



Executive Summary: For the review period of October 1, 2022 to September 30, 2023, programmatic monitoring activities included assessing CSRC’s program operations, management practices, system protocols, and internal controls, utilizing FloridaCommerce’s programmatic monitoring tools, to determine if CSRC operated in compliance with each of the programs’ laws, regulations, state and local plans, policies and guidance, and any contract or agreement terms. Monitoring also included sample testing of randomly selected participant case file records from each of the workforce programs reviewed. An acronym list is located following the table below.

Programmatic issues identified in the report are categorized as findings, issues of noncompliance, and observations based on a scale of high, medium, and low risk probabilities. High, medium, and low risk factors are used to separate issues that present more of a threat to program operations including issues that may potentially impact the fiscal integrity or delivery of services within program operations. While no material issues or weaknesses came to the reviewers’ attention other than those contained in the following summary, there is no assurance that other issues do not exist. *NOTE: A voluntary 10-day response period is available following issuance of this summary for CSRC to provide additional documentation which may or may not lead to resolution of issues or instances on the final report.*

Preliminary Review Issues Summary:

<i>Program</i>	<i>Cases Reviewed</i>	<i>Findings</i>	<i>Other Non-Compliance Issues (ONIs)</i>
Welfare Transition (WT)	18		
Supplemental Nutrition Assistance Program – Employment & Training (SNAP E&T)	18		
Management Process Review			
Workforce Innovation and Opportunity Act (WIOA) and Special Projects	35	1	
Rapid Response			
Wagner-Peyser (WP)	50		2
Jobs for Veterans State Grant (JVSG)	30	1	1
Management Information Systems (MIS) & Security			
Complaint System	45	1	
Migrant Seasonal Farmworker (MSFW)	12	2	3
	Totals	5	6

Acronyms					
ABAWD	Abled Bodied Adult without Dependents	FMA	Bureau of Financial Monitoring and Accountability	OST	Occupational Skills Training
AP	Administrative Policy	FY	Fiscal Year	POS	Priority of Service
CAP	Corrective Action Plan	IEP	Individual Employment Plan	PY	Program Year
CFR	Code of Federal Regulations	IRP	Individual Responsibility Plan	RESEA	Reemployment Services and Eligibility Assessment Program
CSRC	CareerSource Research Coast	IT	Information Technology	RR	Rapid Response
DCF	Department of Children and Families	ITA	Individual Training Account	SNAP E&T	Supplemental Nutrition Assistance Program Employment and Training
DVOP	Disabled Veterans Outreach Program	IWT	Incumbent Worker Training	SMA	State Monitor Advocate
DWG	Disaster Recovery Dislocated Worker Grant	JPR	Job Participation Rate	S.M.A.R.T	Specific, Measurable, Attainable, Realistic, and Time-Bound
DW	Dislocated Worker	JVA	Jobs for Veterans Act	SYEP	Summer Youth Employment Program
EDP	Employability Development Plan	JVSG	Jobs for Veterans State Grant	TAA	Trade Adjustment Assistance
EEO	Equal Employment Opportunity	LMI	Labor Market Information	TANF	Temporary Assistance for Needy Families
ES	Employment Service	LVER	Local Veterans Employment Representative	TCA	Temporary Cash Assistance
ETA	Employment and Training Administration	LWDB	Local Workforce Development Board	TEGL	Training and Employment Guidance Letter
F.A.C	Florida Administrative Code	MIS	Management Information System	U.S.C.	United States Code
FCDP	Farmworker Career Development Program	MOU/IFA	Memorandum of Understanding & Infrastructure Funding Agreement	WE	Work Experience
FG	Final Guidance	MSFW	Migrant and Seasonal Farmworker	WFS	Workforce Services
FLC	Foreign Labor Certification	MSG	Measurable Skills Gains	WIOA	Workforce Innovation and Opportunity Act
FLSA	Fair Labor Standards Act	ONI	Other Noncompliance Issue	WP	Wagner-Peyser
FloridaCommerce	Florida Department of Commerce	OSPS	Bureau of One-Stop and Program Support	WSA	Work Search Activity
F.S.	Florida Statutes	OSST	One-Stop Service Tracking	WT	Welfare Transition

***This acronym table reflects all acronyms that have been used in the PY 2023-2024 monitoring review cycle. All acronyms may not be used in this report.**

Corrective Action Plan (CAP): The following general CAP requirements will need to be developed, implemented, and an LWDB response is expected post-issuance of the report to address issues identified below for each Finding, Other Non-Compliance Issue (ONI), and any additional program specific issues identified in the report. The general CAP requirements to be addressed are as follows: copies of updated local operating procedures/policies addressing the requirement; a monitoring schedule showing timeframes activities/services to be monitored; documentation of completed or intended staff training/retraining, including dates, agendas, and roster (as applicable); and written communication to staff regarding the issues.

WT

Total Cases: 18

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

SNAP E&T

Total Cases: 18

Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Compliance Actions
1.The SNAP Self-Attestation Form for Transportation Reimbursement was not updated as required for two participants. When brought to their attention, CSRC updated the form immediately.	<u>SNAP State Plan; Memorandum dated February 3, 2023 titled The Supplemental Nutrition Assistance Program Employment and Training Updates.</u>	N/A	N/A	N/A	N/A	Y	CSRC must provide an assurance that forms are updated timely. CSRC must also provide documentation of the review of all files opened after the February policy revision and CSRC staff's attempt to contact and initiate the signature of the new form, if the identified case files are still open.
Totals – SNAP E&T		0	0	0	0	1	

Management Process Review

Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Compliance Actions
Local Board Governance / Merit Staffing Structure / Ethics / Financial Disclosure / Sector Strategies / Collection of Demographic Data							
The review did not reveal any Findings, Other Noncompliance Issues or Observations.							
Totals – Management Process Review		0	0	0	0	0	

WIOA

Total Cases: 38

Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Compliance Actions
Adult/Dislocated Worker (DW)							Cases: 22 (13 Adult/9 DW)

1. Training end dates as recorded in Employ Florida for 11 participants did not match the documentation retained in the participant's case file. Additionally, documentation in one participant's case file was for a previous WIOA application that was not recorded in Employ Florida.	<u>20 CFR 680.410-420 and .770-840; WIOA Section 122 (b)(1)(D), (b)(4)(A), (a)(3) and 134(c)(3); AP 009 and 90; and TEGL 19-16.</u>	N/A	N/A	N/A	N/A	Y	CSRC must ensure that activity beginning and end dates are recorded accurately, and timely in Employ Florida. Additionally, CSRC must ensure that services provided to a participant are documented to reflect the actual amount of the expenditure, a need for the service, is approved and allowable, and the service activity matches what is entered in Employ Florida.
Youth							Cases: 13 (12 Out of School/1 In School)
2. The credential attainment recorded in Employ Florida for one participant did not meet the definition of a nationally recognized credential.	<u>Federal Data Validation Requirements TEGL 10-16 Change 2; and WIOA Section 3(52) and 129 (c)(1)(C).</u>	N	Y	N/A	N/A	N/A	CSRC must ensure that credentials recorded in Employ Florida meet the definition of a nationally recognized credential that documents measurable technical or industry/occupational skills necessary to gain employment or advance within an occupation.
3. The OST activity for two participants was voided in Employ Florida after it was originally closed with successful completion.	<u>WIOA Section 129(c)(2)(D); and 20 CFR 681.540.</u>	N/A	N/A	N/A	N/A	Y	CSRC must ensure that services provided to a participant are documented to reflect the actual amount of the expenditure, a need for the service, is approved and allowable, and the service activity matches what is entered in Employ Florida.
Special Projects							Cases: 3 (3 DW)
<ul style="list-style-type: none"> • PY23 Hurricane Ian DWG 							
The review did not reveal any Findings, Other Noncompliance Issues or Observations.							
Totals - WIOA		0	1	0	0	2	

Rapid Response							
Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Compliance Actions
1. Although a Local Operating Procedure (LOP) was developed for the Rapid Response program, the policy was missing the following components:	<u>20 CFR Part 639; TEGL 19-16; and AP 114.</u>	N/A	N/A	N/A	N/A	Y	CSRC must include a revision or plan to revise, with timelines, their local RR policy to include all mandatory

<p>A. The roles and duties of the career center staff.</p> <p>B. Other RR partners, including other local agencies, organizations and/or service providers.</p>							<p>components necessary to properly administer the RR program.</p>
<p>2. The informational packet distributed to affected workers did not include information on the impact on health coverage after a layoff.</p>	<p><u>20 CFR 682.300(b)(1); TEGL 19-16; and AP 114.</u></p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>Y</p>	<p>CSRC must ensure the provision of information regarding alternative health coverage options that may be available after a layoff are provided to affected workers. Options may include Cobra, Affordable Care Act plans, and/or short-term medical insurance. If additional information is requested by the affected worker, staff should refer them to their Human Resource department.</p> <p>The link below is provided to assist with sharing information on possible health coverage options after a layoff. Health care options following a lay off</p>
<p>3. The informational packet distributed to employers did not address the needs of businesses in transition across the business lifecycle to include layoff aversion strategies.</p>	<p><u>20 CFR 682.300(b)(2); TEGL 19-16; and AP 114.</u></p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>Y</p>	<p>CSRC must ensure that informational material provided to employers covers reactive strategies as well as proactive strategies as needed across the business cycle.</p> <p>Proactive strategies may include but not limited to information such as: Short-Time Compensation and, Incumbent Work Training and feasibility studies.</p>
<p>4. The LWDB has not formulized an early warning network system.</p>	<p><u>20 CFR 682.330 (g); and TEGL 19-16.</u></p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>Y</p>	<p>The Early Warning Network is a proactive measure to develop connections and partnerships for the purpose of establishing quick alerts of potential dislocations and to address the impending needs of employers and affected workers. It is strongly recommended that the Local Rapid Response Coordinator begin formulizing and developing an early warning</p>

							network system by cultivating strong partnerships with their local Economic Development Council, Chamber of Commerce and Small Business Development Centers.
5. The Rapid Response program lack systems and processes to anticipate, prepare for, and manage economic changes.	<u>20 CFR 682.330 (g); and</u> <u>TEGL 19-16.</u>	N/A	N/A	N/A	N/A	Y	CSRC is encouraged to develop a system to track outcomes and performance data and information related to the activities of the rapid response program. Additionally, CSRC may want to utilize the EconoVue platform on a regular basis. Last log in by staff is documented as March of 2023.
Totals – Rapid Response		0	0	0	0	5	

WP							Total Cases: 50
Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Compliance Actions
WP - General							Cases: 45
1. A referral listed on the “Referrals Pending Review” list had not been reviewed by staff by the deadline.	<u>AP 099</u>	N/A	N/A	N	Y	N/A	CSRC must provide an assurance that referrals on the “Referrals Pending Review” list are reviewed within 72 hours.
2. A couple job seekers had service codes recorded in Employ Florida without the correct documentation to support the service.	<u>TEGL 19-16; Wagner-Peyser Act of 1933, as amended; 20 CFR 651.10, 652.07, 652.3; AP 096 and 115; Employ Florida Service Code Guide.</u>	N/A	N/A	N	Y	N/A	CSRC must provide an assurance that services entered in Employ Florida match the type of service provided, have all required documentation, and correctly identify the actions taken.
RESEA							Cases: 5
The review did not reveal any Findings, ONIs, or Observations.							
Credentialing							
The review did not reveal any Findings, ONIs, or Observations.							
Totals - WP		0	0	0	2	0	

MIS & Security

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

Totals – MIS and Security

0 0 0 0 0

JVSG Total Cases: 30

Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Compliance Actions
JVSG Participants Cases: 15							
1. One participant did not have an automated 089, nor did they receive a manual 189 (Priority of Service) activity code.	<u>20 CFR 1010; and AP 096, 102, and 111.</u>	N	Y	N/A	N/A	N/A	CSRC must provide documentation of the provision of priority of service in a case note for the participant if the participant's application is still open and active. CSRC must also provide an assurance that if there is no automatic priority of service notification on the current WP application activity history/service plan screen, staff must verbally provide priority of service, record the code 189 in Employ Florida and case note the provision.
2. One participant did not have a corresponding E53 (Veteran Advocacy) on the employer account for a V12 (Veteran Advocacy) activity code documented on the participant account within Employ Florida.	<u>AP 117.</u>	N/A	N/A	N	Y	N/A	CSRC must provide an assurance that LVERs will capture and document each Veteran Advocacy conducted by the LVER to ensure both participant and employer's accounts are accurate, and advocacy is being completed. CSRC must also provide an assurance that LVER will verify the employer has an active account in Employ Florida before documenting a V12 activity code on the participant's Employ Florida account.
Local Veteran Employment Representative (LVER) Cases: 15							

3. Three employers FEIN listed in the employer's profile was not the same FEIN listed for the employer in SunBiz.	<u>AP 098; Employ Florida Terms of Use</u>	N/A	N/A	N/A	N/A	Y	CSRC must provide documentation of CSRC staff's efforts to verify the FEIN numbers if the employers are still open and active in Employ Florida. CSRC must also provide an assurance that any future employer FEIN entry into Employ Florida matches the FEIN in SunBiz, and that the LVER will review this information and correct it as needed.
4. Two employer's accounts are missing information within the E02 (Provided Job Fair Information) case note documentation.	<u>38 USC Ch 4104; VPL 03-14; and Employ Florida Employer Service Code Guide</u>	N/A	N/A	N/A	N/A	Y	CSRC must provide an assurance that employer activity codes are recorded during all future LVER activities and that a corresponding case note with required information is entered in the Employ Florida.
Totals - JVSG		0	1	0	1	2	

ES Complaint System							Total Reviewed: 45
Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Compliance Actions
1. A complaint log reporting two complaints was missing the WP related and date pending sections. The log did not indicate who the complaints were filed against. Additionally, the log did not contain the dates the complaints were referred to the enforcement agency for further investigation.	<u>20 CFR 658.410; Employment Service and Employment-Related Law Complaint System Handbook; FG 03-040.</u>	N	Y	N/A	N/A	N/A	CSRC must submit an assurance that, complaint logs will be properly completed and reviewed, before they are submitted to FloridaCommerce. The assurance must also indicate that all complaint logs will be submitted to the SMA by the fifth working day after the end of the quarter in which the complaint was taken.
Totals – ES Complaint System		0	1	0	0	0	

MSFW	Total Cases: 12
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Issue	Applicable References	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Compliance Actions
MSFW Applications							Total Cases: 10
1. Several MSFW applications were missing crops/crop codes listed on the Employ Florida Wagner-Peyser applications or in a case note.	<u>20 CFR 653; and FG 03-040.</u>	N/A	N/A	Y	Y	N/A	CSRC must provide an assurance that staff will review all MSFW applications recorded subsequent to the review and ensure the applications contain all necessary requirements.
MSFW Job Orders							Total Job Orders: 2
2. One agricultural job order did not contain the specific days and hours to be worked in the job description.	<u>20 CFR 653; and FG 03-040.</u>	N/A	N/A	N	Y	N/A	CSRC must provide an assurance that staff will review all agricultural job orders recorded subsequent to the review and ensure the job orders contain all necessary description requirements.
MSFW General							
3. MSFW Service Level Indicators-The Vero Beach significant office did not meet the Equity Ratio Indicators and Minimum Service Level Indicators during the review period. The Equity Ratio Indicators not met were received individualized career service. In addition, the office did not meet the Minimum Service Level Indicators of median earnings of MSFWs in unsubsidized employment and MSFWs placed in a job. Note: Another MSFW Service Level Indicators Report will be pulled within 30-days following the review. The Report may/may not yield changes to the Preliminary Review Exit Summary.	<u>20 CFR 653; FG 03-040; and Local Workforce Services Plan.</u>	Y	Y	N/A	N/A	N/A	CSRC must submit an assurance that outreach staff will provide MSFWs with staff-assisted career center services, including referrals and placements to employment. CSRC must also provide an assurance the MSFW Service Level Indicators Report will be monitored regularly to identify service gaps.

<p>4. MSFW Outreach Services- During the review period, there was no coordination and documentation of outreach activities with the MSFW grantee partner. Coordinated outreach activities must be reported to FloridaCommerce through monthly outreach reports.</p>	<p><u>20 CFR 653.107; WIOA Unified Plan; Local Workforce Services Plan; FG 03-040</u></p>	<p>N</p>	<p>Y</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>CSRC must provide an assurance of efforts that will be taken to strengthen the relationship with the NFJP Grantee partner. CSRC must also provide an assurance that joint outreach activities will be recorded and reported in MSFW Outreach Services Reports.</p>
<p>5. MSFW Outreach Reports- A couple of MSFW Monthly Outreach Reports and Daily Outreach Logs were submitted late to the State Monitor Advocate for reporting purposes.</p>	<p><u>20 CFR 653.107; FG 03-040; WIOA Unified Plan</u></p>	<p>N</p>	<p>N</p>	<p>Y</p>	<p>Y</p>	<p>N/A</p>	<p>CSRC must provide an assurance that MSFW Monthly Outreach Reports will be submitted timely to the SMA for reporting purposes, subsequent to the review</p>
<p>Totals – MSFW</p>		<p>1</p>	<p>2</p>	<p>2</p>	<p>3</p>	<p>0</p>	