CareerSource Florida Key Revised and New Policies:

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Policy Number P9

Workforce Policy

Title:	Availability of Services to Floridians		
Туре:	Programmatic		
Program:	One-Stop Career Centers		
Effective:	September 21, 2021	Revised:	08/21/2025

I. PURPOSE AND SCOPE

Local workforce development boards (LWDBs) are required by law to provide universal access to workforce services for both job-seeker and employer customers. This policy outlines statewide expectations for LWDBs, including setting and publicly posting one-stop career center hours, enhancing customer responsiveness, and maintaining clear, comprehensive communication to create a system that supports individuals in finding employment, assisting businesses in finding talent, and advances economic opportunities across Florida. Aligned with the REACH Act's goals to improve workforce coordination and expand opportunities for meaningful employment and economic freedom for Floridians², this policy:

- 1. Guides LWDBs in delivering fast and effective services to Floridians, and
- 2. Strengthens accountability and transparency to ensure consistency for customers and improved leveraging of public funds.

II. KEY PROGRAM OBJECTIVES

- 1. Provide high-quality, responsive, timely, and effective customer service that meets the needs of job seekers and employers.
- 2. Provide planned, targeted outreach to engage jobseekers and employers to increase community engagement, improve access to workforce services, strengthen business partnerships, and align with the needs of local employers to improve employment outcomes for those with barriers to employment within the local area.

^{1 20} CFR Part 678; § 445.004(10), Fla. Stat.

² Chapter 14.36, F.S

- Ensure availability of services to all Floridians—including Florida businesses, jobseekers with disabilities, limited English skills, those receiving public assistance, or other employment barriers—using universal design in physical and digital spaces.
- Coordinate seamlessly across WIOA core and combined partner programs to deliver integrated services that support high-quality education, training, and employment outcomes.
- 5. Maintain transparency and accountability by clearly posting service hours, available resources, and accessibility information at career centers and on LWDB websites.
- 6. Foster continuous improvement by using customer feedback, data (including complaint resolution data), and staff input to enhance service delivery and ensure positive employment outcomes.

III. MEASURABLE PERFORMANCE OUTCOMES

1. Performance Measures to include:

a. For Job Seekers

- i. Outreach to potential participants (numbers by area, population type and identified barriers).
- ii. Time to determine eligibility.
- iii. Time to service provision.
- iv. Training and employment outcomes.
- v. Customer satisfaction ratings at least twice a year utilizing a variety of formats including one that is electronically accessible.

b. For Employers

- i. Business outreach (numbers by industry sector and business size)
- ii. Number of active partnerships (including apprenticeships, preapprenticeships, customized training, incumbent worker training, internships, work experience, and On-the-Job Training (OJT))
- iii. Number of active partnerships by industry sector
- iv. Time to execution of partnership agreements or contracts (including OJT)
- v. Business satisfaction ratings at least twice a year utilizing a variety of formats including one that is electronically accessible.

2. Compliance Measures to include:

- a. Posted hours, signage, and communication in compliance with state and federal regulations and Florida Workforce System Statewide Brand Policy
- b. Digital, physical, and telephonic accessibility in compliance with federal and state regulations

IV. POLICIES AND PROCEDURES

Each LWDB shall maintain service delivery standards in accordance with its Grantee-Subgrantee Agreement, the following policies and procedures, and all other applicable laws, rules, and guidelines.

The Governor sets statewide service delivery standards, requiring LWDBs to submit WIOA Local Plans that align with Florida's WIOA Combined Plan. Consistent with Chapter 73B-7. Florida Administrative Code and as directed by FloridaCommerce:

- 1. WIOA Regional and Local Plan Instructions mandate that career centers provide services during standard business hours at designated locations.
- 2. Each local workforce board signs a Grantee-Subgrantee Agreement with FloridaCommerce.
 - a. LWDBs must adopt and publicly post annual schedules of operations, covering daily hours, holidays, and service availability.
 - b. Centers affiliated with colleges or universities may align their schedules with the academic calendar.
- 3. FloridaCommerce and CareerSource Florida must be notified of schedule changes impacting the availability of walk-up services to Floridians as soon as possible.
 - a. Schedule changes must be approved in advance by FloridaCommerce, except in cases of emergencies, such as natural disasters or government directives.
 - b. If an emergency closure occurs, boards must notify FloridaCommerce and CareerSource Florida within 48 hours to ensure continuity of services using a method designated by FloridaCommerce.

A. Customer Service Expectations for One-Stop Centers and LWDBs Serving Job Seekers

LWDBs and career centers shall maintain a welcoming and safe environment that:

- 1. Has readily available options to support job seekers with challenges or barriers impeding meaningful participation.
- Ensures all signage and communication follow the Florida Workforce System Statewide Brand Policy and encourage job seekers, including those with barriers to employment (childcare, transportation, homelessness, and other needs) to participate in person or online.
- 3. Does not employ any policy, procedure or signage at a LWDB site that functions as a bar to job seekers with children, or other identified barriers, from entry to those sites.
- Engages potential customers in the community to ensure that job seekers are aware of available services.
- 5. Communicates in a timely, responsive, and respectful way when responding to requests from job seekers.

- 6. Determines jobseeker customer eligibility promptly and delivers services efficiently with a high level of communication and opportunities for feedback.
- 7. Gathers and shares data on job seeker satisfaction to inform training and supports increased job-seeker satisfaction, including:
 - a. timeliness of interactions:
 - b. provision of service and support;
 - c. clarity of communication; and
 - d. results from services provided.
- 8. Has a publicly available process that tracks and resolves customer complaints.
- 9. Provides training to employees on improving customer service and the roles of career center employees designated to resolve customer complaints.
- 10. Includes program outlines and descriptions of customer service goals in the LWDB WIOA Local and Regional Plans³.
- 11. Implements LOPs that align with customer service standards and other goals identified in the LWDB WIOA Four-year and Two-Year plans⁴.

B. Customer Service Expectations for One-Stop Centers and LWDBs Serving Employers

LWDBs and career centers shall:

- 1. Engage in strategic, data-driven outreach with employers and businesses within the community to ensure awareness of available services.
- 2. Communicate in a timely, responsive and respectful way when responding to requests from businesses.
- 3. Provide timely and efficient services and support.
- 4. Gather and share data on business customer satisfaction that inform training and supports increased business and community satisfaction, including:
 - a. timeliness of interactions
 - b. provision of service and support:
 - c. clarity of communication; and
 - d. results from services provided.
- 5. Have a publicly available process that tracks and resolves business customer complaints.
- 6. Train employees in improving customer service and on the role of career center employees designated to resolve customer complaints.
- 7. Include a program outline and customer service goals in the LWDB WIOA Fouryear and Two-Year plans.
- 8. Implement LOPs that align with goals identified in the LWDB WIOA Four-year and Two-Year plans.

C. Availability and Hours of Operation

³ Chapter 73B-7, F.A.C.

⁴ Chapter 73B-7, F.A.C.

Comprehensive one-stop career centers must be open to the public for walk-up service during regular business hours and at least eight hours a day, Monday through Friday. As is common practice across the state, local career centers may offer additional service hours, in-person, or virtual appointments to accommodate individuals who work during regular business hours. Customers seeking in-person services at one-stop career centers should not be denied entry or access to services at those centers based on physical appearance, presence of children, or any other indicator that may be associated with the existence of a barrier to employment.

Career centers must clearly display their hours of operation on-site. Additionally, each LWDB, workforce area, and career center staff must provide customers with information on hours of operation and services available at other career centers in their local area. The schedule of operations, including standard hours and holiday closures (following state holidays), must be posted prominently on the LWDB's website in an easily accessible format.

Any restrictions to, or changes in standard availability or hours of operation must be communicated to and approved by CareerSource Florida and FloridaCommerce prior to the change occurring and using a method designated by FloridaCommerce.⁶

V. IMPLEMENTATION

LWDBs must include applicable local strategies in their WIOA Local and Regional Plans and operating policies. FloridaCommerce will monitor implementation.

VI. AUTHORITIES

Public Law 113-128, The Workforce Innovation and Opportunity Act (WIOA), Sections 107-108.

20 CFR Part 678 and 20 CFR 679.500

Training and Employment Guidance Letter 04-15

Chapter 445.003 – 445.004, Florida Statutes

Agreement Between Local Workforce Development Boards and the Florida Department of Commerce (The Grantee-Subgrantee Agreement)

CareerSource Florida Administrative Policy 93 – One-Stop Career Center Certification Requirements

Florida Workforce System Statewide Brand Policy

⁵ See 20 CFR § 678.305(c).

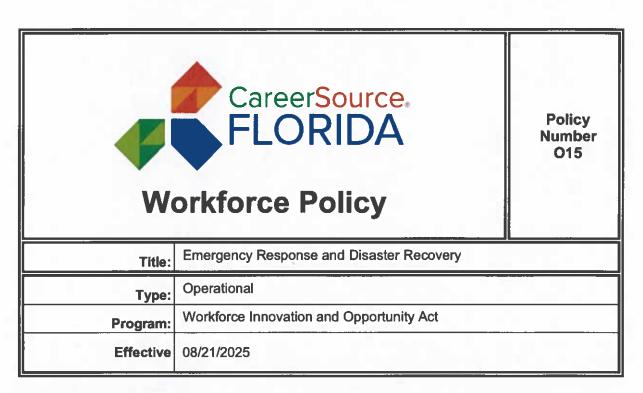
⁶ Notifications of emergency closures must be consistent with [Insert Link to Workforce Policy - Emergency Response and Disaster Recovery].

VII. HISTORY

Revised to incorporate Key Program Objectives, Measurable
Performance Outcomes, and Implementation elements that require
strategies and local operating procedures, including description of
customer service standards and complaint resolution to be incorporated
into WIOA Local Four-Year Plans and Two-Year Modifications;
Emphasizes supporting individuals in finding employment, assisting
businesses in finding talent, and advancing economic opportunities.
Approved by CareerSource Florida Board of Directors

VIII. RESOURCES

WorkforceGPS - Using Data to Help Open Doors for Universal Access and Outstanding Customer Service



I. PURPOSE AND SCOPE

This policy outlines roles and responsibilities of the CareerSource Florida network before, during, and after disasters and states of emergency. It provides a framework for coordinating services with federal, state, and local partners, including the Florida Department of Commerce (FloridaCommerce) and local workforce development boards (LWDBs), Regional Planning Areas, and career centers and establishes guidance for LWDBs to administer Disaster Recovery Dislocated Worker Grants (DWGs), while ensuring compliance with the Workforce Innovation and Opportunity Act (WIOA), U.S. Department of Labor (USDOL) regulations and state requirements.

This policy applies to CareerSource Florida, FloridaCommerce and all LWDBs and regional planning areas.

II. KEY OBJECTIVES

To provide clear guidance and support to LWDBs on operations and considerations during an emergency and outline clear expectations to guide data-based, responsive and comprehensive planning, response, and recovery in the event of a disaster or emergency, including expectations for the following:

- 1. Continuity of Operations Plans (COOP)
- 2. Activation and utilization of state and local Rapid Response Teams
- 3. Provision of services and supports.
- 4. Disaster Recovery Dislocated Worker Grant application and utilization
- 5. Emergency Response and Disaster training for staff

III. MEASURABLE PERFORMANCE OUTCOMES

Measurable outcomes identified by activity are outlined below:

- 1. Continuity of Operations Plans (COOP) compliance
- 2. Disaster Recovery Dislocated Worker Grant
 - a. The negotiated primary indicators of performance for the WIOA Dislocated Worker program serve as the performance measures for participants receiving career or training services through the Disaster Recovery DWG program.

3. Provision of required services and support:

- a. Use of mobile career center units or career center services support at community partner locations
- b. Number and percentage of one-stop customers receiving services during a disaster, including those served in mobile units or at community partner locations.
- c. Time to provision of requested support for one-stop customers during a disaster.
- d. Percentage of participants enrolled in short-term training programs offered during disaster recovery.
- e. Employer satisfaction and engagement with services provided during and after a disaster including satisfaction with Dislocated Worker Grant funded programs, layoff aversion, short-time compensation.

Note: Participants who only receive disaster-relief employment are excluded from WIOA performance indicators unless they also receive career or training services through the grant or are co-enrolled in another WIOA program with a common exit. For more information, refer to Administrative Policy 115, Common Exit.

IV.BACKGROUND

The Florida Division of Emergency Management leads the State Emergency Response Team (SERT), which coordinates disaster response across state agencies, nonprofits, and federal partners. FloridaCommerce leads SERT's Emergency Support Function 18 (ESF 18), which helps businesses recover and stabilize the economy.

CareerSource Florida partners with FloridaCommerce, LWDBs, career centers, and WIOA combined planning partners to support job seekers and businesses during emergencies. Together, they coordinate office closures, assess workforce needs, and deliver services such as Disaster Dislocated Worker Grants. The goal is to ensure quick, easy access to services that help communities recover and people return to work.

V. POLICIES AND PROCEDURES

A. CareerSource Florida Network Coordination

CareerSource Florida and FloridaCommerce collaborate systematically to support activities and the workforce recovery needs of the state before, during, and after an emergency.

B. Office Closures and Emergency Notifications

Local governments manage emergency declarations and evacuations under section 252.38, Florida Statutes. Counties and municipalities coordinate emergency management plans, which guide office closure decisions. LWDBs must follow local directives and report closures exceeding two days to FloridaCommerce.

Each LWDB office or center must designate a contact person responsible for notifying

CareerSource Florida, FloridaCommerce, and the Local Emergency Operations Center of office closures. Updated contact details, including name, phone number, fax, and email, must be provided to FloridaCommerce and CareerSource Florida.

C. State-owned Facility Closures

FloridaCommerce will close state-owned workforce facilities in affected counties during disaster or emergency situations based on the following criteria:

- 1. Local government decision to close offices
- 2. Mandatory evacuation orders
- 3. Declaration of a local state of emergency

When state-owned facilities are closed due to an emergency, employees assigned to those facilities will be released from duty and granted administrative leave for the duration of the closure. Employees required to remain on duty to provide essential services will receive special compensatory leave credits for hours worked during the closure. Essential services are normally considered to be services directly related to the preservation of life, health, or property.

D. Non-State-Owned Facility Closures

LWDBs and career centers must follow local and state emergency management directives and close offices accordingly.

LWDBs must notify FloridaCommerce of emergency office closures exceeding two days, unless a state of emergency has been declared for a specified period.

E. Notification Protocols

LWDBs must notify FloridaCommerce of office closures as soon as possible, and within 48 hours of the event, as feasible, using approved communication channels. Closure information will be posted and made available to the public.

F. Operational Requirements

LWDBs shall support business and jobseeker customers through a combination of activities, including but not limited to:

- 1. Providing access as available to career centers and dedicated staff through on-site, virtual, and electronic interactions.
- 2. Providing access to career center mobile units as directed and coordinated by CareerSource Florida and FloridaCommerce in consultation with federal and state partners.
- 3. Providing access to quality customer service and direct services to affected workers including:
 - a. job training services.
 - b. filing of reemployment assistance claims
 - c. resume preparation and job-readiness workshops.
 - d. job placement services.
 - e. career and skills assessment services
 - f. labor market information
 - g. referrals to community programs
 - h. information on the impacts of layoffs on health coverage and other benefits
 - i. community resource workshops
 - j. veterans' programs and services for those with barriers to employment

- k. supportive services1
- I. job fairs and other special events.

a. Cybersecurity and Protection of Electronic Data

Operational emergency planning must include cybersecurity measures consistent with guidance provided by FloridaCommerce and grantee-subgrantee agreements. A LWDB must notify Florida Commerce via the approved method when a cyberattack occurs and must have a local operating procedure (LOP) that includes the following:

- Data protection
- 2. Authentication using MFA or passkeys.
- 3. Staff responsibilities
- 4. Incident response
- 5. Device management

The incident response plan should outline the steps to be taken during a breach in security. This plan must also include clear direction on roles and responsibilities of specific LWDB staff through access control measures, establish communication channels, and define escalation procedures.

LWDBs should conduct and document periodic cybersecurity assessments and audits to identify vulnerabilities and weaknesses that include penetration testing and vulnerability scanning to uncover potential flaws in the organization's systems. LWDBs should implement a strategy to ensure all systems receive OS, application, driver and firmware updates at a regular cadence and should ensure critical data and systems are recoverable in a manner consistent with their approved LOP for continuity of operations to ensure essential functions continue during and after a disruption or crisis.

LWDBs are required to take reasonable measures to protect and secure electronic data containing personal information. LWDBs must follow the requirements set forth in their agreements with FloridaCommerce regarding any breach of security and must follow the requirements in section 501.171, Florida Statutes, and FloridaCommerce's directions as specified in the agreement.²

G. Disaster Recovery Jobs Portal

LWDBs shall provide expedited access to individuals whose employment has been either lost or interrupted as a direct result of a major disaster and instruction on navigating the Disaster Recovery Jobs Portal linked from the Employ Florida website to find job opportunities or post disaster-related jobs to assist in rebuilding affected communities.

H. Rapid Response and Layoff Aversion Activities and Short-Time Compensation

LWDBs shall provide access to Rapid Response and Layoff Aversion activities authorized under WIOA and described in CareerSource Florida Workforce Policy 2021.06.09.A.2 – Rapid Response and Layoff Aversion System and Training and Employment Guidance Letter No. 19-16, to assist employers and impacted workers prior to and immediately following announcement of layoff or natural or other disaster resulting in a mass job dislocation.

I. Business Damage Assessment Surveys

Encouraging business owners to navigate FloridaDisaster.biz to obtain information about preparedness resources, current disaster updates, recovery programs, and to complete the Florida Business Damage Assessment Survey, which helps FloridaCommerce to determine

¹ Supportive Services described in <u>20 CFR 680.900</u> for Adult and Dislocated Workers and <u>20 CFR 681.570</u> for Youth.

² Grantee-Subgrantee Agreement

damage related to disaster impacts, understand individual business needs, and to inform relief efforts.

- J. Local Operating Procedures and Continuity of Operation Plans (COOP)

 LWDBs, regional planning areas, and their career center staff shall consult with local government, chief local elected officials, and other stakeholders to develop streamlined strategies, policies, and a comprehensive Continuity of Operations Plan (COOP) that describes engagement in systematic processes that accomplish the following:
 - Creation of local board-led strategies and policies that ensure uninterrupted communication with federal, state, and local partners and designation of trained employees to communicate with state and local partners, leadership, and board members before, during, and after a state of emergency.

2. A published plan that ensures the safety and availability of staff, minimizes disruption of service delivery, and maximizes cooperation with all partners.

- 3. Includes emergency contacts, a disaster response checklist, and service delivery options that include virtual and mobile service delivery. Plans must outline how customer services will be provided within 24 hours, or as soon as practicably possible, of a disaster declaration. LWDBs must update and submit COOPs biennially to CareerSource Florida and FloridaCommerce. COOP plans may be included as part of WIOA local plans and two-year modifications.
- 4. Includes ongoing training of incumbent and new staff to ensure current and sufficient levels of awareness of operational activities before, during, and after a state of emergency.
- 5. Outlines outreach, including surveys of existing and potential business customers before and after states of emergency to obtain business intelligence and information about community business needs resulting from disasters and other emergencies.

K. Use of Disaster Recovery Dislocated Worker Grants

Pursuant to Training and Employment Guidance Letter (TEGL) 09-24,³ FloridaCommerce has the authority to apply for Disaster Recovery Dislocated Worker Grants (DWGs) to help communities affected by a natural disaster or emergency recovery from the impacts of these events and to help develop a workforce better equipped for resiliency to disaster events in the future

A LWDB shall administer and deliver services under the Disaster Recovery DWG funding associated with the Disaster/Emergency Declaration that impacts its area, including but not limited to the following:

- 1. Working with state and local governmental agencies to assess the need for temporary disaster-relief workers and developing worksite agreements to address these needs.
- 2. Working with local employers to address talent needs in the wake of the disaster/emergency; and
- 3. Conducting outreach and eligibility determination of individuals applying for workforce services and providing eligible participants appropriate grant services.

a. Before Qualifying Events

Disaster recovery efforts are primarily managed at the local level and, as the subrecipients of Disaster Recovery DWG funding, LWDBs play a pivotal role in supporting the economic and overall recovery of their region.

LWDBs shall participate in pre-disaster planning efforts organized by FloridaCommerce

³ TEGL 09-24

- i. Identify existing recovery stakeholders (local agencies or organizations that would be critical to support the recovery process after a disaster).
- ii. Coordinate with existing recovery stakeholders and local government officials to develop communication plans and memorandums of understanding.
- iii. Develop public engagement strategies to effectively communicate Disaster Recovery DWG funding availability, flexibilities, and limitations.
- iv. Identify organizations, such as recovery stakeholders, who may operate as worksite sponsors and develop worksite agreements with such organizations.
- v. Prepare position descriptions that encompass anticipated cleanup and restoration activities and providing humanitarian assistance.
- vi. Identify training programs to help local businesses and their workers recover from the disaster.
- vii. Develop general processes and point people for managing Disaster Recovery DWGs; and
- viii. Train appropriate staff on Disaster Recovery DWG participant eligibility, worksite prioritization, and allowable costs.

b. Determining a Need for a Disaster Recovery DWG

FloridaCommerce will assess the need for disaster-relief employment, determine funding needs, decide whether to apply for a Disaster Recovery DWG, and will make Disaster Recovery DWG awards to impacted LWDBs.

c. Disaster Recovery DWG Application Submittal

If a need for Disaster Recovery DWG funding is identified, FloridaCommerce will assist impacted LWDBs in submitting an application in accordance with TEGL 09-24, which must include:

- i. An abstract that identifies impacts of the qualifying event, an overview of activities anticipated, type of participants to be enrolled, a list of project operators or subrecipients and any deliverables or expected outcomes.
- ii. A summary of emergency management agency coordination or anticipation of such activities.
- iii. A project overview to include the project's scope and priorities, as well as plans to identify, recruit, and enroll eligible participants.
- iv. A Community Needs Assessment for each project.
- v. Projected enrollment and cost breakdown by type of activity.
- vi. A project timeline that includes major goals and objectives over the period of performance; and
- vii. A line-item budget.

d. Community Needs Assessment

As a part of the application process, FloridaCommerce submits a Community Needs Assessment to USDOL. The assessment provides the context for the effects of the qualifying event and sets the scope of the planned response.

The Community Needs Assessment must describe:

- i. The impacts of the declared emergency or disaster event, including how the proposed grant will prioritize projects from communities and individuals most in need due to the effects of the declared disaster or emergency situation, or due to economic or other disadvantage.
- ii. How the proposed projects will address the cleanup, or humanitarian needs that

stem from the impacts of the declared emergency or disaster.

- iii. How proposed disaster-relief employment projects will address the needs and help mitigate the effects of the declared emergency or disaster event, and promote community recovery, including through creating high-quality employment opportunities; and
- iv. How Disaster Recovery DWG funds will provide opportunities for individuals to return to unsubsidized employment as a result of grant activities.

For emergencies or disasters of national significance, the Community Needs Assessment should also demonstrate that the declared emergency or disaster could result in the loss of at least 50 jobs in the area covered by the declaration.

For Disaster Recovery DWGs that include employment and training activities in addition to disaster-relief employment, the Community Needs Assessment must include:

- i. A description of the resulting economic impacts of the qualifying event as well as any broader or additional economic effects or challenges including secondary or related layoffs, increases in unemployment, or other factors where applicable, that impact the community or communities to be covered by the proposed projects.
- ii. An explanation of why existing formula and/or other funds are unable to meet the employment and training needs created by the qualifying event.
- iii. An overview of the current economic situation, layoff impacts or other challenges impacting the ability of the grant recipient and any subrecipients to effectively serve eligible dislocated workers; and
- iv. The identification of populations to be targeted for services, including those who had previous barriers to employment, such as the need for supportive services (to include childcare or transportation), to enable participants to successfully enroll, participate in, and complete grant-funded activities.

LWDBs and Regional Planning Areas affected by a declared disaster must coordinate with county and city emergency management offices and other agencies involved in disaster recovery in the affected areas⁴, to complete the Community Needs Assessment.

e. Funding of Disaster Recovery DWGs

USDOL issues its funding decision within 45 calendar days of receiving a valid application. If the application is approved, USDOL will issue Disaster Recovery DWG funds to FloridaCommerce in full or incrementally.

FloridaCommerce will use state and federal disaster declarations, the Business Damage Assessment Survey and local recovery stakeholder feedback to determine areas of the state that have significant disaster recovery needs. LWDBs are expected to use Disaster Recovery DWG funds when areas within their region demonstrate significant disaster recovery needs.

FloridaCommerce will distribute funds to participating LWDBs based on identified needs and availability of funds. Funds are released to LWDBs by FloridaCommerce through NFAs that describe special grant conditions.

Requests for additional funds must be submitted by LWDBs to FloridaCommerce when needed and must be supported by information that details enrollments, completion of

⁴ Such agencies will include FEMA, Small Business Administration, voluntary organizations active in disaster (VOAD) in the affected area, and others.

work goals, remaining program activities, and expenditures.

FloridaCommerce is responsible for ensuring that funds are expended in compliance with Disaster Recovery DWG requirements and for the de-obligation and re-obligation of funds to meet ongoing needs. Failure to meet planned Disaster Recovery DWG enrollments and/or expenditures may result in sanctions for LWDB failure to meet federal and state standards.⁵

f. Participant Eligibility

LWDBs must ensure that individuals receiving services funded by a Disaster Recovery DWG meet at least one of the following eligibility requirements:

- Temporarily or permanently laid off as a consequence of the emergency or disaster:⁶
- A dislocated worker as defined in WIOA Section 3(15), including displaced homemakers as defined in WIOA Section 3(16).
- iii. A long-term unemployed individual;7 or
- iv. A self-employed individual who became unemployed or significantly underemployed⁸ as a result of the emergency or disaster.

g. Eligibility Documentation

LWDBs must document eligibility in the participant's Employ Florida program application, including, but not limited to the participant's:

- i. Verification of Work Authorization Status9
- ii. Citizenship or right to work;10
- iii. Compliance with the Selective Service Act; and
- iv. Status as one of the four grant-specific eligibility categories listed above. 11

Each LWDB is required to collect supporting eligibility documentation used to determine eligibility and retain such documentation in the participants' electronic and/or hard-copy case files, in accordance with local operating procedures, and upload this documentation into Employ Florida, as soon as is practicably possible. Additionally, LWDBs must obtain and maintain documentation that supports the determination for eligibility and continued participation, including utilizing the E-Verify system pursuant to Section 448.095, F.S.

Circumstances surrounding the disaster may make documentation of eligibility difficult for

¹⁰ A copy of the completed Form I-9 and E-Verify documentation must be maintained in the file of a participant placed into a temporary disaster-relief position.

⁵ Workforce Policy 104 – Sanctions for Local Workforce Development Boards' Failure to Meet Federal and State Standards

The term "laid off as a consequence of the emergency or disaster" includes any job separation that can be reasonably linked, directly or indirectly, to the disaster or emergency. May include individuals who were forced to leave their employment following the disaster due to reductions in time or wages, as well as external circumstances caused by the disaster that prevents them from remaining at their pre-disaster job. For example, a worker may have to leave a job to take care of problems caused by the emergency or disaster, to take care of themselves or a relative during the emergency or disaster or dealing with temporary or permanent homelessness due to the emergency or disaster. May include individuals whose offers of employment were rescinded or whose ability to work was delayed or canceled due to the disaster.

⁷ A Long-term Unemployed Individual has been unemployed for six (6) out of the last 13 weeks. An individual is considered unemployed if they were not employed during the weeks in question or were employed in irregular jobs, such as day labor, or in part-time positions, (i.e., an average of 20 hours or less for the six weeks).

⁸ An individual is significantly underemployed when their income from self-employment is no longer adequate to maintain self-sufficiency or meet living expenses.

⁹ TEGL 10-23, Change 2

¹¹ Such documentation may include a notice of separation from previous employer; documentation of Reemployment Assistance benefits or other unemployment compensation; federal income tax returns; business ledgers; and client information for selfemployed individuals.

participants to obtain during the initial stages following the disaster. Self-attestation is an allowable method for documenting employment-related eligibility requirements when other documentation is not available. If the LWDB subsequently discovers through monitoring that it has served an ineligible participant, the participant must be terminated from the program and a case note must be recorded in Employ Florida describing the review process and subsequent determination of ineligibility. This situation will not result in disallowed costs.

h. Veterans and Eligible Spouse Priority of Service

As covered persons, veterans and eligible spouses determined eligible for services under a Disaster Recovery DWG must receive priority over non-covered persons in accordance with Workforce Policy 111, Priority of Service for Veterans and Eligible Spouses.

i. Allowable Activities

In most cases, Disaster Recovery DWG projects must include a disaster-relief employment component.¹² Participants may be enrolled in disaster-relief employment activities, as well as employment and training activities, concurrently, sequentially, or as stand-alone services. However, certain Disaster Recovery DWG awards may limit the availability of certain activities as specified within the accompanying NFA.

Prioritization of types of services must be determined in coordination with local emergency planning and recovery agencies as further discussed in Section V.K.x. of this policy. Please see Attachment for additional information on allowable activities.

i. Disallowed Activities

The following are not allowable uses of Disaster Recovery DWG funds:

- i. Activities that are in preparation for future disasters;13
- ii. Incumbent Worker Training (IWT)¹⁴ and Customized Training for employed workers.
- iii. Purchasing humanitarian supplies such as food, clothing, and hygiene products;15
- iv. Purchasing materials to do repairs.
- v. Matching FEMA funds.
- vi. Membership dues for local economic development organizations; and
- vii. Paying for LWDB staff education not directly related to the performance of their job duties in managing the Disaster Recovery DWG.

k. Disaster-Relief Employment

LWDBs must demonstrate that disaster-relief employment created under a Disaster Recovery DWG aligns with the following categories:

- i. Cleanup and recovery efforts; or
- ii. Delivery of appropriate humanitarian assistance in the aftermath of the

¹² Disaster Recovery DWGs awarded due to an influx of individuals relocated from a disaster-affected area to another geographic area may not require a temporary disaster-relief employment component.

¹³ DWG activities must be designed to mitigate the effects of the current declared disaster for which the grant was awarded; activities that may prevent future disasters or their impacts are permissible only where such activities are incidental to addressing the impacts of the current disaster or emergency.

¹⁴ IWT is generally not allowable for DWGs but may be made available for certain specified funding opportunities.

¹⁵ For example, Disaster Recovery DWG funding could be used to support food delivery workers through disaster-relief employment at food shelters but not to purchase the food itself.

emergency or disaster.

Post-disaster response and recovery activities address needs associated with mass care/sheltering, public health and health care, (re)housing, debris/infrastructure removal and repair, support to business owners, emotional/psychological support, public health and health care, and mitigation activities that are directed at correcting existing damage.

Humanitarian assistance provided by temporary disaster-relief workers generally includes actions designed to alleviate suffering and maintain human dignity in the aftermath¹⁶ of disasters. The humanitarian assistance provided by disaster-relief workers must relate directly to needs created by the disaster or emergency, and physical, emotional, and economic consequences of the disaster or emergency.

I. Disaster-Relief Employment Duration

Eligible participants may be enrolled into disaster-relief employment under a Disaster Recovery DWG for up to 12 months or 2,080 hours (whichever is longer).

USDOL may approve an extension for up to an additional 12 months/2,080 hours through a grant modification. When an extension is granted, FloridaCommerce will notify the impacted LWDBs by modifying the NFAs to reflect the extension.

m. Participant Wages and Fringe Benefits

In accordance with WIOA Section 181(a)(1)(A), participants must be compensated at the same rates, including periodic increases, as employees who are similarly situated in similar occupations doing the same type of work, and who have similar training, experience, and skills.

However, in cases where the worksite does not have employees doing the same or similar work and with similar training, experience, and skills, LWDBs must ensure that the wages paid to participants:

- i. Are in line with the industry standard for that type of work in the area where the work is to be performed, supported by documentation; or
- ii. Are paid at least \$15 per hour in the absence of a determinable industry standards for the area where the type of work is to be performed.¹⁷

Where applicable, fringe benefits must be paid in accordance with the policies of the Disaster-Relief Employer.¹⁸ If employees at the worksite are doing similar work and receiving hazard pay, disaster-relief workers may also be paid hazard pay rates for their work.¹⁹

n. Training and Pre-vocational Activities

To meet the disaster-recovery needs of affected areas, LWDBs may provide short-term training and pre-vocational activities that allow a disaster-relief worker to obtain the skills

19 Overtime is allowable.

The aftermath involves time and causality. With every declared disaster, there will be physical damage which results in the dislocation of individuals, families, and businesses, as well as economic and emotional damage. Temporary disaster-relief workers may be provided to help deal with these crises since they are the consequence of the disaster for the time necessary to help affected individuals recover.

¹⁷ TEGL 09-24

¹⁸ Disaster-Relief Employers are entities designated by FloridaCommerce or LWDBs to carry out day-to-day human resources and payroll activities of a Disaster Recovery DWG. The role of the Disaster-Relief Employer is described in Section V.K.g-r.

needed to conduct the disaster-relief work.²⁰ For example, this may include training in the use of heavy equipment. During involvement in these activities, for a participant who has been hired in a disaster-relief position that requires attainment of specific skills, the participant may receive wages under the Disaster Recovery DWG.

o. Employment and Training Activities

Pursuant to WIOA Section 170(d)(1)(C), LWDBs may use Disaster Recovery DWG funding to provide employment and training activities to participants to help them obtain (re)employment that leads to self-sufficiency when they are unlikely to return to their prior employment. These services may include job search/job readiness activities, literacy instruction, including English as a Second Language (ESL) instruction, and occupational skills training and/or work-based training for career pathways that lead to high-demand jobs in high-growth industries.

An Individual Employability Plan must be developed in Employ Florida, detailing the need for training services as well as certain individualized career services such as work experiences, literacy/GED prep/ESL instruction, short-term pre-vocational services, and out-of-area job searches/relocation.

p. Supportive Services

LWDBs must provide supportive services when needed to enable individuals to participate in disaster-relief employment and employment and training activities. Supportive services provided to participants in disaster-relief employment must be designed to enable the participant to safely and effectively carry out the job for which they have been hired. Any supportive service provided must enable the individuals to participate in grant-funded employment and training activities. Any supportive services provided must be consistent with WIOA and applicable regulations, as well as Workforce Policy 109, Supportive Services and Needs Related Payments. LWDBs must ensure their local operating procedures governing supportive services and needs-related payments include the provision of such services to individuals participating in disaster-relief employment and employment and training activities.

Note: Participants who receive wages from disaster-relief employment are not eligible for needs-related payments.

g. Disaster-Relief Employers and Worksites

LWDBs must identify appropriate Disaster-Relief Employers based on the nature and scope of the disaster or emergency and the types of disaster-relief activities that projects will be carrying out. LWDBs must have contracts or agreements in place with Disaster-Relief Employers to ensure that they comply with all Disaster Recovery DWG and other relevant rules and requirements, including with regard to employment activities, participant eligibility, participant safety and health (including Occupational Safety and Health Administration (OSHA) safety and work condition standards), supervision and attendance, and any other worksite requirements.

Similarly, LWDBs must identify appropriate Worksite Sponsors based on the nature and scope of the disaster or emergency and the types of disaster-relief activities that projects will be carrying out. Worksite Sponsors are entities²¹ that preferably have experience in disaster recovery and enter into worksite agreements with LWDBs to

Such training is not required to be included in state or local eligible training provider/program list, nor is the occupation required to be on the local targeted occupation list.

²¹ Worksite Sponsors are entities with which participants are placed to engage in disaster-relief employment and are often governmental or nonprofit entities to avoid potential conflicts of interest.

develop position descriptions and to support participant placement on worksites. LWDBs must ensure that the Worksite Sponsor complies with all Disaster Recovery DWG and other relevant rules and requirements.

r. Eligible Disaster-Relief Employers

Each disaster-relief worker must have an employer of record, referred to as the Disaster-Relief Employer. There is no limitation on what type of entity or organization may be a Disaster-Relief Employer. The LWDB, a staffing agency, or another entity may be the Disaster-Relief Employer. The Disaster-Relief Employer is responsible for maintaining all personnel and payroll records related to the employment of disaster-relief workers, including employer and employee withholdings and other benefits, if applicable. The Disaster-Relief Employer may be responsible for unemployment claims filed by temporary disaster-relief workers when their assignment ends.

s. Worksite Selection

Disaster-relief worksites must be in the geographic area covered by the qualifying event for the Disaster Recovery DWG and within the LWDB's jurisdiction.²² LWDBs must give the highest priority to cleanup of the disaster area's most severely damaged public communities, facilities, and property, and to the cleanup of and provision of humanitarian assistance to economically disadvantaged portions of the disaster area.

The administration of Disaster Recovery DWG funds must be in coordination with projects administered by emergency management and disaster recovery agencies. The funding of temporary disaster-relief positions shall not duplicate or supplant other funding.

Projects may perform work on private property when the following conditions are met:

- i. The work must be intended to remove health and safety hazards to the larger community, or to address or alleviate specific economic or employment-related impacts of the disaster, such as cleanup work needed for disaster-affected employers to resume or continue operations.
- ii. The activities are necessary to remove health and safety hazards on private lands or around homes or other structures and may only return the land or structure(s) to a safe and habitable level, or operational status, and will not improve the original land or structure(s); and
- iii. The LWDB establishes a priority of disaster-relief activities in coordination with the local area's disaster-recovery team²³ that identifies the need for and use of private for-profit worksites, as applicable.

t. Health and Safety Standards

In all Disaster Recovery DWG projects, LWDBs must establish written policies specifying that Disaster-Relief Employers ensure that project participants are afforded the same health and safety standards established under federal and state law applicable to working conditions of permanent employees. LWDBs must also ensure that participants receive appropriate safety training and ensure safe working conditions in accordance with the OSH Act of 1970, as amended. LWDBs are responsible for ensuring and maintaining documentation that worker orientation and OSHA/safety

²² In extraordinary cases, LWDBs may develop and staff worksites outside of their jurisdiction with approval from FloridaCommerce.

In some communities, groups are sanctioned by the County Emergency Operations Center, and any number or type of non-profits could be the county's proxy for disaster-relief activities. (This may include the Red Cross, Salvation Army, United Way, faith-based groups, and others.)

training has occurred.

Note: Certificates awarded for completion of basic safety training (i.e., OSHA 10) are not recognized postsecondary credentials under WIOA.

u. Prioritizing Disaster-Relief Worksites

LWDBs must be prepared to deploy the most appropriate disaster-relief jobs based on the criteria listed in TEGL 09-24, as well as through consultation with local government, community and faith-based organizations, economic development and industry stakeholders, etc. Priorities for the types of disaster-relief jobs should be based on an assessment of the following factors:

- i. Physical impact on public properties.
- Physical and human impact on the elderly, people with disabilities, low-income and other special needs populations.
- iii. Impact on organizations that are needed to respond to the disaster or emergency (governmental, community, and faith-based); and
- iv. Impact on local businesses, industry sectors, and the overall economic health of the area.

v. Approval and Tracking of Worksites

LWDBs are responsible for approving temporary disaster-relief worksites and job duties for disaster-relief workers. Worksite Reports containing worksite and job description information must be maintained and reported to FloridaCommerce according to a schedule and in a format provided by FloridaCommerce for each Disaster Recovery DWG.

Worksite files must be maintained for each worksite and must include:

- The agreement between the LWDB, the Worksite Sponsor, and the Disaster-Relief Employer, including non-duplication requirements (see Subsection V.K.x. below).
- ii. Approved job descriptions.
- iii. Evidence of appropriate OSHA/safety training.
- iv. Evidence that supervisor orientation²⁴ has taken place at the worksite.
- v. Description of supplies and equipment needed and responsibility for providing such:²⁵ and
- vi. Copies of attendance records.

Worksite files will be reviewed on a semi-annual basis by FloridaCommerce staff and must be provided upon request.

w. Use of Equipment for Temporary Disaster-Relief Workers

Generally, Disaster Recovery DWG funds may not be used to purchase equipment.²⁶ Workforce Policy 87, Prior Approval Administrative Policy for Local Workforce

²⁴ Worksite supervisor orientation includes an overview of their responsibilities under the grant, allowable activities, timekeeping, discipline, etc.

The worksite file identifies the supplies and equipment that will be needed for the temporary disaster-relief worker(s) to fulfill their job duties. As supplies are provided to individual participants, these are recorded as supportive services in Employ Florida.

Equipment means tangible <u>personal property</u> (including information technology systems) having a useful life of more than one year and a per-unit <u>acquisition cost</u> that equals or exceeds the lesser of the capitalization level established by the <u>non-Federal entity</u> for financial statement purposes, or \$10,000. See <u>2 CFR 200.1</u>.

Development Boards requires prior approval from FloridaCommerce before funds awarded to a LWDB may be used to purchase equipment for such cases, which may be subject to exception.

If equipment needed for the temporary disaster-relief workers to complete their assigned task is not available at the worksite, such equipment may be rented. Equipment rental expenses must be detailed as a separate line item in the budget(s) submitted by the LWDB to FloridaCommerce.

x. Coordination with FEMA and Non-Duplication of Funds

Disaster-relief activities must be coordinated with the appropriate local emergency management agencies to avoid duplication of benefits²⁷ and ensure that grant activities appropriately respond to the affected community's needs after a disaster. LWDBs must also coordinate with federal agencies responding to the disaster, either through direct contact or through state or local agencies working with the federal agencies.

As FEMA and Disaster Recovery DWG funds can pay for similar services, the best way to ensure that the LWDB is not duplicating FEMA funding is to obtain a written statement from the county, city, and/or non-profit as to what services and/or funding FEMA is or will be supplying to the entity and what disaster-recovery services will be provided by disaster-relief temporary workers. This will provide documentation to show that Disaster Recovery DWG funds are not duplicated with FEMA funded services/activities. The written statement should include a brief description of what staff, equipment, supplies, etc., are being paid through FEMA vs. Disaster Recovery DWGs. When a Disaster Recovery DWG funded disaster-relief temporary job participant works at a site which is later approved for FEMA reimbursement, and it is time for FEMA to reimburse the costs of the project, the wages of the temporary job participants must be deducted from the cost of the project before FEMA reimburses 75% of the cost of the project to the local government.

LWDBs must establish policies and procedures that describe how the LWDB will assess the availability of other resources, such as assistance from FEMA, private insurance, etc., to ensure non-duplication of funds and recover grant funds when other funds become available for the same activities. The established policies and procedures must also address a plan to recover grant funds expended for activities or services for which other funds become available from FEMA, public or private insurance, or other available resources.

y. Local Operating Procedures

Local Operating Procedures (LOPs) help local areas further define and clarify how programs will operate locally and are unique to each LWDB. LOPs govern procedures for the Disaster Recovery DWG program and must specifically address how the program will be administered locally. The LOPs must align with this policy. LWDBs must develop LOPS that:

- Define what constitutes a participant as being "unlikely to return to previous employment."
- ii. Establish a local process for collecting and maintaining eligibility verification documentation, including ensuring that documentation collected is made available for monitoring by federal, state, and other auditors.

²⁷ Duplication occurs when a beneficiary receives assistance for the same purpose from multiple sources resulting in the total assistance exceeding the actual need.

- iii. Outline how the LWDB will ensure the wages paid to participants enrolled in the disaster-relief employment are in line with the industry standard for that type of work in the area where the work is to be performed.
- iv. Ensure that supportive services are provided when needed to enable individuals to participate in disaster-relief employment and employment and training activities.
- v. Specify that Disaster-Relief Employers must ensure that participants are afforded the same health and safety standards established under federal and state law applicable to working conditions of other employees at the worksite.
- vi. Describe how the LWDB will assess the availability of other resources, such as assistance from FEMA, private insurance, etc., to ensure non-duplication of funds and recover grant funds when other funds become available for the same activities.

Local policies relating to program services must be updated to allow for the full array of services needed to operate DWGs. A written process must be developed that describes variations from the local policies. LWDBs must also ensure that LOPs related to the provision of supportive services and needs-related payments include how these services will be provided to Disaster Recovery DWG participants.

LOPs may be submitted to FloridaCommerce to provide feedback and ensure compliance with WIOA, USDOL regulations, and this policy.

VI.IMPLEMENTATION AND MONITORING

a. Florida Commerce Oversight

FloridaCommerce oversees the programmatic and financial management of Disaster Recovery DWGs to ensure effective support for businesses, individuals, and communities impacted by disasters.

Monitoring may occur on-site or virtually and will focus on:

- i. Outreach and recruitment
- ii. Participant eligibility
- iii. Career services and training
- iv. Performance and expenditure management
- v. Business services
- vi. Disaster-relief strategies
- vii. Coordination with federal, state, and local partners

Deficiencies, including the failure of an LWDB to meet Disaster Recovery DWG enrollments and/or expenditures, or failure to meet performance requirements, may result in sanctions and Performance Improvement Plans (PIP) identified in Workforce Policy P104 – Sanctions for Local Workforce Development Boards' Failure to Meet Federal and State Standards and Workforce Policy P88 – Performance Requirements for Local Workforce Development Boards.

b. Local Workforce Development Board Responsibilities

LWDBs must establish local policies and procedures to meet state and federal requirements. Each worksite must be included in the LWDB's formal monitoring plan.

- Monitoring Schedule: Conduct the first monitoring visit within three months of a participant's placement, and at least every six months thereafter.
- ii. Monitoring Standards: An independent staff member or third party unaffiliated

with worksite or case management must conduct the monitoring. The monitor must engage directly with worksite supervisors²⁸ and disaster-relief workers.

iii. **Documentation:** Each visit must be documented in a written report, including any required corrective actions. LWDBs must provide monitoring tools and documentation to FloridaCommerce upon request.

iv. **Compliance:** If LWDBs discover that workers are engaged in non-disaster-related activities, they must take immediate corrective action, which may include terminating the worksite agreement.

v. **Strategic Planning:** LWDBs must use information gathered from their monitoring activities to refine their disaster response strategies, including for business engagement, staff training, and integration of disaster response into service delivery.

c. Statewide Monitoring

CareerSource Florida and FloridaCommerce will monitor the implementation of this policy, including:

- i. Local operating procedures
- ii. Continuity of Operations (COOP) plans
- iii. Emergency service delivery logs
- iv. Mobile unit deployment
- v. Supportive service distribution
- vi. Post-disaster performance data

FloridaCommerce will review each LWDB's COOP and operating procedures every two years to ensure alignment with state protocols. LWDBs must submit a disaster response summary within 30 days of the event's closure, detailing services provided, and individuals served.

VII. AUTHORITIES

Public Law 113-128, The Workforce Innovation and Opportunity Act (WIOA), WIOA Sections 3(15); 134; 170; 181; 184; 185; 188; 189

20 CFR Sections 679.100 - 130 20 CFR Part 680, Subpart C, Section 682.300 - Section 682.370 20 Code of Federal Regulations (CFR) Part 687, National Dislocated Worker Grants

TEGL 19-16, Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by Title III of WIOA, and for Implementation of the WIOA Final Rules

TEGL 14-18, Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL)

TEGL 09-24, Updated National Dislocated Worker Grant Program Guidance

Chapter 252, Florida Statutes

Sections 445.003 – 445.004, Florida Statutes

²⁸ Worksite Supervisors are individuals at a temporary disaster-recovery worksite who are responsible for overseeing the day-to-day work of temporary disaster-relief workers assigned to the worksite.

Section 448.095, Florida Statutes

CareerSource Florida Workforce Policy G1 – State Workforce Development Board Roles and Responsibilities

CareerSource Florida Workforce Policy 2021.06.09.A.2 – Rapid Response and Layoff Aversion System

CareerSource Florida Workforce Policy P114 - Rapid Response Program Administration

Florida Administrative Code (FAC), Chapter 60K-5, and Chapter 252.38, Florida Statutes

VIII. HISTORY

Date	Description
08/21/2025	AWI Final Guidance 00-017, CareerSource Florida Workforce Policy Disaster Recovery Dislocated Worker Grants Program Administration Policy, and CareerSource Florida Emergency Response Strategy consolidated into a single policy to provide strategic and operational guidance.
06/18/2024	CareerSource Florida Emergency Response Strategic Policy approved by the CareerSource Florida Board of Directors
08/16/2023	CareerSource Florida Workforce Policy Disaster Recovery Dislocated Worker Grants Program Administration Policy updated to conform to TEGL 16-21 ²⁹ and re-issued by FloridaCommerce.
06/09/2021	CareerSource Florida Workforce Policy Disaster Recovery Dislocated Worker Grants Program Administration approved by CareerSource Florida Board of Directors to provide LWDBs with the minimum requirements for administering Disaster Recovery Dislocated Worker Grants.
11/27/2000	AWI Final Guidance 00-017 – Procedures for the Closure of the One-Stop Delivery System Centers Due to Natural Disasters or Other Emergency Conditions issued by the Florida Agency for Workforce Innovation

IX. RESOURCES

Florida Virtual Business Emergency Operations Center - Florida Disaster.biz

Workforce Services Quick Facts: Mobile Unit

Workforce Services Quick Facts: State Rapid Response Program

Disaster Recovery Dislocated Worker Grants

State of Florida Comprehensive Emergency Management Plan

ESF 18: Business, Industry and Economic Stabilization Annex

Employ Florida Disaster Recovery Jobs Portal

²⁹ Note: TEGL 16-21 rescinded.

National Dislocated Worker Grants – WIOA Desk Reference

National Voluntary Organizations Active in Disaster Resource Center

Attachment: Disaster Recovery Projects Allowable Activities

Activity Type	Description	Allowable/Disallowed	Citation (CFR/TEGL)
Disaster Relief Employment	Temporary jobs created to assist with clean-up, humanitarian aid, and recovery efforts in areas affected by a federally declared disaster or emergency. These jobs must be related to disaster recovery and are time limited.	Allowable	20 CFR 687.180(b)(1)
Employment and Training Activities	Services such as job search assistance, career counseling, occupational skills training, and on-the-job training provided to help dislocated workers re-enter the workforce.	Allowable	20 CFR 687.180(b)(1)
Pre-vocational Activities	Services that prepare individuals for employment or training, including basic skills instruction, English language acquisition, and work readiness training.	Allowable	TEGL 09-24 Attachment II
Supportive Services	Services that enable individuals to participate in disaster relief employment or training, such as transportation, childcare, housing assistance, and work-related tools or clothing.	Allowable	TEGL 09-24 Attachment II
Preparation for Future Disasters	Activities focused on planning, training, or equipping for future disasters rather than responding to a current declared disaster.	Disallowed	TEGL 09-24 Attachment II
Incumbent Worker Training	Training for workers who are currently employed and not dislocated, which is not allowable under Disaster Recovery DWGs.	Disallowed	TEGL 09-24 Attachment II
Customized Training for Employed Workers	Employer-specific training for currently employed individuals, which is not aligned with the intent of serving dislocated workers.	Disallowed	TEGL 09-24 Attachment II

Purchasing Humanitarian Supplies (e.g., food, clothing, hygiene products)	Buying food, clothing, hygiene products, or other humanitarian aid items is not an allowable use of DWG funds because these are not employment related services, other federal programs cover humanitarian needs and WIOA Title I funds must align with workforce outcomes.	Disallowed	TEGL 09-24 Attachment II
Purchasing Materials for Repairs	Using DWG funds to buy construction materials or supplies for physical repairs is not permitted because this is not a workforce activity. Other federal programs are designed to fund infrastructure and material recovery. Under WIOA, all expenditures must be tied to employment outcomes. Allowing material purchases could lead to misallocation of funds.	Disallowed	TEGL 09-24 Attachment II
Matching FEMA Funds	Dislocated Worker Grant funds cannot be used to match or supplement FEMA disaster relief funds. DWG funds are intended to supplement workforce development efforts, not to serve as a match or cost-share for other federal programs like FEMA's Public Assistance. Federal cost principles prohibit the use of one federal grant to match another unless explicitly authorized.	Disallowed	TEGL 09-24 Attachment II
Membership Dues for Local Economic Development Organizations	Paying dues or fees to join local economic development groups is not an allowable cost because this is not an employment or training activity and paying membership dues to economic development organizations does not provide a direct benefit to dislocated workers nor does it contribute to	Disallowed	TEGL 09-24 Attachment II

	measurable employment outcomes. Under WIOA, administrative costs must be reasonable, necessary and allocable to the grant's purpose.		
Education for Local Workforce Board Staff (not job-related)	TEGL 09-24 explicitly lists training or education for staff that is not directly tied to managing the Dislocated Worker Grant as a disallowed activity. Training that helps staff administer the grant, comply with federal reporting requirements, and manage disaster relief employment or training programs that support effective delivery of grant-funded services may be allowable.	Disallowed	TEGL 09-24 Attachment II



POLICY NUMBER P122

Workforce Policy

Title:	Adult and Dislocated Worker Program Eligibility
Program:	Workforce Innovation and Opportunity Act
Туре:	Programmatic
Effective:	08/21/2025

I. PURPOSE AND SCOPE

The purpose of this policy is to provide the Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated Worker program eligibility requirements to Local Workforce Development Boards (LWDBs) and program service providers and to ensure timely, efficient, and aligned services are provided to all seeking eligibility in this program.

II. KEY OBJECTIVES

- 1. Expand timely access to career services so eligible adults and dislocated workers can get the help they need through the one-stop system.
- 2. Improve employment outcomes by helping participants find and keep good jobs with competitive wages.
- 3. Promote skill development through training that leads to recognized credentials and prepares workers for in-demand industries.
- 4. Strengthen partnerships by working with required and additional partners to deliver coordinated services.
- 5. Ensure compliance and accountability by tracking performance.

III. MEASURABLE PERFORMANCE OUTCOMES

WIOA outlines six primary performance indicators for the Adult and Dislocated Worker programs, as defined in Section 116(b)(2)(A) of WIOA and 20 CFR Part 677. Additional measures of performance for this policy include:

1. Aligned, clearly written and posted local operating procedures outlining processes for

Adult and Dislocated Worker program eligibility.

2. Average time to eligibility determination and service delivery.

IV. POLICIES AND PROCEDURES

A. Eligibility for Career Services

WIOA section (sec.) 3(2) defines an individual who is considered an adult and WIOA sec. 3(15) defines an individual who is considered a dislocated worker for eligibility purposes to participate in the WIOA Adult or Dislocated Worker programs. LWDBs must ensure that every individual receiving services under the WIOA Adult or Dislocated Worker programs meets the applicable eligibility criteria and is subsequently enrolled in the program.

An individual's eligibility status is fixed at the time of eligibility determination, and individuals remain eligible for the Adult/Dislocated Worker Program even if there are changes in the original circumstances that were used as the basis to establish eligibility. For example, an individual determined eligible as a dislocated worker on the basis of an anticipated layoff or termination remains eligible even if the layoff or termination does not take place.

Pursuant to the definition of dislocated worker, RESEA participants and those in stopgap employment may also be eligible for services through the WIOA Dislocated Worker Program.

B. Eligibility for Training Services

Training services may be made available to employed and unemployed adults and dislocated workers consistent with federal regulations. Additional considerations include:

- i. Economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services serve as part of the determination consistent with local plans;²
- ii. Individuals unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as state-funded training funds or Federal Pell Grants established under Title IV of the Higher Education Act of 1965, or who require WIOA assistance in addition to other sources of grant assistance, including Federal Pell Grants may be eligible. Veteran Assistance (VA) benefits for education and training services do not constitute "other grant assistance" under WIOA's eligibility requirements and do not preclude eligibility or need to be exhausted or depleted for eligibility to be determined.; and³
- iii. Need financial support to cover training costs that have not been paid. Reimbursement for training services already paid for is not allowed.

¹ 20 CFR 680.220, 20 CFR 680.210(2), 20 CFR 680.210(3), 20 CFR 680.210(b)

² The Florida Department of Commerce publishes the Adjusted Lower Living Standard Income Level (LLSIL) Wage Rates each year upon converting the LLSIL to an hourly wage. The hourly wage rates are used as baseline date in state-generated performance reports such as the monthly management report and may be used by local workforce development boards for other purposes such as the locally required definition for employment that leads to self-sufficiency. Each LWDB must describe the definition of "self-sufficiency" used by the local area in its WIOA local plan.

^{3 20} CFR 680.210(c), 20 CFR 680.230

iv. If training services are provided through the adult funding stream, are determined eligible in accordance with the state and local priority system in effect for adults, as prescribed in Workforce Policy 105 – Priority of Service.⁴

C. Statutory Priority for Adult Funds

WIOA establishes a priority requirement with respect to funds allocated to a local area for the Adult program.⁵ When using WIOA Adult funds to provide individualized career services and training services, LWDBs must give priority to recipients of public assistance consistent with Workforce Policy 105 – Priority of Service and Workforce Policy P111 – Priority of Service for Veterans and Eligible Spouses for the requirements for providing priority of service under WIOA.

D. Eligibility Documentation

Upon issuance of this policy, all LWDB are required to collect supporting eligibility documentation used to determine eligibility and retain such documentation in Employ Florida. LWDBs must ensure the documentation collected is appropriate and available for review by auditors and federal, state, and local representatives. Adult and dislocated worker service providers must obtain and maintain documentation that supports the determination for eligibility and continuous participation. Please see Section VI. Resources: Source Documentation for Core/Non- Core Programs DOL-only Data Element Validation.

E. Enrollment

1. Employ Florida Requirements

Individuals seeking WIOA services, aside from self-service or information-only services or activities, through the Adult and Dislocated Worker program must be registered in Employ Florida.⁶ Once an individual is determined to be eligible for the WIOA Adult or Dislocated Worker program, staff are required to complete a WIOA Adult or Dislocated Worker program application in Employ Florida and enter all required information, including that required by 29 CFR 38.41(b).

2. Enrollment Process Requirements

Individuals interested in consideration for WIOA Title I Adult or Dislocated Worker program services must be allowed to apply for services. However, an application alone is not equivalent to enrollment into the program. LWDBs must ensure that every individual receiving services under this program is determined eligible as an adult or dislocated worker and formally enrolled in the program as soon as possible but no later than 90 days after eligibility determination. When enrollment is not completed within 90 days of eligibility determination, a redetermination must occur. Enrollment into the program(s) requires assigning an

^{4 20} CFR 680,210(d)

⁵ WIOA sec. 134(c)(3)(E)

^{6 20} CFR 680.110(b)

appropriate service in Employ Florida that initiates participation.⁷ Note that while LWBDs must meet the 90 days requirement above, LWDBs should strive to ensure that every individual seeking to receive services under the Dislocated Worker program is determined eligible as a dislocated worker and formally enrolled in the program no later than 30 days after eligibility determination.

3. Enrollment in the Adult Program, the Youth Program, or Both

Individuals between the ages of 18 to 24 who meet the respective program eligibility requirements may participate in either the WIOA Adult or Youth program or participate in both concurrently. Such individuals must meet the youth or adult eligibility criteria applicable to the services provided. If such concurrent enrollment occurs, LWDBs must track expenditures separately by program and the delineation of services must be clearly identified in the service plan for activities in Employ Florida.

See Workforce Policy 095 - Youth Eligibility for specific details about coenrollment.

4. Timely, Efficient, and Aligned Determinations

LWDBs must engage all customers by following the standards established in CareerSource Florida Workforce Policy P9 - Availability of Services to Floridians. For job seekers, LWDBs prioritize customer-centered approaches that ensure a smooth transition from self-service to staff-assisted support, guiding individuals through intake, eligibility assessment, service delivery, and ultimately into quality employment. Additionally, customer eligibility determination should allow for the provision of services and support as quickly as possible, and LWDBs should deliver services efficiently with a high level of communication and opportunity for feedback.

F. State and Local Monitoring

LWDBs must create and publicly post local operating procedures or LOPs that align with federal and state requirements. Service providers must fully cooperate with all state and LWDB monitoring and follow all applicable laws and policies. FloridaCommerce will monitor activities associated with this policy consistent with 2 CFR 200 and as required by 20 CFR 683.410.

V. IMPLEMENTATION

LWDBs must implement this policy through written LOPs that align with federal and state requirements. LOPs must define local eligibility and enrollment processes, including intake procedures, and service timelines and must not include criteria beyond those set forth in WIOA Section 134(c)(3) and 20 CFR 680.210 regarding eligibility or "suitability" for training services. LWDBs must clearly define and apply key eligibility terms and ensure all determinations are supported by documentation that meets the required standards⁸.

⁷ Employ Florida Service Code Guide

⁸ TEGL 23-19, Change 1

Documentation must be uploaded to Employ Florida and retained per 2 CFR 200.334.

Each LWDB must establish internal controls and a local monitoring plan to ensure timely eligibility determinations and compliance with WIOA requirements. Monitoring must occur at least annually, include a statistically valid sample of participant files, and assess compliance with eligibility, documentation, and priority of service requirements. LWDBs must also track service delivery timelines and use results to improve customer flow.

LWDBs must evaluate the effectiveness of eligibility and enrollment processes using WIOA performance indicators under Section 116(b)(2)(A) and 20 CFR 677.155. Performance data should inform adjustments to LOPs, local policies, and service strategies. Service providers must cooperate with all monitoring activities and correct any deficiencies.

This policy is effective upon approval. FloridaCommerce will monitor implementation of this policy and related LOPs for compliance with applicable statutes and regulations, including 20 CFR 683.410(b)(2).

VI. AUTHORITY

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

Code of Federal Regulations (CFR), Title 20 Part 680, Adult and Dislocated Worker Activities Under Title I of the Workforce Innovation and Opportunity Act

TEGL No. 11-11, Change 2, Selective Service Registration Requirements for Employment and Training Administration Funded Programs

TEGL No. 19-16, Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by Title III of WIOA, and for Implementation of the WIOA Final Rules

TEGL 07-20, Effective Implementation of Priority of Service Provisions for Most in Need Individuals in the Workforce Innovation and Opportunity Act (WIOA) Adult Program

VII. REVISION HISTORY

Date	Revision
08/21/2025	Revised to add measurable performance outcomes. Revisions included the requirement that LWDBs track how long it takes to determine WIOA eligibility and provide services, updates reflecting federal guidance on requirements for verifying work authorization, based on TEGL 10-23, Change 2 and selective service verification, and

	providing guidance on the retention of eligibility proof in Employ Florida. This policy also provides guidance on what must be included in internal procedures and local policies for LWDBs on this topic.
12/19/2022	Approved as CareerSource Florida Administrative Policy 122 and implemented.

VIII.RESOURCES/ATTACHMENTS

Source Documentation for Core/Non-Core Programs DOL-only Data Element Validation

Implementing Priority of Service Provisions for Most in Need Individuals in the WIOA Adult Program

WIOA Desk Reference-Priority of Service for WIOA Adult Funds

Promising Practices in Achieving Universal Access and Equal Opportunity: A Section 188 Disability Reference Guide

Selective Service - Who Must Register

Includable/Excludable Income



POLICY NUMBER P129

Workforce Policy

Title:	Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Program Components and Case Management Policy.
Type:	Programmatic
Program:	SNAP E&T
Effective:	08/21/2025

I. PURPOSE AND SCOPE

ABAWDs and mandatory work participants in the SNAP Education and Training (E&T) program are required to participate in activities operated by Local Workforce Development Boards (LWDBs) and local career centers. LWDBs deliver SNAP E&T components, including supervised job search, job search training, vocational and basic education, work experience, and job retention services. Timely access to SNAP E&T and other services is critical to removing barriers to participation and supporting successful employment outcomes.

This policy provides LWDBs with a comprehensive description of program components and activities required for operating the SNAP E&T program and requires LWDBs to ensure local SNAP E&T strategies and operations align with the Florida SNAP E&T Plan and the Workforce Innovation and Opportunity Act (WIOA) Combined Plan. LWDBs are also expected to align with Florida's workforce development priorities, focus on employment and training for ABAWDs and other mandatory work participants that lead to self-sustaining jobs, and implement data-driven accountability measures to enhance service delivery and outcomes.

II. KEY PROGRAM OBJECTIVES

Objectives of this policy include:

- Promote economic self-sufficiency for SNAP E&T recipients, particularly those with barriers to employment, and the achievement of long-term economic independence through access to employment, education, training, and support services.
- 2. Align with the State's identified SNAP E&T services with Florida's broader workforce development system and ensure strategic alignment with WIOA's six core programs, including adult education, vocational rehabilitation, and employment services.
- 3. Support Job-Driven Training that prioritizes training and education programs that are responsive to labor market demands and equip participants with skills that lead to in-demand occupations and sustainable employment.
- Enhance Service Delivery that leverages the expertise and infrastructure of Florida's LWDBs to deliver high quality and timely SNAP E&T services that are regionally tailored, accessible, and effective.
- 5. Ensure Simplified Access and High-Quality Customer Service for all eligible SNAP recipients, including youth and those facing barriers to employment.
- Foster Innovation and Continuous Improvement including data-driven decisionmaking, and strategies that enhance program outcomes and participant success.
- Comply with Federal and State Accountability Standards by maintaining rigorous documentation, performance tracking, and reporting in alignment with federal and state requirements to ensure transparency, accountability, and program integrity.

III. MEASURABLE PERFORMANCE OUTCOMES

Consistent with the requirements identified in Florida's approved SNAP E&T State Plan, all performance outcomes associated with this policy include:

- 1. Ensure SNAP participants who receive Supervised Job Search services are within monthly allowable hours targets of 39 hours for ABAWD and 59 hours for Mandatory Work Participants (MWP).¹
- 2. Track and document all SNAP components delivered to participants, including:
 - a. Number of participants served in each component.
 - b. Number of participants who complete these services and, in fact, move toward employment; and
 - c. Number of participants who receive work-related training services and offered participant reimbursements.

¹ <u>7 CFR 273.7(e)(2)</u> ("However, job search, including supervised job search, or job search training activities, when offered as part of other E&T program components, are acceptable as long as those activities comprise less than half the total required time spent in the components.").

 Maintain documentation and methodology for all administrative costs, including the certification of the percentage of time and effort for staff working on the provision of SNAP E&T components and services.

LWDBs component activities performance data may be subject to technical assistance in the event individual LWDB data is inconsistent with the state's historical FNS-583 quarterly or annual reporting.

IV. BACKGROUND

The Florida SNAP E&T Program is a federally funded initiative that helps recipients gain skills, training, and work experience for long-term employment and economic self-sufficiency. The program is administered by the Florida Department of Children and Families (DCF), which determines eligibility and refers participants to LWDBs for services. The Florida Department of Commerce (FloridaCommerce) oversees service delivery through LWDBs and career centers. CareerSource Florida, the State Workforce Development Board, ensures alignment with statewide workforce goals, while LWDBs and career centers deliver program services, provide assessments, employment planning, component assignments, and other services. Collaborative efforts enhance engagement, compliance with federal and state requirements, and effective service delivery to support participant success and program accountability.

Under Title 7, Code of Federal Regulations (CFR), <u>sections 273.7</u> and <u>273.24</u>, and <u>Chapter 414.455, F.S.</u>, Florida operates a mandatory SNAP E&T program for Able-Bodied Adults Without Dependents (ABAWDs) and Mandatory Work Participants who do not meet an exemption. ABAWDs must meet specific work requirements to maintain benefits.²

V. POLICIES AND PROCEDURES

A. Program Access and Participant Engagement

1. Referral Process

Consistent with <u>7 CFR 273.7(c)(1)</u>³ DCF screens SNAP recipients and refers eligible individuals to LWDBs via the One-Stop Service Tracking (OSST) system. LWDBs must review referrals daily and initiate contact within 10 calendar days for ABAWDs. This process must be documented.

LWDBs should establish referral protocols with local DCF offices and relevant DCF staff, to ensure timely and accurate referrals to connect participants to wraparound services (e.g., housing, mental health, and

^{2 7} CFR 273.7(I)(1)(i)(C)

³ 7 CFR 273.7(c)(1).

substance abuse recovery) and promote a holistic approach to economic self-sufficiency. Staff must maintain regular communication with DCF partners and document referrals and outcomes in OSST.

2. Orientation and Initial Engagement

Individuals referred to the SNAP E&T program will receive an Employment and Training Referral (ETR) notification letter instructing the participant to complete specific steps via OSST within seven (7) days. The ETR provides participants with information to complete the orientation, assessment, and schedule options for the initial engagement appointment with a case manager. All steps must be completed within the seven (7) day window to avoid OSST beginning the automated consideration process with DCF to determine if the reason for being non-compliant is related to good cause. The orientation and assessment may be completed online or in-person for individuals who are not computer literate or do not have access to a computer or internet.

The orientation must outline why the participant is referred to the program, an overview of the SNAP E&T program components, participation expectation/requirements, and available support services. The orientation is a required activity for newly referred or reopened referrals for participants who have not completed orientation within the previous 12 months. Participants may also be required to complete orientation if there have been significant program changes, regardless of the time frame of last attendance.

Career center staff must inform participants of grievance procedures, their rights, responsibilities, and the consequences of noncompliance. In addition, the participant must acknowledge receipt of this information by signing the Opportunities and Obligations Form. Staff should maintain a copy of the signed form in the participant's case file and provide a copy to the participant for their records.

3. Eligibility Verification

Career center staff should confirm the participant's eligibility using DCF referral data housed in their management information system and OSST records to ensure the individual has been properly referred and does not appear to meet an exemption as outlined in the most current programmatic guidance and current federal law.⁴ Staff should confirm this information at the time of the initial engagement appointment prior to assigning the participant to a program component. If it is determined the participant may meet an exemption, staff must instruct the participant to notify DCF of their

^{4 7} CFR 273.7(a).

household changes to allow DCF to determine whether the participant continues to meet the requirements for referral to the SNAP E&T program.

B. Assessment and Employability Planning

As part of the online assessment, participants will answer questions that provide information on the participant's:

- academic and occupational skills
- career goals and interests
- personal needs/barriers
- employability skills
- work history

Staff must review the assessment information with the participant during the initial engagement appointment to ensure accuracy. The information will be used throughout the employability planning process culminating in the creation of an Individual Employment Plan.

LWDBs may use other assessment tools, in addition to the OSST Initial Assessment, to assist with employability planning/case management, such as Test of Adult Basic Education (TABE), My Career Shines, Career Scope, and the CLIFF Dashboard. Additional assessments should be scheduled or conducted at the initial engagement appointment, as determined appropriate, prior to the participant being assigned to a program component. Further, LWDBs may conduct additional assessments during program participation as the participants' needs change, or a new program component is being considered. In the event of a system outage, staff may conduct the assessment manually by using the OSST Initial Assessment Form.

LWDBs must ensure that staff are trained in techniques to facilitate a productive experience to include motivational interviewing, employability planning, coordination of services, and methods of ongoing progress monitoring.

C. Documentation and Compliance

Staff must document case management activities, participation hours, support services, participant reimbursements, supporting documentation, and outcomes in OSST and the participant's case file in a timely and accurate manner. It is recommended that documentation of activities occur within two days of provision. Case files must include verification of participation (i.e., timesheets, attendance records, check stubs, etc.), documentation supporting participant reimbursements, support service referrals, and any correspondence related to the participant's progress or challenges. Documentation may be submitted to

staff either in-person or virtually (i.e., email, upload to document management system, etc.).

1. IEP Development

To ensure effective service delivery and alignment with participant goals, all participants must have an Individual Employment Plan (IEP) developed and maintained in the participant case file and a summary documented via case notes in OSST. IEP development should use the S.M.A.R.T. (Specific. Measurable. Achievable. Relevant. Time-Bound) principles and include sector strategies and career pathways principles as described in CareerSource Florida Workforce Policies O3 – Sector Strategies Policy and P10 – Comprehensive Employment Education and Training Strategy, and implemented in WIOA Local Plans.

2. IEP Processing Steps and Completion Timeline

The IEP must identify appropriate SNAP E&T components, support services, and co-enrollment opportunities with WIOA or other workforce programs. IEPs should reflect both short-term and long-term employment and educational goals, informed by labor market information and participant interests. The IEP must be initiated during the initial engagement appointment. Completion of the IEP means the IEP has been signed by the participant and staff or otherwise documented in OSST. All contact attempts made to complete or update the IEP must also be documented in case notes.

D. SNAP E&T Components

A qualifying SNAP E&T component is considered standalone and can count for part or all of the monthly work requirement for ABAWDs and MWPs.⁵ Career center staff must assign participants to appropriate SNAP E&T components (upon completion of assessment), document component assignments in OSST, and update the IEP accordingly.

Work components and activities under the SNAP E&T program are outlined in <u>7 CFR 273.7</u> and further defined in the SNAP E&T State Plan. Participants may be enrolled in one or more qualified components each month to satisfy the program's mandatory work requirement.

Note: Supervised job search and job search training are non-qualifying components unless paired with a qualifying activity.⁶ Supervised job search and job search training activities, when offered as part of other E&T program

⁵ See 7 CFR 273.24.

^{6 7} CFR 273.7(e)(2).

components, are acceptable as long as those activities comprise less than half the total required time spent in the components.⁷

Career center staff must assess participants for co-enrollment opportunities in WIOA and other workforce programs. Co-enrollment can fill service or funding gaps (e.g., training, support services), provide access to additional work-based learning (e.g., On-the-Job Training and apprenticeships), and maximize participant outcomes through layered support. Staff must document co-enrollment decisions in OSST and coordinate with WIOA case managers to align services.

Details on required components consistent with Florida's state plan include:

1. Supervised Job Search

Supervised Job Search (SJS) activities are guided and tailored to participant needs and employment goals and provide participants with increased opportunities to obtain employment. This component must occur at state-approved locations such as LWDB computer labs, LWDB community partner computer labs, public libraries, and on personal computers and/or devices while being supervised. Criteria that may be used to determine whether a location is deemed state-approved include:

- a. Locations that are open to the public with access to resources for job searching (i.e., computers/tablets, internet access, etc.)
- b. Locations that serve populations that are typically eligible for and/or recipients of food assistance benefits and fall into a barrier category such as ex-offenders, domestic violence victims, high school dropouts, disabled, etc.
- c. Locations that have an agreement with the state and/or LWDBs that defines mutually agreed upon services to SNAP eligible individuals.
- d. Locations that are willing to assist individuals who are actively seeking employment and have the means to monitor (supervise) and track time that an individual spends job searching.
- e. Locations that have qualified and sufficient staff to assist with job searching, as well as monitoring (supervising) and tracking the time an individual spends job searching.

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⁷ ld.

Supervised Job Search may be conducted independently or within a group setting, and may also be conducted remotely, in-person, or a combination of both. LWDBs should tailor the delivery of supervised job search services to the needs of participants. Participation in this component must be tracked and reflected on the Job Participation Rate Screen and in case notes. Supervised Job Search activities must have a direct link to increasing the employment opportunities of participants. A participant in the Supervised Job Search program must be likely to find a job through the activity, and appropriate jobs must be available for that participant in the community. Effective case management requires that supervised job search is not established as continuous, year-round activity for the program participant.

Participants in supervised job search must have at least one meeting a month with a qualified staff member to review job search activities, get feedback, troubleshoot issues, and discuss next steps. This meeting may occur remotely or in-person and be synchronous with the job search activities or asynchronous and must be documented within OSST. Interactive software or other types of automated processes on a computer do not meet the requirement for engagement with a qualified staff person at least once a month. In between meetings with a qualified staff person, LWDBs may use other supervisory techniques, such as software that tracks time spent logged into a job search website or computer assessments that automatically identify next steps for the participant.

The hours assigned to Supervised Job Search for ABAWDs are limited to 39 hours monthly. If Supervised Job Search is combined with Job Search Training, the total combined hours cannot exceed 39 hours monthly. For MWPs, the activity is limited to 59 hours monthly. If combined with Job Search Training, the total combined hours cannot exceed 59 hours monthly.

2. Job Search Training

Job Search Training is a component that enhances the job readiness of participants by teaching them job seeking techniques, increasing job search motivation, and boosting self-confidence. Job Search Training assists participants with development of essential job readiness/employability skills, through workshops or sessions to secure/retain employment. This component may consist of, but is not limited to, job skills assessments, classroom instruction, job development and placement services, and other direct training or support activities. It could also teach life and interpersonal skills, time management, decision making skills, appropriate dress for the workplace, career planning, and how to develop a resume.

The hours assigned to Job Search Training for ABAWDs are limited to 39 hours monthly. If combined with Supervised Job Search, the total combined

hours cannot exceed 39 hours monthly. For MWPs, the activity is limited to 59 hours monthly. If combined with Supervised Job Search, the total combined hours cannot exceed 59 hours monthly.

3. Basic Education and Vocational Training

The basic education component includes a wide range of activities that improve basic skills and the employability of participants. Such programs include Adult Basic Education (ABE), basic literacy, English as a Second Language (ESL), high school completion or general education equivalency (GED), career and technical education (CTE), and other post-secondary education.

Education components can offer participants an opportunity to earn postsecondary credentials valued by employers and industry, including certificates and degrees, industry-recognized credentials, and licensures.

Vocational Training helps to improve the employability of participants through training in a skill or trade that will allow the participant to move directly into employment. Training is offered at the career centers, through community partners, and training providers who are approved by the LWDBs and/or CareerSource Florida.

An ABAWD can complete 80 hours monthly in basic education and/or vocational training to meet the mandatory work requirement. An MWP can complete 120 hours monthly in basic education and/or vocational training to meet the mandatory work requirement.

Participants assigned to education components (basic education/vocational training), may be allowed one hour of study time⁸ for each hour of class time completed, as long as documented verification is provided of the actual time spent in the classroom. Education may be provided onsite or through online classes. OSST must be updated with the number of hours completed (including study time) and documentation maintained in the participant's case file.

Education components (basic education/vocational training) may be combined with the following components:

- a. Supervised Job Search
- b. Job Search Training
- c. Work Experience

⁸ Study time must be documented via time logs or signed study activity forms and must be verified before being approved.

LWDBs are strongly encouraged to review program participants who are interested in Vocational Training for co-enrollment in the WIOA program.

4. Work Experience

Work Experience programs include a planned, structured learning experience that takes place in a workplace for a limited amount of time. These activities are designed to connect participants with employers to build employability skills or job-related skills through actual work experience or training at a worksite. In lieu of wages, participants receive compensation in the form of their monthly food assistance allotment. Work experience sites can be developed with not-for-profit, for profit, private, and public employers. Worksite agreements, as well as job descriptions for each work experience position, must be obtained by staff prior to assigning participants to a worksite.

Participants may identify a worksite that aligns with their career path. However, the participant will not be assigned to work experience at the worksite until an agreement with the site has been executed.

When a participant is assigned to a worksite, the employer cannot replace regular employees with participants performing work experience. ⁹ The employer must also provide participants with the same or similar work conditions and assignments as regular employees and is required to supervise work activities and complete time sheets for participants.

Hours assigned to work experience must not exceed the allowable hours derived from the benefit calculation. To determine the benefit calculation, staff will use the participant's monthly food assistance allotment divided by the current state minimum wage which equals the monthly required hours. If there is more than one participant within a household, the monthly required hours will be further divided by the number of participants to derive the number of hours that each career seeker will need to complete monthly. If the number of hours determined by the benefit calculation is not enough to satisfy the work requirement for the participant type, additional program components must be assigned.

Work experience may be combined with the following components:

- a. Supervised Job Search
- b. Job Search Training
- c. Education Basic Education
- d. Vocational Training

⁹⁷ CFR 273.7(e)(2)(iv)(B).

In case there are additional members in the household receiving SNAP benefit, LWDBs must verify with DCF for an accurate number of hours for assigning under Work Experience.

5. Job Retention Services/Employment Retention Services (ERS)

The Job Retention Services (commonly known as Employment Retention Services or ERS) components are continued supportive services to help a SNAP E&T participant continue in their first months on their job. The activities help participants even if their new employment income makes them no longer eligible to receive SNAP benefits. Participants are eligible for at least 30 days and up to 90 days after securing employment and within 30 days of successful completion of a SNAP E&T program component. Participants are not eligible to receive ERS if they are leaving the SNAP E&T program due to a failure to comply with the general work requirement or an intentional program violation.

All reimbursements considered under ERS must be reasonable, necessary, and directly related to the participant's employment, such as uniforms/clothing required for the job, equipment or tools required for the job, and/or transportation. Other items may be considered for ERS if they meet the criteria.

E. Support Services and Participant Reimbursements

Participants may be provided reimbursement for costs associated with program participation, including transportation, work-related expenses, costs for books, supplies and tools, digital supports, clothing and uniforms, and other expenses, as needed and allowable. Career center staff must document participation hours, support services, participant reimbursements, supporting documentation, outcomes and ensure services are reasonable, necessary, and directly related to participation in program components.

LWDBs must obtain and retain documentation, including receipts, for verification and audit purposes. Self-attestation may be used in some circumstances to document expenses; however, staff should use this option as a last resort and must include a justification documented in case notes. Self-attestation forms will be used for items in value of \$100.00 or less. LWDBs should use the SNAP Self-Attestation Form Template for documentation purposes.

LWDBs staff must ensure all necessary information is in case notes related to GCC request for an exemption. This will allow DCF staff to make an appropriate and accurate E&T decision for SNAP participants.

F. Braiding Funding and Leveraging Resources

LWDBs are encouraged to braid SNAP E&T funds with WIOA and other local, state, or community resources to expand access and supplement service capacity to training and support services, increase reimbursement opportunities, and support innovative service delivery models.

Career center staff and LWDBs must actively pursue opportunities to braid SNAP E&T funds with other workforce and community resources to maximize participant access to training, support services, and employment opportunities; fill service gaps not covered by a single funding source; and increase the efficiency and impact of program investments.

LWDBs should establish clear agreements with their partners, define roles and responsibilities, and track outcomes to ensure transparency and accountability. LWDBs should also maintain documentation of such agreements and a list of applicable partnerships.

G. Provider Determination

There may be instances where a participant may be ill-suited for a particular Education and Training component, despite the participant's best efforts to remain in the program. Based on the case manager's assessment of the participant's fit with the work component and after documented efforts to explore all available alternative program components, the case worker may record the participant as failing the work requirement. All assessments of fit and documented efforts to identify an alternative work component must be maintained as part of case management prior to this determination and must contain documented supervisor approval. The SNAP E&T program, in accordance with 7 CFR 273.7(c)(18)(i)(A), allows for LWDBs to process a provider determination for DCF to consider an exemption.

H. Case Management and Compliance Monitoring

1. Ongoing Case Management

LWDBs must maintain regular contact with SNAP E&T participants to monitor progress and address ongoing barriers. Career center staff must update OSST with customer participation hours, progress notes, and changes in status.

2. Participation Tracking

Career center staff must enter participation hours, support services, participant reimbursements, supporting documentation, outcomes and applicable documentation in OSST as soon as possible but no later than by

the 10th business day following the end of the month. LWDBs must outline in local operating procedures the frequency at which participant's documentation will be received and entered in OSST.

Participants in partial month participation are required to participate (in any combination) in a minimum of 4 work hours per day, or 20 hours per week and MWPs are required to participate in a minimum of 6 work hours per day, or 30 hours per week. In this instance, the ABAWD/MWP will not be required to complete the required monthly participation hours. Participants in partial month participation who complete the partial hours for the given month will be considered compliant. For example, an ABAWD was referred for participation on June 9th with 15 business days remaining in the month. The ABAWD must complete 60 hours (15 days multiplied by 4 hours daily) to be considered compliant; anything less will be considered non-compliance.

3. Targeted Case Management

Case management must be proactive, participant-centered, and focused on achieving measurable outcomes. Updates must be documented in OSST, including progress notes, participation hours, and any changes to service strategies. Case managers must review and update the IEP based on the LWDB's LOPs or when there is a significant change in the participant's status, goals, or assigned activities. The approved IEP form may be accessed on FloridaCommerce's website.

4. Noncompliance and Good Cause Consideration

If a SNAP E&T participant fails to comply with the requirements of the program, LWDBs must initiate good cause consideration (GCC) review and document all issues. 10 GCC participant cases must be referred to DCF for determination.

I. Data Entry and Reporting

1. OSST System Use

Career center staff must record all case management activities for participants including participation hours, support services, participant reimbursements, supporting documentation, and outcomes in OSST. All data must be accurate and timely to support performance reporting. It is recommended that data entry is completed within 2 business days from provision.

^{10 7} CFR 273.7(i).

2. Employ Florida Integration

Career center staff working with SNAP E&T customers must ensure the participant registers in Employ Florida for job seeking, uploading resumes, exploring labor market services, and to document job referrals, placements, and employment outcomes.

J. Exemptions

In accordance with 7 CFR 273.7(i), DCF is responsible for determining outcomes from a good cause review for a SNAP recipient who does not complete applicable SNAP work requirements. Outcomes of the review may result in a determination of good cause or a sanction. Allowable exemptions are subject to change based on programmatic guidance.

VI. IMPLEMENTATION

Oversight of Florida's SNAP E&T program is shared among FloridaCommerce, which monitors LWDB operations and provides technical assistance; DCF, a WIOA Combined Planning Partner which manages participant eligibility, referrals, and good cause determinations; and the CareerSource Florida Board of Directors, which sets statewide workforce policy and ensures alignment with Florida's broader workforce development goals. SNAP E&T is a required one-stop partner and contributes to infrastructure funding and service delivery.

LWDBs must establish clear local policies and procedures to guide the delivery of SNAP E&T services. These procedures must be in alignment with the state plan and include:

- 1. Identifying and co-enrolling eligible SNAP E&T participants in WIOA and other workforce programs to maximize access to training, support services, and employment opportunities.
- 2. Approving, documenting, and tracking support services.
- 3. Ensuring accurate and timely data entry in OSST and Employ Florida, including participation hours, case notes, and service delivery records.
- 4. Maintaining documentation for all services provided, including receipts and attendance logs, to support audit readiness and performance reporting.

LWDBs must also document and implement internal monitoring processes to ensure compliance with federal and state requirements including:

- Conducting regular internal reviews of case files, documentation, and data entries.
- 2. Participating in state-led monitoring and technical assistance.
- 3. Taking corrective action when necessary to address identified issues.

This policy and any subsequent changes are effective upon approval by the State Workforce Development Board and issuance to the CareerSource Florida Network.

VII. AUTHORITIES

H.R. 1 – One Big Beautiful Bill Act 119th Congress (2025-2026)

7 CFR § 273.7 – Work provisions for SNAP recipients.

7 CFR § 273.24 – Time limits for ABAWDs.

20 CFR §§ 676–681 – WIOA performance accountability and planning.

20 CFR 678.410(3) - One Stop Partners

29 U.S.C. § 3101 – Workforce Innovation and Opportunity Act.

<u>Section 445.033, Florida Statutes</u> – FloridaCommerce and Department of Children and Families local performance accountability and reporting.

VIII. RESOURCES

Florida SNAP E&T Plan