights:

- 159 youth were served and a total of 150 completed the program
- Students participated in JA Finance Park had the rare opportunity to experience their financial futures and careers first-hand. Upon entering the center, students received a "life situation" with job, income, education, and family scenarios. Based upon their adult persona, students visited businesses in the simulation to gather information to be used for making financial decisions, such as managing a household budget, using banking services and making purchasing and investment decisions. Within JA Finance Park is the JA Inspire Career Center, where students explored many different careers offering them an insight into ways they could achieve their potential which helped them to understand the different educational paths they could pursue to achieve their goals.
- Youth learned about cyber security, coding and video game creation with virtual teacher Ellis Wyms, a former Tampa Buccaneer Super Bowl player, and Marcus and Malcom Howard Entrepreneurs who have started their own education series on game and coding creation.
- Dale Carnegie provided training on personal skills and interactions.
- Visited Keiser University and enjoyed many different hands on STEM activities.
- Visited HCC Ybor Manufacturing and Automotive Center
- Had many different speakers from Bob Conigliaro with Caspers and Co. to inspirational speaker Morgan Nelson. a 29 year old, who overcame years of incarceration to become an inspirational speaker and a member of 100 Black Men organization.
- On 6.27.19, the last day of the program each campus conducted an STEM Tec Expo – "Gallery Walk Through Celebration" where students showcased their projects and provided an overview of their accomplishments during the past 4 weeks. Parents, partners and local businesses were invited to attend this event.



## Informational Item # 7

### 2019 - 2020 Workforce Solutions Strategic Plan

#### Goal I

##### Provide Employers with a Skilled Workforce

- Objective 1 Provide workforce resources to employers.
- Objective 2 Identify training opportunities for targeted occupations.
- Objective 3 Develop Labor Market Information.
- Objective 4 Develop a Regional Targeted Occupations List.

#### Goal II

##### Develop Effective Employer Based Workforce Programs

- Objective 1 Increase participation in the On the Job Training (OJT) and Paid Work Experience (PWE) programs.
- Objective 2 Encourage employer involvement in the Local Incumbent Worker Training (IWT) programs.
- Objective 3 Connect employers with the Florida Flex Program administered by CareerSource Florida.
- Objective 4 Encourage employer participation in the internship and apprenticeship programs.

#### Goal III

##### Effectively Market and Brand Services and Programs

- Objective 1 Develop innovative strategies and outreach materials to market various programs.
- Objective 2 Host employer focused and sponsored events based on trends and interest.
- Objective 3 Encourage participation with partners within the community.



## 2019 – 2020 One Stop Strategic Goals Update

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### **GOAL 1: PROVIDE JOB SEEKERS WITH EXPANDED ACCESS TO EMPLOYMENT AND TRAINING SERVICES.**

**Objective 1:** Provide a wide range of workforce resources to job seekers.

- Support open access to the Resource Room, materials, and maintain qualified staff to meet the needs of local job seekers.
- Promote CareerSource Specialized Programs and Services to all job seekers.

**Objective 2:** Maximize the use of technology and online services to meet job seeker needs.

- Support Employability Skills Workshops for local job seekers in multiple media such as center workshops, ATLAS eCourses and other applications available.
- Improve the effectiveness of partnerships through technology such as electronic referrals through the One Stop Partner Portal, automation of job seeker registration in Employ Florida and data sharing.
- Identify virtual services platform to promote robust services to job seekers and employers.
- Explore options to implement a multi-channel contact center as an enhanced communication strategy to handle inbound calls, text messaging and web chat services.

### **GOAL 2: PROVIDE EFFECTIVE WORKFORCE PROGRAMS ALIGNED WITH DEMAND INDUSTRY SECTORS.**

**Objective 1:** Increase participation in Occupational Skills Training (OST).

- Enroll job seekers into training programs that lead to careers in targeted occupations with an emphasis on career ladder opportunities in the following industries:
  - Healthcare
  - Manufacturing
  - Information Technology
  - Financial & Professional Services
  - Hospitality

**Objective 2:** Increase enrollments in Apprenticeship and Pre-Apprenticeship Programs through Department of Education and Industry recognized models.

- Establish an Apprenticeship team to identify additional partnership opportunities and build referrals.
- Promote apprenticeship training and pre-apprenticeship programs to prepare job seekers for career opportunities.
- Enroll job seekers into training programs that include Occupational Skills Training (OST) and Work-Based Learning programs such as On-the-Job Training (OJT).

**Objective 3:** Increase enrollments in short-term Career-Ready programs.

- Sustain and expand pre-vocational training programs in targeted occupations.
- Conduct effective outreach strategies through a variety of media to support pre-vocational training.

### **GOAL 3: EFFECTIVELY MANAGE KEY WORKFORCE DEVELOPMENT PERFORMANCE.**

**Objective 1:** Manage workforce development performance through monitoring and analysis of critical performance reports.

- Monitor performance measures under local reporting, WIOA Primary Indicators of Performance and Performance Modeling.
- Analyze all programmatic monitoring to include internal, contracted board, DEO or external monitoring such as USDOL.

**Objective 2:** Evaluate the effectiveness of programs/services.

- Complete a demographics and caseload review by program and center location to include asset mapping.
- Utilize a variety of methods to evaluate customer satisfaction and gather feedback for evaluation and continuous process improvement.
- Analyze Wagner Peyser customer demographics on a bi-annual basis to include: age, ethnicity, educational levels, special populations, etc.
- Generate unrestricted funds for the region through programs such as: Department of Health Tobacco Free Florida and Department of Economic Opportunity Florida Ready to Work Assessments.



## Information Item # 8

### By-Laws Ad-Hoc Committee Update

#### Background:

U.S. Department of Labor (USDOL) recommended that Career Source Tampa Bay change our Consent Agenda process to remove the silent consent process.

#### Information:

The Committee members received a copy of the current By-Laws and the first draft of revised By-Laws generated by the county 3-4 months months ago, prior to the release of the USDOL findings. There may be recommendations from USDOL that are not in this draft.

The committee reviewed the By-Laws through Article V. Section 1. Proposed changes were made. Discussion of other topics:

The committee approved adding the following committees:

- Standing Compensation Committee – Created to: 1) Review and oversee the Chief Executive Officer, 2) Review and finalize any type of CareerSource incentive plan.

Discussion for and against the standing compensation committee occurred. The recommendation was to create a Standing Compensation Committee. The Ad Hoc committee agreed that 2 meetings per year would be adequate. One meeting would be tied to when the strategic plan for CSTB compensation and benefits is finalized, and the 2<sup>nd</sup> meeting would be to review the CEO.

Standing Youth Committee – Focusing on opportunities for youth is important to this agency. It is one of the cornerstones of CSTB's new Summer Job Connection initiative. This large initiative warrants its own standing committee outside of Workforce Solutions. This committee would focus on career pipeline development and career exploration. The meetings of this committee would probably be quarterly, following other committee schedules. Members should be included from the 4 groups, and having non-board members serve on committees was also suggested

Ken Jones will amend the draft with the Ad Hoc Committee's recommended changes and meet again with the committee to finish reviewing the By-Laws.

Next Meeting: TBD



## Information Item # 9

### Compensation and Benefits Study – Update and Timeline

#### Background:

In 2018, the Finance Committee for CareerSource Tampa Bay, empowered by the Board of Directors started the discussion for the need to have a comprehensive benefits review. In June 2019, the scope of work was completed to start the process of engaging a comprehensive compensation analysis to ensure market alignment for CSTB staff related to compensation and benefits.

#### Information:

Bids have been solicited to consulting firms to complete a comprehensive review of current employee benefits which include: pay, pay structure, medical benefits and other voluntary benefits and to determine our competitiveness with similar organizations. Nine consultants were initially contacted to determine if they met the qualifications needed and had an interest in submitting a proposal. The consultants contacted are as follows:

- **Compensation Resources**
- **Cody & Associates**
- Total Compensation Solutions\*
- **CPS HR Consulting**
- Evergreen Solutions\*
- Corporate Compensation Partners, LLC\*
- Dean Group Consulting\*
- Sullivan Cotter\*
- Management Advisory Group International, Inc.\*

\* After further review of the scope of work, six companies declined to submit a proposal either due to lack of interest or not having the qualifications to provide services for all aspects of the scope of work.

#### TIMELINE FOR COMPLETION (Highlighted = current status)

Activity	Date
Due date of proposal to CSTB	7/1/2019
Proposal review and consultant selection by CSTB internal staff. Consultant selection to be made by the date of the Board meeting, 7/18/2019	7/2/19-7/12/19
Consultant start date (Projected)	7/22/19
Consultant end date (Projected)	9/30/2019
Solicitation of benefit providers** (Projected)	10/1/2019
Benefit provider selections (Projected)	11/1/2019
Begin open enrollment (Projected)	end of Nov

\*\*Ad Hoc Finance Committee to be scheduled in October for consultant presentation of compensation and benefit package options. Board meeting to be scheduled in October for final compensation and benefit package approval prior to open enrollment.



# Information Item # 10

## Public Relations/Marketing Update

**OVERVIEW:**

**2019-2020 MARKETING CAMPAIGNS:** A draft marketing plan has been given to CEO John Flanagan to work as a roadmap for fiscal year 2019-20. Campaigns have been broken up into different sections based on funding:

**General Branding Campaign:**

- Fall 2020 – Job Seekers - Bring awareness to CSTB among Hillsborough County residents
- Winter 2020 -- Employers - Tie in with Business Forum/Business Services
- Spring 2020 -- Youth Services

**Grant Funded Campaigns:**

CareerReady, TechHire, Summer Job Connection, Apprenticeship

**Statewide Funded Marketing Campaigns:**

Career Services and Passion to Profession (lead generating campaigns)

The marketing plan identifies channels to reach our targeted audience. For example, we are looking at working closely with the *Tampa Bay Business Journal* on a high impact plan that include advertising in the print edition and afternoon digital editions, Book of Lists ad, sponsorships that will get our name with key business leaders and human resource directors. We will also be looking to maximize our advertising dollars to have the biggest impact using other channels such as digital marketing, billboards, radio, and television. We plan to measure the campaigns and provide a return on investment by monitoring web traffic and lead generation for specific programs.

**UPDATE FOR CURRENT MARKETING CAMPAIGNS:**

Marketing is currently working on a social media marketing campaign for the **ApprenticeshipFLA**. Goal is to reach out to 25 enrollees for the program. **Hurricane Maria Campaign** generated 32 referrals from radio advertising 92.5 FM and we received 30 responses via text from radio advertising. The first part of **Tech Hire (USF Boot camp) Campaign** ended on May 31, 2019. We are expanding this campaign starting in July, 2019 with a goal of attracting 400 people to sign up for IT Boot Camps.

**Tech Hire Campaign (USF Boot camp)**

Date	Page Views	Unique Page Views	Average Time on page	Entrances
May 1-31, 2019	16,258	11,383	4:29	11,302
April 1-30, 2019	8,420	6163	4:00	6114

**Summer Job Connection** campaign was very successful both in marketing and desired outcomes. Marketing advertised on radio and utilized digital marketing in an effort to create leads and send people

to a dedicated webpage promoting the summer jobs program. The following are the results from the marketing effort:

**Marketing efforts for Summer Job Connection**

Date	Page Views	Unique Page Views	Avg Time on Page	Entrances
May 1-31	10,058	8,506	Youth 3:01 Employer 2:56	4,232
April 1-30	8,194	6,175	Youth 4:06 Employer 3:41	2,340

**Career Ready Digital Marketing (May-June 2019) Social Media**

	Leads generated
Mechatronics Robotics Leads	128
Soldering Cabling Leads	51
Welding Fabrication Leads	274

**PUBLIC RELATIONS:**

**Positive Sentiment:** We had three stories with positive sentiment published in the month of May. The stories were about the Summer Job Connection and aired on Bay News 9, Great 38 WTTA (sister station of News Channel 8) and ABC Morning Blend.

**Negative Sentiment:** In May the Department of Labor issued their findings to the DEO. That report generated negative media sentiment on three local media outlets (WFLA-TV, FOX 13, and the Tampa Bay Times). There was one trade publication (MII Publications) that also picked up the report.

**Press Releases:** (2) June: Construction firm hiring 100 & Summer Job Connection (2) May (2) April  
**Letter to the Editor:** (1) Summer Job Connection

**WEBSITE:**

**New Website:** Marketing has turned over the pages of the new website for each program to review. We expect to have program response by June 21<sup>st</sup>. This information will be shared with vendors CTS and Moore Communications. CSTB Marketing team to update content via WordPress. Marketing will work with the vendors to make final webpage updates and make sure forms are working. **Current Website:** We continue to see an increase in page views from March. We attribute the increase due to traffic generated from marketing efforts.

**Website Traffic (CareerSourceTampaBay.com)**

Timeframe	Page Views	Unique Page Views	Avg. Time on page	Users	% New Visitors
May 2019	128,116	89,678	1:31	25,428	22,968
April, 2019	108,287	77,515	1:29	21,696	20,108
March, 2019	80,389	56,011	1:30	13,641	11,953
January - May, 2019	482,559	339,525	1:30	83,334	80,496
July 2018 - May, 2019	1,134,310	798,100	1:35	190,580	187,052
July 2017 - June 2018	1,587,580	1,106,231	1:38	268,491	266,955

*Source: Google Analytics*

**SOCIAL MEDIA UPDATE:** We continue to restructure our social media pages as we prepare for FY 19-20. **LinkedIn** has seen a significant increase in followers. We started a new **Facebook** page in March, 2019 and we expect to see this number increase with the help of marketing efforts in FY 19-20.



Social Media Growth Trend (July 1, 2018 – May 31, 2019)

# of New Followers	July	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	April	May	June	New For FY 18-19	Total Followers
Twitter	6	-3	10	14	-7	0	-3	-3	4	9	8	-	35	1656
Facebook	-2	-3	-1	0	1	-3	-1	0	1	21	20	-	33	57
Instagram	33	23	152	12	-1	14	15	3	0	0	0	-	251	321
LinkedIn	66	60	53	26	20	9	14	181	214	192	195	-	1,030	3,773
													<b>Totals</b>	
Engagements	1,312	1,666	619	549	64	253	169	846	673	1,018	663		7,832	
Impressions	45K	44K	17K	11K	5K	21K	18K	28K	21K	31K	47K		292,710	
<i>Source: Sprout Social</i>														

Updated 6.20.2019





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