

CAREERSOURCE ESCAROSA

ADMINISTRATIVE PLAN

Effective January 25, 2024

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SECTION I. INTRODUCTION

CSE, a non-profit corporation, is certified by the State of Florida as the local area workforce board as required by federal legislation to include the Workforce Innovation and Opportunity Act (WIOA) and the Personal Responsibility and Work Opportunities Assistance Act (PRWOAA). In addition, CSE has been chartered by the State of Florida under state legislation as the local area workforce board and welfare transition board as required under the Florida Workforce Innovation Act of 2000 (SB 2050). CSE is grant recipient, administrative entity and fiscal agent for workforce programs in workforce Region 1, comprised of Escambia and Santa Rosa Counties.

CSE oversees the following major services and programmatic activities:

- Wagner Peyser (jointly managed with Florida Commerce)
- Veterans programs (jointly managed with Florida Commerce)
- Workforce Innovation and Opportunity Act
- Welfare Transition Program
- Reemployment Assistance Program
- Supplemental Nutrition Assistance Program
- Trade Adjustment Assistance Act (jointly managed with Florida Commerce)
- All functions related to the operation of the One-Stop Centers.

SECTION II. FINANCIAL MANAGEMENT

INTRODUCTION

CSE has established a financial system which provides fiscal control and accounting procedures that are in accordance with generally accepted accounting principles (GAAP) and financial management requirements of 2 CFR Part 200

– Uniform Administrative Requirements, Cost Principles, and Audit Requirement for Federal Awards (Uniform Guidance). Internal controls are reviewed and evaluated annually by an independent auditor in accordance with generally accepted audit standards. A detailed description of specific internal controls and accounting procedures is presented on the following pages.

TRAVEL POLICIES

1. PURPOSE:

This manual contains procedures for authorizing and obtaining reimbursement of travel expenses by employees and other authorized persons of the Local Area Workforce Board (Board). All requests for approval and payment for travel expenses will be accomplished in accordance with Section 112.061, Florida Statutes (F.S.) and these procedures. The requirements contained within apply to all travel whether paid for with State or Federal funds. In addition, the requirements apply whether paid by reimbursement, contractual agreements, or other methods of payment, including payment to a contractor or volunteer.

II. AUTHORITY:

The authority for this manual is contained in Section 445.007(10), F.S., which requires local area workforce boards to reimburse standard travel in accordance with rates established in Section 112.061, F.S., and in compliance with applicable state and federal requirements. Rule 69I-42.007, where applicable, has been relied on in drafting this template in compliance with Section 445.007(10), F.S.

III. DEFINITIONS:

- A. **Authorized person or authorized traveler:** Board employee, board member, or other persons traveling on Board business who are authorized to incur travel expenses in performance of Board duties. This expressly includes consultants and advisers, per Section 112.061(2)(e)2, F.S.

The travel day for Class A travel shall be calendar day (midnight to midnight). The travel day for Class B travel shall begin at the same time as the travel period. For Class A and Class B travel, the travel shall be reimbursed one-fourth of the authorized rate of per diem for each quarter, or fraction thereof, of the travel day included within the travel period. Class A and Class B travel shall include any assignment on official business outside of regular office hours and away from regular places of employment when it is considered reasonable and necessary to stay overnight and for which travel expenses are approved.

- a) The travel day for Class A travel shall be calendar day (midnight to midnight). The travel day for Class B travel shall begin at the same time as the travel period. For Class A and Class B travel, the traveler shall be reimbursed one-fourth of the authorized rate of per diem for each quarter, or fraction thereof, of the travel day included within the travel period. Class A and Class B travel shall include any assignment on official business outside of regular office hours and away from regular places of employment when it is considered reasonable and necessary to stay overnight and for which travel expenses are approved.
- b) A traveler shall not be reimbursed on a per diem basis for Class C travel, but shall receive subsistence as provided in this section, which allowance for meals shall be based on the following schedule:
1. Breakfast – When travel begins before 6 a.m. and extends beyond 8 a.m.
 2. Lunch – When travel begins before 12 noon and extends beyond 2 p.m.
 3. Dinner – When travel begins before 6 p.m. and extends beyond 8 p.m. or when travel occurs during nighttime hours due to special assignment.

- B. **Class A Travel:** Continuous travel of 24 hours or more away from Board headquarters. Overnight absence from Board headquarters must be reasonable and necessary to conduct Board business.

- C. **Class B Travel:** Continuous travel of less than 24 hours which involves overnight absence from Board headquarters. The travel day for Class B begins at the same time as the travel period. Overnight absence from official headquarters must be reasonable and necessary to conduct Board business.

- D. **Class C Travel:** Travel for short or day trips where the traveler is not away from his or her official headquarters overnight.

NOTE: Class C Travel subsistence allowances are reimbursed. No per diem allowances are reimbursed to Class C travelers or reimbursed if traveler is in the city or town of the official headquarters or immediate vicinity. {Source: Section 112.061 (15), F.S.}

- E. **Complimentary/Gratuitous Transportation:** Transportation which is provided free of charge by another Local Workforce Development Board (LWDB) authorized traveler in a travel status. A traveler shall not be allowed either mileage or transportation expenses if gratuitously transported by another traveler who is entitled to mileage or transportation expense. The traveler should still show how and with whom he/she traveled when requesting reimbursement for other costs incurred during travel.
- F. **Conference/Convention:** The coming together of persons with a common interest or interests for the purpose of deliberations, interchange of views, the removal of differences or disputes and discussion of their common problems and interests. The term also includes similar meetings such as seminars and workshops that are large formal group meetings programmed and supervised to accomplish intensive research, study, discussion and work in some specific field or on a governmental problem or problems.
- G. **Headquarters:** The headquarters of an authorized traveler assigned to an office shall be the city or town in which the office is located except that:
- 1) For Board members, the headquarters is the primary address for the Board. {Source: Section 112.061(4), F.S.}
 - 2) When any Board employee is stationed in any city or town for a period of over 30 continuous workdays, such city or town shall be the Board headquarters and the employee shall not be allowed per diem or subsistence, as provided in this section, after the period of 30 continuous workdays has elapsed, unless this period of time is extended by the express approval of the board of directors or their designee. {Source: Section 112.061(4), F.S.}
 - 3) An authorized traveler may leave his/her assigned post to return home overnight, over a weekend, or during a holiday, but any time lost from his/her regular duties shall be taken as annual leave and authorized in the usual manner. The traveler shall not be reimbursed for travel expenses in excess of the established rate for per diem allowable had the traveler remained at the assigned post. However, when a traveler has been temporarily assigned away from the Board headquarters for an approved period extending beyond 30 days, the traveler shall be entitled to reimbursement for travel expenses at the established rate of one round trip for each 30-day period actually taken to his/her home in addition to pay and allowances otherwise provided. {Source: Section 112.061(4), F.S.}

IV. AUTHORITY TO INCUR TRAVEL EXPENSES:

Section 112.061(3)(a), Florida Statutes, states: *All travel must be authorized and approved by the head of the agency, or his or her designated representative, from*

whose funds the traveler is paid. The head of the agency shall not authorize or approve such a request unless it is accompanied by a signed statement by the traveler's supervisor stating that such travel is on the official business of the state and also stating the purpose of such travel. (For a Board, the "Head of the Agency" is the board of directors. In compliance with this provision, the board may designate either a board member or a board employee to authorize travel expenses. A board is not a state agency.)

Section 112.061(3)(b), Florida Statutes, states: *Travel expenses of travelers shall be limited to those expenses necessarily incurred by them in the performance of a public purpose authorized by law to be performed by the agency and must be within the limitations prescribed by this section.*

Section 445.007(10), Florida Statutes, states: *Preapproved, reasonable and necessary per diem allowances and travel expenses may be reimbursed. Such reimbursement shall be at the standard travel reimbursement rates established by s. 112.061 and shall be in compliance with all applicable federal and state requirements.*

2 CFR Part 230, Appendix B, Selected Items of Cost, paragraph 51 states:

a. General. Travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the non-profit organization. Such costs may be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to the entire trip and not to selected days of the trip, and results in charges consistent with those normally allowed in like circumstances in non-profit organization's non-federally-sponsored activities.

- A. An *Authorization to Incur Travel Expense* form must be completed and approved by the board of directors or their designee for all travel prior to the beginning date of travel. This includes travel advances. {Source: Sections 445.007(10), _(12), & 112.061(11), F.S.}
- B. Refer to the September, 2022, Board of Directors Meeting Minutes, to confirm who is authorized to approve.
- C. The authorization form should include, but not be limited to:
 - 1) Name of each traveler,
 - 2) Purpose of the travel,
 - 3) Estimated, itemized cost to the Board, and
 - 4) Statement of benefits accruing to the Board by virtue of such travel. {Source: Section 112.061(11), F.S.}
- D. Attached to the form should be a copy of the program or agenda of the convention or conference, itemizing the registration fees, and any meals or lodging included in the registration fee. {Source: Section 112.061(11), F.S.}
- E. The form is required to be signed by the traveler and the traveler's supervisor stating

that the travel is to be incurred in connection with Board business. {Source: Section 112.061(11), F.S.}

- F. A copy of the completed form shall be included as support for the travel reimbursement voucher. {Source: Section 112.061(11), F.S.}
- G. The Board may pay for travel expenses of candidates for executive or professional positions, where written approval of the board of directors or their designee is obtained. {Source: Section 112.061(3)(d), F.S.}

V. MEALS AND PER DIEM:

- A. Reimbursement for meals is only allowable when in authorized Class A or Class B travel status and for those who are approved for reimbursement of those meals, as included in Section IV above. Reimbursement of meals for Class C travel status is not allowed. {Source: Section 112.061, F.S and 445.007(10), F.S.}
- B. Per Section 112.061(6), F.S., the current approved meal allowance rates are as follows:
 - Breakfast - \$6.00 (*When travel begins **BEFORE** 6 a.m. and extends **BEYOND** 8 a.m.)*)
 - Lunch - \$11.00 (*When travel begins **BEFORE** 12 noon and extends **BEYOND** 2 p.m.)*)
 - Dinner - \$19.00 (*When travel begins **BEFORE** 6 p.m. and extends **BEYOND** 8 p.m.)*)
- C. In determining the starting or ending time for the travel event, the time of day is important. When returning during work hours, the official work site location should be the return destination, unless otherwise approved by the board or its designee. If returning after or before work hours, the destination, and therefore the point when travel concludes, is the traveler's home. The same considerations apply for determining when travel begins.
- D. When a meal is included in a registration fee, the meal allowance must be deducted from the reimbursement claim, **even if the traveler decides for personal reasons not to eat the meal**. As provided in Attorney General Opinion 081-53, a continental breakfast is considered a meal and must be deducted if included in a registration fee. {Source: Section 112.061(6)(c), F.S.}

In the case where a meal is provided by a hotel or airline to all guests, the traveler will be allowed to claim the meal allowance by law.

- E. Per diem may be used to calculate reimbursement due for days of travel which do not include hotel costs, for example, the final day of a trip. The allowable rate for per diem is currently eighty dollars, as provided for in Section 112.061(6)(a)1, F.S. All claims for per diem and subsistence must be within the limitations set forth in this section of the statutes.
- F. All travelers are allowed the authorized per diem for each day of travel or if actual expenses exceed the allowable per diem, the amount allowed for meals as provided in Section 112.061(6)(b), F.S., plus actual expenses for lodging at a single occupancy

rate. Per diem shall be calculated using four six-hour periods (quarters) beginning at midnight for Class A or when travel begins for Class B travel. Travelers may only switch from actual to per diem while on Class A travel on a midnight to midnight basis. A traveler on Class A or B travel who elects to be reimbursed on a per diem basis is allowed \$20.00 for each quarter from the time of departure until the time of return. {Source: 69I-42.006, F.A.C.}

VI. TRANSPORTATION:

Section 112.061(7)(a), F.S., states: *All travel must be by a usually traveled route. In case a person travels by an indirect route for his or her own convenience, any extra costs shall be borne by the traveler; and reimbursement for expenses shall be based only on such charges as would have been incurred by a usually traveled route.*

2 CFR Part 230, Appendix B, Selected Items of Cost, paragraph 51 states:

c. Commercial air travel.

(1) Airfare costs in excess of the customary and standard commercial airfare (coach or equivalent), Federal Government contract airfare (where authorized and available), or the lowest commercial discount airfare are unallowable except when such accommodations would: require circuitous routing; require travel during unreasonable hours; excessively prolong travel; result in additional costs that would offset the transportation savings; or offer accommodations not reasonably adequate for the traveler's medical needs. The non-profit organization must justify and document these conditions on a case-by-case basis in order for the use of first-class airfare to be allowable in such cases.

(2) Unless a pattern of avoidance is detected, the Federal Government will generally not question a non-profit organization's determinations that customary standard airfare or other discount airfare is unavailable for specific trips if the non-profit organization can demonstrate either of the following: that such airfare was not available in the specific case; or that it is the non-profit's organization's overall practice to make routine use of such airfare.

d. Air travel by other than commercial carrier. Costs of travel by non-profit organization-owned, -leased, or -chartered aircraft include the cost of lease, charter, operation (including personnel costs), maintenance, depreciation, insurance, and other related costs. The portion of such costs that exceeds the cost of allowable commercial air travel, as provided for in subparagraph c., is unallowable.

A. Travelers are encouraged to use the most economical means of travel when feasible. The most economical mode of travel is determined by the following conditions:

- 1) The nature of the business.** {Source: Section 112.061(7), F.S.}
- 2) The most efficient and economical means of travel, considering time of the traveler, impact on the productivity of the traveler, cost of**

transportation, and per diem or subsistence required. {Source: Section 112.061(7), F.S.}

- 3) The number of persons making the trip and the amount of equipment or material to be transported. {Source: Section 112.061(7), F.S.}
- 4) Authorized travelers with a common destination are required to consider and evaluate joint utilization of vehicles. Approval for anything other than joint utilization must be requested in advance via the *Authorization to Incur Travel Expense* form and must include justification. {Not required by Rule or Statute. Recommended Best Practices.}

B. Airline Travel

- 1) Travel agency surcharges may be reimbursed as long as properly justified and a receipt is provided.
- 2) The traveler must provide a passenger receipt to be reimbursed for his/her airfare. An itinerary is acceptable as a receipt for electronic tickets. {Not required by Rule or Statute. Recommended Best Practices.}
- 3) Penalty for cancellation or exchange of a ticket may be paid by the Board, only if the cause for the cancellation is in the best interest of the Board, or if the cancellation is due to illness of the traveler or illness or death of a member of the traveler's immediate family. Justification should be included with the request for reimbursement. {Source: 69I-42.007(5), F.A.C.}
- 4) Transportation by chartered vehicles (including airplanes, buses, etc.) when traveling on Board business may be authorized when necessary or where it is to the advantage of the Board, provided the cost of such transportation does not exceed the cost of transportation by privately owned vehicle, as allowed under Section 112.061(7)(d), F.S. {Source: Section 112.061(7)(e), F.S.}.
- 5) A traveler on a private aircraft shall be reimbursed the actual amount charged and paid for the fare for such transportation up to the cost of a commercial airline ticket for the same flight. The owner or pilot of such aircraft is also entitled to transportation expense for the same flight. {Source: Section 112.061(7)(h)}

C. Rental Cars

- 1) Rental vehicles should be rented as close to the time of departure as reasonably allowed. Furthermore, rental vehicles should be returned as soon as possible upon the traveler's return. Failure to do so may result in a reduction of the reimbursement. {Not required by Rule or Statute. Recommended Best Practice.}
- 2) In areas where a non-airport rental facility exists at a comparable proximity, the non-airport facility should be used in order to avoid airport fees and

surcharges. {Not required by Rule or Statute. Recommended Best Practice.}

- 3) The cost of the vehicle should be reasonable and necessary for the number of travelers, the type of travel, and the distance to be traveled. {Not required by Rule or Statute. Recommended Best Practice.}

D. Board/personal vehicles

- 1) Employees traveling to a common destination are required to consider and evaluate joint utilization of vehicles. Approval for anything other than joint utilization must be requested in advance via the *Authorization to Incur Travel Expense* form and must include justification. {Source: Section 112.061(7), F.S.}
 - 2) Board-owned vehicles should be used when practical and available. {Not required by Rule or Statute. Recommended Best Practice.}
 - 3) If travel is performed by a Board vehicle, “BOARD” should be entered in the map mileage column of the travel voucher. {Not required by Rule or Statute. Recommended Best Practice.}
 - 4) If travel is complimentary, “COMP” should be entered in the map mileage column of the travel voucher. No reimbursement shall be made for gratuitous transportation. {Source: Section 112.067(7)(h) & Recommended Best Practice.}
 - 5) Use of personal vehicles must be approved in advance via the *Authorization to Incur Travel Expense* form. {Source: Section 112.061(3)(a), 445.007(10), & Recommended Best Practice.}
 - 6) The traveler is entitled to mileage allowance at a fixed rate of 44.5 cents per mile when using a personal vehicle. The reimbursement for expenditures related to the operation, maintenance, and ownership of a vehicle shall not be allowed when privately owned vehicles are used in public business and reimbursement is made via mileage allowance. {Source: Section 112.061(7)(d), F.S.}
 - 7) Mileage claimed must be from point of origin to destination based on the official DOT highway map located at the web site below. {Source: Section 112.061(7)(d)3, F.S.}
- <http://fdotewp1.dot.state.fl.us/citytocitymileage/viewer.aspx>
- 8) Vicinity mileage necessary to conduct Board business must be shown separately on the *Voucher for Reimbursement of Travel Expenses* form.
 - 9) Local vicinity mileage claim must include description with destination and purpose of trip. If traveler is leaving from a location other than the work site during work hours, the lesser of work site miles vs actual miles should be claimed. {Not required by Rule or Statute. Recommended Best Practice.}

- 10) Flexibility may exist when other cost savings are considered. For example, multiple travelers might carpool to avoid multiple airport parking fees. In this case, the mileage used to pick up other travelers can be claimed. {Source: 69I-42.008(4), F.A.C. & Recommendations Best Practice.}
- 11) Vicinity mileage cannot be claimed while in a rental vehicle if the cost of that vehicle is reimbursed by the Board. Reimbursement shall be for the cost of mileage or the cost to rent the vehicle, whichever is more economical and authorized by the appropriate Board designee. {Source: Section 112.061,(7)(d)1, F.S.}
- 12) An employee may claim mileage from his home to a work location outside his official headquarters provided travel begins more than one hour before or one hour after the traveler's regular work hours and provided the miles claimed do not exceed the miles driven. {Source: 69I-42.008(4), F.A.C.}
- 13) The Board is not responsible for reimbursing parking fines or fines for unlawful driving. {Source: 2 CFR 230, Appendix B, Paragraph 16 (OMB A-122)}

VII. LODGING EXPENSES:

2 CFR Part 230, Appendix B, Selected Items of Cost, paragraph 51 states:

b. Lodging and subsistence. Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, shall be considered reasonable and allowable only to the extent such costs do not exceed charges normally allowed by the non-profit organization in its regular operations as a result of the non-profit organization's written travel policy.

- A. An **itemized** hotel receipt must be submitted to claim reimbursement (**a credit card receipt is not sufficient**). {Source: 69I-42.006, F.A.C.}
- B. All other reimbursable expenses included on a hotel receipt, such as parking or phone calls, should be properly listed in the incidental column of the travel voucher. {Source: Recommended Best Practice}
- C. Employees can only be reimbursed at the single occupancy rate. {Source: Section 112.061(6)(a)2, F.S.}
- D. Hotel expenses over \$175.00 per night may require additional justification. {Not required by Statute or Rule. Recommended Best Practice.}
- E. Overnight lodging may not be reimbursed if travel is within 50 miles of headquarters or residence, unless the circumstances necessitating overnight travel are fully explained by the traveler and approved by the agency head. Criteria for approval shall include late night or early morning job responsibilities and excessive travel time because of traffic conditions. {Source: 69I-42.006(7)}

VIII. REIMBURSABLE INCIDENTAL EXPENSES:

The below expenditure types, detailed in 69I-42.010, F.A.C., are required to be accompanied with a receipt, unless otherwise noted. These expenses should be listed in

the incidental column of the travel voucher.

- A. All taxi fares/Uber, Lyft, or other rideshare companies require a receipt.
- B. Storage, parking fees or tolls requires a receipt. Such fees are not allowed on a weekly or monthly basis unless it can be established that such method results in a savings to the Board.
- C. Dry cleaning, laundry and pressing expenses when official travel extends beyond seven days and such expenses are necessary to complete the official business portion of the trip.
- D. Passport and visa fees required for official travel.
- E. Fees charged for the purchase of traveler's checks for official travel expenses.
- F. Fees for the exchange of currency necessary for official travel.
- G. Cost of maps necessary for conducting Board business.
- H. Communication expenses for business-related fax and telephone use can be reimbursed with proper justification. Personal telephone calls made are not a reimbursable communication expense.
- I. Tips paid to taxi drivers that do not exceed 15 percent of the taxi fare are reimbursable and do not require a receipt.
- J. Actual amount of tip paid for mandatory valet parking is not to exceed \$1 per occasion are reimbursable and do not require a receipt.
- K. Actual portage paid shall not exceed \$1 per bag not to exceed \$5 per incident are reimbursable and do not require a receipt. **Portage charges exceeding \$5 per incident will require additional justification. The number of bags must be stated on the travel reimbursement request.**

IX. CONFERENCE / CONVENTION TRAVEL:

- A. Purpose of Conference: Public funds shall not be expended for attendance at conferences or conventions unless:
 - 1) The main purpose of the conference or convention is in connection with the business of the Board and is directly related to the performance of statutory duties and responsibilities of the Board. {Source: Section 112.061(6)(a), F.S. & 69I-42.004(1), F.A.C.}
 - 2) The conference or convention will provide a direct educational or other benefit supporting the duties of the traveler. {Source: 69I-42.004(1), F.A.C.}
 - 3) The duties and responsibilities of the traveler seeking to attend such meeting are compatible with the objective of the particular conference or

convention. {Source: 69I-42.004(1), F.A.C.}

B. No one, whether traveling out of state or in state, shall be reimbursed for any meal or lodging included in a convention or conference registration fee paid by the Board. {Source: Section 112.061(7)(a), F.S.}

C. The Board may pay the registration fee directly to the conference or convention sponsor or allow the traveler to include the registration fee in the calculation of their travel costs and reimburse the traveler. {Source: 69I-42.004(4), F.A.C.}

D. Documentation Needed:

1) Travel to a conference or convention must be approved in advance by the board of directors or their designee. Benefits to the Board must be indicated on the authorization. {Source: 69I-42.004(2), F.A.C.}

2) The approved *Authorization to Incur Travel Expense* form must be submitted with the travel reimbursement request. {Source: 69I-42.004(2), F.A.C.}

3) A copy of the program or agenda of the conference or convention itemizing the registration fees and any meals or lodging included in the registration fee shall be attached to the *Voucher for Reimbursement of Travel Expenses* when submitting for payment. {Source: 69I-42.004(3), F.A.C.}

4) If no agenda is available, or if the agenda attached is not clear as to what is included in the registration fee, the traveler will make a statement on the *Voucher for Reimbursement of Travel Expenses* as to the extent of the meals included in the registration fee. The travel reimbursement request must be reduced by the applicable meal allowance. {Source: 69I-42.004(3), F.A.C.}

5) Payment in advance of earlier than seven workdays before the travel period should be accompanied by written justification, such as discounts for earlier payment or earlier payment required for reservation. {Source: 69I-42.004(4), F.A.C.}

X. TRAVEL ADVANCES:

A. The Board or its designee may make, or authorize the making of, advances to cover anticipated costs of travel to travelers. Such advancements may include the costs of subsistence and travel of any person transported in the care or custody of the traveler in the performance of his or her duties. {Source: 112.061(12), F.S.}

B. An *Travel Authorization* form is required to be completed and signed by the traveler and the traveler's supervisor. {Source: Recommended Best Practices}

C. Travel advances shall not exceed the amount estimated for travel.

D. Travel advances cannot be requested earlier than 7 days before the travel period begins without written justification of circumstances that necessitate an exception to

this restriction. {Source: Recommended Best Practices}

- E. When the advance travel period has ended, the traveler shall properly complete a *Voucher for Reimbursement of Travel Expenses* for the travel period for which he/she received an advance, within 3 business days of the traveler's return to headquarters. {Source: Recommended Best Practices}
- F. A traveler may not have more than one travel advance outstanding at any time without written justification and approval by the board of directors or their designee. {Source: Recommended Best Practices}

XI. REIMBURSEMENT OF TRAVEL EXPENDITURES BY INDIVIDUALS WITH DISABILITIES:

- A. For individuals covered under the Americans with Disabilities Act (ADA), there are special provisions for travel reimbursement that apply. {Source: 69I-42.012, F.A.C.}
- B. When a physically handicapped traveler incurs travel expenses more than those ordinarily authorized pursuant to Section 112.061, F.S., and such excess travel expenses were incurred to permit the safe travel of that handicapped traveler, those excess expenses will be reimbursed by the Board to the extent that the expenses were reasonable and necessary to the safe travel of the individual. All such claims for reimbursement of excess travel expenses shall be submitted in accordance with the requirements of the Americans with Disabilities Act of 1990, 42 U.S.C. 12101 et seq. {Source: 69I-42.012, F.A.C.}
- C. When a payment is requested pursuant to the Americans with Disabilities Act, which would not otherwise be authorized travel reimbursement, the voucher must include a signed statement from the Board chair or his designee certifying that:
 - 1) An employee of the Board, an applicant for a position or other covered person has requested a "reasonable accommodation" pursuant to the ADA, to assist him in performing his duties, applying for a position, or other covered activity. {Source: 69I-42.012, F.A.C.}
 - 2) The Board has determined that the individual is a "qualified individual with a disability" as defined in the ADA. {Source: 69I-42.012, F.A.C.}
 - 3) The Board has determined that the payment is for a "reasonable accommodation" pursuant to the ADA, for that employee, applicant or person. {Source: 69I-42.012, F.A.C.}
 - 4) The Board will maintain all records related to this request for seven years and make those records available for review to persons authorized to review such records. {Source: 69I-42.012, F.A.C.}
- D. All vouchers related to providing a "reasonable accommodation" shall contain a file number or other code by which the voucher can be readily traced to the confidential records maintained by the Board pursuant to paragraph (C)(4) above. {Source: 69I-42.012, F.A.C.}

XII. SUBMISSION AND PAYMENT OF TRAVEL REIMBURSEMENTS:

The provisions below are not required by law or rule, but involve the application of recommended best practices in submission and payment of travel reimbursement requests.

- A. **A *Voucher for Reimbursement of Travel Expenses* should be completed in all instances (even if the net amount due the traveler is zero) and maintained in the employee's office.**
- B. Submit original or copy of all documentation with the *Voucher for Reimbursement of Travel Expenses*. This includes ALL receipts and backup documentation.
- C. Small receipts should be taped to a sheet of paper, not stapled.
- D. The *Voucher for Reimbursement of Travel Expenses* should show both reimbursable expenses to the traveler and expenses already paid by the purchasing card or corporate card and notated in the appropriate areas of the travel voucher.
- E. Copies of all receipts paid with the purchasing card or corporate card must be attached.
- F. The *Voucher for Reimbursement of Travel Expenses* should be submitted within 3 working days of the last day traveled.
- G. A *Voucher for Reimbursement of Travel Expenses* that is only requesting reimbursement for vicinity miles should be completed at least monthly. {Not required by Statute or Rule. Recommended Best Practice.}

TRAVEL – CHIEF EXECUTIVE OFFICER

Due to the recent actions by the State in requiring all travel of local area workforce boards to comply with State Travel requirements, the Executive Director is requesting Board approval of his/her involvement in the following:

Organizations and events related to improving business recognition, economic development, outreach and recruitment to the business community:

- Economic Development Office of Santa Rosa County (Industry Appreciation Week, etc.)
- Pensacola Bay Area Chamber of Commerce related events (First Friday Breakfast, CEI Advisory Council, Next Generation Learning, Industry Appreciation Week, etc.)
- Locklin Technical College
- George Stone Technical College
- Tours of new businesses/current business expansions
- Opening Doors, Homeless Reduction Task Force of Northwest Florida, First Place Partners, Florida Workforce Development Association, Early Learning Coalitions (Santa Rosa and Escambia Counties), Disadvantaged Transportation Board (Santa Rosa and Escambia Counties)
- Meetings with Economic Development Office of Santa Rosa County/Pensacola Chamber for new businesses/business expansions

- Escambia County Enterprise Zone
- City of Pensacola Enterprise Zone
- Involvement with educational partners regarding Career Academies
- Florida Power and Light Economic Symposium
- Florida's Great Northwest

Organizations related to increasing services/referrals for the residents CSE serves through our various programs:

- Transportation for the Disadvantage for Santa Rosa
- Early Learning Coalition of Escambia (Secretary)
- Early Learning Coalition of Santa Rosa
- United Way of West Florida, Diversity, Equity, and Inclusion Development Board
- Various activities associated with the military (National Flight Academy, Change of Commands, Military Appreciation Month, etc.)
- Bay Works/United Way (Initiative centered around Cincinnati Works to promote hiring of disadvantaged citizens by the top 125 businesses in our community)
- Various community groups/public educational entities regarding grants related to employment and/or training

Day-to-Day Work related activities:

- Monthly Manager's Meeting
- CareerSource Florida state meetings
- Florida Workforce Development Association (Chief Executive Officer's group) meetings
- Various national or regional workforce symposiums
- Various state committee meetings on which Chief Executive Officers are requested to participate
- One Stop Consortium meetings (One Stop Provider format for CSE)

The above is not intended to be a complete list, but is provided as a basis for the Director's involvement in activities directly related to the business community and economic development; interactions with community groups to refer/offer services to potential customers of CSE, and to ensure the smooth operation of programs and services on a day-to-day basis.

CREDIT CARDS

The Chief Executive Officer, Chief Financial Officer, and/or designated managers of Escarosaare authorized to use any CSE credit card for the purposes of conducting business. The following are conditions under which the card(s) may be used:

1. Purchase of airline tickets (including insurance and baggage loss) and cost of rental vehicles when approved by Chief Executive Officer.
2. Hotel and facilities charges when used in conjunction with travel, meetings, or other special activities used in conducting the business of CSE.
3. Purchase of gasoline for rental cars when on approved business travel.

4. Other expenditures determined necessary by the Chief Executive Officer for the purpose of providing program services, purchases, or other necessary financial transactions.

Appropriate documentation should be provided for all activities with which the corporate charge card is used.

CSE does not provide entertainment or alcoholic beverages in conjunction with expenditures on this card.

With the approval of the Chief Executive Officer, CSE staff are authorized to use an CSE credit card for payment of travel expenses for Florida Commerce staff for the purposes above.

BUDGETARY PROCESS

Approval Process

The Chief Financial Officer shall annually submit a detailed budget to the Chief Executive Officer for review and approval. The proposed budget will include a breakdown by appropriate program cost categories. The CEO will present the final recommended budget to the Executive Committee for consideration and approval. The recommended proposed budget will then be presented to the full Board of Directors for review and adoption. Modifications to the budget will be submitted to the Executive Committee and Board of Directors when required due to funding changes and unexpected changes in the programs except for temporary programs that require a budget submitted to Florida Commerce along with the request for funds (time requirements would not allow prior Board approval). The budget submitted to Florida Commerce will be entered in the Accounting System for comparison to actual expenditures

Monthly Statement of Revenues and Expenditures

To ensure that all expenditures are made in accordance with the approved budget, a monthly Revenues and Expenditures report will be maintained. The monthly report will include the following:

- Total amount budgeted
- Expenditures year-to-date
- Remaining budget balance
- Percentage of budget spent

Oversight

1. Detailed financial statements will be prepared monthly for analysis by the Chief Executive Officer and Chief Financial Officer.
2. The most current financial statements will be reviewed by the Executive Committee at their meetings.
3. The Executive Committee will present condensed expenditure vs. budget statements to the CSE Board for review and approval.
4. Policies and reporting procedures established by the state will be followed.

CASH MANAGEMENT AND REPORTING – FEDERAL FUNDS

It is the policy of CSE to utilize advance funds, as allowed under federal law, for the operation of its all programs administered by Florida Commerce, i.e. Workforce Innovation and Opportunity Act (WIOA), Welfare Transition Program (WTP), Wagner Peyser, Unemployment Compensation, Supplemental Nutrition Assistance Program (SNAP) and Veterans Programs. Cash advances will be limited to the minimum amounts needed and shall be timed in accordance with the actual, immediate cash requirements. Program income, rebates, refunds, contract settlements, audit recoveries, and interest earned shall be disbursed prior to requesting additional cash advances.

Cash advances are requested through the State of Florida's Subrecipient Enterprise Resource Application (SERA) for all funds that flow through the Florida Commerce. Advances are requested weekly (by Wednesday or the designated day in holiday weeks) for electronic transfer into CSE's bank account by the following Tuesday.

Each program's funds will be accounted for separately on a weekly basis in order to monitor cash balances and project the cash advances required for the following week's disbursements.

Projection of the cash advances required will be based on actual invoices due and estimates of participant support services expenditures to be disbursed the day after the receipt of the cash warrant. The Accounting Manager and the Chief Financial Officer will participate in the cash request process with the Chief Financial Officer making the final determination of the exact amount to order from each fund. The Chief Financial Officer or Accounting Manager (in the absence of the CFO) will enter the request in SERA.

All federal funds will be maintained in a financial institution with FDIC coverage and balances exceeding the FDIC coverage will be collaterally secured.

Interest earned exceeding allotted amount per 2 CFR 200.305(9) will be used as program income for WIOA programs, which include WIOA Adult, Dislocated Worker, Youth and Veterans' Programs.

Transfer of funds between CSE accounts are subject to CEO approval.

CSE will report results of financial operations monthly to Florida Commerce via the SERA system by the 20th day following the month end. Expenditures for the reports will come from the accounting system. Expenditures will be reported to each Notice of Funds Available (NFA) in which expenditures were incurred. Expenditures will be applied to program income prior to applying to federal funds. Monthly reconciliations of the general ledger to SERA will be prepared by the Chief Financial Officer and maintained in a file for audit and monitoring review.

BANK RECONCILIATION

1. The bank statement will be received by the Chief Executive Officer and reviewed prior to submitting to the accounting department for preparation of the bank reconciliation. The bank statement packet will be initialed and dated by the Chief Executive Officer signifying review.

2. The Bank account is reconciled with accounting records in a timely manner by the Accounting Manager. The Chief Financial Officer reviews and approves the bank reconciliation.
3. Bank reconciliation procedures will include:
 - a. Accounting for check numbers used.
 - b. Investigating checks outstanding for more than 60 days.
 - c. Tracing and reviewing bank transfers.
 - d. Itemizing outstanding checks.
4. If checks listed are still outstanding for more than 30 days after investigation. A stop payment will be issued with the bank and the checks are voided in the accounting system as instructed by the Chief Financial Officer.

CASH RECEIPTS

Once the cash request has been entered in SERA and approved by Florida Commerce, the Chief Financial Officer will print a SERA report showing the cash by NFA to be received from the state. A copy of the report will be given to the Senior Accountant and a copy is maintained for the cash receipts journal entry. All program funds are received by means of electronic bank transfer into the CSE bank account. The Accounting Manager ascertains that the transfer has occurred and enters deposits in the Cash Receipts Log and Senior Accountant prepares the Cash Receipt Memo/Journal Entry. The Chief Financial Officer verifies that the appropriate program is credited by signing the Cash Receipt Memo/Journal Entry. The cash receipt journal entry is entered into the accounting system by the Senior Accountant and then reviewed and posted by the Accounting Manager.

Other non-federal cash receipts are received through the mail. The Executive Secretary (or Chief Financial Officer if Executive Secretary is unavailable) receives the unopened mail each day. The Executive Secretary prepares a log of any checks received then distributes the checks to Accounting after stamping each check with Deposit Only with CSE's bank account number. The Accounting Clerk prepares the Cash Receipt Memo/Journal Entry and attaches all documents associated with the remittance. It is reviewed and approved by the Chief Financial officer and the bank deposit is made by the Accounting Clerk.

CASH DISBURSEMENTS

CSE has 3 types of cash disbursements:

- Accounts Payable Disbursements
- Global Cash Card Disbursements
- Petty Cash Disbursements

Accounts payable disbursements are made weekly on Wednesday or Thursday if cash has been received from the state in which case checks are disbursed as soon as cash is received. If a holiday falls on Thursday the checks will be disbursed on the day prior to the holiday (if cash has been received from the state). Emergency checks may be cut with approval from the Chief Financial Officer.

Petty cash disbursements are made as needed and when the fund permits.

Accounts Payable Disbursement

The following types of payments are made through accounts payable:

- Invoices for purchased goods or services
- Recurring monthly expenses
- Lease and rental agreements
- Service Provider invoices
- Participant training and support expenses
- Employee reimbursements

All invoices received through the mail and through email are accumulated by the Accounting Clerk. Invoices for purchased goods or services are matched with purchase orders, receiving reports, shipping reports and/or any other authorizations required. The Accounting Clerk prepares the check requests (Check Request Form) for these invoices as well as invoices for recurring monthly expenses and lease and rental agreements. General ledger accounts to be charged are determined by the authorization document or the Chief Financial Officer.

Employee reimbursements are requested by the employee and approved by his/her supervisor. Supporting documentation such as approved travel advance request or travel expense report must be attached to the request.

Invoices for Service Provider Contracts are audited for compliance with the contractual agreement by the Accounting Manager or Senior Accountant and the check request is prepared. The audited invoice is forwarded to the Chief Financial Officer for approval.

Participant support services and training payments are initiated by the Service Provider Case Managers. A check request that designates the program to be charged and includes authorization documents is prepared by Support Services personnel and forwarded to the Service Provider Case Manager to approve and sign. Once approved and signed by Service Provider Case Manager, the Accounting Manager reviews the check request.

All non-support services check requests are submitted to the Chief Financial Officer for final review and approval for payment.

The Senior Accountant processes all approved check requests in the accounting system and prepares computerized checks. Checks are attached to the check requests and backup documentation by the Accounting Clerk. The checks are then submitted to the Chief Executive Officer or Chief Operations Officer (if Chief Executive Officer is not available). All checks for \$20,000 or over require a second signature by an authorized CSE Board member.

Signed checks are returned to the Accounting Clerk for mailing or other distribution. Check copies are attached to supporting documentation and each page of the supporting documentation is stamped "PAID". Checks that are not mailed directly to the recipient must be signed for when distributed.

Blank checks are secured in a locked fireproof cabinet with limited access to the Senior

Accountant and Accounting Clerk. The Chief Financial Officer and Accounting Manager (when CFO is not present) is responsible for securing blank checks.

Checks that must be voided are marked "VOID" and the signature lines are removed. All voided checks are voided through the accounting system. If an outstanding check needs to be voided after investigation, a stop payment is issued with the bank and the check is voided. All documentation regarding the voided checks are filed in the vendor file.

Petty Cash Fund

The Board of Directors has authorized a petty cash fund in the amount of \$100. The fund is maintained by the Accounting Clerk. Petty cash will be distributed upon receipt of an approved petty cash request form with attached receipts for the expenditures. The Accounting Clerk reconciles the petty cash fund and the reconciliation is approved by the Chief Financial Officer before the fund will be reimbursed. The petty cash fund will be reimbursed through an accounts payable request that will include the approved reconciliation and all petty cash request forms.

Global Cash Cards

The Career Advisors and Case Managers prepare a list of participants that are eligible to receive needs based payments for transportation and other support services. The list includes the amount to be distributed and for purpose. The list is approved by the Program Managers. If there are new participants, the Career Advisors and Case Managers will order a cash card through the Global Cash Card system. The approved list is sent to the Accounting Department for coding and processing. The Senior Accountant will upload the information into the template provided by Global Cash Card. The cash is transferred to Global Cash Card from CSE Operating Account by the Chief Financial Officer or Accounting Manager in the absence of the CFO. The funds are loaded on the cards by the Senior Accountant through the Global Cash Card system. All documentation related to the transactions are reconciled at the end of the month by the Senior Accountant.

PERSONNEL AND PAYROLL

Employee Leasing

The CSE Board of Directors has entered into an employee leasing agreement with Landrum Professional, Inc. (Landrum). This agreement creates a dual employment relationship between CSE and Landrum. Landrum provides a multitude of services, which includes payroll administration, human resources management, compliance reporting, and employee benefits administration. CSE retains hiring, firing, supervision, evaluation, promotion, salary determination, and employee benefits determinations.

Employee Records

The Accounting Manager maintains a set of employee records for the CSE staff electronically. Landrum maintains the official personnel files on employees, which will include all legally required documentation, i.e. I-9's, W-4's, and employee benefits documentation.

CSE's electronic files contain:

- Name, address, emergency information
- Employment information, i.e. resume
- Job Description
- Employment Data Form
- Payroll Change Notice
- Job titles and wage history
- Employment Status
- Change Form

Medical information is maintained on separate forms, stored separately from all other employee information and treated as confidential medical records.

Salary Administration

Each personnel file contains an "Employment Data" and "Payroll Change Notice" for each pay increase, promotion, demotion or other change in employment circumstance. This completed form include the change and the Chief Executive Officer's approval signature. The Accounting Manager forwards a copy to Landrum for action and filing.

New positions created by CSE must be approved by the Board of Directors. The Board will approve the position title, job description and salary range.

Employee Compensation, Incentives, and Merit/COLAs

Merit incentives are subject to approval by the CEO and funding availability as determined by the Board's budget. When approved, the incentive will take place on the universal evaluation anniversary date of July 1st or the agreed upon date established by the Board of Directors.

1. Merit Incentives

1. Merit incentives are earned based on job performance, and only awarded when the employee meets or surpasses the performance elements, as reflected in the Performance Evaluation Report prepared by the employee's supervisor.

The following table serves as guidance as to the amount of incentive that may be earned by the employee.

<u>RATING</u>	PERCENT INCENTIVE
5 = Clearly Exceeds/ Outstanding	5.5- 6% with justification for the high end
≥ 4 = High Meets Expectations	4.5 -5%
≥ 3 = Fully Meets	3.5- 4 %

2. Employees become eligible for consideration for merit incentive on the universal evaluation anniversary date and after completion of one full year of employment.

3. In the event of an employee being assigned to a new supervisor during the performance rating period due to a promotion or lateral transfer, an evaluation will be completed by the supervisor prior to the change, and any merit or longevity incentive warranted will be given on a pro-rated basis at that time.
4. If the employee reports to more than one supervisor simultaneously during the reporting period, both supervisors will have input into the evaluation with the primary supervisor being the responsible party for completing and submitting the evaluation report.
5. In the event a merit incentive will cause the employee to exceed the maximum rate of the salary range for the position, the incentive will be given up to the maximum amount allowed and at this point.

Note: For employees who worked less than the full period in which the incentive was earned, the incentive amount will be pro-rated based on the number of full months they worked during the earning period. The amount for such employee will be based on 1/12th of the full incentive amount multiplied by the number of full months that they worked during the award period.

According to Florida Statutes, F.S. 445.007(9) – Regional Workforce boards states, “Regional workforce boards, their administrative entities, committees, and subcommittees, and other workforce units may authorize expenditures to award suitable framed certificates, pins, or other tokens of recognition for performance by units of the workforce system.”

Payroll Processing

Payroll is processed bi-weekly by Landrum. Bi-weekly timesheets are prepared electronically in Landrum’s timesheet system by the employee. Once the timesheet is completed the employee will electronically submit their timesheet for approval. Their supervisor will electronically approve the timesheet. The Accounting Manager reviews payroll reports for accuracy prior to submitting to Landrum for payroll processing.

Landrum is responsible for making federal payroll tax deposits, preparing quarterly tax information forms (Form 941 and UCT-6), and preparing and submitting W-2 Forms.

Annual Leave Requirement

Staff who works within CSE’s Accounting Department shall be required to take five consecutive days (one week) of annual leave each fiscal year. This policy may also be applied to other staff that have access to financial records and/or items which are equal to cash access. This determination will be made by the Chief Executive Officer upon consultation with the Chief Financial Officer.

Schedules of Operations and Holidays

CSE annually implements schedules of operations, to include daily hours of operation and holiday closures, which adopts either the federal, state or appropriate county holiday schedules, per Subgrantee Agreement between CSE and Florida Commerce.

Additional Holidays

CSE may be eligible for additional holidays in the event that the State of Florida’s Governor declares additional non working holidays to state employees. Implementation will be based upon the approval of CSE Board of Directors.

Benefits

Insurance Waiver Benefits (Local Operating Procedures)

Section XIV. Board Adopted/Approved Policies.

ACCOUNTING SYSTEM AND FINANCIAL REPORTING

Accounting System

CSE will maintain an accrual accounting system in accordance with generally accepted accounting principles (GAAP). The financial records will contain accurate information pertaining to grant awards and authorizations, obligations, unobligated balances, assets, liabilities, expenditures and income as required by 2 CFR Uniform Guidance 200.302. The system will permit the tracing of all transactions to source documents in order to establish that funds have not been used in violation of the federal regulations, Uniform Guidance and other pertinent policies.

1. The CSE's accounting system is based on a chart of accounts that segregates financial information by fund, cost category and expenditure type. The Chief Financial Officer or Accounting Manager will be responsible for maintaining the chart of accounts and must authorize any new account numbers.
2. The books of account include general ledger and accounts payable subsidiary ledger. Sufficient detail will be kept in either the general ledger or subsidiary records to determine to which fund source cash, accounts receivable, accounts payable and deferred revenue relate. Asset and liability accounts will be reconciled monthly to ensure accurate balances.
3. The Chief Financial Officer will review and approve entries in the general ledger (through the accounts payable system and journal entries) to ensure that costs are charged against the proper fund and expenditure type.
4. Journal entries that require a write-off of over \$3,000 of revenue, accounts receivable or accounts payable require review and approval by the Executive Committee (with the exception of audit adjustments).
5. A standardized monthly closing procedure and checklist is used to ensure that consistent accounting principles are followed in the recording of financial data.

Chart of Accounts Overview

The chart of accounts is the framework for the general ledger system, and therefore the basis for CSE's accounting system. The chart of accounts consists of account titles and account numbers assigned to the titles. General ledger accounts are used to accumulate transactions and the impact of these transactions on each asset, liability, net asset, revenue, expense and gain and loss account.

CSE's chart of accounts is comprised of six types of accounts:

1. Assets
2. Liabilities
3. Net Assets

4. Revenues
5. Expenses
6. Gains and Losses

Each account number shall be preceded by a three-digit fund code or a two-digit cost pool code and followed by seven additional segments denoting various cost categories. The entire general ledger number consists of the following:

Segment 1	Fund/Cost Pool Code
Segment 2	Object Code (Expense type)
Segment 3	Category 1 Code
Segment 4	Category 2 Code
Segment 5	Contract Code
Segment 6	Miscellaneous Code
Segment 7	Grant Code

Financial Statements

The Chief Financial Officer will prepare financial statements monthly. The Chief Financial Officer will be responsible for the timely reporting of financial information to the proper funding agency (see Cash Management and Reporting – Federal funds).

An annual independent financial audit will be conducted in accordance with generally accepted government auditing standards (GAGAS) and Uniform Guidance – 2 CFR Part 200, Subpart F.

Bonding

All personnel who have positions of trust are bonded up to \$300,000.

Program Income

Any income generated by a grant or grant-supported activity or earned only as a result of the grant will be put back into the program from which it was generated. This statement applies to CSE and its service providers. Service providers will be monitored annually to ensure that this policy is followed. If program income is returned to CSE from service providers, it will be used in the program from which it was generated.

Stand-In Costs

All allowable costs that are incurred by a federal program and paid by a non-federal source shall be reported as uncharged to the federal program costs. These costs will be included as separate line items in the financial statements presented for audit and reported in the appropriate section of the state reports. These expenses will be treated consistent with cost principles affecting other expenses, including but not limited to, the cost allocation methodology, cost classification methodology, and supporting documentation requirements. These costs will be proposed as Stand-In Costs to substitute for federal costs that have been disallowed as a result of an audit or other review.

Discretionary Income

All non-federal funds shall be assigned discrete account numbers and accounted for separately in the financial statements. Any expenditure to be applied against these revenues shall also be accounted for separately.

PURCHASING

Purchasing Policy

CSE will follow the Uniform Guidance 2 CFR 200.317 – 200.326 in the procurement of supplies, equipment, construction, training, and other services. Electronic Signature software will be used to sign purchase requisitions, check request, employee travel and purchase orders.

Micro-Purchases:

Procurement by micro-purchases is the acquisition of supplies or services, the aggregate amount of which does not exceed \$10,000. To the extent practicable micro-purchases must be distributed equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the prices are considered to be reasonable.

Small Purchases:

Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold (\$250,000.00). If small purchase procedures are used, written price or rate quotations must be obtained from three qualified sources.

Simplified Acquisition Threshold:

Purchases in excess of \$250,000 and/or aggregate units of items or services which annual purchases exceed \$250,000 require either sealed bids or written proposals (see Procurement Section for procedures). Participant support services, i.e. childcare, uniforms, tools, etc. are identified on an individual basis and not considered aggregate units.

Fixed assets with a value of \$5,000 or more will require the Chief Executive Officer's approval.

CSE will prepare a written lease vs. purchase determination for all equipment items, defined as \$5,000 or greater. Annually, during the budgeting process, a determination will be made concerning computer equipment purchases (for equipment under \$5,000). This determination will be documented and kept to support the final decision made.

Factors in the determination will be cost, maintenance cost and turnaround time for repairs, staff time and budget. The analysis will assess the effect of long-term leases on future budgets, especially for computer equipment.

Documentation for the process will be maintained by the accounting department.

A purchase order system has been established to maintain internal control over the procurement process. All purchases require a purchase order with the exception of:

1. Purchases costing in total less than \$500.
2. Purchases of services or property that involve a contractual agreement.
3. Recurring expenses such as telephone costs, utilities, insurance, etc.

4. Participant support services such as childcare, books and tools purchases, health support, etc.
5. Staff's travel, conferences and any prepaid items.

Purchase Order Procedures

All purchase orders will be prepared using the accounting system Purchase Order Module.

1. Purchase requisitions indicating items or services required, quantity, and program or account to be charged will be prepared by staff members and approved by their immediate supervisor.
2. Completed purchase requisitions will be submitted to the Senior Accountant for processing. Every effort to choose the most cost effective vendors taking into account price, quality and, when appropriate, delivery time. Minority vendors and/or recycled products will be used when cost and time permits. Disbarred or suspended vendors as listed in the U.S. General Services Administration Office of Acquisition Policy's "Lists of Parties Excluded from Federal Procurement or Non-procurement Programs" will not be used.
3. Each purchase order will be assigned a discrete number. A log will be maintained listing the date, the assigned number, and the vendor.
4. The completed purchase order will be submitted to the Chief Financial Officer for review and signed with electronic signature. The purchase order will be reviewed to determine if the purchase is for an allowable expense and that funds are available in the appropriate program. In the Chief Financial Officer's absence the Chief Executive Officer or any Board Director may sign purchase orders through electronic signing.
5. Purchased items are received and signed in by the individual or department requesting the items. Receiving reports are forwarded to the Accounting Clerk and retained to file with the request for payment. If there is no vendor receiving report, the Accounting Clerk will send a copy of the purchase order to the requestor for signature to signify receipt of the items.

SECTION III. COST ALLOCATION PLAN

CSE has an approved Cost Allocation and Resource Sharing Plan which allocates in accordance with the requirements of Generally Accepted Accounting Principles and the Uniform Guidance. The Cost Allocation Plan is a document separate from the Administrative Plan.

SECTION IV. PROCUREMENT

AUTHORITY - PROCUREMENT AND CONTRACTS

The CSE Board of Directors shall authorize and sign any and all contracts with service

providers that utilize funds under their auspices in excess of \$25,000. A standing committee of the CSE Board (designated by the nature of the contract) shall have the authority to terminate contracts and rate proposals. The Committee will then submit the recommendations to the full Board for final approval and/or action. The Chief Executive Officer shall sign contracts and contract modifications for CSE that do not exceed \$25,000.

Contracts between the board and an organization or individual represented on the LWDB require prior approval from Florida Commerce. Contracts between the board and an organization or individual represented on the LWDB may not be included on a consent agenda by the LWDB. Additionally, a member whose organization may benefit from the contract must abstain from voting on the contract. All contracts exceeding \$10,000 between local boards, a relative of a local board, or an employee of the board, which do not require prior approval from Florida Commerce but do require approval by a two-thirds vote of the board.

CSE publishes contracts between a LWDB and a member of the board, a relative of a board member, an organization or individual represented on the board, or an employee of the board approve on or after July 1, 2021, and requires it to remain published for at least one (1) year after termination of the contract. Any member whose organization may benefit from the contract must abstain from voting on the contract. CSE's procurement policies shall reflect Federal, State and local laws and regulations. Procurement Policies shall comply with Uniform Guidance Parts 200.318- 323.

CONFLICT OF INTEREST/ETHICAL PROCUREMENT POLICIES

Board of Directors

No member of the Board of Directors shall join in discussions related to or cast a vote on the provision of services by that member (or any organization which that member directly represents) or vote on any matter that would provide direct financial benefit to that member or those organizations (Section 141(f) of PL 97-300). Contracts awarded to a related party organization must also be submitted to Florida Commerce for approval.

Employee

It is a breach of ethical standards for an employee to participate directly or indirectly in procurement when:

- The employee or an immediate member of his/her family has a financial interest in the procurement,
- The business/organization in which an employee or any other member of his/her immediate family has a financial interest pertaining to the procurement; or
- Any other person, business, or organization with which an employee or his/her immediate family member is negotiating or has an arrangement concerning prospective employment is involved in the procurement.

Where an employee or his/her immediate family member holds financial interest in blind trust, there will be no conflict of interest, provided that the blind trust has been disclosed

to the organization governing procurement ethics.

Whenever the employee discovers or becomes aware of such an actual or potential conflict, he/she should promptly withdraw from the procurement or seek guidance on participation from the group that governs procurement ethics for the agency.

Disclosure

Any employee who has or obtains any benefit from any contract with a business in which he/she has financial interest must report this to the appropriate official or group, except when that interest has been placed in a disclosed blind trust.

Gratuities and Kickbacks

It is a breach of ethical standards for anyone to offer, give, or agree to give any employee or former employee, or for an employee or former employee to accept from another person a gratuity or an offer of employment in connection with any aspect of procurement.

It is a breach of ethical standards for any payment, gratuity, or offer of employment to be made by or on behalf of a subcontractor under a contract to the prime contractor or higher tier subcontractor, or any person associated with these, as an inducement for the award of a subcontract.

De Minimis Policy for Acceptance of Gifts

The Conflict of Interest/Ethics Policy is not intended to prohibit the acceptance of unsolicited modest courtesies, openly given and accepted as part of the usual business amenities, for example, occasional business-related meals or promotional items with a value of less than \$25.

Prohibition Against Contingent Fees

It shall be a breach of ethical standards for anyone to be retained, or to retain anyone, to solicit or secure a contract for a commission, brokerage, or contingent fee or the promise of such payments. This prohibition does not apply to the hiring of bona fide employees of an organization, or to retaining a bona fide commercial selling organization.

Confidentiality and Non-disclosure of Proposal Information

All staff involved in any aspect of the procurement process will not reveal or disclose information to anyone outside of the official group involved in reviewing offers and making contract award decisions.

Use of Confidential Information

It is a breach of ethical standards for any employee or former employee to use confidential information for actual or anticipated personal gain, or for the actual or anticipated personal gain of any other person.

Policy for Disciplinary Action for Conflict of Interest Violations

Officers, employees or agents who violate the conflict of interest/ethics standards will receive disciplinary action as determined by the Executive Committee which may include termination or legal action depending on the severity of the conduct.

PROCUREMENT PROCESS

Needs Identification

All procurement for contracts shall be in conjunction with programs and related activities designed to meet the needs of the area served through Region #1.

Funds Availability

Items/services to be purchased shall be budgeted items approved by the CSE Board of Directors.

Items/services to be purchased where the cost estimate exceeds \$25,000, but does not exceed \$250,000, shall be included in budget line items (previously approved by the CSE Board of Directors) and shall be approved by the Chief Financial Officer and the Chief Executive Officer.

Timeliness

Notice of the Request for Proposal (RFP) or Intent to Negotiate (ITN) shall be published in at least one newspaper distributed in Escambia and Santa Rosa Counties as well as posted on the CSE website for at least five (5) working days prior to the date set for receipt of letters of intent to bid and/or the date of the bidders' meeting.

The RFP shall be due no sooner than seven (7) days past the date set for receipt of letters of intent to bid and/or the date of the bidders' meeting.

The bidders' meeting is strictly an information exchange session where technical assistance will be provided and attendance is not mandatory to qualify for submission of proposal(s). Bidders, however, must either submit a letter of intent to bid or attend the bidders' meeting to qualify for submission of proposals.

Deadline

Each RFP will contain a deadline date and time for submissions of proposals. The CSE staff will carefully log in the receipt of each proposal, ensuring that proposals are date stamped prior to the proposal deadline. Any proposal received after the deadline date and time will be rejected and will not be considered further.

Format

Proposals must be presented with the same topic headings and in the same order as set forth in the RFP. Each heading must be addressed with a response or not applicable (n/a) noted, when appropriate. All proposals shall be typed on 8-1/2 x 11" paper and all pages shall be numbered consecutively.

Competition/Solicitations

Bid Requirements

1. All services/items where the cost estimate exceeds \$250,000 shall be obtained using a competitive bid system RFP. RFPs shall be rated and reviewed by staff, knowledgeable community members, LWDB Region I Board Members, and/or experts in various fields. The ratings and rankings shall be submitted to a standing committee of the CSE Board (designated by the nature of the contract) for review

and approval. The Committee will then present a recommendation to the Board for final approval.

2. All services/items where the cost estimate is under \$250,000.00 but at or above \$10,000.00 will require at least three written quotes. Quotes will be submitted to the Chief Financial Officer and Chief Executive Officer for approval. All service provider contracts will be submitted to a standing committee of the CSE Board (designated by the nature of the contract) and then presented to the final Board for approval.
3. All services/items where the cost estimate is \$10,000.00 or below will follow the Micro-Purchase policy.

Sole Source

The competitive bid system shall be utilized as the primary vehicle for soliciting proposals in items 1 and 2 above; however, sole source may be utilized if conditions exist, as listed below:

1. The service is only available from a single source.
 2. Emergency conditions exist for the service that will not permit a delay resulting from competitive solicitation.
 3. After solicitation of a number of sources, competition is determined inadequate.
 4. The awarding agency authorizes noncompetitive proposals.
1. All sole source awards shall be reviewed by a standing committee of the CSE Board (designated by the nature of the contract) and shall be submitted to the Board for final approval.

Contents

Request for Proposals shall include the following areas:

- I. PROPOSAL DEADLINE
- II. GENERAL INFORMATION
 - Purpose of the Request for Proposals (RFP)
 - Background Information
 - Federal and State Legislation
 - General
 - Services Description
 - Cost Categories
 - Procurement
 - Profit
 - Administration of the RFP
 - Financial Capacity of Proposers
 - Contract period
 - Description of Services to be Solicited

- Performance Outcomes
- III. PROPOSAL SUBMITTAL INSTRUCTIONS
 - Instructions
 - Required Information
- IV. GOVERNING PROVISIONS AND LIMITATIONS
 - Contractor
 - Orientation/Competency
 - Type of Contract
 - Third Party Contracting
 - Disclosure of Proposal Contents
 - Audit Requirements
 - Conflict of Interest
 - Notification of Funding
 - Records Retention
 - Appeals Process
- IV. PROPOSAL FORMAT
 - Response Narrative
 - Staff Qualifications
 - Administrative Capabilities
 - Budget Information
 - Indirect and Direct Administrative Costs
 - Proposal Review Evaluation
 - Required Certifications
 - Proposal Rating Sheet

Submission

Proposals may be received by the Chief Executive Officer and/or the designated manager involved with the RFP. Proposals may be opened/reviewed by the Chief Executive Officer and/or the designated manager. The Chief Executive Officer and/or manager will forward the proposals to the appropriate Rating Review Committee members for review and ratings.

A log will be kept noting time and date of receipt of proposals.

Source Selection Procedures

1. The RFP provides specifications that describe the program activities to be funded and the guidelines to be adhered to by successful bidders.
2. The selection of service providers for each activity will be based upon the proposer's track record of demonstrated effectiveness, ability to meet performance criteria, fiscal accountability, cost effectiveness of the proposal, and any technical applications necessary for program performance.
3. Proposals submitted in response to an RFP will be reviewed by the designated manager for completeness and conformity with the RFP requirements. The manager will also ensure the original proposals were received prior to the RFP deadline.
4. Proposers will be cautioned to carefully review the proposals rating criteria, attached to the RFP, since the criteria described is that which will be used by the

committee assigned to evaluate proposals.

5. Reasonableness of cost shall be a determining factor in the proposals. To determine the reasonableness of cost, the following shall be used:
 - a. Facilities/Rental - Local average square footage rates;
 - b. Salaries - Compared to other individuals' salaries within the organization or within the area and to other individuals with comparable level of prior programmatic experience;
 - c. Equipment/Property - Through procurement practices, previous purchases of similar or like equipment or availability/source of supplier;
 - d. Transportation - Will not exceed current transportation payments, but may be of equal or less value; and
 - e. Communications, Utilities, etc. - Based upon time allocations of program.
6. Members of the committee rating the proposals shall be furnished internal monitoring and audit reports regarding previous subcontractors (if available). The rating committee members will utilize the reports when rating new proposals.
7. Proposals in compliance with the RFP will be reviewed and ranked by a designated committee of the Board of Directors. The committee will consist of members appointed by the Chairman and will include the Chief Executive Officer and/or appropriate manager.
8. The award will be made to the most responsible offeror(s) whose proposal(s) is/are most advantageous after consideration of price, technical factors, and other desired factors. The chosen contractor must be deemed responsible and possessing the ability to perform successfully under the terms and conditions of the RFP.
9. The proposal must obtain a rating of not less than 70% of the possible score to be considered for funding.
10. The Proposal Summary Evaluation Sheet shall contain the following:
 - a. Average Rating Total;
 - b. Proposed Funding Amount;
 - c. Type of Outcomes;
 - d. Number of Outcomes;
 - e. Past WIOA/WTP Subcontractor (as relates to proposed services);
 - f. Past Performance (if applicable) (as relates to proposed services);
 - g. Monitoring/Audit Findings (as relates to proposed services);
 - h. Reasonableness of Cost; and
 - i. Cost Categories;
 - j. Conflict of Interest Statement.
11. All proposals will be ranked by committee members using a points system defined in the RFP. A simple majority vote of the committee will determine the recommended award (contractor) to the Board of Directors.

12. Under extremely competitive conditions, the committee may require formal presentations by two (2) or more competitors. A second ranking and scoring will take place using the same criteria as identified in the RFP.

Contractor Responsibility

In the event that a bid is received from an agency and/or business with which CSE has not contracted services in the past, an on-sight review, if feasible, or documentation will be required which will demonstrate the agency's ability to perform the services required. This may include letters of reference from other agencies who have contracted with the proposer for similar or like services or verbal confirmation of the above. Proposers who have provided services in the past shall be evaluated based upon past performance.

Procurement Files

CSE will maintain procurement files sufficient to detail the significant history of procurement. These files will include necessary information to document the rationale for the method of procurement, selection or agreement type, awardees selection or rejection, and the basis for the agreement price. Items that will be included in the file to fulfill the above are:

1. Legal Advertisement: Copy of legal ad.
2. Bidders' Meeting Attendees: Sign-in sheets.
3. Bidders' List: CSE shall also solicit proposals from all prospective providers who have requested their names to be added to a "bidders' list", which shall be updated once per year. All bidders who have not submitted a proposal within a one-year period or did not renew their intent to bid through written correspondence shall be removed from the bidders' list. CSE shall attempt to ensure that current providers on the bidders' list are notified of the RFPs; however, CSE assumes no liability for real or prospective losses suffered by potential bidders due to failure to notify via this bidders' list.
4. RFP Instructions: Copy of proposal packages to include rating sheets.
5. RFP Ratings: Rating sheets completed by CSE Committee members and as recommended to the Board of Directors.
6. Offeree's Proposals: Submission in response to CSE's RFP by potential providers/bidders.
7. Cost/Price Analysis: Documentation to show that contract budget is reasonable.

Procurement files will be retained for five (5) years after the final reports have been submitted to the state.

Appeal or Protest

Grievances/appeals by the proposer shall be made to the Chair of the standing committee of the CSE Board of Directors. The appeal must be submitted in writing within five (5) days of notification of intent not to fund. The Committee shall review the appeal and

shall respond to the submitting organization in writing within ten (10) working days a recommendation to clarify or resolve the appeal. If the finding of the Committee is not satisfactory to the submitting organization, the issue will be forwarded to CSE's Executive Committee for final resolution. The Executive Committee shall issue to the submitting organization the final resolution within ten (10) working days of receipt of the appeal. Legal and technical counsel may be involved in this process. If the grievance is based upon discrimination due to race, sex, religion, age, etc., the grievance procedures included in CSE's "Grievance/Complaint Hearing/Appeal Procedures".

CONTRACTS

Contract Type

All contracts in excess of \$10,000.00 must address termination for cause and for convenience by the non-federal entity including the manner by which it will be effected and the basis for settlement.

All contracts using WIOA funding with units of government must be cost reimbursement contracts.

Contract Contents

Contract contents may include the following:

- Table of Contents
- Statement of Work, to include services to be provided
- Method and Time of Payment
- Compensation and Time Period
- Public Records Requirement
- Modification Unilaterality
- Equal Opportunity Clause
- Provision against Assignment
- Funding
- Total Amount Allowable
- Type of Contract
- Contract Liabilities and Indemnification
- Insurance
- Termination for Convenience
- Termination for Cause
- Property/Equipment Clause
- Maintenance of Effort
- Conflict of Interest
- Compliance with appropriate regulations
- Accounting Standards
- Audits Right Clause
- Resolution of Complaint
- Maintenance of Records
- Transfer of Records
- Sub-agreements
- Definitions and Acronyms
- Performance Standards
- Disallowed Costs

Program Income
Pell Grant Reductions
Notice and Contact
Sponsorship
Procurement of Supplies
Attachments
Anti-Lobbying
Copyrights Clause
Sectarian Statement
Clean Air Act
Energy Policy and Conservation Act
Patent Rights Clause
Authorizations for Signature

Attachments:

Submitted Proposal
Budget Summary
American with Disabilities Act Checklist
Drug Free Workplace
Public Entity Crimes
Debarment, Suspension, and Other Matters (\$25,000 or more)
Anti-Lobbying (\$100,000 or more)
Equal Access/Equal Opportunity
Clean Air Act
CSE Grievance Policies and Procedures

Contract Numbers

All contracts will be sequentially numbered as issued and given a unique contract number using the following convention:

Funding Source – Program Year – Sequential Number

Example: first contract funded by the Workforce Investment and Opportunity Act for Program Year 2016-2017 will be numbered as WIOA-2016-2017-01, the second will be numbered WIOA-2016-2017-02.

Contract Administration

1. Contract payments, documentation required, and how the contractor will be paid are addressed in each individual contract. There is no set policy, as it is individualized based upon the agency and the services to be provided.
2. Contract payments are for completed outcomes or for line-item, cost-reimbursement charges.
3. Contract modifications are allowed if approved by the CSE Chief Executive Officer. The appropriate staff manager may negotiate modifications; however, approval by the Chief Executive Officer is required for implementation of a modification. The Chief Executive Officer will sign contract modifications.
4. CSE does not allow a prime contractor to subcontract services without prior

approval.

5. CSE will not extend contracts beyond the first year unless the RFP specifies that three-year proposals are being bid, and interested bidders will need to submit three-year proposals, or unless the RFP states that contracts may be negotiated for extension or modification.
6. Service providers' performance, as required in their contracts, will be reported to the Board of Directors quarterly through the appropriate committee. The service provider's performance will be reviewed prior to renewal of the contract for the second and third year. Service providers with unacceptable performance will not have their contract renewed.

Contract and Agency Disputes

Appeals by the contractor will be made directly to the Chief Executive Officer. The contractor must submit a written grievance stating the issues of concern to the Chief Executive Officer within ten (10) working days. The Chief Executive Officer will attempt to resolve and/or clarify any concerns. If a satisfactory agreement is not reached within ten (10) working days, the issue will be forwarded to the CSE Executive Committee. The Executive Committee will make a final decision regarding the issue within ten (10) working days. Legal counsel may be involved in this process. Additional actions will be referred to the Director, Florida Commerce.

Contract Files

Active contract files should include contracts, invoices and back-up documentation, revenues expended and received, correspondence, modifications, monitoring reports, progress reports, and equipment/property purchases in the accounting office, if applicable.

CSE will retain records for five years, or per appropriate federal and state requirements, for all contracts. If litigation or an audit question is pending, records will be retained until legal or audit questions are resolved. Contractors must retain original documentation, as specified above, regarding expenditures and revenue.

Contract Closeout

The attached "Contract Closeout Guide" will be used to close out each contract after its term expires. The form will be signed and maintained in the contract file with a copy sent to the contractor.

Action to be Taken After Receipt of Notice of Termination:

After receipt of the notice of termination, the contractor shall cancel outstanding commitments covering the procurement or rental of materials, supplies, equipment, and miscellaneous items and shall exercise all reasonable diligence to accomplish the cancellation or diversion of outstanding commitments covering personal services that extend beyond the date of such termination, to the extent that they relate to the performance of any work terminated by the notice. With respect to such canceled commitments, the contractor agrees to:

1. Settle all outstanding liabilities and claims arising out of such cancellation of commitments or ratify all such settlements; and

2. Assign to CSE in the manner, at the time and to the extent directed by CSE, all of the rights, titles, and interest of the contractor under the orders and subcontracts so terminated. CSE shall have the right, at its discretion, to settle or pay any or all claims arising out of the termination of such orders and subcontractors.

Payment:

For cost reimbursement agreements, payments will be made for expenditures incurred up to the date that termination notification has been received. CSE must receive the final request for cost reimbursement within thirty (30) days after the termination of the Agreement.

Forms

1. Certification Regarding A Drug-free Workplace
2. Certification Regarding Debarment, Suspension, and Other Matters
3. Anti-lobbying Statement
4. Sworn Statements of Public Entity Crimes
5. Equal Access/Equal Opportunity
6. Clean Air Act
7. Contract Closeout Guide

SECTION V. PROPERTY MANAGEMENT

PROPERTY MANAGEMENT POLICY

CSE's property management policy and procedures conform to Uniform Guidance Part 200.313.

All tangible personal property with a value of \$5,000 or greater is capitalized as an asset, inventoried and tagged with a unique CSE property number. Tangible personal property is defined as non-expendable property with a life expectancy of one year or more. This policy does not pertain to participant training materials that are purchased for the participant to retain permanently.

Tangible property with a value of \$500 to \$4,999 is inventoried and tagged with a unique CSE property number. These items have a value to CSE and are maintained with the same internal control procedures as capitalized property. This property will be maintained in a separate database and files.

The Chief Financial Officer is responsible for maintaining property records and internal control over property.

Staff will notify the Chief Financial Officer and/or the Accounting Manager immediately of any changes in the status of property, i.e., moves, sales, scrapping, obsolescence, damaged or missing equipment.

All sales and disposal of property will be in accordance with 2 CFR Uniform Guidance Part 200.313 and at the direction of the Executive Committee.

Property purchased with federal funds shall be used in the program for which it was acquired as long as needed. When no longer needed in the original federal program, the property will be used in connection with other federal programs.

PROPERTY MANAGEMENT PROCEDURES

Upon receipt of the CSE property as defined above, the Accounting Manager assigns and asset tag with a property number. A copy of the accounts payable packet, which should include a check copy, invoice and purchase order, should be attached to the Property Record Form. If physically possible a label stating the property number and "Property of the Workforce Escarosa, Inc." will be attached to the item.

1. The Property Record Form will be entered into MIP (accounting software) and contain, when applicable:
 - a. Property number.
 - b. Description of item or items,
 - A. Class (e.g. desks) and type (e.g. typewriter desk),
 - B. Number of units,
 - C. Name, make, or manufacturer,
 - D. Year and/or model.
 - c. Identification:
 - A. Manufacturer's serial number, vehicle identification, number, title certificate number, etc.
 - d. Cost of Property and Date Acquired
 - A. Surplus property, donations, and similar acquisitions should be recorded at their value at the time of acquisition rather than at the cost to the governmental unit.
 - B. For current acquisitions show purchase order number, check number, date, and cost and from whom acquired.
 - C. Show both unit cost and total cost if items are under group control.
 - e. Physical location.
 - f. Custodian's delegate.
 - g. Date of last physical inventory and condition.
 - h. Disposition
 - A. Show method of disposition: sold, traded, scrapped or transferred.
 - B. Give full particulars as to date, amounts, who sold to, authority, etc.
 - C. Funding source and/or account charged.
 - i. Any additional information desired by the custodian.
2. A physical inventory of the above-defined property will be taken annually. This physical inventory will be reconciled with property records.
3. All pertinent data regarding property records are incorporated the Fixed Assets Module of the accounting system for permanent record keeping and well as files with supporting documentation.

SECTION VI. RECORDS MANAGEMENT AND CONFIDENTIALITY

CSE has processes and procedures in place to manage, retain and properly dispose of program and financial records, to include insuring the confidentiality of client personal information.

RECORDS MANAGEMENT

Client Records

Client files are maintained by the service provider delivering services for one year after the client has been terminated or until all follow-up services are completed. The files are then transferred to the designated CSE Programs staff individual (by program) for proper storage and safekeeping. Files that have been transferred to CSE are archived in locked storage units. Access to units is limited to the designated staff, which retrieves records necessary for monitors and auditors. Client records will be retained for a period of five (5) years, after the final expenditures report for the fiscal year has been submitted to the state as required by the State of Florida policy or until all audits are complete and findings on all claims have been finally resolved, whichever is the longer period of time. Files will be shredded at the archive site in the presence of designated staff.

Financial Records

Financial records consist of vendor files that include a copy of checks and appropriate backup, payroll records, journal entries, the books of account, financial statements and cash management reporting records. All financial records for the current and prior fiscal year are maintained at the administrative offices. All other financial records are maintained in a secured archive area. The Accounting Staff will maintain archived financial records. Financial records will be retained for a period of five (5) years after the final expenditures report has been submitted to the state with the following exceptions:

- If any litigation, claim, or audit is started before the expiration of the 5-year period, the records shall be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.
- Records for real property and equipment acquired with Federal funds shall be retained for 5 years after final disposition of the property.

Property Records

Property records are maintained at the administrative offices. The Chief Financial Officer maintains a computer database of the inventory.

Property records will be retained for a period of five (5) years after final disposition of the property.

CONFIDENTIALITY

While in custody of the service providers the client files are kept in a secure location with access limited to “need to know” personnel, auditors and monitors. Clients do not have access to their files. Florida Commerce’s Guidance Paper, AWI FG 04-044, concerning data sharing will be followed when sharing of client information between staff and agencies is necessary. CSE staff members, service provider and partner staff members must submit

annually a “Non-Disclosure and Confidentiality Certification between RWB and Contractors/Subcontractors” form.

Medical Records

Medical, Supplemental Security Income (SSI) and disability-related information on applicants/participants are stored in a manner that ensures confidentiality, and must be used only for the purposes of record keeping, reporting and determining eligibility. WIOA and TANF applicants/participants may be deferred from program activities and have medical information supporting their temporary medical deferral. TANF applicants that apply for SSI may also have medical documentation.

CSE has established the following procedures to comply with the Health Insurance Portability and Accountability Act (HIPPA) and place controls on the access of the medical information that participants/applicants share with program staff.

1. All medical, SSI, disability, and medical case note information are maintained on separate forms/sheets, stored separately from all other information about a particular individual and treated as a confidential medical record. Therefore, participants/applicants with medical, disability, or SSI information have two separate records/files; one program record and one medical record. All case notes, doctor forms, letters, etc. pertaining to medical information, disability, SSI are kept in the individual’s medical record.
2. Medical records are kept in a separate location from program records.
3. Access to disability-related or medical information is limited to:
 - a. Case managers (custodian of the file) of the individual.
 - b. Supervisors and managers may be informed regarding restrictions on the work or duties of a participant and regarding necessary accommodations.
 - c. First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment or evacuation.
 - d. USDOL, Florida Commerce, Florida Commerce contracted monitors, and CSE staff/monitors responsible for program compliance issues will be provided information on request. Participant release forms must be signed by the participants and maintained with their medical record. This release form will state that the participant is aware and agrees to the release of their medical information.
4. Any request for participant medical information from a source not listed above, or in cases where the file custodian is not sure of a specific request for information, he/she will report the request to his/her manager. The manager will coordinate with the Chief Executive Officer or Chief Operations Officer (if Chief Executive Officer is not available) concerning release of the information.
5. Staff having access to medical information receives HIPPA training to insure comprehension and compliance with the law.

6. Managers are responsible for the following:

- a. Ensure that all appropriate staff receives HIPPA training. This training may count toward staff's 15 hours required One-Stop credential training.
- b. Ensure that new staff members receive HIPPA training within 60 days of hire.
- c. Ensure that all HIPPA procedures are followed.
- d. Ensure that participant medical records are maintained as required by the above procedures.
- e. Ensure that all medical records/files have a participant's signed release form as a part of their medical record.

Demographic Data

Demographic data (race/ethnicity, sex, age, and disability status) for applicants, registrants, eligible applicants/registrants, participants, terminated participants and employees, employees, and applicants for employment are stored in a manner that ensures confidentiality. The data is maintained in secure files, with access available to authorized personnel only. The data is used only for the purposes of record keeping and reporting; determining eligibility, where appropriate, for WIOA financially assisted programs or activities; determining the extent to which the CSE is operating its WIOA financially assisted program or activity in a nondiscriminatory manner; or other used authorized by law. The data is used for statistical purposes only and is not used in a manner which reveals the identity of the individual.

Subpoena or Public Records Request

In the event there is a subpoena or public records request for confidential information, CSE will follow the guidance in AWI FG 02-033. CSE will not release any confidential information unless specifically authorized by law. Any subpoena or public records request submitted to an CSE staff member or service provider will be forwarded to the Chief Executive Officer who will coordinate release of the information with Florida Commerce's general counsel. If necessary, CSE will contact legal representative. A public records request for non-client CSE records must be submitted to the Chief Executive Officer who will coordinate release of the records. If necessary, CSE will contact legal representation before release of the information.

SECTION VII. GRIEVANCE PROCEDURES

The following Grievance Policy is disseminated to each CSE staff member, service provider staff members and program participants through a form that the individual signs acknowledging notice of the policy. The forms signed by staff members (CSE and service providers) are maintained by CSE and the forms signed by program participants are maintained in their client files.

GRIEVANCE POLICY

Workforce Investment and Opportunity Act (WIOA), Trade Adjustment Act (TAA), Welfare Transition (WT/TANF) and Wagner-Peyser (WP) Program participants and other interested parties (e.g., contractors, One-Stop partners, One-Stop operators, and employers affected by decision or actions of the local workforce system have a right to file

grievances/complaints with the Local Workforce Development Board, Region 1. The grievance/complaint should be filed with CSE, in accordance with the below listed procedures. In the event you submit a grievance/complaint not under the authority of CSE, CSE will notify you within 5 working days from the receipt of the grievance/complaint of the relevant agency responsible for the grievance/complaint.

Sexual Harassment Policy

An individual or entity desiring a copy of the CSE Sexual Harassment Policy should write or call CSE, 6913 North 9th Avenue, Pensacola, FL 32505; telephone number (850) 473-0939.

Criminal Fraud and Abuse

The procedures for reporting such incidents and instructions for completing the incident reporting form can be found at the following web site: http://www.floridajobs.org/forms/inspec_gen/complaint_assessment.doc. The form should be completed and mailed to: USDOL Office of Inspector General, Office of Investigations, Room S5514, 200 Constitution Avenue NW, Washington, D.C. 20210 or to USDOL South East Regional Inspector General for Investigations, Office of Investigations, Sam Nunn Atlanta Federal Center, 61 Forsyth Street, SW, Suite 6T1, Atlanta, Georgia 30303. Reports or complaints alleging fraud and abuse may also be reported through the USDOL Hotline at 1-800-347-3756.

Reporting Discrimination Complaints

Forms for filing discrimination complaints can be found at the following website: <http://www.floridajobs.org/civilrights/docs/Complaint%20form.docx>

You may file a discrimination complaint by completing the Complaint Information Form found at the above reference website or by sending information listed on the form in writing as directed:

A **WIOA/TAA** complaint may be filed with CSE's Equal Opportunity Officer or the U.S. Department of Labor's Civil Right Center, with a copy to Florida Commerce and the Equal Employment Opportunity Commission, Tampa Area Office. **CSE, Attn: Equal Opportunity Officer, 6913 North 9th Avenue, Pensacola, FL 32504; U.S. Department of Labor, Civil Rights Center, 200 Constitution Avenue, N.W., Room N-4123, Washington, DC 20210; Florida Commerce, Office for Civil Rights, MSC 150, 107 East Madison Street, Tallahassee, FL 32399-4'29, Equal Employment Opportunity Commission (EEOC), Tampa Area Office, 501 East Polk Street, Suite 100, Tampa, FL 33602, 813-228-2310 or TTY 813-228-2003.**

A **WT** complaint may be filed with U. S. Department of Health and Human Services (U.S. Department of Health and Human Services, Office of Civil Rights, Inspector General, Sam Nunn Atlanta Federal Center, 61 Forsyth Street, SW, Suite 3B70, Atlanta, GA 30303), with a copy mailed to Florida Commerce and EEOC Tampa Area (addresses above). You can file electronically at the following address: civic.rights@deo.myflorida.com

A **WP** complaint may be filed with the CSE EO Officer or with the U.S. Department of Labor, Civil Rights Center. See addresses above.

You may contact the **Florida Commission on Human Relations, 4075 Esplanade Way, Room 110, Tallahassee, FL 32399, (850) 488-7082** to file a discrimination complaint within 365 days from date of the allege violation.

Sight and speech impaired person filing a complaint should call the Florida Relay System

at 1-800-955-8771 (TTY) or 1-800-955-8770 for voice assistance.

Filing a Grievance/Complaint and Request for Hearing/Appeal with CSE

An WIOA/TAA/WT participant or entity presumed adversely affected by an CSE action, to include but not limited to: displacement of employee; denial or termination as a WIOA training provider; denial of eligibility as a WIOA OJT or customized training provider; participant sanctioned for using controlled substances; termination of program eligibility or sanctioning for non-compliance with work activities, may submit a Grievance/Complaint or hearing request. Submissions should be concise and clearly written or typed; state the facts, laws, procedures, etc. that the grievant/complainant believes to be relevant for review; and must include a legible address where official notices may be mailed to the grievant/complainant; include the words **REQUEST FOR A HEARING** at the top of the first page in capital letters; and specifically state the type of violation and nature of the action that is the subject of the grievance. The grievance shall be no longer than five pages (exhibits and attachments are not included in the five-page limit) and submitted to CSE, Chief Executive Officer, 6913 North 9th Avenue, Pensacola, FL 32504. CSE will attempt to resolve the grievance/complaint informally. If the matter cannot be resolved informally, CSE must establish a hearing date, complete the hearing and issue a decision within a 60-calendar day time frame from the date the grievance/complaint was filed. When the matter is not resolved informally, you will be notified by certified mail return receipt at least 15 calendar days prior to the hearing. The written hearing notice will include: hearing procedures, date, time, and place of the hearing; pertinent sections of the WIOA, WT, and any federal regulations involved. Affected parties may be represented at the hearing by an attorney or other representative, and may present witnesses or documentary evidence at the hearing. The parties will receive a written decision of the hearing within **30 calendar days** after the hearing by certified mail return receipt requested. Individuals alleging a labor standards violation may submit the grievance/complaint to binding arbitration procedure if the affected parties are covered by a collective bargaining agreement.

WP participants may file discrimination complaints against Florida Commerce or its employees or complaints alleging discrimination by an employer. Special handling procedures are required for complaints filed by Migrant and Seasonal Farm Workers (MSFW). CSE shall attempt to resolve the MSFW complaint. If the MSFW complaints cannot be resolved within five working days of receipt of complaint by CSE, the complaint form and copies of all documents in the complaint file are forwarded to Florida Commerce, Monitor Advocate Office, MSC 150, 107 East Madison St, Tallahassee, FL 32399-4133. Attention: Senior Monitor Advocate.

*Note: Individuals with a disability needing special accommodations shall call CSE at (850) 473-0939 or fax at (850) 473-0935 at least five working days prior to the hearing and state what special accommodation requirements are needed in order to participate in the hearing.

Right to Appeal

An individual, or entity, adversely affected by CSE actions or decisions can file an appeal with the State WIOA/TAA Administrative entity. An appeal may be made to the federal level (USDOL) if the state has not conducted a hearing or made a decision regarding the grievance/complaint **within the mandated 60-calendar day timeframe**, or if either party is dissatisfied with the state hearing decision. If Florida Commerce Administrative Entity

in conjunction with State Board staff determines that grievance/complaint filed at the State level should have been decided at the local level, then the grievance/complaint may be remanded back to CSE.

Filing a Grievance/Complaint and Request for Hearing/Appeal at the State Level

Because of the many types of grievances/complaints and level of hearing/appeals allowed under WIOA/TAA/WT regulations, Florida Commerce staff working in conjunction with the State Board staff will be responsible for reviewing and determining the appropriate processing of requests/appeals filed at the State level. The following procedures should be followed when filing a grievance/complaint and/or requesting a hearing/appeal regarding a decision made by CSE. The request and/or grievance/complaint for a hearing appeal should be clearly identified at top of the first page, i.e., REQUEST FOR HEARING. The written hearing request should not exceed five pages (not including attachments) and should state the facts, procedures, etc. that the grievant/complainant believes to be relevant for review and, if applicable, shall include any written decision made by CSE and an address where official notices may be mailed to the grievant/complainant. The request shall be sent by certified mail return receipt to Florida Commerce, Office of General Counsel, MSC 150, 107 East Madison Street, Tallahassee, FL, 32399-4128. The grievant/complainant and CSE will be contacted at least 5 working days of receipt of the complaint to attempt an informal resolution. If informal methods do not resolve the issue, then a hearing will be scheduled. The complainant/ grievant will be notified of the specific procedures for the hearing and will receive a decision within 60 calendar days from receipt.

State and Federal Level Appeal Process

If Florida Commerce has not reached a decision on the appeal of a local decision or the grievant disagrees with the decision, the grievant/complainant can file an appeal to USDOL no later than 60 calendar days of receipt of the decision being appealed. That request is submitted by certified mail, return receipt to Secretary USDOL, Attention: ASET, Washington, D.C. 20210. A copy of the appeal must be simultaneously provided to Florida Commerce (address above). Actions that may not be appealed to USDOL include: sanctions applied at the local level for using a controlled substance; sanction for non-compliance with work activities; or denial of eligibility as a WIOA/TAA training provider. WP states that non-ES related complaints (employment, discrimination, health and safety, etc.) must be forwarded as soon as possible after being received, to Florida Commerce, Office of General Counsel, MSC 150, 107 East Madison St, Tallahassee, FL, 32399-4128, or to the appropriate federal agency with a copy of the complaint sent to Florida Commerce Office of General Counsel. If the WP complaint is not resolved within 15 working days, then the complaint and associated file documents are forwarded to Florida Commerce, Office of One-Stop and Program Support, MSC 105, 107 East Madison St, Tallahassee FL 32399-4133, Attention: ES Complaint Coordinator.

SECTION VIII. AUDIT PLAN

CSE maintains the Audit Plan as a separate document. The Plan conforms to the requirements of 2 CFR Uniform Guidance Subpart F and the “Audit and Audit Resolution Final Guidance AWI FG 05-019” issued August 12, 2005 by DEO.

SECTION IX. PROCEDURES FOR ESTABLISHMENT AND COLLECTION OF A DEBT

CSE agrees to repay from non-federal funds any amounts accrued due to the mis-expenditure of funds due to willful disregard of the federal law, gross negligence, fraud/theft, or failure to observe accepted standards of administration. CSE does not have any funding which is not federal, therefore, in those instances where the liability does not arise due to willful disregard of the requirements of federal law, gross negligence, or failure to observe accepted standards of administration, CSE will request that the State allow repayment of disallowed costs to be reprogrammed into the same program and title. The reprogramming would take place during the program year the funds were obligated by Florida Commerce or the two succeeding program years. This is in accordance with Training and Employment Guidance Letter No. 2-87.

CSE will take prompt and aggressive corrective action upon becoming aware of any evidence of a violation of the federal law.

The necessity for debt collection from a service provider or vendor is expected to be a rare occurrence in the program. Should the situation occur, CSE will directly attempt to obtain any required repayment amounts from a business or subcontractor. A registered letter will be sent requesting the repayment within 48 work hours of identification. Requested amounts should be paid within 45 days. If this does not occur, appropriate legal sanctions/actions will be imposed.

SECTION X. MONITORING PLAN

INTRODUCTION

The Program Manager or his/her designee will review, monitor and evaluate programmatic activities of CSE and its service providers to ensure compliance with applicable rules and statutes such as: Workforce Investment and Opportunity Act (WIOA), the Trade Adjustment Assistance program (TAA), the Welfare Transition (WT), and Wagner Peyser (WP), The State and Local Plan, The Administrative Plan, and State Policies.

These procedures have been developed from the WIOA, TAA, WT, and WP Monitoring Technical Assistance Guide and from various monitoring handbooks/documents.

It is the intent of this monitoring function to encourage results and improve the overall management, integrity and quality of the programs and activities under the umbrella of CSE.

MONITORING, OVERSIGHT AND EVALUATION PROCEDURES

The Monitoring Unit

The CSE Program Managers or his/her designee are responsible for monitoring, evaluating and reporting on WIOA, TAA, WT and WP Service Provider contracts, special grants and programmatic activities associated with CSE. Comprehensive monitoring will ensure

effective oversight of program activities, maintenance of program integrity, and constructive evaluation and planning. The Program Monitor(s) reports directly to the Chief Operations Officer.

Monitoring Tools

The monitoring tools have been developed and adapted from the Florida Commerce monitoring tool. As with any monitoring activity, the procedures and tools may need to be updated and revised to meet current federal, state or local requirements on an as needed basis. All of the questions on the monitoring tools must be answered. If a question does not apply “X” will be marked.

In performing the monitoring function, CSE may use the following objectives:

1. Compliance Monitoring - the determination that the program activities comply with applicable laws, EF/OSST regulations and other administrative requirements upon which the release of funds depends and that they maintain program integrity.
2. Performance Monitoring - the determination that the activity is performing the appropriate program service required which may be numerical, i.e., number of participants served, number of participants entered into employment, etc., and defined by such things as the law, the contract, performance standards, and State/Local Plan.
3. Managerial/Program Quality Monitoring - includes an in-depth examination of program activities to ensure that a quality process is in place to meet the employment or training objectives. This is based on certain assumptions about what constitutes good or quality programs. The monitors review program activities to verify that these attributes are present. Programs may be refined or modified as a result of what is learned about the process being instituted.

The Monitoring Process

The actual data collection procedure may include one or more of the following methods:

1. Record Review - may be used to monitor participant records, financial records, EEO resource personnel or any activity that has a record keeping approach to record specific data. Monitoring tools and checklists are used to effectively review the records.
2. Interviews - are primarily used for gathering information about program quality and performance for managerial monitoring and for general orientation purposes prior to compliance monitoring reviews.
3. Observation - can be made on such activities as how records are organized, non-verbal communications during an interview and verifying such articles as EEO Posters, Mission and Vision Statements.

The flow of the monitoring process will consist of activities such as:

1. Prior to making an on-site visit, a review of relevant background information,

- identification of data sources, and the location and organization of the activities involved will be completed. The items reviewed will consist, at a minimum, of the service provider's contract, formal monitoring reports or audits, reports submitted by the service provider, relevant laws, regulations, administrative issuances, reports and monitoring instruments related to the monitoring objective.
2. Data collection will fall under the following categories:
 - a. Desk Review - a review of data such as contracts, client folders, EF/OSST data and reports at the monitor's desk. Transference of the data to various checklists and other monitoring tools may be required.
 - b. On-site Review - an actual visit to the training site to review such components as program activities and outcomes, participant records, childcare referral documents, performance standards to evaluate the success of the program, staff or service provider. The monitor will also observe the client process/training activity, and interview appropriate staff or clients.
 - c. Random Sample - a random sample of participant records will be selected to review for compliance with WIOA, TAA, WT, WP, and other programs under CSE's authority and the contractual agreement.
 3. Data Analysis - Final conclusions are developed and written from the integration review and evaluation of all of the data that has been accumulated using the above methods. The steps in the data analysis process include:
 - a. Review the monitoring objectives.
 - b. Give the date and a brief description of the monitoring activities, which may include staff points-of-contact within the organization monitored, the data sources, name and titles of interviewees and records.,
 - c. Formulate conclusions for each monitoring objective citing that they were used in the analysis leading to the conclusion.
 - d. Formulate and integrate conclusions of the overall status of the activity and issues that were covered by the monitoring activity.
 - e. Compare the actual performance to the planned levels in terms of outcomes.
 - f. Provide a written report within 20 working days of the completion of the monitoring activity.
 4. Technical Assistance may be provided upon request or at the discretion of CSE.
 5. There will be follow-up monitoring to determine whether appropriate corrective actions were completed.
 6. Incident report - All instances of suspected fraud or criminal malfeasance, misapplication of funds and gross mismanagement in the operation of any program must be reported. In the event that an instance of possible fraud, abuse or mismanagement is uncovered during the routine monitoring visit, the Program Monitor will immediately report the incident to the Chief Executive Officer so that the appropriate corrective action can be taken such as DE obligation of funds and

cancellation of contracts that are not in compliance with federal regulations and/or the contracts themselves.

- a. Fraud or Criminal Malfeasance should be considered broadly as any alleged deliberate action which is apparently limited to indication of bribery, forgery, extortion, embezzlement, theft of participant checks, kickbacks, intentional payments to a contractor with the expectation of receiving services and payments to ghost enrollees.
 - b. Misapplication of funds should be considered as alleged use of funds, assets or property not authorized or provided for in the grant or contract. This category includes, but is not limited to, nepotism, political patronage, use of participants for political activities, ineligible enrollees, conflict of interest, non-reported income from Federal funds, violation of contract procedures, knowingly or unknowingly violating federal/state law, as applicable. Corrective action may include such activities as technical assistance, guidance, DE obligation of funds, cancellation of the contract and/or notification of CSE legal counsel..
 - c. Gross Mismanagement should be considered as actions or situations arising out of management ineptitude or oversight which leads to major violations of contract provisions and/or which severely hampers accomplishments or achievement of program goals. These include situations which lead to waste of government resources and put into serious jeopardy future support of a particular project. This category includes, but is not limited to, unaudited records, unsupported costs, highly inaccurate fiscal reports and/or program reports, payroll discrepancies, payroll deductions not paid to the Internal Revenue Service and lack of internal control procedures. The corrective action may include technical assistance, guidance DE obligation of funds, cancellation of the contract and/or notification of CSE legal counsel.
7. A written monitoring report will be completed and submitted to the service providers or the appropriate CSE Manager within 20 working days of completion of the formal monitoring activity and may include the following:
- a. Findings - are systematic in nature and may indicate that the subcontractor is not complying with a specific compliance document.
 - b. Corrective Actions - must be provided for each finding to ensure that the service provider/department is aware of the specific corrections which must be undertaken to bring the contract into compliance.
 - c. Omissions - are not systemic in nature and would be considered as an infrequent occurrence.
 - d. Corrective Action Plan - the service provider/department must provide a written corrective action plan within 20 working days of receipt of the official report noting the completion of the corrective actions.
 - e. Objectivity - to emphasize the objectivity of the monitoring effort, findings and

omissions should be corroborated by a specific compliance document.

- f. Exemplary - areas of superior contract performance work noted during the monitoring review may be cited in the monitoring report.
- g. Contract Performance - the EF/OSST systems will provide information in support of the contract work and the service provider official reports.
- h. Draft Review - the CSE Chief Executive Officer and Chief Financial Officer may review drafts of any monitoring report.
- i. Distribution - the report will be addressed to the service provider's contract representative/department manager and a copy may be provided to the contract operational staff, the Appropriate Program Committee and the appropriate CSE staff. Documentation will be maintained to support the findings in the monitoring report.
- j. Monitoring Record Retention - all monitoring documents must be retained in accordance with current retention requirements.

MONITORING SCHEDULE

A monitoring schedule will be drafted in July of each year to ensure that an orderly and complete review of CSE's activities is accomplished within a timely manner. More frequent monitoring may need to be done on a case by case basis if issues are noted that need additional review. The schedule will be provided to the Chief Executive Officer and the affected service provider/department heads by the end of July. The schedule may be revised at the agreement of both parties as long as the review is conducted within the fiscal/programmatic year (e.g., July 1-June 30).

MONITORING OF PROCUREMENT PROCESS AND CSE PROPERTY MANAGEMENT

Bidding Procedures/Process

The competitive procurement process will be monitored annually by the state's fiscal monitoring team to determine that the required procedures have been followed. Procurement procedures are based on the cost of the purchased item or service. The following areas will be reviewed to determine that:

- 1. Items/services where the cost exceeds \$250,000:
 - a. The competitive bid (Request for Proposal) process was utilized.
 - b. The bids were rated and submitted to the designated committee for approval.
 - c. Standard criteria as described in the Procurement Policies were used for the rating of the proposals and a majority committee vote recommended the proposal to be presented to the Board for final approval.
 - d. Sole source procurement was kept to a minimum and approved by the Board.
- 2. A sample of the procurement of items/services with a cost that is from \$10,000 to \$250,000:

- a. The required bids or quotes were obtained.
 - b. The purchase was approved by the Chief Financial Officer or the Chief Executive Officer.
 - c. Sole source procurement has been kept to a minimum and is properly documented.
3. A sample of the procurement of items/services with a cost that is up to \$3,000.
 - a. Approval by the Chief Financial Officer and the appropriate staff manager was obtained.
 - b. A purchase order was issued.

MONITORING OF SERVICE PROVIDERS/PROGRAMS

CSE monitoring procedures for conducting compliance reviews for service provider contracts operated under grants such as WIOA, TAA, WT, and WP will comply with the requirements of 20 CFR 667.400 through 667.500 and in accordance with Uniform Guidance Subpart F.

Service Providers

Service providers will be monitored at least once during the contract period or annually for multi-year contracts. Circumstances such as new programs, number of past findings, concerns, program performance as compared to planned performance or any other factors determined relevant by CSE may warrant more than one monitoring review in a given year.

The monitoring activities will include testing for compliance with the contract, compliance with federal, state and local laws and regulations governing WIOA/TAA/WP funds, and the quality and quantity of performance under the contract. Data will be gathered as to outcomes, success rates, cost effectiveness and value to the community.

Service providers will be notified in writing 10 working days in advance of the planned dates of the monitoring visit with the exception of follow-up and technical assistance reviews. Each notification letter will include a general list of documents which must be available on-site for review. However, additional documentation may be requested at the time of the visit. If any documentation or information or parts thereof are not made available to the monitor promptly and readily throughout the on-site review, the service provider will be cited accordingly for noncompliance.

In addition to regular on-site monitoring review, CSE may conduct follow-up reviews or special or unannounced visits. The service provider may be subject to a follow-up review at the discretion of CSE due to their special nature. These reviews may vary from the standard monitoring procedures.

The on-site visits will include, but not necessarily be limited to, the following:

1. A formal entrance interview with the contract representative to give an overview of the monitoring activities, and finalize any logistical arrangements so that documents and records are accessible.

2. Interviews with staff, participants, instructors and worksite supervisors or employers, as appropriate.
3. Review of participant records and documentation.
4. Review and observation of program activities and services.
5. Visits to training sites and placement worksites.
6. Review of fiscal records (performed by CSE Accounting Staff).
7. At the conclusion of the on-site review, an exit interview will be conducted with the contract representatives to discuss concerns of the monitor.

Service providers will be monitored based on the following types of contracts:

1. Cost Reimbursement

- a. A separate file should be maintained for each service provider and may include such documentation as:
 - A. a copy of the contract and modifications;
 - B. written communications such as monitoring reports, monitoring tools, corrective action plans, technical assistance visit documents;
 - C. The Accounting Department obtains Audits of service providers as required by the Single Audit Act. Accounting staff are responsible for reviewing the audits and maintaining a copy.
- b. The service provider procurement process, as described in the Procurement/Bidding Process Section, will be monitored for compliance.
- c. The service provider's annual audit (if required) will be reviewed for WIOA/WT/TAA/WP compliance (performed by Accounting Staff).
- d. Monitoring of program activities will be performed as described in the plan.
- e. The Accounting Manager maintains a schedule of payments made against the contract. Each contract invoice is reviewed for compliance with the contract and WIOA/WT/TAA/WP laws before approval for payment. The service provider is required to attach enough backup documentation to the invoice so that compliance can be reasonably determined. CSE's Independent Auditor and the State's Fiscal monitoring team reviews compliance for this section.

Technical Assistance

Technical assistance will be provided upon request from the service provider, upon the recommendation of the assigned Program Monitor, Program Manager and/or upon the

direction of the Chief Executive Officer. When the Program Manager observes that the service provider has a lack of understanding of policies and/or procedures required by WIOA/WT/TAA/WP law, he/she will determine whether technical assistance is required and notify the service provider. Technical assistance may also be required when the corrective action plan submitted by the service provider is inadequate.

DE obligation of Funds and Cancellation of Contracts

If issues cannot be resolved through corrective action and/or technical assistance when the service provider is found non-compliant with WIOA/WT/TAA/WP laws, federal regulations and contractual agreements, the Board of Directors may cancel the contract and DE obligate the funds. The following procedure would be followed in such a case:

1. The Program Monitor will suggest corrective action and provide technical assistance.
2. If the finding is still not resolved, the Program Monitor will notify the Chief Executive Officer and the appropriate CSE staff.
3. If the finding cannot be resolved through the Chief Executive Officer, intervention, and a recommendation will be made to the Board of Directors to cancel the contract and DE obligate the funds.
4. With Board approval, the contract will be cancelled and the funds DE obligated from that service provider.

On-the-Job Training

CSE will use On-the-Job Training (OJT) contracts as appropriate. OJT contracts will be monitored on an individual basis and may include the following:

1. Service provider staff will arrange an actual job site monitoring visit during the OJT period. The monitor will interview the staff, employer/supervisor and if available the participant.
2. Verification that the Career Plan has justified the OJT by documenting the DOT Code, salary, participant barriers, grade level and past work experience.
3. Review the OJT contract and training outline for accuracy and completeness.
4. An OJT monitoring written conclusion (noting any concerns or findings) will be provided to the service provider, the Chief Executive Officer, and the Chief Operations Officer within 20 days of the monitoring visit.

MONITORING OF PROGRAM ACTIVITIES

Program activities will be monitored quarterly or more often as required by utilizing the appropriate matrix/monitoring tool. The areas that will be monitored will include the following:

Outreach, Recruitment, and Objective Assessment

Outreach, recruitment and objective assessment activities will be monitored for:

1. Appropriateness and effectiveness of outreach activities as compared to the success of specific target group enrollments and terminations as reflected on the EF/OSST listings. Copies of such documentation as newspaper advertisements or other outreach activities may be maintained in a file.
2. Compliance with ADA and EEO requirements in outreach recruitment advertisements and activities.
3. Size of the targeted population applicant pool recruited as compared to the EF/OSST screen enrollment of these populations.
4. The effectiveness of the objective assessment activity as it relates to identifying targeted populations.

Intake and Eligibility

Monitoring efforts for intake and eligibility may include:

1. A sample of client records from a current service provider EF listing to show those clients determined eligible since the last monitoring review.
2. A monitoring tool will be used to verify the accuracy of the documentation to determine eligibility as described in the Resource Guide, the WIOA Eligibility Documentation TAG and appropriate Division Policies.

Case Management System

The case management system documents the training, placement and supportive service activities for each participant.

1. The Career Plan is the keystone of the case management system and is monitored. It must be reviewed to ensure that the participant is receiving the appropriate mix of training, placement and supportive service activities.
2. The quality of the training process may be identified by positive outcomes, entered employment rates and average placement wages for targeted populations or other criteria described in the contract or described in related policies and procedures.
3. The quality of the supportive service system is identified by the effectiveness and timeliness of the case management system in meeting the supportive service needs of the participant during the training component and, if applicable, during employment or work experience. All supportive services must be in compliance with applicable CSE Board policies and procedures, federal laws, regulations and policies, dealing with support services and procurement. The specific services must be described in the Career Plan, and/or the counselor's notes.

Community Service Work Experience

The community service work experience training requirement for WT participants which is provided at a supervised public, private not-for-profit, or for-profit agency will be monitored as follows:

1. A sample of client records will be reviewed annually or more often as appropriate.
2. A monitoring tool will be used to verify the work experience as described in the service provider contract, the WT Handbook, CSE Board policies, State WT policies and procedures and any other compliance documents.

WIOA Youth Services

Procedures have been specifically developed to monitor WIOA Youth Services and any other WIOA temporary jobs program due to the unique nature of these programs. Such monitoring activities will include:

Organizational Stage

Monitoring for the youth program should begin early in the program year. The monitors must allow ample time to meet with the Program Coordinator and Career Advisors in order to formulate strategies for coordinating the monitoring activities. The monitors must obtain the following information:

1. The number of Career Advisors and the number of caseloads.
2. The names of the Career Advisors and all contact information including site and office locations.
3. The number of youth to be served.
4. The locations of the academic enrichment classes (AEC) and/or work experience sites.

Organizing and Dividing Jobsites

Prior to the conclusion of the academic enrichment portion of the program each Career Advisor shall provide the monitoring staff with a participant list which should include: participant name, social security number, date of birth, home address, home telephone number, job title, number of hours to work, jobsite, supervisor's name and jobsite telephone number. Specific jobsites will then be assigned to each monitor for visitation.

Jobsite Visitation

1. The monitors will visit each jobsite and interview supervisors and participants to ensure that the program is in compliance with all worksite agreements and all applicable state and federal regulations. Special emphasis will be placed on determining that all Child Labor Laws are followed.
2. A jobsite visitation form must be completed for each visit. This includes all subsequent visits.

Corrective Action and Follow-Up

In the event that a problem with a participant or jobsite should arise, the Career Advisors should be immediately informed. If the Career Advisor is unable to resolve the problem, the Program Coordinator and Program Monitor shall be contacted. A Corrective Action Form will be completed at the time of the problem's discovery and filed in the corrective action binder.

Follow-up of all corrective actions will be completed during the next monitoring visit or, in extreme cases, the following work day. All actions and corrective actions will be noted on the Corrective Action Form.

Folder/Record Review

Program Monitor(s) are responsible for reviewing the participant folders of their assigned caseload. This will be performed several times throughout the year to ensure that all items added during the course of the program are reviewed. The File Folder Checklist will be used to affirm that all items that are required are included in the folder. The Monitor will review a sample of completed folders to test that WIOA eligibility requirements are met.

Youth Services Monitoring

The Youth Services monitoring instruments/tools include the review of any basic remediation courses, high school/GED, Jobsite Visitation Forms, and, Corrective Action Forms. The forms may be officially amended as needed. All items and blanks on the form must be completed or marked with an N/A. All monitoring instruments will be completed as soon as possible and stored in the Youth Services binder located in an area determined by the Program Monitor. Completed monitoring instruments are official WIOA documents and will be archived and destroyed in accordance with current WIOA rules and regulations.

MONITORING FISCAL ACTIVITIES

The monitoring of all service providers' fiscal activities is performed by the Accounting Department. The Accounting Department maintains a contract file and payment schedule for each service provider and verifies each invoice submitted against the provisions of the contract. CSE requires a level of backup to be submitted with each invoice that will allow determination of validity and allowability of an expense. CSE will perform a risk analysis of each service provider taking into account whether a Single Audit was performed and whether the invoice backup was complete and adequate documentation of expenditures. If the service provider does not receive a Single Audit and they are considered high risk based upon documentation, a site visit will be made to review financial procedures and internal control. A report will be submitted for inclusion with the annual monitoring report.

CSE's Audit Plan details the requirements and monitoring procedures for service provider audits and their submittal to CSE. The Accounting Department performs these monitoring procedures and maintains the files.

EMPLOY FLORIDA/ONE STOP SERVICE TRACKING

Verification of the EF/OSST will be completed on an annual basis or more often as required and will consist of such activities as:

1. Verification that the client data is entered in the system in a timely manner.
2. Testing for accuracy in a sample of enrolled and terminated records.
3. Verifying the maintenance of the master file of the client records.
4. Verifying the accurate compilation of the data to provide statistical reports.

REVIEW OF INTERNAL OPERATIONS

A complete review of the internal administrative operations may be performed at the request of the Chief Executive Officer or the Board of Directors. Internal hearings may be utilized to monitor and research various internal activities.

SECTION XI. EQUAL OPPORTUNITY PROCEDURES

CSE maintains a Method of Administration (MOA) plan in a separated document. This plan is updated as required by policy and legal requirements.

SECTION XII. PRIOR APPROVAL PROCESS

The Uniform Guidance requires that certain cost items and administrative provisions have approval from the oversight agency prior to expending funds or implementing the administrative provisions. CSE will follow the DEO Policy #87 in order to comply with the circular requirements.

1. An annual approval form for as many of the specified cost items as possible will be filed by June 15th of each year.
2. A prior approval request form for other individual approval requests will be filed on a case-by-case basis.
3. The forms will be submitted electronically to florida.myflorida.com. Florida Commerce staff will process the request and email their final decisions to CSE.

SECTION XIII. FRAUD POLICY

PRACTICE OF ETHICAL BEHAVIOR

Unethical actions, or the appearance of unethical actions, are unacceptable under any conditions. The policies and reputation of CSE depend to a very large extent on the following considerations.

Each employee must apply her/his own sense of personal ethics, which should extend beyond compliance with applicable laws and regulations in business situations, to govern behavior where no existing regulation provides a guideline. It is each employee's responsibility to apply common sense in business decisions where specific rules do not provide all the answers.

In determining compliance with this standard in specific situations, employees should ask themselves the following questions:

1. Is my action legal?
2. Is my action ethical?
3. Does my action comply with CSE policy?

4. Am I sure my action does not appear inappropriate?
5. Am I sure that I would not be embarrassed or compromised if my action became known within the Organization or publicly?
6. Am I sure that my action meets my personal code of ethics and behavior?
7. Would I feel comfortable defending my actions on the 6 o'clock news?

Each employee should be able to answer "yes" to all of these questions before taking action.

The Director, Managers and Supervisors are each responsible for the ethical business behavior of her/his subordinates. Directors, Managers and supervisors must weigh carefully all courses of action suggested in ethical and economic terms and base their final decisions on the guidelines provided by this policy as well as their personal sense of right and wrong.

COMPLIANCE WITH LAWS, REGULATIONS AND ORGANIZATION POLICY

CSE does not tolerate the willful violation or circumvention of any Federal, state, local, or foreign law by an employee during the course of that person's employment; nor does CSE tolerate the disregard or circumvention of CSE policy or engagement in unscrupulous dealings. Employees should not attempt to accomplish by indirect means, through agents or intermediaries, that which is directly forbidden.

Implementation of the provisions of this policy is one of the standards by which the performance of all levels of employees will be measured.

Disciplinary Action

Failure to comply with the standards contained in this policy will result in disciplinary action that may include termination, referral for criminal prosecution, and reimbursement to CSE or to the federal/state government, for any loss or damage resulting from the violation. As with all matters involving disciplinary action, principles of fairness will apply. Any employee charged with a violation of this policy will be afforded an opportunity to explain her/his actions before disciplinary action is taken.

Disciplinary action will be taken:

1. Against any employee who authorizes or participates directly in actions that are a violation of this policy.
2. Against any employee who has deliberately failed to report a violation or deliberately withheld relevant and material information concerning a violation of this policy.
3. Against any Director, Manager or Supervisor who attempts to retaliate, directly or indirectly, or encourages others to do so, against any employee who reports a violation of this policy.

FRAUD POLICY

Scope

This policy applies to any fraud or suspected fraud involving employees, officers or

directors, as well as members, vendors, consultants, contractors, funding sources and/or any other parties with a business relationship with CSE. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship with CSE.

Policy

Management is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Each member of the management team will be familiar with the types of improprieties that might occur within his or her area of responsibility, and be alert for any indication of irregularity.

Any fraud that is detected or suspected must be reported immediately to the Chief Executive Officer, Chief Financial Officer or, if necessary, to the Chair of the CSE Executive Committee, who coordinates all investigations.

Actions Constituting Fraud

The terms fraud, defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

1. Any dishonest or fraudulent act
2. Forgery or alteration of any document or account belonging to CSE
3. Forgery or alteration of a check, bank draft, or any other financial document
4. Misappropriation of funds, securities, supplies, equipment, or other assets of CSE
5. Impropriety in the handling or reporting of money or financial transactions
6. Disclosing confidential and proprietary information to outside parties
7. Accepting or seeking anything of material value from contractors, vendors, or persons providing goods or services to CSE. Exception: gifts less than a nominal \$25 in value.
8. Destruction, removal or inappropriate use of records, furniture, fixtures, and equipment
9. Any similar or related irregularity

If there is a question as to whether an action constitutes fraud, contact the Chief Executive Officer, Chief Financial Officer or, if necessary, the Chair of the Executive Committee for guidance.

Investigation Responsibilities

The Executive Committee has the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. The Executive Committee may utilize whatever internal and/or external resources it considers necessary in conducting an investigation. If an investigation substantiates that fraudulent activities have occurred, the Executive Committee will issue reports to appropriate designated personnel and, if appropriate, to the Escarosa Board of Directors.

Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with

legal counsel and senior management, as will final dispositions of the case.

If suspected fraud or other wrongdoing involves programs funded in whole or in part with federal funds, additional responsibilities, such as special reporting and disclosure to the awarding agency, may apply to the organization. It is the policy of CSE to fully comply with all additional reporting, disclosure and other requirements pertaining to suspected acts of fraud as described in award documents.

Confidentiality

The Executive Committee, Chief Executive Officer and the Chief Financial Officer treat all information received confidentially. Any employee who suspects dishonest or fraudulent activity will notify the Chief Executive Officer, Chief Financial Officer or if necessary, the Executive Committee Chair immediately, and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act (see Reporting Procedures section below).

Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect CSE from potential civil liability.

Authority for Investigation of Suspected Fraud

Members of the CSE Executive Committee will have free and unrestricted access to all CSE records and premises, whether owned or rented; and the authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who may use or have custody or any such items or facilities when it is within the scope of their investigations.

Reporting Procedures

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

An employee who discovers or suspects fraudulent activity will contact the Chief Executive Officer, Chief Financial Officer or, if necessary, the Chair of the Executive Committee immediately. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual(s), his or her attorney or representative(s), or any other inquirer should be directed to the Executive Committee or legal counsel. No information concerning the status of an investigation will be given out. The proper response to any inquiry is "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation", "the crime", "the fraud", "the forgery", "the misappropriation", or any other specific reference.

The reporting individual should be informed of the following:

1. Do not contact the suspected individual in an effort to determine facts or demand restitution.

2. Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the CSE legal counsel or the Executive/Audit Committee.

Sarbanes-Oxley Act of 2002

CSE will comply with the following requirements of the Sarbanes-Oxley Act of 2002:

It is illegal for any corporate entity to punish whistleblowers or retaliate against any employee who reports suspected cases of fraud or abuse (SOX, Section 1107, Section 1513 of Title 18, USC)

It is a crime to alter, cover up, falsify, or destroy any document that may be relevant to an official investigation (SOX, Section 1102, Section 1512 of Title 18, USC).

SECTION XIV. BOARD ADOPTED/APPROVED POLICIES

- CSE Local Operating Procedures – Insurance Waiver Benefits
Approved by CSE Board of Directors – January 25, 2024
- Strategic Policy – Education and Industry Consortiums
Adopted by CSE Board of Directors – November 3, 2023
- Strategic Policy – Regional Planning Areas Strategic Policy
Adopted by CSE Board of Directors – November 3, 2023
- Administrative Policy – 090 – Eligible Training Providers List Requirements
Adopted by CSE Board of Directors – November 3, 2023
- Administrative Policy – 095 – Youth Program Eligibility/Waiver for Workforce
Innovation & Opportunity Act Out-of-School Youth
Expenditures
(Update in process by Florida Commerce)
Adopted by CSE Board of Directors – July 20, 2023
- Administrative Policy – 115 – Common Exit
Adopted by CSE Board of Directors – November 16, 2022



INSURANCE WAIVER BENEFITS
LOCAL OPERATING PROCEDURES
JANUARY 23, 2024

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Introduction:

This policy outlines the insurance waiver benefits. This is the process for employees who wish to opt-out of the company-provided health insurance due to having adequate coverage through another source. It also details the financial incentive offered to employees who choose to opt-out.

Eligibility:

- Employees are eligible to opt-out of company-provided health insurance if they can demonstrate proof of comprehensive health insurance coverage from another source, such as:
 - A spouse's employer-sponsored plan
 - Individual or family health insurance plan
 - Government-sponsored health insurance program (e.g., Medicare, Medicaid, Tricare)
- The alternative coverage must provide comparable benefits to the company-provided plan, including coverage for:
 - Inpatient and outpatient hospital care
 - Physician services
 - Prescription drugs
 - Mental health and substance abuse treatment
 - Preventive care

Opt-Out Process:

- Employees interested in opting out must submit a written request to the accounting department, along with proof of their alternative health insurance coverage.
- The accounting department will review the request and determine eligibility.

- Upon approval, employees will be required to sign a waiver acknowledging their understanding of the implications of opting out, including:
 - Loss of company-paid portion of health insurance premiums
 - Ineligibility for company-sponsored health insurance benefits, such as vision and dental coverage
 - Responsibility for any future changes in their alternative health insurance coverage

Stipend:

- As an incentive for opting out, the company will offer a monthly stipend to eligible employees.
- The amount of the stipend will be 50% of the premium cost of current individual plans available to employees.
- The stipend will be taxable income for the employee.

Employee Responsibilities:

- Employees who opt-out are responsible for:
 - Maintaining their alternative health insurance coverage throughout their employment.
 - Notifying the accounting department immediately of any changes to their alternative health insurance coverage.
 - Providing updated proof of coverage annually.

Company Responsibilities:

- The company will:
 - Provide information and resources about the opt-out process and stipend.
 - Assist employees in navigating the opt-out process.
 - Maintain confidentiality of employee health insurance information.

Revisions:

- This policy is subject to change at any time with or without prior notice.

Questions:

- Employees with questions about this policy should contact the accounting department.



INSURANCE WAIVER FORM

This waiver form must be completed by any eligible employee who has voluntarily elected to waive his/her opportunity to participate in the employer-sponsored group health plan.

EMPLOYEE NAME	DATE OF HIRE

I hereby certify that the medical insurance benefits provided by my employer has been explained to me, and that I elect to decline the plan. I understand by declining this offer I may not be offered another opportunity to participate unless I marry, divorce, have a child (natural or adoption), experience an involuntary loss of health benefits, or any other involuntary cause as defined under section 125 of the IRS code. I must request to enroll within 30 days after a qualifying event. I may also enroll during the next open enrollment period.

Reason for decline:

--

Signature: _____

Date: _____



Strategic Policy

Title:	Education and Industry Consortiums
Adopted:	
Effective:	

I. PURPOSE AND SCOPE

Section 445.007(15), Florida Statutes, requires each local workforce development board to create an education and industry consortium composed of representatives of educational entities and businesses in the designated workforce service delivery area.

This policy requires local workforce development boards to appoint education and industry consortiums composed of local leaders who provide independent information from stakeholders in their local area. Local workforce development boards shall consider this information in creating strategies and local plans that describe efforts to provide educational and workforce opportunities to businesses and job seekers. The goal is to align educational programming with industry needs at the local level.

This policy applies to local education and industry consortiums and the local workforce development boards that appoint them. Education and industry consortiums act as independent advisory groups. Members do not have any direct or implied authority over local workforce development boards, their membership or employees.

II. BACKGROUND

Signed into law May 15, 2023, Senate Bill 240, an act relating to education, amended section 445.007(15), Florida Statutes, requiring each local workforce development board to create an education and industry consortium composed of representatives of educational entities and businesses in the designated service delivery area.

CareerSource Florida surveyed local workforce development boards and education institutions to determine what ongoing activities existed and obtain information and recommendations from local education and industry stakeholders about the availability of education, employment and

training opportunities available to businesses and job seekers in local workforce development areas.

A workgroup was convened to develop a collaborative strategic policy that meets statutory requirements of Senate Bill 240 and aligns all relevant federal, state and local laws and policies. The goal for these consortia is for the local workforce development board to obtain local community-based information related to educational programs and industry needs and provide that information to local workforce development boards to inform programs, services and partnerships in the service delivery area. This approach ensures local workforce development boards are informed about the current workforce and talent needs of their targeted industries and existing educational and training offerings. This approach also affords businesses the opportunity to closely collaborate with workforce and education stakeholders to eliminate barriers and identify innovative talent pipeline opportunities like work-based learning experiences, internships, preapprenticeship, registered apprenticeship, on-the-job training, customized training, Incumbent Worker Training and other training opportunities.

The workgroup, which included stakeholders from education, business, state government and local workforce development boards, met six times and made recommendations informing the strategic policy elements listed below.

III. POLICY

Required Membership

Each local workforce development board shall create an education and industry consortium composed of representatives of educational entities and businesses in the designated service delivery area. The chair of the local workforce development board shall appoint the consortium members. A member of a local workforce development board shall not serve as a member of the consortium. Consortium members shall be appointed for two-year terms beginning on Jan. 1 of the year of the appointment, and any vacancy on the consortium must be filled for the remainder of the unexpired term in the same manner as the original appointment.

The membership of the education and industry consortium must meet the following requirements:

Industry Representative Requirements:

- Chief Executive Officers or presidents or other executive level staff from the top public and private employers in the local area.
- Industry representatives should reflect the priority industries in the local area.

Education Representative Requirements:

- Superintendents, presidents, or other leadership staff from education institutions in the local area that represent both public and private education entities in:
 - K-12 education
 - District Technical Colleges
 - State Colleges
 - Universities
 - Other degree or credential granting institutions in the local area

If a member of the education and industry consortium is unable to attend a meeting, a designee from the members' executive team may attend.

Meetings

Each education and industry consortium composed of representatives of educational entities and businesses in the designated service delivery area must meet at least quarterly. The local workforce development board will ensure that administrative support is provided to the consortium as needed and will be specifically responsible for the following:

- Maintaining a roster of consortium members and posting the current roster on the local workforce development board website.
- Posting scheduled consortium meetings on the local workforce development board website.
- Posting the quarterly reports from each meeting on the local workforce development website.

It is not required that consortium meetings be separately conducted from existing, similar meetings in the local area. Consortium meetings' discussions need only focus on the local labor market needs including:

1. Industry representatives sharing their specific talent development needs or observations on talent in the local area.
2. Education representatives sharing what specific education offerings are available in the local area.

Reports

Education and industry consortiums in each local area shall provide quarterly reports to the applicable local workforce development board (and locally designated areas) which provide community-based information related to educational programs and industry needs to inform the local workforce development board on programs, services, and partnerships in the service delivery area.

Quarterly reports shall include:

- A record of the consortium members in attendance.
- A summary analysis of the local labor market based on industry representative needs and education offerings.
- Information on priority industry sectors and occupations for the local area.
- Information on the status of existing talent pipelines for in-demand occupations and the need to expand or leverage existing and/or new resources.

Local workforce development boards are encouraged to consider information obtained from the education and industry consortium to determine effective ways to grow, retain and attract talent to the service delivery area.

As noted above, quarterly education and industry consortium reports shall be published on the local workforce development board's website. Links to education and industry consortium reports and rosters shall be included in each local workforce development board's Workforce Innovation and Opportunity Act local plan.

IV. AUTHORITY

[Public Law 113-128, Workforce Innovation and Opportunity Act \(2014\)](#)

[Chapter 445.004, Florida Statutes](#)

[Chapter 445.007, Florida Statutes](#)

V. ATTACHMENTS

Consortium Member Appointment Letter Template

Consortium Roster Matrix Template

Quarterly Report Template



Strategic Policy

Title:	Regional Planning Areas Strategic Policy
Adopted:	
Effective:	

I. PURPOSE AND SCOPE

A Regional Planning Area is made up of two or more local workforce development areas to improve workforce system alignment within larger economic development areas to support economic mobility, growth and prosperity.

The intended goals of establishing Regional Planning Areas across neighboring local workforce development areas include but are not limited to:

- Aligning workforce strategies to address the needs of shared industry sectors, employers and significant populations of job seekers.
- Addressing common labor shortages and worker skills gaps with aligned service strategies.
- Realizing system efficiencies through reducing resource costs (monetary, time or other).

Beyond establishing formal Regional Planning Areas as defined in this policy, local workforce development areas are encouraged to engage in other partnership opportunities with the broader CareerSource Florida network that achieves these goals.

II. BACKGROUND

Public Law 113 – 128, The Workforce Innovation and Opportunity Act (WIOA), requires the state workforce development board to assist the Governor in developing, implementing and modifying a State Workforce Development Plan. Florida's WIOA State Plan describes Florida's strategy for supporting the publicly funded workforce system. WIOA Section 106 describes the process by which the Governor designates local workforce development areas within the state. Local areas are designated consistent with labor market areas in the state;

are consistent with regional economic development areas in the state; and have available the federal and non-federal resources necessary to effectively administer WIOA activities including whether the areas have the appropriate education and training providers such as institutions of higher education and area career and technical education schools.

The Reimagining Education and Career Help (REACH) Act was signed into law in June 2021. The REACH Act addresses the evolving needs of Florida's economy by increasing the level of collaboration and cooperation among state businesses and education communities while improving training within and access to a more integrated workforce and education system for all Floridians. The law takes an integrated, collaborative approach to strengthen partnerships and enhance access to education, training and employment opportunities within and across key workforce, education and support services systems that are the backbone of Florida's comprehensive workforce development ecosystem.

In December 2021, the CareerSource Florida Board of Directors approved CareerSource Florida Policy 2021.12.09.A.1 – Comprehensive Employment, Education and Training Strategy. This strategic policy encourages local workforce development boards to use all allowable resources and to collaborate with all partners to develop innovative strategies that create simplified access to Florida's workforce system and provide excellent customer service for Florida's job seekers and businesses; focus on continuous improvement, strengthen partnerships to leverage shared resources and eliminate duplication of services; align programs and resources to meet local market demand in occupations that lead to self-sustaining jobs; and, implement data-driven accountability measures and quantifiable outcomes related to training programs, employment and services to Florida businesses.

On Feb. 23, 2023, the CareerSource Florida Board of Directors approved the Florida Workforce System Transformation Plan, a three-pillar plan directing the CareerSource Florida network to modernize the local workforce development board governance structure in the nation's third-largest state and better position the system to be more customer-centered, cost effective and responsive to meet workforce talent demands. The plan focuses on:

- Alignment and consolidation for local workforce development boards.
- System-wide improvements for improved customer consistency and better leveraging of public funds; and
- Regional planning to further promote workforce system alignment with education and economic development and optimize opportunities for regional growth.

The Governor subsequently affirmed the CareerSource Florida Board of Directors' recommendation to realign and consolidate local workforce development areas as outlined in the Florida Workforce System Transformation Plan.

III. POLICIES AND PROCEDURES

The Florida Workforce System Transformation Plan directs the CareerSource Florida network to establish Regional Planning Areas. The requirements for Regional Planning Areas in this policy are established by WIOA, Florida law, and actions by the CareerSource Florida Board of Directors.

CareerSource Florida, in collaboration with the Governor's REACH Office, FloridaCommerce and local workforce development boards, shall develop recommendations to the Governor and state workforce development board for the designation of Regional Planning Areas for the state. Local workforce development boards may request designation as a Regional Planning Area by submitting the request and supporting documentation to the state workforce development board for consideration.

The state, after consultation with local workforce development boards and chief local elected officials for the Regional Planning Area, shall require the local workforce development boards and chief local elected officials within a planning region to include the shared Regional Planning Area objectives, activities, and performance elements as a regional addendum to each local workforce development board's WIOA local plan. The state shall provide technical assistance and labor market data, as requested by local areas, to assist with such regional planning and subsequent service delivery efforts.

Regional Planning Area and local WIOA plans must align with Florida's WIOA Statewide Plan.

Requirements for Regional Planning Areas:

- Each local workforce development area must be part of a Regional Planning Area.
- Regional Planning Areas must include, at a minimum, two contiguous local workforce development areas within Florida.
- Regional Planning Areas shall have relevant relationships as evidenced by population centers, commuting patterns, industrial composition, location quotients, labor force conditions and geographic boundaries.
- Regional Planning Areas shall establish a shared regional service strategy with a defined goal.
- Regional planning areas shall establish administrative cost arrangements across local workforce development areas. Acceptable examples of administrative cost arrangements include but are not limited to shared staff, technology systems, or back-end administrative support tools.
- Chief Local Elected Officials in a new regional planning area **MUST** participate in the regional planning process that results in the inclusion of the shared regional objectives and initiatives as an addendum to each local workforce development board's WIOA plan.
- The regional plan must include a description of activities that result in the following items:
 - Establishment of regional service strategies using cooperative service delivery agreements that include but are not limited to:
 - Consistent eligibility standards and enrollment processes.
 - Common training and coordination of supportive service offerings.
 - Common technology tools and sharing of data within tools outside of Employ Florida.
 - Development and implementation of sector strategies for in-demand sectors or occupations.

- Collection and analysis of regional labor market data.
- Coordination of supportive services.
- Coordination of services with regional economic development services and providers.
- Establishment of agreement concerning how the regional planning area will collectively negotiate performance for the local workforce development areas or the planning region.

IV. AUTHORITIES

[Public Law 113-128, The Workforce Innovation and Opportunity Act \(WIOA\)](#)

[Chapter 445.003 – 445.007, Florida Statutes](#)

[Chapter 2021-164, Laws of Florida, The Reimagining Education and Career Help Act](#)

[CareerSource Florida Strategic Policy 2000.08.15.I.8D -- Certification of Local Workforce Development Boards](#)

[CareerSource Florida Strategic Policy 2020.02.20.A.1 – Board Governance and Leadership](#)

[CareerSource Florida Administrative Policy 094 – Local Workforce Development Area Designation](#)

[Consolidated Action Item – Reimagining Florida’s Workforce System](#)

V. RESOURCES

[Reimagining Florida’s Workforce System: A Three-Pillar Plan for Transformation](#)

[Future State Options Report](#)

[Background Research and Analysis Report](#)



**POLICY
NUMBER
090**

Administrative Policy

Title:	Eligible Training Providers List Requirements		
Program:	Workforce Innovation and Opportunity Act		
Effective:	3/1/2016	Revised:	TBD

I. PURPOSE AND SCOPE

The purpose of this policy is to provide guidance to local workforce development boards (LWDBs) on the Eligible Training Provider List (ETPL) and related federal and state requirements, performance standards, data reporting, and procedures for determining initial and continued eligibility of training providers and programs of study.

II. BACKGROUND

Workforce Innovation and Opportunity Act (WIOA) Title I training can be provided through a variety of contract mechanisms, or it may be funded through an Individual Training Account (ITA) that is used to purchase training from an Eligible Training Provider (ETP). ETPs are postsecondary providers of training services that are eligible to receive funds from LWDBs as prescribed in Section 133(b) of WIOA. The ETPL is mandated by Section 122 of WIOA, which requires the Governor, through the state workforce development board, CareerSource Florida, Inc., to establish criteria, information requirements, and procedures on the eligibility of training providers of training services in the state. Additionally, Florida's 2021 Reimagining Education and Career Help (REACH) Act charges the Florida Department of Commerce (FloridaCommerce) with establishing ETP criteria focused on participant outcomes.

The workforce development system established under WIOA emphasizes informed consumer choices, job-driven training, provider performance, and continuous improvement. The quality and selection of training providers and programs of study are vital to achieving these core principles.

III. AUTHORITY

Workforce Innovation and Opportunity Act of 2014, Public Law 113-128

20 Code of Federal Regulations (CFR) 680.400 et seq., Subpart D – Eligible Training Providers

Training and Employment Guidance Letter (TEGL) No. 8-19 and TEGL No. 8-19, Change 1

TEGL No. 13-16

TEGL No. 3-18

TEGL No. 21-22

Section 445.003(7)(b), Florida Statutes (F.S.)

Section 445.004(4)(h), F.S.

Section 1005.21, F.S.

Section 1008.39, F.S.

IV. POLICIES AND PROCEDURES

An ITA may be used to pay for any allowable type of training if the program of training services (also referred to as a “program of study”) is on the ETPL. ETPs are entities that are eligible to receive WIOA Title I-B funds for adult and dislocated worker participants who enroll in training programs, through ITAs. ITAs may also be used for WIOA Title I Youth funds to provide training to older, out-of-school youth, ages 18-24, and in-school youth, ages 16-21.

WIOA requires that each state ensure qualified providers offering a variety of job-driven training programs are available. A training provider must provide a program of study to be included on the ETPL.

A. STATE AND LOCAL ETPL

FloridaCommerce and the LWDBs must work together to identify ETPs to be included on the state ETPL. LWDBs must select approved training providers from the state ETPL. In addition to the criteria outlined in this policy, LWDBs may add additional requirements for training providers, except registered apprenticeship programs (RAPs), that supplement the criteria and information requirements for an ETP or program of study. This will result in training providers that are on the state

ETPL that may not be eligible for inclusion on the local ETPL; therefore, the local ETPL will be a subset of the state ETPL. LWDBs that do not establish additional requirements through local policy must include all state ETPs on its local ETPL. Note: All ETPs on a local ETPL must first be on the state ETPL.

State and local ETPLs must be maintained in the state's online labor exchange and case management system, Employ Florida. Also, LWDBs must make the state ETPL or their local ETPL, as appropriate, publicly available through their local websites.

B. PROVIDER AND PROGRAM ELIGIBILITY UNDER WIOA

To be eligible to apply for inclusion on the ETPL and to receive training funds under WIOA Section 133(b), the training provider must be one of the following types of entities detailed in 20 CFR 680.410(d):

1. Institutions of higher education such as universities, colleges, or other public or private institutions of higher education that provide programs that lead to a recognized postsecondary credential.
2. RAPs.
3. Other public or private training providers, which may include community-based organizations and joint labor-management organizations.
4. Eligible providers of adult education and literacy activities under WIOA Title II, if these activities are provided in combination with training services as described in 20 CFR 680.350.

Additionally, LWDBs may be included on the ETPL if they meet the conditions of WIOA Section 107(g)(1), which states that authority may be permitted to LWDBs to provide training services pursuant to a request from the LWDB if the local board:

1. Submits a request or an application to FloridaCommerce for approval by the CareerSource Florida Board of Directors, which must include:
 - a. Satisfactory evidence that there is an insufficient number of eligible providers of such a program of training services to meet local demand in the local area;
 - b. Information demonstrating that the LWDB meets the requirements for an eligible provider of training services under WIOA Section 122; and
 - c. Information demonstrating that the program of training services prepares participants for an in-demand industry sector or occupation in the local area; and
2. Makes the proposed request or application available to eligible providers of training services and other interested members of the public for a public comment period of not less than 30 days.

C. PROGRAM OF STUDY

A program of study is a course, class, or structured regimen that provides training leading to:

1. An industry-recognized postsecondary credential, a secondary school diploma, or equivalent;
2. Employment; or
3. Measurable skills gains leading to one of the above.

Training services may be delivered in person, online, or using a blended method or approach. Online training providers may apply and be considered for inclusion on the state and local ETPLs but are required to meet the same eligibility and performance criteria established for classroom-based instruction providers. Training programs must also be made physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, such as persons with disabilities.

ETPs may offer programs of study that include:

1. Occupational skills training including training for non-traditional employment;
2. On-the-Job Training (OJT);
3. Incumbent Worker Training (IWT);
4. Programs that combine workplace training with related instruction, which may include cooperative education programs;
5. Private-sector training programs;
6. Skill upgrading and retraining;
7. Entrepreneurial training;
8. Job readiness training provided in combination with training services or transitional jobs;
9. Adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with services provided in the programs listed in numbers 1. through 7., above; and
10. Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

D. INITIAL ELIGIBILITY (TRAINING PROVIDERS)

Initial eligibility for the ETPL applies to all training providers except RAPs registered with the Florida Department of Education (DOE). The training provider must supply verifiable, program-specific performance information pursuant to the criteria established by federal regulations and state statutes under which the provider applies

to become an ETP. The information provided must support the training provider's ability to serve participants.

To meet initial eligibility to be included on the ETPL, a training provider must provide the following:

1. A description of the training or educational institution including the provider's address, email, Federal Employer Identification Number (FEIN), and the name of the contact person;
2. Verification the provider is licensed, certified and/or otherwise authorized under Florida law to provide training services (this applies to in-state and out-of-state providers);
3. A detailed description of each program of training services being submitted for initial eligibility determination;
4. Data supporting the cost of attendance (including, but not limited to, tuition and fees);
5. Verification that the program leads to a credential on the Master Credentials List (MCL) and information on any other associated MCL credentials which can be used as part of a sequence in an individual's career lattice;
6. Whether the provider has developed the training in partnership or collaboration with a business or industry (identifying the business or industry);
7. Identification of the in-demand industry sectors and occupations that best fit with the training program;
8. A description of prerequisites, skills, and knowledge required prior to the commencement of the training; and
9. Information related to WIOA performance indicators (employment, median earnings, credentials) other than measurable skills gains.

All eligibility determinations are made based on the review of required information, which must be submitted through the ETPL portal in Employ Florida, as outlined in **Section IV. I – ETPL Portal** of this policy.

Training providers seeking initial eligibility determinations should contact an LWDB in the local area or planning region in which they plan to operate. The LWDB will provide the training provider with guidance and assistance with the ETPL application process and requirements, as needed. The LWDB will review the application to ensure documentation requirements are met and notify the State ETPL Coordinator via email at ETPL@commerce.fl.gov that a determination of initial eligibility request has been submitted. When conducting a preliminary review of training provider applications, the LWDB must do so using only the state's criteria. The LWDB should not apply any additional local requirements or criteria during the preliminary review process.

The State ETPL Coordinator will approve or deny the application and notify the training provider of the determination through Employ Florida or the training provider's preferred mode of communication as indicated in the application. If approved, the ETP will be added to the state ETPL.

Alternatively, training providers may directly contact the State ETPL Coordinator at ETPL@commerce.fl.gov to request an initial eligibility determination. The State ETPL Coordinator will review the application to ensure that all documentation requirements are met. The State ETPL Coordinator will follow the aforementioned process for determining eligibility and providing notification to the training provider for approval or denial of the initial eligibility request.

Training providers and the programs of study that are approved will receive initial eligibility for one year and will be subject to the continued eligibility requirements subsequent to their initial eligibility period.

E. INITIAL ELIGIBILITY (PROGRAMS OF STUDY)

A training provider's request for an initial eligibility determination must be accompanied by a request for initial eligibility determination for at least one program of study. A training provider may request initial eligibility determinations for multiple programs of study, but each program of study is reviewed independently. When an ETP with continued eligibility for one or more programs of study requests that a new program of study be added to the ETPL, the new program of study will undergo an initial eligibility determination and may be approved or denied.

Training providers seeking initial eligibility for a program of study should contact an LWDB in the local area or planning region in which they plan to operate. The LWDB will provide the training provider with guidance and assistance with the ETPL application process and requirements, as needed. The LWDB will review the application to ensure documentation requirements are met and notify the State ETPL Coordinator via email at ETPL@commerce.fl.gov that a determination of initial eligibility request for a program of study has been submitted.

All eligibility determinations are made based on the review of required information, which must be submitted through the ETPL portal in Employ Florida, as outlined in **Section IV. I – ETPL Portal** of this policy. The State ETPL Coordinator will approve or deny the program application and notify the training provider of the determination(s) through Employ Florida or the preferred mode of communication indicated in the application for initial eligibility.

Alternatively, training providers may directly contact the State ETPL Coordinator at ETPL@commerce.fl.gov to request an initial eligibility determination for one or more programs of study. The State ETPL Coordinator will review the application to ensure that all documentation requirements are met. The State ETPL Coordinator will follow

the aforementioned process for determining eligibility and providing notification to the training provider for approval or denial of the initial eligibility request.

F. CONTINUED/SUBSEQUENT ELIGIBILITY

After a training provider has completed the one-year initial eligibility period, the training provider is required to apply for continued eligibility and recertify their program(s) of study every two years to maintain their eligibility for the ETPL. This process requires submission of performance and cost information for each program of study listed on the state ETPL.

Applications for continued eligibility must be submitted three months prior to the end of their current eligibility period. Training providers applying for continued eligibility of programs of study must log in to the ETPL portal to review and update all required fields and forms for each program of study for which continued eligibility is being sought. If the LWDB is assisting the training provider with their subsequent eligibility, the LWDB will review the program application to ensure all documentation requirements are met and notify the State ETPL Coordinator that a continuing eligibility request has been submitted for the program(s) of study. The State ETPL Coordinator will review all information provided and notify the LWDB and the provider of approval or denial through Employ Florida or the preferred mode of communication outlined in the application.

Each training provider seeking continued eligibility must supply the following information as required by 20 CFR 680.410:

1. Verification the provider is licensed, certified, or otherwise authorized under Florida law (if applicable) to be a provider of training services. This requirement applies to in-state and out-of-state providers.
2. Information reported to state agencies on federal and state training programs other than WIOA Title I-B programs as listed below:
 - a. The total number of persons enrolled in the program;
 - b. The total number of WIOA participants enrolled in the program;
 - c. The total number of persons completing the program;
 - d. The total number of WIOA participants completing the program;
 - e. Quality¹ of the program of study including a program that leads to a recognized postsecondary credential;
 - f. Provider's ability to offer industry-recognized certificates and credentials;
 - g. The total number of persons awarded a Recognized Postsecondary Credential (or other credential, if applicable);

¹ Florida defines quality as training programs that meet the minimum criteria as defined in this policy as well as programs that develop skills valued by priority industry sectors.

- h. The total number of WIOA participants awarded a Recognized Postsecondary Credential (or other credential, if applicable);
- i. The total number of persons employed after completing the program;
- j. The total number of WIOA participants employed after completing the program;
- k. Data identifying the cost of attendance and costs of tuition and fees for WIOA participants completing the program;
- l. Information on recognized postsecondary credentials (or other credential, if applicable) received by WIOA participants;
- m. Whether the credential can be used in conjunction with other credentials as part of a sequence to move an individual along a career pathway or up a career ladder;
- n. Description of how the provider will ensure access to programs of study throughout the state, including in rural areas, and using technology (as applicable);
- o. Description of provider's ability to provide trainings that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities;
- p. Information reported to state agencies with respect to federal and state programs of study (other than the program carried out under WIOA), including one-stop partner programs;
- q. Performance on WIOA performance indicators;
- r. The degree to which programs of study relate to in-demand industry sectors and occupations in the state;
- s. Timeliness and accuracy of ETP's performance reports; and
- t. Any additional factors that are determined appropriate within the parameters of WIOA and statutes.

G. REGISTERED APPRENTICESHIP PROGRAMS

In accordance with the National Apprenticeship Act (NAA) (50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.), entities that carry out RAPs are exempt from the initial and continued eligibility requirements described in this policy. RAPs must be included and maintained on the ETPL until:

- 1. The RAP notifies FloridaCommerce it no longer wants to be included on the list;
- 2. The program becomes deregistered under the National Apprenticeship Act;
- 3. The program is determined to have intentionally supplied inaccurate information; or
- 4. A determination is made by FloridaCommerce that the RAP substantially violated any provision of Title I of WIOA or the WIOA regulations, including 29 CFR part 38.

Because RAPs are exempt from all initial and continued eligibility requirements, the LWDBs may not impose additional criteria or information requirements for RAP sponsors except as outlined in Training and Employment Guidance Letter Nos. 08-19 and 08-19, Change 1, and TEGL No. 13-16, Change 1.

A RAP is an ETP if it is registered with DOE, Office of Apprenticeship (OA), or any other state's State Apprenticeship Agency (SAA). Although they are automatically eligible for ETPL inclusion, RAP sponsors seeking to have their apprenticeship programs listed on the ETPL must still "opt-in" by informing the State ETPL Coordinator at ETPL@commerce.fl.gov. RAPs opting-in may be referred to the State ETPL Coordinator by CareerSource Florida, LWDBs, or DOE. If a RAP expresses interest in being on the state ETPL, the ETPL Coordinator must request the RAPs provide the following information:

1. Occupations included in the RAP;
2. The name and address of the RAP sponsor;
3. The name and address of the Related Technical Instruction provider and the location of instruction if different from the program sponsor's address;
4. The method and length of instruction; and
5. The number of active apprentices.

RAPs on the state ETPL must be included on all local ETPLs in the state and shall remain on the ETPLs until removed or upon written request for removal by the RAP sponsor to the ETPL Coordinator at ETPL@commerce.fl.gov.

FloridaCommerce will regularly coordinate with USDOL, CareerSource Florida and DOE to ensure that necessary updates are made to any information previously provided by RAP sponsors or training providers. FloridaCommerce will also coordinate with DOE to ensure that RAPs registered with the DOE are made aware that they are eligible for placement on the ETPL, and that DOE is informed when a RAP that is registered with USDOL's OA or another state's SAA contacts FloridaCommerce to opt-in to inclusion on the ETPL.

Apprenticeship programs that are not registered with DOE, OA, or another state's SAA are not considered RAPs and must complete the initial eligibility and continued eligibility procedures. Pre-apprenticeships, including quality registered pre-apprenticeships leading to RAPs, are not automatically approved for inclusion on the ETPL and are not exempt from requirements outlined in this policy. Other programs of training services offered by a RAP sponsor or a RAP's provider of related instruction are likewise not automatically eligible.

H. OUT-OF-LOCAL-AREA AND OUT-OF-STATE PROVIDERS

State policies and procedures may provide for reciprocal or other agreements established with another state to permit the use of ITAs for ETPs in another state. As

such, participants may choose ETPs and programs of study located outside of the state or local area if the program is on the state's ETPL and in accordance with state and local area policies.

Out-of-state postsecondary training institutions that are not operating in Florida are not required to be licensed by the Florida Commission for Independent Education (CIE). However, out-of-state providers must provide the following information:

1. Information needed for initial eligibility or continuing eligibility determination;
2. Evidence that the institution (and applicable programs) is accredited by an accreditation agency approved by the U.S. Department of Education;
3. Evidence that the institution meets the licensing requirements of its home state; and
4. Evidence that the institution is identified as active on the ETPL in its state of origin or native state. To provide performance information for its programs, out-of-state providers are required to report their student completion data to FloridaCommerce under established reporting mechanisms.

Out-of-local area and out-of-state training providers must request an initial eligibility determination for each program of study to be included on the state ETPL. Out-of-state providers must also provide documentation, uploaded to the ETPL portal, which validates the above-referenced criteria. These training providers must contact the state ETPL Coordinator directly to request their initial eligibility and the initial eligibility of their programs of study.

I. ETPL Portal

The state ETPL is managed by FloridaCommerce and maintained in Employ Florida, the state's online labor exchange and case management system. Employ Florida connects employers and job seekers and provides information about training opportunities available in the state, including training program services eligible for funding under WIOA Section 133(b).

The ETPL portal is the platform used to maintain ETPLs and record consumer information, including, but not limited to, cost and performance information for each approved program of study. The ETPL portal is the mechanism used by FloridaCommerce to manage the ETPL process, and by LWDBs and training providers to apply for initial eligibility and re-apply for continued eligibility.

The ETPL portal supports WIOA participants in making informed choices about ETPs and programs of study and allows FloridaCommerce to disseminate state and local ETPLs to employers, training providers, workforce staff, One-Stop career center partners, and the public, including individuals with disabilities and individuals with limited English proficiency. Consumer choice is ensured by making the state and

local ETPLs, accompanied by performance and cost information, widely available and easily accessible. ETPLs must be disseminated in a format that facilitates comparison between programs of study and is searchable, user-friendly, and easily understood by individuals seeking information on training outcomes.

J. PERFORMANCE CRITERIA

As required by Section 445.003(7)(b), F.S., FloridaCommerce must establish the minimum criteria a training provider must achieve for completion, earnings, and employment rates of eligible participants. Once criteria are established, training providers will be required to meet at least two of the minimum criteria for subsequent eligibility.

Like the RAP exemption from the eligibility requirements, RAPs also are exempt from ETP performance reporting requirements in WIOA Sections 116(d)(4) and 122, including any additional ETP reporting requirements that have been added by the state or local area.

K. ANNUAL REPORTING

No later than Aug. 31 of each year, training providers must upload information into the ETPL portal on all enrolled and completer individuals for each program of study being considered for continued eligibility. This student data must be submitted each year for each program of study and must include the social security numbers for each enrolled and completer individual to allow for the calculation of minimum performance levels as required in 20 CFR 680.460(g).

The ETPL portal provides a secure solution for the transmission of Personally Identifiable Information (PII). ETPs, excluding RAP sponsors, must upload student data including the social security numbers and completed training of all individuals enrolled during a specific timeframe as determined by policy. Any transmission of PII shall occur in accordance with FloridaCommerce security policies and any disclosure of PII from an education record must be carried out in accordance with the Family Education Rights and Privacy Act (FERPA), including provisions related to prior written consent. As allowed pursuant to 34 CFR 99.31, DOE has designated FloridaCommerce as an authorized representative to enforce or comply with federal legal requirements relating to WIOA.

L. DENIAL, DEACTIVATION, REMOVAL, OR LOSS OF PROVIDER OR PROGRAM ELIGIBILITY

There are circumstances under which training providers may be denied, deactivated, removed, or lose their eligibility for inclusion on the state ETPL, as outlined below. Prior to approving an ITA for a WIOA-eligible individual, LWDBs must ensure that

training providers and program of study are, or continue to be, included on the ETPL at the time the participant is enrolled in the program of study.

(1) Denial

A program of study that FloridaCommerce determines does not meet the eligibility requirements shall be issued a denial notice within 30 calendar days of FloridaCommerce's receipt of the application. A separate denial notice will be issued for each program of study being denied and will include the reason(s) for denial and provide appeal rights, as applicable.

(2) Deactivation

Once an ETP or program of study is approved, it will remain on the state's ETPL through the continued eligibility period of two years unless removed by FloridaCommerce for documented training provider and/or program of study violations. Training providers or programs of study are subject to deactivation and removal from the ETPL if:

1. FloridaCommerce determines the training provider intentionally supplied inaccurate information or substantially violated any provision of Title I of WIOA regulations, including 29 CFR Part 38;
2. The program of study fails to meet the states' minimum performance levels as required in 20 CFR 680.460(g); or
3. The training provider loses its license or accreditation from its accrediting body.

(3) Loss of Eligibility and Removal

A program of study may be removed from the state ETPL if:

1. The training provider fails to supply participant data required for the performance review by the annual due date of Aug. 31.
2. It is determined that the training provider intentionally supplied inaccurate information or substantially violated any provisions of Title I of WIOA or the WIOA regulations, including 29 CFR part 38.
3. It is determined that the provider is engaging in fraud or other criminal acts, incapacity, unfitness, neglect of duty, official incompetence, irresponsibility, misfeasance, malfeasance, gross mismanagement, waste, nonfeasance, or lack of performance.

FloridaCommerce will electronically send a notice of removal from the ETPL to the LWDBs and to the training provider. LWDBs must not issue a participant an ITA for a training provider/program of study that is determined to have lost eligibility for inclusion on the ETPL. If WIOA participants are already enrolled

and have received an ITA for a training provider/program of study that subsequently becomes deactivated or removed from the ETPL, LWDBs may allow enrolled participants to complete the training program; however, no new enrollments may occur. LWDBs must develop local operating procedures to ensure no enrollments are made after the effective date of the notice of removal. Procedures should also include how any existing participants who are enrolled in the program of study will be handled.

(4) Re-application

Training providers may reapply under the initial eligibility criteria provided in this policy.

M. APPEALS

For an appeal of any decision made at the state level, the appellant shall follow the appeals procedure established by FloridaCommerce. For an appeal of any decision made by an LWDB, the appellant shall follow the appeals procedure established in its local plan by the LWDB making the decision.

N. ETPL AND NON-ITA TRAINING SERVICES

There are exceptions to the required use of the ETPL for ITA-funded training by LWDBs. In the following situations covered by these exceptions, a contract for services between the LWDB and the training provider may be attained and implemented to ensure services are provided instead of selecting a training provider from the state ETPL.

(1) Work-Based Training

WIOA supports training and work experience for job seekers through work-based training, which is coordinated by LWDBs through collaboration with local employers. These activities, like OJT, Customized Training, and IWT do not require inclusion on the ETPL, in accordance with 20 CFR 680.530. Please see [Administrative Policy 100](#) for additional information on work-based training.

(2) Training Contracts

A program of study may be provided through training contracts instead of ITAs when there is not sufficient availability of eligible training providers in the local area to accomplish the purpose of an ITA. These contracts may be used for cohort training, per TEGl 21-22, Attachment 1, or in one of the other situations prescribed in 20 CFR 680.320. Because training contracts do not use ITAs, the training provider is not required to be included on the state or local ETPL. The LWDB must have written procedures in place that describe how such a

determination is made and the process for contracting with the training provider(s).

(3) Non-WIOA

The ETPL is a requirement of WIOA and only applies to programs that are supported by WIOA funding. Providers of training services that do not intend to seek WIOA funding do not need to request or pursue ETPL inclusion.

V. DEFINITIONS

- 1. Continued Eligibility:** “Continued Eligibility” or “Subsequent Eligibility” is the eligibility determination that allows training providers to remain on the ETPL until the next eligibility determination.
- 2. Credential:** A WIOA indicator consisting of a recognized postsecondary credential (an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state involved or federal government, or an associate or baccalaureate degree) or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program. All credentials must be included on the Master Credentials List and a credential’s inclusion on the Master Credentials List is sufficient to meet the WIOA definition of “credential.”
- 3. Eligible Training Provider (ETP):** A provider of training services or programs of study (as prescribed in 20 CFR 680.410) that has met the eligibility requirements to receive WIOA funds for providing training service programs to eligible individuals.
- 4. Eligible Training Provider List (ETPL):** A statewide or local compilation of ETPs (as prescribed in 20 CFR 680.410) and approved programs of training services or programs of study (as prescribed in 20 CFR 680.420).
- 5. Individual Training Account (ITA):** A payment agreement with an ETP established on behalf of a WIOA participant for a program of training services or programs of study as prescribed in WIOA section 134(c)(3).
- 6. Initial Eligibility:** The initial determination that allows a training provider and approved program of training services or programs of study onto the state or local ETPL for the first year. An established ETP may also request an initial eligibility determination for a new program of study.
- 7. Local ETPL:** A subset of the state ETPL created when LWDBs establish, through local policy, additional requirements for ETPs and programs of study. All ETPs on a local ETPL are also on the state ETPL, maintained in Employ Florida.

- 8. Master Credentials List (MCL):** Required by the Reimagining Education and Career Help (REACH) Act, the Master Credentials List is a comprehensive list of state-approved degree and non-degree credentials of value that prepare Floridians for in-demand occupations. Credentials on the list satisfy the criteria set forth by the Florida Credentials Review Committee in the Framework of Quality. Programs of study must be on the MCL to be on the state ETPL.
- 9. Personally Identifiable Information (PII):** Information used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information, linked or linkable to a specific individual.
- 10. Program of Training Services:** A "Program of Training Services" or "Program of Study" as prescribed in 20 CFR 680.420. Such a program consists of one or more courses or classes, or a structured regimen, leading to one or more of the following: A recognized postsecondary credential, secondary school diploma or its equivalent; employment; or a measurable skills gain toward such a credential or employment.
- 11. Registered Apprenticeship Program (RAP):** A program that is registered with the USDOL Office of Apprenticeship (OA) or any State Apprenticeship Agency (SSA) as prescribed in 20 CFR 680.470(a). Florida's State Apprenticeship Agency is the Florida Department of Education's Office of Apprenticeship.
- 12. Sponsor (of a Registered Apprenticeship Program):** Any person, association, committee, or organization operating an apprenticeship program and in whose name the program is (or is to be) registered or approved.
- 13. State ETPL:** A list of all Eligible Training Providers and Programs who have been approved to receive WIOA funding through ITAs. It is maintained by FloridaCommerce within the state's ETPL MIS portal.
- 14. Training Provider:** A university, college, public or private technical or vocational training institution, a private training company or private instructor, or a company employee who is qualified to provide instruction that leads to a recognized postsecondary credential, license, secondary school diploma or equivalent.


VI. REVISION HISTORY

Date	Description
3/1/2016	Policy issued by the Florida Department of Economic Opportunity.
TBD	Revised by FloridaCommerce to align with TEGL No. 08-19. Approved by the CareerSource Florida Board of Directors.

MEMORANDUM

DATE: May 24, 2023

TO: Local Workforce Development Board Executive Directors

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

SUBJECT: Waivers for Workforce Innovation & Opportunity Act Out-of-School Youth Expenditure Requirement and Use of Individual Training Accounts for In-School-Youth

The Florida Department of Economic Opportunity (DEO) requested that the Secretary of the U.S. Department of Labor waive the requirement at Workforce Innovation and Opportunity Act (WIOA) Section 129(a)(4)(A) and 20 Code of Federal Regulations (CFR) 681.410 which requires the state and local workforce development boards (LWDBs) to expend 75 percent of the Governor's reserve youth funds and local formula youth funds on out-of-school youth (OSY). DEO specifically requested to lower the OSY expenditure requirement to 50 percent for Governor's reserve youth funds and local formula youth funds.

DEO also requested that the Secretary waive the requirement at 20 CFR 681.550 that limits the use of Individual Training Accounts (ITA) to OSY. DEO specifically requested to allow WIOA ITAs to also be used for in-school youth (ISY).

On March 9, 2023, the U.S. Department of Labor, Employment and Training Administration approved both waiver requests for Program Year (PY) 2022 and PY 2023. Therefore, effective immediately for PY 2022 and PY 2023, LWDBs may:

1. Lower the local youth formula funds expenditure requirement from 75 percent to 50 percent for OSY. As a result of this waiver, DEO expects that the number of ISY served will increase, and performance accountability outcomes for overall WIOA Youth (including both ISY and OSY) will remain steady or increase for the majority of the WIOA Youth performance indicators.
2. Utilize ITAs for ISY, ages 16-21. As a result of this waiver, DEO expects that local implementation of this waiver should not impede the LWDB's efforts to prioritize OSY, including outreach to the OSY population.

DEO is in the process of updating [Administrative Policy 095 – Youth Program Eligibility](#) to reflect the reduced expenditure requirement. In the interim, LWDBs are encouraged to update local operating procedures and policies to align with the guidance provided herein.

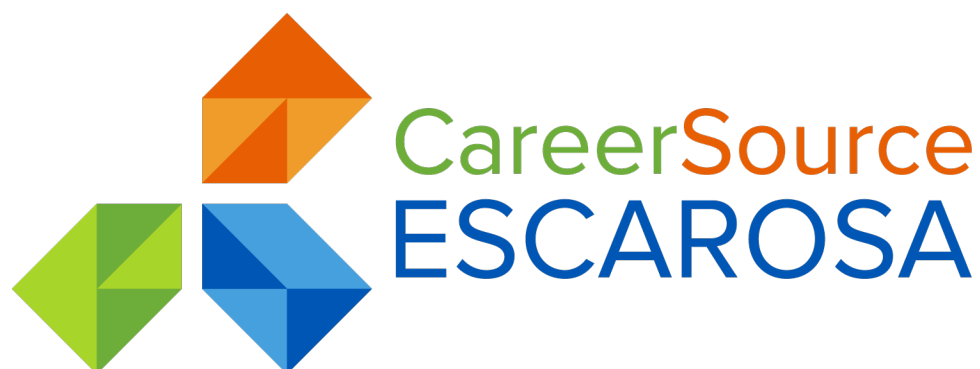
If you have any questions or concerns, please contact the WIOA Program Team at WIOA@DEO.MyFlorida.com or Christa Nelson at Christa.Nelson@DEO.MyFlorida.com or 850-245-7492.

The approved waiver requests and response letters can be viewed [here](#).

Please share this information with the appropriate staff and other interested parties.

KN/dr

cc: Dan McGrew
Keantha B. Moore
Dee Robinson
Isabelle Potts
Shawn Brown



CareerSource ESCAROSA

Common Exit

Workforce Innovation and Opportunity Act, Wagner-Peyser and Trade Adjustment Assistance

Local Operating Procedures

Is to follow State Guidelines for Admin Policy 115

03/18/2022

CareerSource ESCAROSA, (Program) Local Operating Procedures

OUR VISION

Our region is recognized for its economic growth, driven by flourishing businesses and a skilled workforce.

OUR MISSION

CareerSource ESCAROSA is a central workforce development resource, linking businesses with the skilled and trained talent they need.

OUR PRINCIPLE GUIDELINES

To deliver an outstanding service to all who seek out our assistance.

OUR GOAL

Create an environment that fosters economic success.

I. PURPOSE AND SCOPE

This handbook explains the Local Operating Procedures (LOP) that relate to the CareerSource ESCAROSA's programmatic management of the Common Exit for the Workforce Innovation and Opportunity Act, Wagner-Peyser and Trade Adjustment Assistance. It is each staff member's responsibility to become familiar with the contents of this handbook.

This LOP is meant to mirror the exact guidelines that the state outlines in Admin Policy 115. This handbook is not a contract, nor is it intended to address all situations and circumstances that could occur. This LOP is a living document and management reserves the right to make changes to the content, as needed or as the states updates its policies.

If you have specific questions regarding any procedures (whether covered in this handbook or not), please contact your supervisor.

II. BACKGROUND

WIOA establishes performance accountability indicators, aligns performance-related definitions, ensures comparable data collection, and integrates performance reporting requirements to assess the effectiveness of states in achieving positive outcomes for individuals served by the workforce development system.

In accordance with [Training and Employment Guidance Letter \(TEGL\) 10-16, Change 1](#), states are encouraged to implement a common exit policy. Common exit is intended to ensure a more efficient and effective integrated service delivery system, track the coordination of services, and align performance reporting.

III. AUTHORITY

[20 Code of Federal Regulations \(CFR\) Part 677](#)

[TEGL 10-16, Change 1](#)

[TEGL 14-18](#)

[TEGL 19-16](#)

[TEGL 21-16](#)

IV. POLICIES AND PROCEDURES

Florida has an established common exit policy implemented through its online case management and labor exchange system, Employ Florida. This policy requires that an individual who is participating in any program covered by the common exit policy will not exit (and be counted in performance) until the individual is no longer being served by any program to which the policy applies.

Florida's common exit policy is applicable to the following programs:

- a) WIOA Title I – Adult, Dislocated Worker, Youth i. National Dislocated Worker Grants (NDWG)
- b) WIOA Title III – Wagner-Peyser i. Jobs for Veterans' State Grant (JVSG)
 - ii. Migrant and Seasonal Farmworkers (MSFW)
- c) Trade Adjustment Assistance

Program performance measures, including four of the six WIOA Primary Indicators of Performance, as defined in [TEGL 10-16, Change 1](#), are associated with the participant's exit; therefore, accurate documentation and reporting of exit dates, as well as the services which impact the participant's exit, is critical.

A. Reportable Individual

Reportable individuals register in Employ Florida and may access self-service system functionalities and receive information-only services or activities. Reportable individuals are tracked and reported in performance reports but do not impact program performance and may not be used to impose sanctions. Reportable individuals are not considered participants in a program, so they do not exit and are instead closed as never enrolled. The date of closure for reporting purposes is determined as follows:

- a) Individual does not become a participant.
- b) Individual is served with only self-service and/or information-only services.
- c) 90 days elapsed since being identified as a reportable individual, and the individual has not received additional self-service or information-only services or activity during the 90-day time frame.

Once the above criteria have been met, the date of closure is applied retroactively to the last day of receipt of self-service and/or information-only services or activities. This methodology is used to ensure reportable individuals do not remain in the system indefinitely.

B. Participant

A reportable individual becomes a participant when he/she has met program enrollment requirements for eligibility and received a staff-assisted participating service. The participation date is the date the individual receives the first participating service (and is enrolled in the appropriate program). Participating services that establish (trigger) or extend participation are identified in the [Employ Florida Service Code Guide](#).

Note: WIOA Youth are not considered participants until they have received the following:

- a) Objective assessment;
- b) Individual Service Strategy (ISS); and
- c) At least one of the 14 Youth Program Elements as described in [20 CFR Part 681.460](#).

C. Extending Participation

Every participating service provided to a participant, once recorded, establishes a new exit date and extends participation for 90 days. Self-service, information-only services or activities, and follow-up services do not delay, postpone or affect the date of exit. The management of participant services includes regular, direct contact with the participant on all aspects of their workforce development needs.

Direct contact is considered to have occurred when the LWDB staff and the participant have exchanged information, or the participant has agreed to the service being provided by LWDB staff. LWDB staff should ensure that direct contact is made at a minimum of every 30 days with the participant to maintain the highest level of individual service. Determined on an individual basis and/or by local operating procedures, more frequent contact may be required. Indirect contact attempts, such as sending workshop flyers or job leads by mail or email or leaving telephone messages without receiving a response, do not constitute direct contact for the purpose of providing a service or keeping an activity open.

Direct contact may be performed in-person or remotely and may be conducted by mail, telephone, email, or other documented means of contact. Such contact should result in a participating service being provided to the participant. Contact where the participant does not engage will not be considered direct and must not result in a participating service being recorded in Employ Florida. An offer to provide a service or a scheduled appointment to provide a service must only be entered as a case note or non-participating service, as appropriate.

D. Participant Transfer

Participants may relocate from one LWDB to another and continue to receive workforce services without interruption. For WIOA Title I and TAA participants, the Florida Department of Economic Opportunity Bureau of One-Stop and Program Support is responsible for approving the transfer of cases from one LWDB to another in Employ Florida.

Prior to WIOA Title I or TAA participants being transferred in Employ Florida, authorized representatives from both LWDBs must agree to the transfer in writing. This requirement may be met by retaining copies of emails detailing the transfer agreement. Receiving LWDBs should ensure they have received any participant files or documents stored outside of Employ Florida prior to the agreement of transfer.

When a case is transferred from one LWDB to another, the receiving LWDB must accept responsibility for the outcomes and performance associated with that participant. In addition, both LWDBs must maintain documentation on file indicating that the completed transfer was agreed upon. The receiving LWDB will be responsible for ensuring the case file is in good standing and bear responsibility for monitoring issues following the date of accepted transfer. In order to ensure seamless, high quality service to the participant, transfers will require close coordination within the network of LWDBs. The coordination will include, but not be limited to:

- a) Confirmation of reason for transfer to another LWDB (e.g. relocation, customer request);
- b) Dialogue between LWDBs where customer is enrolled and receiving LWDB prior to transfer;
- c) Review of the participant's case file by the transferring LWDB prior to transfer;
- d) Review of the participant's case file by the receiving LWDB prior to approving transfer;
- e) Discussion and resolution of any identified issues between LWDBs;
- f) Requesting guidance from DEO via email at WIOA@deo.myflorida.com for customers files and Employ Florida services that are not in good standing and cannot be resolved between LWDBs.

Note: LWDBs may not decline to accept transferring customers without consulting DEO.

To complete a WIOA Title I or TAA participant transfer, the transferring LWDB must close all open Employ Florida activities and plans, and submit the following to PRA@deo.myflorida.com:

- The LWDB and office the participant is being transferred from;
- The LWDB, office and staff member the participant is being transferred to;
- Documentation of the agreed upon transfer from both LWDB's (email); and
- The participant's State ID and Employ Florida Program Application ID.

Note: WIOA Title III (Wagner-Peyser) cases do not require transfer. However, before providing staff-assisted services, staff must update the participant's Employ Florida Wagner-Peyser Program Application and individual registration to their respective LWDB.

E. Case Closure

When staff have determined a participant no longer requires services because he/she has entered employment or education, become disabled or otherwise incapable of working, or the participant voluntarily opts out of service, the participant's case should be formally closed in Employ Florida. This will immediately stop the addition of any other program services and prompt staff to gather any employment data.

Case closure is a case management feature of Employ Florida and should not be confused with a participant exit, which is federally defined and structured. The decision to close the case should be documented accordingly by staff in case notes. While a participant's case may be closed because the participant entered employment or education, the participant may not be ready for exit and follow-up services. Ideally, each participant should remain a program participant long enough to be stable in a job or post-secondary education.

Prior to closing a participant's case, staff must:

- a) Ensure the Individual Employment Plan/Service Strategy (IEP/SS) Plan has been closed out. (see the [Virtual One-Stop User Guide for Staff, Section 4: Individuals - Case Management](#) for further guidance);
- b) Ensure all services have been closed;
- c) Enter any credential(s) earned during the program, including the type, verification and credential date to the Closure Information tab or Credential Section. (see the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA](#) for further guidance);
- d) Make sure any Measurable Skill Gains attained during the program have been added to the participant's Measurable Skill Gains (MSG) ribbon or, individuals below postsecondary education level literacy/numeracy gains or to the Educational Functioning Level for MSG ribbon (see the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA](#) for further guidance); and
- e) Add any unsubsidized or On-the-Job Training (OJT) employment entered during the program or at closure to the Add Employment ribbon (see the [Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA](#) for further guidance).

Note: LWDBs may delete case closures for participants who request or demonstrate a need for continued services if the participant has not exited. For participants who have exited, the case closure

may not be deleted if 90 days has lapsed, and a new program application in Employ Florida will be required for the participant.

F. Follow-Up Services

For WIOA Adult and Dislocated Worker programs, follow-up services may begin immediately following placement into unsubsidized employment if no future services (other than follow-up services) are scheduled or expected. For the WIOA Youth program, follow-up services may begin immediately following the last date of service if no future services (other than follow-up services) are scheduled or expected.

Follow-up services do not cause the exit date to change, delay exit or trigger re-enrollment in the program. LWDBs must provide and document WIOA follow-up services in Employ Florida unless the participant refuses services. If a participant refuses follow-up services, staff must document the refusal with a case note in Employ Florida. Guidance regarding the recording of follow-up services in Employ Florida is available in the [Virtual OneStop® User Guide for Staff, Section 6: Programs - WIOA](#). Employ Florida follow-up service codes are outlined in the [Employ Florida Service Code Guide](#).

Note: Follow-up services are not required for TAA or Wagner-Peyser participants, or any WIOA Title I participant exited due to a global exclusion, as described in [Section IV.G.2](#) of this policy.

G. Exits

Individuals who are participating in more than one program covered under the common exit policy will have a single common exit date. The participant's exit occurs when he/she has:

- a) Not received services for at least 90 calendar days from any programs to which the common exit policy applies; and
- b) No future services scheduled, except for self-service, information-only activities, or follow-up services.

1. System Exit

System (soft) exit occurs automatically after participants receive no staff-assisted services for 90 days in either WIOA Title I, WP, or TAA programs. Exit will occur automatically based on actual or projected end dates of reported participating services/activities. For WIOA and TAA, case notes should support the last date of staff-assisted services provided with activity end dates that accurately reflect the actual last service provided.

In some cases, WIOA and/or TAA activities may be completed but the participant continues to receive WP services, which will extend program exit. Exit is often triggered by completion of training, successful transition into employment, or loss of contact. The completion of training and successful transition into employment must be documented in services with corresponding activity end dates. However, if the participant is not engaged in open WIOA activities, loss of contact must only be documented in a case note. WIOA participants who are exited due to a loss of contact must follow the closure guidelines in Section IV.E of this policy.

2. Manual Exit

Manual (hard) exits are not allowed unless the participant falls into one of the WIOA Title I global exclusion scenarios. Otherwise, participants must be soft exited from the system to be closed out after 90 days of receiving no staff-assisted services.

Participants may be excluded from the Primary Indicators of Performance Measures, at the time of closure, for any of the following global exclusions that precludes the participant from entering employment or participating in services:

- a) Institutionalized:** The participant exits the program because he or she has become incarcerated in a correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center while receiving services as a participant.
- b) Health/Medical:** The participant exits the program because of a medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
- c) Deceased:** The participant is deceased.
- d) Reservist called to Active Duty:** The participant exits the program because the participant 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.
- e) Foster Care (WIOA Youth Only):** The participant is in the foster care system, as defined in 45 CFR 1355.20(a) and exits the program because the participant has moved from the local workforce development area as part of such a program or system.

Note: If a participant is exited due to a global exclusion and it is due to a medical reason or disability, staff must collect information in a separate file and not disclose in case notes the details pertaining to the reason for exit. The exclusionary/neutral exit reasons that could disclose medical or disability-related information are:

- a) Health/medical issues; and
- b) Residing in an institution or facility providing 24-hour support, such as prison or hospital.

LWDB staff should submit requests to create a manual closure through global exclusion in writing to the LWDB's Data Integrity Specialist (DIS) or an individual designated by LWDB as the approving authority for global exclusions. LWDB staff should state the reason for the request and provide the name and state identification number of the participant in order to receive approval from the approving authority to create a closure and exclusion on behalf of the LWDB.

If the approval to create the closure and exclusion is granted, then the requesting staff member is solely responsible for ensuring that all the necessary and required documentation has been secured and uploaded to Employ Florida for verification purposes. The approving authority must review all the necessary documentation before the hard exit and exclusion is created. LWDBs should reference the Virtual One-Stop User Guide for Staff, Section 6: Programs - WIOA, 6-133 for further guidance.

H. Mismanagement of Exits

The participant's exit must not be prolonged by staff extending service dates, removing exits, or opening new services unless it is demonstrated and documented in Employ Florida that the participant has unmet needs and is actively being served. Additionally, Employ Florida service codes that are not training or work experience services must not be future dated to extend participation. Attempts to re-engage a participant do not constitute a participating service for the purpose of

providing a service or keeping an activity open. These contacts must instead be documented by case notes or by the appropriate non-participating service. Prolonging exit due to the inability to contact a participant is inappropriate.

The following actions do not constitute a service nor direct contact with a participant for the purpose of extending participation:

- a) Leaving voicemail messages for the participant;
- b) Speaking with relatives of the participant who are not the participant's guardian(s);
- c) Scheduled services or an offer to provide services;
- d) Sending flyers, letters or postcards;
- e) Speaking with the participant's parole officer;
- f) Casual, unscheduled conversations with the participant in public;
- g) Having the participant bring in time sheets and/or attendance records for payment without providing meaningful guidance, service or conducting a review of the participant's IEP; and
- h) Contacts to obtain employment status, educational progress, need for additional services or income support payments without providing meaningful guidance, service or conducting a review of the participant's IEP.

I. State and Local Monitoring

DEO will monitor the requirements outlined in this policy and local operating procedures. Additionally, LWDBs must establish local monitoring policies and procedures that include, at minimum:

- a) Roles of the participant and LWDB staff; and
- b) Local monitoring procedures for implementation of this policy.

V. DEFINITIONS

Common Exit - Occurs when a participant has not received services (excluding self-service, information-only service or activities, or follow-up services) from any program covered by the common exit policy for at least 90 days, and no future services are planned. The common exit date for all program in which the participant is enrolled will be the end date of the last participating service the participant received.

Data Integrity Specialist - An individual designated by the LWDB and provided elevated system privileges by the Local Employ Florida Administrator to assist with maintaining security protocols and data validation in the State's labor exchange and case management system, Employ Florida.

Non-Participating Service - A service that does not commence or extend program participation. Supportive services, self-service, information-only services, administrative, follow-up services, and locally defined services are non-participation services. (Exception: for WIOA Youth, supportive services are a participation service).

Participant - An individual who is determined eligible to participate in the program and receives a service funded by the program in either a physical location (CareerSource Florida Network Career Center or affiliate site) or remotely through electronic technologies.

Participation Date - The first day, following a determination of eligibility, (if required), that the individual begins receiving a staff-assisted participating service funded by the program.

Participating Service - A program-funded, staff-assisted service provided to an eligible applicant, other than supportive services, self-service, information-only services, administrative, local defined, or follow-up services. (Exception: for WIOA Youth, supportive services are a participating service).

Reportable Individual - A jobseeker who engages with the workforce system on an initial level through non-participation services and may not have met program requirements for eligibility or participation.

VI. REVISION HISTORY

Date	Description
06/15/2021	Issued by Florida Department of Economic Opportunity.
06/09/2021	Approved by CareerSource Florida Board of Directors.

VII. RESOURCES

<https://performancereporting.workforcegps.org/home/>

<https://www.dol.gov/agencies/eta/Performance/resources>