

REQUEST TO SERVE AS A DIRECT SERVICE PROVIDER

Career Source Tampa Bay requests permission to serve as a direct service provider of workforce services for Hillsborough and Pinellas Counties for the period July 1, 2026, through June 30, 2029.

The CareerSource Florida Board of Directors, as the State Workforce Development Board, granted approval for CareerSource Tampa Bay to be a direct provider of career services for Hillsborough and Pinellas Counties for the two-year period expiring June 30, 2026. The designation as direct provider of workforce services is renewed by submission of a new request per [Composition and Certification of Local Workforce Development Boards; Certification of One-Stop Systems; and Direct Service Provider Designation Policy G105](#).

To support CareerSource Tampa Bay meets the requirements to be designated as the direct provider of workforce services, CSTB submits the following:

CLEO AGREEMENT

CareerSource Tampa Bay will present this Request to Serve as a Direct Service Provider for approval at the March 26, 2026, CSTB Board of Directors meeting and April 9, 2026, Hillsborough/Pinellas Workforce Development Consortium meeting. This is a renewal as the direct provider of career services, not a change in the service delivery model.

This document and the “Statement of Intent” will be presented for approval at the March 26, 2026, CSTB Board of Directors meeting and April 9, 2026, Hillsborough/Pinellas Workforce Development Consortium meeting. Board and Consortium agreement of CSTB serving as the direct provider of workforce services will be evidenced by Board Chair and Consortium Chair signatures on the Statement of Intent.

30-DAY PUBLIC COMMENT PERIOD

The 30-day comment period is applicable to an LDWB requesting a waiver to provide training services per 20 CFR § 679.410(c)(2). CSTB is not seeking to provide training services. Accordingly, the public comment period is not applicable.

To provide the public a meaningful opportunity for review and comment, CSTB posted this Request to Serve as a Direct Service Provider and the Statement of Intent from 02/26/26 through 03/09/26 on the Public Comments section of CSTB’s website at [Public Comments - CareerSource Tampa Bay](#) .

Submitted comments will be considered and attached.

FIREWALL IMPLEMENTATION

CSTB has utilized protective measures to ensure transparency, integrity, proper oversight and management of internal processes. Organizational and procedural barriers have been implemented to separate entity functions that could create conflicts of interest and supports segregation of duties. For example, there is a segregation of duties between staff providing services and staff responsible for oversight and internal programmatic monitoring of services. The same staff or department does not both provide services and oversee the provisions of those services. Additional firewalls include but are not limited to reporting hierarchy of managers and staff that provide clear separation between job duties and responsibilities, and conflict of interest/confidentiality/disclosure agreements. Firewalls are in place preventing an entity that develops, manages or conducts a competition from also competing for that award or being involved in the selection, award, and administration of the award.

As described in the CareerSource Policy G125 – Local Workforce Development Board Conflict of Interest and Contracting Policy, each board member must complete a Disclosure and Certification of Conflict of Interest in a Contract form. The form requires notification of conflicts of interest regarding board members and board employees to be disclosed prior to board’s voting to approve contracts; board members who benefit financially or who have a relationship with the contracting vendor abstains from vote and the contract must be approved by two-thirds vote of the board when a quorum has been established.

The following actions have also been implemented to establish a firewall to separate the role of oversight versus our role as the managing board for operational services:

- Require career center staff to participate in training, performance training, and other pertinent staff development activities.
- Monitor programs to ensure allowable and timely expenditures.
- Monitor monthly financial reports to ensure budget and regulatory compliance.
- Utilize cost reimbursement contracts to encourage optimal performance.

COST ANALYSIS

Direct service delivery will result in substantial cost savings. The annual cost savings estimated at approximately \$510,000 is primarily a result of eliminating the indirect and profit CSTB would pay if services were contracted. CSTB utilized a rate of 15%, which is the average indirect and profit rate used by contracted service providers to calculate the estimated cost savings. Providing direct services allows CSTB to solely pay direct costs for staff earnings and benefits without the additional administrative, profit or overhead fees for contracted services. In addition, as the direct provider of workforce services, CSTB will have the flexibility to revise the organization’s staff structure as the need for workforce services changes.

PERFORMANCE IMPROVEMENT

LWDB as direct provider of workforce services continues to be in the best interest of the LWDB's customers as the business model allows for direct communication between the board of directors, executive leadership, management, and frontline staff, creating cohesive practices across all levels of the organization. This direct communication eliminates a 'middle-man' and provides a clean, consistent, and unfiltered conduit of information to staff ensuring quick turn around on directives and changes in business. The model allows CSTB to be more proactive to dynamic changes in the labor market, economy, business environment, funding fluctuations, and regional changes. Additionally, messaging to staff is consistent, so all expectations and service delivery requirements are managed and delivered to the same high standard across all programs of the organization. Since administrative and Career Center staff closely plan and implement any changes to the organization, the consistency of messaging has provided a clear and concise vision to all staff.

All the required WIOA partners are included in the CSTB one-stop delivery system. CSTB system of one-stop centers provides a full array of employment services and connects customers to work-related training and education. CSTB provides high-quality career services, education and training, and supportive services that customers need to get good jobs and stay employed and helps businesses find skilled workers and access other supports, including education and training for their current workforce.

CSTB has established strong, robust and sustained partnerships with core programs. The LWDB directly manages or has oversight of a wide range of core programs. Coordination is managed within a direct line of supervision with coordinated service delivery and accountability.

The six core WIOA programs are outlined below:

- WIOA Title I (Adult, DW and Youth formula programs) administered by the Department of Labor
- Title II – Adult Education and Literacy programs administered by the Department of Education
- Title III – WP employment services administered by the Department of Labor
- Title IV – Rehabilitation Act of 1973 programs administered by the Department of Education

CSTB will continue to provide the following services:

- Wagner Peyser Job Placement Services
 - Resume and cover letter development
 - Job search assistance
 - Interview preparation and coaching
 - Employment skills workshop (virtual and in person)
 - Labor market information
- WIOA Adult and Dislocated Worker Services, including Basic Career Services, Individualized Career Services and Occupational Skill Training Services
 - Individualized career plans
 - Career assessment and exploration

- On-the-job training (OJT)
- Paid work experience (PWE)
- Apprenticeships
- Continuing education opportunities
- Follow up services
- WIOA Youth Services, including Basic Career Services, Individualized Career Services and Occupational Skills Training Services
 - Career exploration and guidance
 - Work readiness training
 - Internships and summer job programs
 - Paid work experience (PWE)
 - Follow up services
- Reemployment Assistance Services
 - Navigation assistance to the Florida Department of Commerce Unemployment compensation program
- Reemployment Services and Eligibility Assessment Program (RESEA)
 - Individualized career planning
 - Receive a combination of targeted self and staff assisted services
- Social Security Administration (SSA) Employment Network, Ticket to Work and Disability Navigator
- Temporary Assistance to Needy Families (TANF) authorized under Social Security Act Title IV, Part A and the Welfare Transition Program (WTP)
 - Development of Individual Responsibility Plan (IRP) outlining employment goals and steps to achieve them
 - Adult basic education (ABE) and General Educational Development (GED) preparation
 - English language acquisition (ESL) classes
 - Work Experience opportunities through OJT, community service and work experience assignments
 - Job search assistance
 - Barrier removal through community referral and supportive services
 - Transitional or Post employment services
- Supplemental Nutrition Assistance Program (SNAP) Employment and Training Services
 - Individual career planning
 - Skills assessment
 - Job placement services
 - Employment retention services
- Employer Services to include Rapid Response
 - Recruitment and screening
 - Job fairs and hiring events
 - Posting employment vacancies
- Veteran Services
 - Employment services for veterans and spouses of veterans
 - Transitional assistance for military personnel
 - Veteran-specific job fairs and events

- Customized and Incumbent Worker Training
 - Industry-specific training programs
 - Skills upgrade training for current employees
- Management of Florida Department of Commerce (FloridaCommerce) team members and delivery of workforce services under:
 - Trade Adjustment Act (TAA) programs
 - Department of Veterans Affairs, Veteran’s Employment Program (VR&E), Jobs for Veterans State Grant (JVSG), and
 - Migrant Seasonal Farmworkers (MSFW) program
 - Job search assistance tailored to agricultural and non-agricultural jobs
 - Individualized career planning and guidance
 - Information on worker rights and labor laws

Services managed through a contract provider of CSTB or partner under MOU will continue to include:

- Title IV program services through the Division of Vocational Rehabilitation
- Offender reentry services through the Hillsborough County Ex-Offender Re-entry Coalition and People Empowering and Restoring Communities (PERC)
- Department of Juvenile Justice Senior Community Service Employment Program & American Association of Retired Persons (AARP)
- Adult Education and Literacy programs under Title II, local County Schools Adult and Education
- Career and postsecondary technical education programs under Carl D. Perkins Career and Technical Education Act of 2006 (re-authorized in 2018 as the Strengthening Career and Technical Education for the 21st Century (Perkins V) Act) through multiple training partners and apprenticeship programs
- Hillsborough County Social Services
- Pinellas County Social Services
- Division of Blind Services
- Multiple Housing Agency Authorities across Hillsborough and Pinellas Counties
- Tampa Housing Authority & St. Petersburg Housing Authority
- Pinellas Opportunity Council

No change in co-located partner services:

- Abilities/Service Source
- Dress for Success
- Gulf Coast Jewish Family and Community Services -TANF program employment and training services to the non-custodian parent through the Non-Custodial Parent Employment and Training Program (NCPEP contract provider)
- Housing Education Alliance
- Job Corps
- Coptic Charities

Other partner community organizations that offer services through referrals:

- Abe Brown Ministries
- Corporation to Develop Communities of Tampa (CDC of Tampa)
- Eckerd Connects
- ECHO
- Enterprising Latinas, Inc.
- Farmworker Career Development Program
- Metropolitan Ministries
- Tampa Lighthouse for the Blind
- Westcare GulfCoast Florida
- Boley Centers
- Department of Children and Families/Hope Florida
- Gulfcoast Legal Services
- Homeless Leadership Alliance of Pinellas
- Operation PAR
- Urban League
- Goodwill Suncoast Industries
- 211 Tampa Bay Cares
- Homeless Empowerment Program
- St. Pete Free Clinic

All services are designed to enhance workforce development, support job seekers, and assist employers in meeting their workforce needs.

CSTB is responsible for constant improvement of the organizational structure to efficiently and effectively manage the day-to-day operations to ensure CSTB's Local Plan is carried out and provides excellent customer service, achieving State and Federal required performance measures, completing all reports and meeting all deadlines. By providing direct services, CSTB is better able to align with the structure of services provided by CareerSource Tampa Bay. By eliminating the Contracted Provider and making all staff (excluding FloridaCommerce staff) CSTB board employees, there has been continued cost savings that allows CSTB to provide additional services to the residents and businesses in the two-county area. The management structure has been streamlined, eliminating redundant overhead and direct supervision without an additional layer of provider management.

Youth Services (Pinellas County) – Sail Future Academy, a premier Career Preparatory High School, offers innovative programs empowering teens to transform their life outcomes. Sail Future is a high school designed to prepare students for the real world through practical experience in Business, Design Thinking, Applied Math, English, Career Exploration and Maritime. Students are engaged in student-led business, paid internships, work-based experiences, and project-based coursework to enhance problem-solving and critical thinking skills.

CSTB contracted with Educational Data Systems, Inc. (EDSI) to provide One-Stop Operator services for the year ending June 30, 2026, and anticipates EDSI to continue providing services during the extension period contingent upon successful performance.

- The contracted One-Stop Operator (OSO) serves as conveners and provides oversight to promote and develop quality workforce services that are delivered in the most efficient and effective way possible, through full integration and coordination of the One-Stop Career Center partners, CSTB programs and service delivery partners with associated resources that support seamless delivery. OSO will ensure the comprehensive Career Center and satellites meet and maintain credentialing requirements.
- OSO responsibilities include but are not limited to (1) Functional integration of all workforce investment activities of the centers to ensure that they meet the needs of employers and career seekers by enhancing communication, coordination, collaboration, and engagement. (2) Promoting benefits of education, training and upskills to job seekers and community through centralized outreach. (3) Establish and/or maintain linkages between all One-Stop partners designated by CSTB to improve communication, referral, service delivery, and tracking performance of the partners. (4) Creating strong feedback loops within the partners and CSTB so successes or issues are brought to light immediately for resolution or celebration. (5) Coordinate and hold meetings with all One-Stop partners designated by CSTB and publish minutes for each partner meeting. (6) Managing CSTB's partnership efforts with the State of Florida required partners such as Division of Blind Services (DBS) and Division of Vocational Rehabilitation (VR) Services. (7) Maintain list of partners, referral process and increase number of partners. (8) Managing, tracking, evaluating and overseeing CSTB's Employer and Customer Satisfaction initiatives for job seekers and employers using an accepted CSTB methodology and (9) Recommending methods of continuous improvement to CSTB's executive leadership.

CSTB will continue to leverage technology and improve service efficiency and effectiveness as we move to a more virtual platform in the programs and services that we offer to our customers. Our goal is to increase our ability to reach customers who may have barriers such as transportation and/or childcare issues that prevent them from fully participating at a CareerSource Center, CSTB will work to develop and implement alternative service delivery methods, such as virtual services or additional access points.

The Virtual One Stop Services include:

- Online assessment modules to evaluate job seeker interest and aptitude.
- Career exploration modules.
- Online orientation modules for CSTB programs and services.
- A suite of workshops, offered in person and virtually, that cover topics ranging from basic computer skills to resume development to mock interviewing that prepare individuals for career attainment and address a multitude of challenges and provide best practices to apply to their job-seeking toolkit.

- Virtual Job Fairs.
- Virtual Appointments.
- WIOA Adult, Dislocated online application and enrollment portal.
- WIOA Youth online application and enrollment portal.
- Customized administrative dashboard reporting to track outcomes.

Furthermore, CSTB continues to explore additional access points in the community, such as expanded partnerships with community-based organizations and public libraries.

Under CareerSource Florida Policy G103 Performance Requirements for Local Workforce Boards effective July 15, 2025, CareerSource Florida requires that LWDBs are to maintain 90% threshold of their Negotiated Goals for all WIOA Primary Indicator measures and meet CSF Letter Grades. CareerSource Tampa Bay, LWDB 28 during the previous Direct Provider Extension granted to CareerSource Pinellas, LWDB 14 and to CareerSource Tampa Bay, LWDB 15 3-year period worked to manage merger and consolidation activities under the Governor's REACH transformation plan and targeted Workforce System Integration moved 24 local workforce boards to 21 assigning consolidation to LWDB 14 and LWDB 15 to merge effective July 1, 2024. CareerSource Tampa Bay, LWDB 28 stepped to the plate to manage as the Direct Service Provider merger and consolidation mandated requirements as well service delivery consolidation needs and opportunity to meld the best local practices of merging areas while managing and performing at state required performance levels. CareerSource Tampa Bay, LWDB 28 seeks to continue to be an innovative and high performance LWDB during the new Service Provider extension as a proven expert in workforce systems. During the previous 3-year extension running from July 1, 2023 through June 30, 2026, the following performance was attained:

WIOA Primary Indicators; pre and post-merger:

CareerSource Tampa Bay, LWDB 28 has worked to identify best practices from both previous LWDB 14 and 15 service delivery to show continuous performance improvement as the Direct Service Provider with a seasoned and experienced team. LWDB 28 has met or exceeded all Primary Indicators barring their DW Median Wage but with performance improvements is confident that this remaining measure will meet or exceed goal by the end of Program Year 2025-2026 if not during the next WIOA Primary reporting cycle, Quarter 2 PY2025-2026.

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Post Merger – LWDB 28

Quarter 1 Performance PY25-26					Annual Performance PY24-25				
Measure	PY25-26 1st Quarter Performance	PY25-26 % of Performance Goal Met For Q1	PY25-26 Performance Goals	Outcome	Measure	PY23-24 4th Quarter Performance	PY24-25 % of Performance Goal Met For Q4	PY24-25 Performance Goals	Outcome
Adults:					Adults:				
Employed 2nd Qtr After Exit	84.8	102.79	82.50	Exceeds	Employed 2nd Qtr After Exit	84.90	102.91	82.50	Exceeds
Median Wage 2nd Quarter After Exit	\$9,517.0	112.07	\$8,492	Exceeds	Median Wage 2nd Quarter After Exit	\$9,506	111.94	\$8,492	Exceeds
Employed 4th Qtr After Exit	82.7	101.35	81.60	Exceeds	Employed 4th Qtr After Exit	83.00	101.72	81.60	Exceeds
Credential Attainment Rate	77.1	92.89	83.00	Meets	Credential Attainment Rate	75.60	91.08	83.00	Meets
Measurable Skill Gains	85.6	140.56	60.90	Exceeds	Measurable Skill Gains	92.00	151.07	60.90	Exceeds
Dislocated Workers:					Dislocated Workers:				
Employed 2nd Qtr After Exit	85.9	103.62	82.90	Exceeds	Employed 2nd Qtr After Exit	85.50	103.14	82.9	Exceeds
Median Wage 2nd Quarter After Exit	\$9,880.0	88.81	\$11,125	Fail	Median Wage 2nd Quarter After Exit	\$9,289	83.50	\$11,125	Fail
Employed 4th Qtr After Exit	83.1	102.97	80.7	Exceeds	Employed 4th Qtr After Exit	82.8	102.60	80.7	Exceeds
Credential Attainment Rate	82.6	98.92	83.5	Meets	Credential Attainment Rate	79.7	95.45	83.5	Meets
Measurable Skill Gains	92	108.75	84.6	Exceeds	Measurable Skill Gains	96	113.48	84.6	Exceeds
Youth:					Youth:				
Employed 2nd Qtr After Exit	76.4	96.22	79.4	Meets	Employed 2nd Qtr After Exit	78.8	99.24	79.4	Meets

Median Wage 2nd Quarter After Exit	\$6,260.0	153.92	\$4,067	Exceeds	Median Wage 2nd Quarter After Exit	\$6,107	150.16	\$4,067	Exceeds
Employed 4th Qtr After Exit	78.9	98.13	80.4	Meets	Employed 4th Qtr After Exit	80.80	100.50	80.4	Exceeds
Credential Attainment Rate	72.9	116.27	62.7	Exceeds	Credential Attainment Rate	73.30	116.91	62.7	Exceeds
Measurable Skill Gains	66.7	113.05	59	Exceeds	Measurable Skill Gains	72.10	122.20	59	Exceeds
Wagner Peyser:					Wagner Peyser:				
Employed 2nd Qtr After Exit	64.9	99.24	65.4	Meets	Employed 2nd Qtr After Exit	66.00	100.92	65.4	Exceeds
Median Wage 2nd Quarter After Exit	\$7,957.0	112.31	\$7,085	Exceeds	Median Wage 2nd Quarter After Exit	\$7,909	111.63	\$7,085	Exceeds
Employed 4th Qtr After Exit	67.1	109.11	61.5	Exceeds	Employed 4th Qtr After Exit	67.70	110.08	61.5	Exceeds
Annual Performance: LWDB exceeded 12 out of 18 WIOA Primary indicators and met 5 out of 18 failing 1 indicator for WIOA DW Median Wage by 6.5% of the 90% goal or Meets threshold					Annual Performance: LWDB exceeded 14 out of 18 WIOA Primary indicators and met 3 out of 18 failing 1 indicator for WIOA DW Median Wage by 6.5% of the 90% goal or Meets threshold				

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PRE-MERGER

LWDB 14					LWDB 15				
Measure	PY23-24 4th Quarter Performance	PY23-24 % of Performance Goal Met For Q4	PY23-24 Performance Goals	Outcome	Measure	PY23-24 4th Quarter Performance	PY23-24 % of Performance Goal Met For Q4	PY23-24 Performance Goals	Outcome
Adults:					Adults:				
Employed 2nd Qtr After Exit	83.30	90.54	92.00	Meets	Employed 2nd Qtr After Exit	85.40	103.64	82.40	Exceeds
Median Wage 2nd Quarter After Exit	\$8,875	82.63	\$10,740	Fails	Median Wage 2nd Quarter After Exit	\$7,970	93.76	\$8,500	Meets
Employed 4th Qtr After Exit	87.40	96.90	90.20	Meets	Employed 4th Qtr After Exit	86.80	108.50	80.00	Exceeds
Credential Attainment Rate	76.80	88.28	87.00	Fails	Credential Attainment Rate	74.50	100.68	74.00	Exceeds
Measurable Skill Gains	77.90	114.56	68.00	Exceeds	Measurable Skill Gains	77.20	105.46	73.20	Exceeds
Dislocated Workers:					Dislocated Workers:				
Employed 2nd Qtr After Exit	80.70	91.70	88.00	Meets	Employed 2nd Qtr After Exit	81.60	98.43	82.90	Meets
Median Wage 2nd Quarter After Exit	\$12,064	128.76	\$9,369	Exceeds	Median Wage 2nd Quarter After Exit	\$9,100	89.88	\$10,125	Fails
Employed 4th Qtr After Exit	89.00	105.70	84.20	Exceeds	Employed 4th Qtr After Exit	90.00	110.02	81.80	Exceeds
Credential Attainment Rate	60.90	70.40	86.50	Fails	Credential Attainment Rate	77.80	92.62	84.00	Meets
Measurable Skill Gains	83.30	122.50	68.00	Exceeds	Measurable Skill Gains	87.80	113.44	77.40	Exceeds
Youth:					Youth:				
Employed 2nd Qtr After Exit	79.80	95.57	83.50	Meets	Employed 2nd Qtr After Exit	83.00	106.55	77.90	Exceeds
Median Wage 2nd Quarter After Exit	\$5,550	118.14	\$4,698	Exceeds	Median Wage 2nd Quarter After Exit	\$5,436	115.46	\$4,708	Exceeds
Employed 4th Qtr After Exit	89.50	110.49	81.00	Exceeds	Employed 4th Qtr After Exit	82.30	109.73	75.00	Exceeds

Credential Attainment Rate	79.60	94.65	84.10	Meets	Credential Attainment Rate	76.20	127.00	60.00	Exceeds
Measurable Skill Gains	58.20	90.29	68.00	Meets	Measurable Skill Gains	58.20	209.35	27.80	Exceeds
Wagner Peyser:					Wagner Peyser:				
Employed 2nd Qtr After Exit	68.50	108.39	63.20	Exceeds	Employed 2nd Qtr After Exit	68.20	105.41	64.70	Exceeds
Median Wage 2nd Quarter After Exit	\$8,616	132.24	\$6,515	Exceeds	Median Wage 2nd Quarter After Exit	\$7,704	116.88	\$6,591	Exceeds
Employed 4th Qtr After Exit	69.00	109.18	63.20	Exceeds	Employed 4th Qtr After Exit	68.90	108.50	63.50	Exceeds
Annual Performance: LWDB exceeded 9 out of 18 WIOA Primary indicators and met 6 out of 18 failing 3 indicators					Annual Performance: LWDB exceeded 14 out of 18 WIOA Primary indicators and met 3 out of 18 failing 1 indicator for WIOA DW Median Wage by 1.1% of the 90% goal or Meets threshold				

REACH Letter Grades; pre and post-merger:

CareerSource Tampa Bay, LWDB 28 is proud to report REACH Letter Grades maintained during their pre and post-merger consolidation of services delivery, identifying and broadening local best practices across the broader local area while maintaining if not continuing to improve Grade performance.

CareerSource Florida Reporting – LWDB Annual (Reach) Letter Grades – 3 Year Period, as available

Program Years	LWDB	Grade	Score	Comment
PY2025-2026	28	N/A	N/A	No PY2025-2026 reporting available as of February 13 report date
PY2024-2025	28	A	93.33	Post Merger
PY2023-2024	15	A	93.39	Pre-Merger
	14	A-	91.64	Pre-Merger

GRANT PROGRAM IDENTIFICATION

Funding for the Workforce Services Delivery Model may come from the following sources:

- Workforce Innovation and Opportunity Act Adult, Dislocated Worker, Youth
- Trade Adjustment Assistance
- Temporary Assistance for Needy Families
- Supplemental Nutrition Assistance Program
- UC/Unemployment Compensation (Reemployment Assistance)
- Wagner-Peyser

- Jobs for Veterans State Grant, which funds:
 - Disabled Veterans Outreach Program, Local Veteran Employment Representative
- Reemployment Services and Eligibility Assessment (RESEA)
- Special Grant Programs, which are currently funded by:
 - Hillsborough County (multiple projects funded through 2026)

As opportunities become available, additional private and public funds are anticipated through the submission and award of special grants.

OVERSIGHT AND MONITORING

As exhibited above, LWDB 28 continues to meet or exceed primary indicators and is poised to meet the remaining measure by the end of program year 2025-2026. LWDB 28 continued strength is reflected in its REACH Letter Grades maintained during their pre- and post-merger consolidation of services delivery, identifying and broadening local best practices across the broader local area while maintaining if not continuing to improve Grade performance. Corrective action is immediately taken to address areas of concern.

All programs are formally monitored by Board program staff on an annual basis and are also subject to unannounced and random monitoring throughout the program year. Programmatic monitoring will be handled in house by Board program staff. Internal programmatic monitors will not be the individuals delivering services to maintain the necessary separation and checks and balances. A Quality Assurance plan is also in place which requires monitoring on an ongoing basis by career center staff, to ensure that programmatic compliance is imbedded into daily operations.

Programmatic monitoring includes:

- Staff training on the programmatic monitoring tools.
- Access tracking database with customized reports by program, by staff member.
- Compilation and delivery of a monitoring report within thirty (30) calendar days of the end of the monitoring.
- Development of a plan for corrective action(s) (if necessary).
- Implementation of corrective action(s) in a timely manner.