

# Programmatic Monitoring Report

Program Year 2024-2025

April 7, 2025

For

CareerSource Okaloosa Walton  
Local Workforce  
Development Board – 02

Prepared by



Division of Workforce Services  
Bureau of One-Stop and Program Support

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# Executive Summary

During the period of November 4 – 8, 2024, the Florida Department of Commerce (FloridaCommerce) conducted a programmatic monitoring review of CareerSource Okaloosa Walton's (CSOW) workforce programs. CSOW's service area includes Okaloosa and Walton counties which are a part of the Crestview-Fort Walton Beach-Destin Florida Metropolitan Statistical Area.

Programmatic monitoring was conducted by FloridaCommerce's Bureau of One-Stop and Program Support staff through a remote desktop review analysis. Monitoring activities included assessing CSOW's program operations, management practices, system protocols, internal controls, and record keeping and reporting to determine if CSOW 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 a sample testing of randomly selected participant case file records from each of the workforce programs reviewed.

Programmatic issues identified in the report are categorized as Findings, Other Noncompliance Issues (ONI), and Observations based on a scale of high, medium, and low risk factors. High, medium, and low risk factors are used to separate issues that present more of a threat to program operations including issues that may impact the fiscal integrity or delivery of services within program operations.

The review revealed that CSOW has the systems in place to perform the broad management and functions required to operate the workforce programs; however, deficiencies in case file documentation requirements and operational and management practices in several program review areas were identified. The programmatic monitoring review resulted in two findings, seven ONIs, and several observations. While no material issues or weaknesses came to the reviewers' attention other than those contained in the report, there is no assurance that other issues do not exist.

As a subrecipient of authorized funds administered by FloridaCommerce, CSOW is accountable for failing to correct performance and programmatic deficiencies found during compliance monitoring reviews. To reduce programmatic deficiencies observed and to increase program integrity at the local level, corrective action by CSOW is required to be taken.

The results of each of CSOW's workforce programs are summarized in the following charts by program and category.

## ACRONYM TABLE

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ABAWD – Able Bodied Adult without Dependents
AP – Administrative Policy
ARP – Alternative Requirement Plan
CAP – Corrective Action Plan
CFR – Code of Federal Regulations
CSOW – CareerSource Okaloosa Walton
DCF – Department of Children and Families
DVOP – Disabled Veterans Outreach Program
DWG – Disaster Recovery Dislocated Worker Grant
DW – Dislocated Worker
EDP – Employability Development Plan
EEO – Equal Employment Opportunity
ES – Employment Service
ETA – Employment and Training Administration
F.A.C–Florida Administrative Code
FCOP – Farmworker Career Development Program
FG – Final Guidance
FLC – Foreign Labor Certification
FloridaCommerce – Florida Department of Commerce
FLSA – Fair Labor Standards Act
FMA – Bureau of Financial Monitoring and Accountability
F.S. – Florida Statutes
FY – Fiscal Year
IEP – Individual Employment Plan
IRP – Individual Responsibility Plan
IT – Information Technology
ITA – Individual Training Account
IWT – Incumbent Worker Training
JPR – Job Participation Rate
JVA – Jobs for Veterans Act
JVSG – Jobs for Veterans State Grant
LMI – Labor Market Information
LVER – Local Veterans Employment Representative
LWDB – Local Workforce Development Board
MIS – Management Information System
MOU/IFA – Memorandum of Understanding & Infrastructure Funding Agreement
MSFW – Migrant and Seasonal Farmworker
MSG – Measurable Skills Gains
O&O - Opportunities and Obligations form
ONI – Other Noncompliance Issue
OSPS – Bureau of One-Stop and Program Support
OSST – One-Stop Service Tracking
OST – Occupational Skills Training
PIRL – Participant Individual Report Layout
POS – Priority of Service
PY – Program Year
RESEA – Reemployment Services and Eligibility Assessment Program

SMA – State Monitor Advocate  
S.M.A.R.T – Specific, Measurable, Attainable, Realistic, and Time-Bound  
SNAP E&T – Supplemental Nutrition Assistance Program Employment and Training  
SYEP – Summer Youth Employment Program  
TAA – Trade Adjustment Assistance  
TANF – Temporary Assistance for Needy Families  
TCA – Temporary Cash Assistance  
TEGL – Training and Employment Guidance Letter  
TRA – Trade Readjustment Assistance  
U.S.C. – United States Code  
USDOL – United States Department of Labor  
VRE – Veteran Readiness and Employment  
WE – Work Experience  
WFS – Workforce Services  
WIOA – Workforce Innovation and Opportunity Act  
WP – Wagner-Peyser  
WSA – Work Search Activity  
WT – Welfare Transition

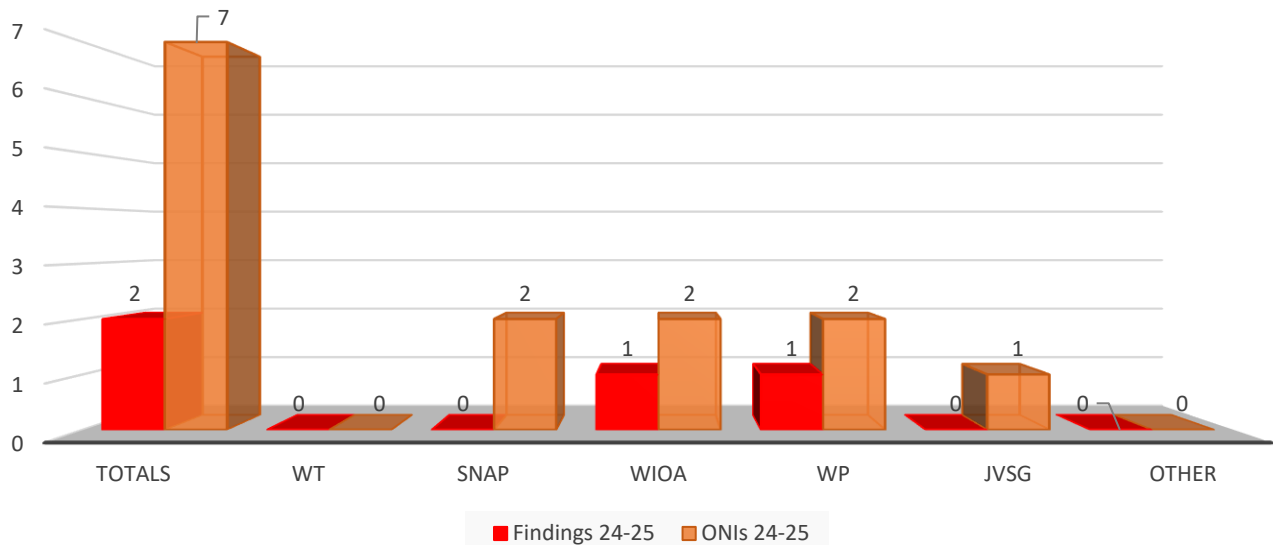
**\*The above table reflects all acronyms that have been used in the PY 2024-2025 monitoring cycle; however, all acronyms may not be used in this report.**

## SUMMARY TABLE OF PROGRAMMATIC MONITORING RESULTS

N=No. Y=Yes. N/A=Not Applicable.

PY 2024 – 25 Programmatic Monitoring Results					
Workforce Program	Issue	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue
SNAP E&T	One participant was engaged in Job Search Training as a standalone activity which does not meet the definition outlined in the State SNAP Plan.			N	Y
	Three participants did not have their initial appointment 590-service code ended within two business of completion of the appointment or “no show” as required.			N	Y
SNAP E&T Totals		0	0	0	2
WIOA Adult	Documentation to support low-income eligibility determination for one participant did not match what was entered in Employ Florida.			N	Y
	A Measurable Skills Gain (MSG) was not recorded in Employ Florida for one participant.			N	Y
WIOA Youth	Supportive service documentation was missing from one participant’s case file.	N	Y		
WIOA Totals		0	1	0	2
WP	One newly registered employer-entered account in Employ Florida was missing documentation of staff validation and approval at the time of registration.	N	Y		
	One job seeker placement was missing documentation of the source of verification of the placement.			N	Y
WP/RESEA Common Issue	Five job seekers with EDPs recorded in Employ Florida were either missing short/long term goals or the goals were not occupational in nature.			N	Y
WP Totals		0	1	0	2
JVSG	One participant received a service code (V03 Individual Career Counseling) that did not have case notes that met the requirements of the Employ Florida Service Code Guide.			N	Y
JVSG Total		0	0	0	1
Results – All Programs		0	2	0	7

### Monitoring Issues By Program PY 2024-2025 CareerSource Okaloosa Walton



#### **DEFINITIONS APPLICABLE TO PROGRAMMATIC MONITORING**

1. Finding – A high risk issue that directly impacts the integrity or effectiveness of program operations or could potentially result in major program deficiencies (e.g., participant ineligibility, missing files, lack of fully executed contracts, issues indicative of systemic problems in program operations, has the appearance of fraud or abuse, possibility of non-conforming services provided to participants, potential questionable costs, etc.). Findings are expected to be responded to in the CAP.
2. Other Noncompliance Issue – A medium risk finding that results in deviation from process or practice not likely to result in failure of the management system or process but has a direct impact on program operations (data validity, timeliness of entering system information, missing program elements and employment plan information, failure to timely conduct follow-ups, etc.). ONIs could potentially be upgraded to a finding over time based on the nature of the deficiency (e.g., repeat violations, issues indicative of systemic problems in program operations, questionable costs, etc.). ONIs are expected to be responded to in the CAP.
3. Observation – A low risk issue that is intended to offer constructive comments and an opportunity to improve current local practices, processes, and procedures that result in positive program outcomes. Observations are not expected to be responded to in the CAP except when requested.

**PROGRAMMATIC MONITORING REPORT  
CAREERSOURCE OKALOOSA WALTON  
LOCAL WORKFORCE DEVELOPMENT BOARD - 02**

## **I. DESCRIPTION OF MONITORING APPROACH**

### **Review Purpose and Scope**

Monitoring consisted of a programmatic review of CSOW's workforce programs. The purpose of the monitoring review was to assess CSOW's compliance with applicable federal and state program statutes, regulations, and programmatic and administrative requirements. The scope primarily involved a review of participant case file data entered in the State's MIS, a review of participant case file documentation provided by CSOW from the selected file samples, and a review of local plans, procedures, reports, records, and other abstract information. In some instances, interviews were conducted with CSOW staff, employers, and participants to gather information about program processes and service delivery strategies.

### **Type of Review**

A remote desktop review was performed for programmatic monitoring, with the selected sampled items provided through upload to FloridaCommerce's SharePoint monitoring system or access to CSOW's document storage system.

### **Compliance Review Abstract Information**

- Programmatic Monitoring Review Dates: November 4, 2024 to November 8, 2024
- Programmatic Monitoring Sample Review Period Dates: October 1, 2023 to September 30, 2024

Note: Entrance conference and exit conference attendees are listed in Section VIII of this report.

### **Programs Reviewed:**

- Welfare Transition
- Supplemental Nutrition Assistance Program – Employment and Training
- Workforce Innovation and Opportunity Act
- Rapid Response
- Wagner-Peyser
- Jobs for Veterans State Grant
- Any identified special projects operational during the review period

### **Monitoring Review Tools**

FloridaCommerce's PY 2024-2025 programmatic monitoring review tools were used to conduct the review. The tools were developed to provide a framework for monitoring activities performed by OSPS as well as the criteria used to monitor.

## II. PROGRAMMATIC MONITORING REVIEW

The outcome of the programmatic monitoring review is detailed in the following sections of the report. The information presented describes the issues noted and, where appropriate, required corrective actions for improvement.

The following general CAP requirements must be submitted for each finding, ONI, and any additional program specific issues identified in the report.

### **General Program CAP Requirements**

- A copy of updated local operating procedures/policies that address the requirement, if applicable.
- A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.
- Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topics.
- Documentation of written communication to staff informing them of the requirements.

## WELFARE TRANSITION

***The sample size consisted of 18 participant case files. The review did not reveal any Findings or ONIs; however, the following Observation was noted:***

### **Observation**

One participant did not have documentation of an exit survey in the case file or an attempt to orally contact the participant documented in OSST case notes. CSOW must administer the exit survey to participants during the hardship extension interview when a participant is approaching the 48-month lifetime limit for Temporary Cash Assistance. When a participant is determined eligible for transitional services and when contacting participants regarding the pre-penalty/sanction process, case notes must be entered in OSST and documentation must be retained in the participant's case file. It should be noted that CSOW staff submitted the Intake/Exit Survey during the 10-day response period. More information on exit survey requirements can be found at the following link: [House Bill 1267 Implementation Memorandum](#).



## SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM – EMPLOYMENT AND TRAINING

*The sample size consisted of 18 participant case files.*

*The following issues were identified:*

### Other Noncompliance Issues

#### ONI SNAP #02.25.01

##### Category: Assignment of Activity Hours

Condition: Of the 10 case files reviewed of participants that were assigned activity hours, three (30.0 percent) participants were engaged in Job Search Training as a standalone activity which does not meet the definition outlined in the SNAP E&T State Plan.

Criteria: The FY 2024 SNAP E&T State Plan states, in part, that, “Job Search Training is limited to 39 hours and must be combined with other program components”. The plan also states that, “Job Search is a subsidiary activity limited to less than half of the total time spent in the allowable component”.

Cause: Insufficient staff training, lack of consistent policies and procedures, or the inadvertent hastiness in completing the engagement process may be causes for incorrect assignment and data entry.

Effect: Instances of participants not being assigned to the required number of hours or assigned to program components that do not comport with program requirements could result in a participant filing a grievance, complaint, or request a fair hearing for being assigned to hours and program components that are not required.

Required Action: CSOW must provide documentation that the case files have been updated with other program components the participant should have been assigned to, in conjunction with JS, if the case file is still open. Additionally, an assurance must also be provided with the CAP that CSOW staff will thoroughly review each case transaction in the future to ensure that when assigning JS, it is combined with another allowable program component and the data is accurately recorded in OSST. A plan or process outlining CSOW’s efforts for preventing a recurrence of this issue in the future including routine monitoring, staff training, and written notification to staff informing them of the requirements must also be submitted with the CAP.

#### ONI SNAP #02.25.02

##### Category: Initial Engagement Process

Condition: Of the 16 case files reviewed where a 590 – appointment setting code was entered in OSST, one (6.3 percent) participant did not have their initial appointment status ended within two business days of completion of the appointment.

Criteria: FloridaCommerce Memorandum – Supplemental Nutrition Assistance Program Employment and Training Able-Bodied Adults without Dependents Initial Engagement Process Changes, dated January 5, 2017, states, in part, that, “SNAP E&T Case Managers are responsible for selecting the appointment status within two business days of completion or have No-show indicated as required.”

Cause: Not entering information in the system timely may indicate that insufficient staff training, input errors, or follow-through by staff may be reasons for noncompliance.

Effect: Failure to expedite the assignment of and participation in qualifying SNAP activities regarding the initial engagement process could potentially result in overpayment of food assistance benefits to an ineligible individual. It could also affect performance reporting.

Required Action: CSOW must provide an assurance that all future initial appointments and status codes (either a 590 or 594) will be ended in OSST within two business days of completion of the appointment or have “No Show” recorded as required. Documentation of staff training or written notification to staff informing them of the requirements must also be provided with the CAP.

CSOW should also consider establishing some type of tickler system to set future alerts such as options in Outlook or use the case “To Do” screen in OSST as a way of reminding or alerting staff of timelines for completing required actions. This helps ensure that a check and balance system is in place to prevent further occurrences.

## WORKFORCE INNOVATION AND OPPORTUNITY ACT

### WIOA ADULT AND DISLOCATED WORKER PROGRAM

*The sample size consisted of 22 Adult and Dislocated Worker participant case files (16 Adults and 6 Dislocated Worker). The following issues were identified:*

#### Other Noncompliance Issues

##### ONI WIOA #02.25.03

##### Category: Eligibility Documentation

Condition: Of the 22 Adult/DW participant case files reviewed, low-income determination documentation in one participant’s (4.5 percent) case file did not match what was entered into Employ Florida.

Criteria: CareerSource Florida Adult and Dislocated Worker Program Eligibility Policy 122 Section G. states that, “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. WIOA establishes specific participant eligibility, priorities, and requirements for participation to account for the proper use of title I funds. LWDBs must establish a local process for collecting and maintaining eligibility verification documentation and ensure the documentation collected is made 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.”

Cause: Lack of follow-through, staff training, or simple oversights could be causes for not obtaining sufficient documentation.

Effect: Failure to maintain documentation to verify eligibility can lead to potential questioned costs and negatively impact data results and performance reporting.

**Required Action:** CSOW must provide documentation to support the low-income determination if the participant's case file is still open. Documentation must also be provided showing CSOW has a check and balance system in place that ensures eligibility information is supported by case file documentation and is verified before services are rendered. CSOW must also provide an assurance that all participant eligibility documentation will be maintained in participant case files and match the information recorded in Employ Florida. CSOW must also provide a plan or process with the CAP for preventing a recurrence of this issue in the future including more in-depth monitoring, staff training, and written notification to staff informing them of the requirements.

#### **ONI WIOA #02.25.04**

##### **Category: Measurable Skills Gains**

**Condition:** Of the 22 Adult/DW case files reviewed of participants that were enrolled in an education or training program, one (4.5 percent) did not have an MSG captured and recorded in Employ Florida.

**Criteria:** TEGL WIOA No. 10-16, Change 3 Section (E), states, in part, that, "The measurable skills gain indicator is used to measure interim progress of participants who are enrolled in education or training services for a specified reporting period. Therefore, it is not an exit-based measure. Instead, it is intended to capture important progressions through pathways that offer different services based on program purposes and participant needs and states should record all measurable skill gains achieved by participants in a program year and report the most recent gain of each gain type."

**Cause:** Insufficient staff training, a lack of guidance or procedures, or a lack of awareness and understanding of the proper way to enter and record MSGs.

**Effect:** Failure to enter and accurately record MSG information in Employ Florida negatively impacts performance results.

**Required Action:** CSOW must provide an assurance that documentation to support an MSG attainment is retained in participant case files or made available upon request and that it matches what is recorded in Employ Florida. CSOW must also provide an assurance that all future MSGs will be documented and recorded within the applicable program year(s). Additionally, CSOW must provide training to staff to ensure they understand the requirements and intent of MSGs including how to review, document, and timely record results. If technical assistance or training is needed, CSOW should contact the Workforce Training and Coordination unit at WFSTraining@commerce.fl.gov. Documentation of staff training and written notification informing them of the requirements must also be provided with the CAP.

## **WIOA YOUTH PROGRAM**

***The sample size consisted of 13 Youth participant case files (9 Out-of-School and 4 In-School). The following issues were identified:***

### **Finding**

#### **Finding WIOA #02.25.01**

##### **Category: Supportive Service**

Condition: Of the 12 Youth participants who received supportive services, one (8.3 percent) participant case file did not contain documentation to verify the supportive service activity type entered in Employ Florida.

Criteria: CareerSource Florida Supportive Services and Needs-Related Payments Administrative Policy 109 Section D. states, in part, that, "LWDBs are required to maintain documentation sufficient to satisfy the requirements of this policy to ensure that funds are allowable and used for the intended purpose." Additionally, the Employ Florida Service Code Guide outlines the various service code titles and definitions as well as the documentation/case note requirements.

Cause: Insufficient staff training, lack of guidance and procedures, staff data entry errors, and inadequate collection of proper documentation may be causes for noncompliance.

Effect: Failure to maintain documentation of supportive services and enter and accurately record the type or date of the supportive service provided may negatively impact performance accountability and reporting and may lead to potential questioned costs.

Required Action: CSOW must provide documentation to verify the supportive service activity recorded in Employ Florida as well as the participant's receipt of the supportive service. CSOW's supportive services system must ensure that funds to participants are provided in the actual amount of the expenditure, are based on need, approved and allowable, are of the proper type, and that the service activity and the amount are documented and match what is entered in Employ Florida. Documentation of written notification to staff informing them of the requirements must also be provided with the CAP.

## WIOA SPECIAL PROJECTS

*The sample size consisted of nine Adult and Dislocated Worker participant case files (6 Adults and 3 Dislocated Worker). The review did not reveal any Findings, ONIs or Observations.*

## RAPID RESPONSE

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

## WAGNER-PEYSER PROGRAM

*The sample size consisted of 45 participant case files (26 job seekers, 15 job orders, and 4 job seeker placements). The following issues were identified:*

### Finding

#### Finding WP #02.25.02

#### Category: New Employer Account Validation

Condition: One (50 percent) of the two newly registered employer-entered accounts reviewed was missing documentation that a validation and approval attempt was conducted by staff within two days of registration in Employ Florida. It was noted that CSOW staff conducted and documented the validation a month after the initial employer registration.

Criteria: CareerSource Florida AP 098 (IV)(B) states, in part, that, “Employer accounts must be verified within two business days of the date of the initial registration.”

Cause: Staff oversight and follow-up may have been factors in noncompliance.

Effect: Failure to validate new employer accounts timely can lead to companies entering job orders in Employ Florida with the intent to defraud job seekers or acquiring job seekers personal protected information.

Required Action: CSOW must provide an assurance that CSOW staff will conduct and document verification and validation efforts within two business days of initial employer registration entry. Documentation of staff training and written notification informing staff of the requirements must also be provided with the CAP.

#### Other Noncompliance Issue

##### ONI WP #02.25.05

##### Category: Placement Verification

Condition: Of the 10 job seeker files reviewed with placements, one (10 percent) was missing documentation of the source of verification of the placement.

Criteria: CareerSource Florida AP 099 (IV)(C) states, in part, that, “Verification information must be documented and must include: 1) a case note identifying the customer’s name, 2) the name of the employer, 3) the source of verification...”

Cause: Lack of staff training and staff data entry errors may be causes for noncompliance.

Effect: Noncompliance with placement guidelines has an impact on performance reporting (Monthly Management Report and other staff reports), as well as erroneous information being recorded in the system if placements are not valid.

Required Action: CSOW must provide documentation with the CAP that the placement has been reviewed and verification has been conducted and documented in case notes in Employ Florida if the job order is still open and the job seeker is still active. CSOW must also provide an assurance that verification of placements will occur, and case notes will be entered on all job orders and/or the job seeker activity service screen documenting staff verification of the placement in the future. Additionally, documentation of staff training and written notification to staff informing them of the requirements must be provided with the CAP.

#### REEMPLOYMENT SERVICES AND ELIGIBILITY ASSESSMENT PROGRAM

The RESEA program review focused on CSOW’s compliance with the requirements of the grant to assist reemployment assistance claimants in returning to work faster by connecting claimants/participants with in-person assessments, and reemployment services and opportunities to further their reemployment goals and successful employment outcomes.

***The sample size consisted of five participant case files. The following common issue was identified in both the RESEA and WP programs:***

## Other Noncompliance Issue

### ONI WP #02.25.06

#### Category: Employability Development Plans

Condition: Of the six (five RESEA and one WP) participant EDPs reviewed, four (66.7 percent) were either missing or had non-occupational short and/or long-term goals identified.

Criteria: CareerSource Florida AP 068 states, in part, that, EDPs must “Be completed jointly with the REA [RESEA] participant and should reveal the participant’s strengths, weaknesses, barriers, and employment or training goals.” The Employ Florida Service Code Guide also states, in part, that the code 205, “...also includes short- and long-term goals...” and that the EDP must “...focus on ‘occupational goals’ instead of ‘educational goals’ to meet program requirements.”

Cause: Lack of staff training and understanding of specific program requirements may have impacted EDP development.

Effect: Absence of specific and individualized employment goals on the EDP reduces staff’s ability to work effectively and efficiently with participants in delivering services, tracking employability goals, and determining what the participant is required to do to attain their short-term and long-term occupational goals.

Required Action: CSOW must provide an assurance with the CAP that all future EDPs will be documented, meet the definition of an EDP, and contain all required elements. All future EDPs must be personalized for each participant to address their specific needs including individualized short-term and long-term occupational goals, the action steps needed to achieve those goals. Documentation of staff training and written notification to staff informing them of the requirements must also be provided with the CAP.

## CAREER CENTER CREDENTIALING

The career center credentialing review focused on ensuring administrative requirements and records were posted and maintained, and that front-line staff had completed all required Florida Certified Workforce Professional Tier I certification and continuing education courses.

***The review did not reveal any Findings or ONIs; however, the following Observation was noted:***

## Observation

The reviewer noted that the local and statewide branding and logo usage policy was available for review; however, the policy did not directly provide guidance on the use the American Job Center (AJC) network common identifier and branding requirements. Following the exit, CSOW provided an updated policy that specifically addressed the AJC common identifier usage. No further action is necessary.

## COMPLAINT SYSTEM

***A total of 36 complaint logs were reviewed. The review did not reveal any Findings, ONIs, or Observations.***

## **JOBS FOR VETERANS STATE GRANT PROGRAM**

***The sample size consisted of 35 participant case files (15 participant files, 15 LVER employer files, and five VRE Chapter 31 files). The following issues were identified:***

### **Other Noncompliance Issue**

#### **ONI JVSG #02.25.07**

##### **Category: JVSG Employment Services**

Condition: Of the 15 veteran case files reviewed, one (6.7 percent) had entry of a specific service code recorded in Employ Florida (code V03 – Individual Career Counseling); however, case notes in the files did not meet the requirements for the specified services recorded.

Criteria: CareerSource Florida AP 117 Section IV.B.3. states, in part, that, “Individual career counseling must be recorded in Employ Florida using service code V03 (JVSG - Individual Career Counseling) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.”

Cause: Lack of staff oversight and programmatic training are likely factors leading to noncompliance.

Effect: Noncompliance has an impact on veteran service delivery and may result in a negative federal review of the Veterans Program.

Required Action: CSOW must provide an assurance that DVOP staff will properly document employment services provided to participants in Employ Florida and ensure the requirements in CareerSource Florida AP 117 and the Employ Florida Service Code guide are followed. Documentation of staff training and written notification to staff informing them of the requirements must also be provided with the CAP.

## **III. FINANCIAL DISCLOSURE REVIEW**

The Financial Disclosure review focused on determining CSOW’s compliance with financial disclosure requirements as referenced in F.S., Chapters 112.3145 and 445.07; and CareerSource Florida FG-075.

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

## **IV. COLLECTION OF DEMOGRAPHIC DATA**

The purpose of this section of the review is to determine compliance with the nondiscrimination and equal opportunity provisions of 29 CFR Part 37, and FloridaCommerce’s Guidelines for Compliance with Section 188 of WIOA regarding Collection of Demographic Data.

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

## V. MANAGEMENT PROCESS REVIEW

The purpose of this review is to determine whether CSOW is implementing requirements associated with local merit staffing responsibilities for FloridaCommerce staff assigned to work under the functional supervision of CSOW's local sector strategy implementation, and local board governance activities.

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

## VI. MANAGEMENT INFORMATION SYSTEMS

The MIS security check focused on the effectiveness of CSOW's information security controls and whether business processes and policies are in place that protect FloridaCommerce information system data and resources and complies with FloridaCommerce's IT guidelines and the FloridaCommerce/CSOW Grantee-Subgrantee agreement requirements.

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

## VII. TRAINING AND TECHNICAL ASSISTANCE

For questions and/or technical assistance in any of the program review areas, CSOW should contact the respective OSPS units at the following email addresses or by sending a Training Request Form to [WFSTraining@commerce.fl.gov](mailto:WFSTraining@commerce.fl.gov).

- WT – [WTProgram@commerce.fl.gov](mailto:WTProgram@commerce.fl.gov)
- SNAP – [SNAPETProgram@commerce.fl.gov](mailto:SNAPETProgram@commerce.fl.gov)
- WIOA – [WIOA@commerce.fl.gov](mailto:WIOA@commerce.fl.gov)
- TAA – [TAA@commerce.fl.gov](mailto:TAA@commerce.fl.gov)
- Rapid Response – [RapidResponse@commerce.fl.gov](mailto:RapidResponse@commerce.fl.gov)
- WP – [Wagner.Peyser@commerce.fl.gov](mailto:Wagner.Peyser@commerce.fl.gov)
- RESEA – [RESEA@commerce.fl.gov](mailto:RESEA@commerce.fl.gov)
- FLC – [H-2A.JobOrder@commerce.fl.gov](mailto:H-2A.JobOrder@commerce.fl.gov) and [H-2B.JobOrder@commerce.fl.gov](mailto:H-2B.JobOrder@commerce.fl.gov)
- MSFW – [State Monitor Advocate \(via direct email\)](#)
- JVSG – [VETS@commerce.fl.gov](mailto:VETS@commerce.fl.gov)

## CORRECTIVE ACTION PLAN REQUIREMENTS

A CAP is required to address how the CSOW will correct any programmatic findings and other noncompliance issues identified in the report. For the noted deficiencies, corrective actions and recommendations have been provided to help respond to the issues identified, and develop and implement processes that result in positive program practices and performance outcomes to improve the quality and integrity of the data collected.



## VIII. ENTRANCE AND EXIT CONFERENCE ATTENDEES

A programmatic monitoring entrance conference with CSOW staff was conducted on November 4, 2024, and a programmatic exit conference was conducted on November 8, 2024.

Name	Agency	Entrance Conference	Exit Conference
Terry Wester-Johnson (Review Lead)	FloridaCommerce	X	X
Nancy Garcia	FloridaCommerce	X	
Yolanda Garcia	FloridaCommerce	X	X
Matrecia Bryant	FloridaCommerce	X	X
Tevin Robinson	FloridaCommerce	X	X
Alyssa Raulerson	FloridaCommerce	X	X
N'Deye Delgado	FloridaCommerce	X	
Sharmarie Gray	FloridaCommerce	X	
Andy Windsor	FloridaCommerce	X	X
Lavetta Williams	FloridaCommerce	X	X
Carol Booth	FloridaCommerce	X	X
Katina Williams	FloridaCommerce	X	X
Barbara Walker	FloridaCommerce	X	X
Vincent Lynn	FloridaCommerce	X	X
Lonnie Saunders	FloridaCommerce	X	X
Andrew Merchel	FloridaCommerce	X	X
Marybeth Allegood	FloridaCommerce	X	X
Alexia Sweet	FloridaCommerce	X	
Kenton Buggs	FloridaCommerce	X	
Sarah Rudnick	FloridaCommerce	X	
Michelle Burns	CSOW	X	X
Will Miles	CSOW	X	X
Kelly Jordan	CSOW	X	X



**Michelle Crocker, Chairperson**

**Michele Burns, Executive Director**

**Date:** May 5, 2025

**To:** Ken Williams and Shawn Brown  
FloridaCommerce  
Caldwell Building  
107 E. Madison Street  
Tallahassee, FL 32399

**Subject:** Letter of Transmittal – CSOW Response to Florida Commerce’s Programmatic Monitoring Review Report, April 7, 2025.

Dear Mr. Williams and Mr. Brown,

Enclosed for your review and acceptance is the CareerSource Okaloosa Walton’s (CSOW) Corrective Action Plan in response to the Florida Commerce’s Programmatic and Financial Monitoring Review conducted November 4-8, 2024.

Should you have any questions about the response, please feel free to contact Michele Burns at (850) 651-2315, extension 2012, or Will Miles at (850) 651-2315, extension 2002. You can contact us by e-mail at [mburns@careersourceow.com](mailto:mburns@careersourceow.com) or [wmiles@careersourceow.com](mailto:wmiles@careersourceow.com). It is our anticipation that the CSOW Corrective Action Plan meets the standards that will allow FloridaCommerce to close out the compliance review.

The final response has been uploaded to DEO SharePoint Portal and includes the following documents:

- CSOW’s response to the Florida Commerce’s Programmatic Monitoring Review.
- Includes the following attachments:
  - ✓ Notification to staff of the Programmatic Monitoring Report, PY 2024-2025
  - ✓ Chief Operating Officer and Program Managers Assurances
  - ✓ Staff Training

Sincerely,

*Michele Burns*  
Michele Burns  
Executive Director

[info@careersourceow.com](mailto:info@careersourceow.com)

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## FloridaCommerce

### Division of Workforce Services One-Stop and Program Support

### Programmatic Monitoring Report

### Program Year 2024 – 2025

\*\*\*\*\*

# CareerSource Okaloosa Walton's Response

Prepared By

CareerSource Okaloosa Walton

*May 5, 2025*

**Acknowledgment: This document was partly developed using the FloridaCommerce Monitoring Report: Programmatic Monitoring Report, Local Workforce Development Board – 02; November 4-8, 2024; Dated April 7, 2025.**

**\*\*\*\*\*The Corrective Action Plans follow each write-up starting on page 5. \*\*\*\*\***

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# Executive Summary

During the period of November 4 – 8, 2024, the Florida Department of Commerce (FloridaCommerce) conducted a programmatic monitoring review of CareerSource Okaloosa Walton's (CSOW) workforce programs. CSOW's service area includes Okaloosa and Walton counties which are a part of the Crestview-Fort Walton Beach-Destin Florida Metropolitan Statistical Area.

Programmatic monitoring was conducted by FloridaCommerce's Bureau of One-Stop and Program Support staff through a remote desktop review analysis. Monitoring activities included assessing CSOW's program operations, management practices, system protocols, internal controls, and record keeping and reporting to determine if CSOW 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 a sample testing of randomly selected participant case file records from each of the workforce programs reviewed.

Programmatic issues identified in the report are categorized as Findings, Other Noncompliance Issues (ONI), and Observations based on a scale of high, medium, and low risk factors. High, medium, and low risk factors are used to separate issues that present more of a threat to program operations including issues that may impact the fiscal integrity or delivery of services within program operations.

The review revealed that CSOW has the systems in place to perform the broad management and functions required to operate the workforce programs; however, deficiencies in case file documentation requirements and operational and management practices in several program review areas were identified. The programmatic monitoring review resulted in two findings, seven ONIs, and several observations. While no material issues or weaknesses came to the reviewers' attention other than those contained in the report, there were no assurance that other issues do not exist.

As a subrecipient of authorized funds administered by FloridaCommerce, CSOW is accountable for failing to correct performance and programmatic deficiencies found during compliance monitoring reviews. To reduce programmatic deficiencies observed and to increase program integrity at the local level, corrective action by CSOW will be taken and included in this report as corrective action plans (CAP).

The results of each of CSOW's workforce programs are summarized in the following charts by program and category.

## SUMMARY TABLE OF PROGRAMMATIC MONITORING RESULTS

N=No. Y=Yes. N/A=Not Applicable.

PY 2024 – 25 Programmatic Monitoring Results					
Workforce Program	Issue	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue
SNAP E&T	Three participants were engaged in Job Search Training as a standalone activity which does not meet the definition outlined in the State SNAP Plan.			N	Y
	One participant did not have their initial appointment 590-service code ended within two business of completion of the appointment or “no show” as required.			N	Y
SNAP E&T Totals		0	0	0	2
WIOA Adult	Documentation to support low-income eligibility determination for one participant did not match what was entered in Employ Florida.			N	Y
	A Measurable Skills Gain (MSG) was not recorded in Employ Florida for one participant.			N	Y
WIOA Youth	Supportive service documentation was missing from one participant’s case file.	N	Y		
WIOA Totals		0	1	0	2
WP	One newly registered employer-entered account in Employ Florida was missing documentation of staff validation and approval at the time of registration.	N	Y		
	One job seeker placement was missing documentation of the source of verification of the placement.			N	Y
WP/RESEA Common Issue	Five job seekers with EDPs recorded in Employ Florida were either missing short/long term goals or the goals were not occupational in nature.			N	Y
WP Totals		0	1	0	2
JVSG	One participant received a service code (V03 Individual Career Counseling) that did not have case notes that met the requirements of the Employ Florida Service Code Guide.			N	Y
JVSG Total		0	0	0	1
Results – All Programs		0	2	0	7

### DEFINITIONS APPLICABLE TO PROGRAMMATIC MONITORING

- Finding** – A high risk issue that directly impacts the integrity or effectiveness of program operations or could potentially result in major program deficiencies (e.g., participant ineligibility, missing files, lack of fully executed contracts, issues indicative of systemic problems in program operations, has the appearance of fraud or abuse, possibility of non-conforming services provided to participants, potential questionable costs, etc.). Findings are expected to be responded to in the CAP.
- Other Noncompliance Issue** – A medium risk finding that results in deviation from process or practice not likely to result in failure of the management system or process but has a direct impact on program operations (data validity, timeliness of entering system information, missing program elements and employment plan information, failure to timely conduct follow-ups, etc.). ONIs could potentially be upgraded to a finding over time based on the nature of the deficiency (e.g., repeat violations, issues indicative of systemic problems in program operations, questionable costs, etc.). ONIs are expected to be responded to in the CAP.
- Observation** – A low risk issue that is intended to offer constructive comments and an opportunity to improve current local practices, processes, and procedures that result in positive program outcomes. Observations are not expected to be responded to in the CAP except when requested.

**PROGRAMMATIC MONITORING REPORT  
CAREERSOURCE OKALOOSA WALTON  
LOCAL WORKFORCE DEVELOPMENT BOARD - 02**

## **I. DESCRIPTION OF MONITORING APPROACH**

### **Review Purpose and Scope**

Monitoring consisted of a programmatic review of CSOW's workforce programs. The purpose of the monitoring review was to assess CSOW's compliance with applicable federal and state program statutes, regulations, and programmatic and administrative requirements. The scope primarily involved a review of participant case file data entered in the State's MIS, a review of participant case file documentation provided by CSOW from the selected file samples, and a review of local plans, procedures, reports, records, and other abstract information. In some instances, interviews were conducted with CSOW staff, employers, and participants to gather information about program processes and service delivery strategies.

### **Type of Review**

A remote desktop review was performed for programmatic monitoring, with the selected sampled items provided through upload to FloridaCommerce's SharePoint monitoring system or access to CSOW's document storage system.

### **Compliance Review Abstract Information**

- Programmatic Monitoring Review Dates: November 4, 2024 to November 8, 2024
- Programmatic Monitoring Sample Review Period Dates: October 1, 2023 to September 30, 2024

Note: Entrance conference and exit conference attendees are listed in Section VIII of this report.

### **Programs Reviewed:**

- Welfare Transition
- Supplemental Nutrition Assistance Program – Employment and Training
- Workforce Innovation and Opportunity Act
- Rapid Response
- Wagner-Peyser
- Jobs for Veterans State Grant
- Any identified special projects operational during the review period

### **Monitoring Review Tools**

FloridaCommerce's PY 2024-2025 programmatic monitoring review tools were used to conduct the review. The tools were developed to provide a framework for monitoring activities performed by OSPS as well as the criteria used to monitor. The FloridaCommerce normal practice is to provide the region with copies of the monitoring review tools prior to the monitoring taking place, however, neither the draft nor completed tools were provided to CSOW until after the after the monitoring had taken place.

## II. PROGRAMMATIC MONITORING REVIEW

The outcome of the programmatic monitoring review is detailed in the following sections of the report. The information presented describes the issues noted and, where appropriate, required corrective actions for improvement. The CSOW corrective action plans (CAPs) are presented following the appropriate sections of the report.

The following general CAP requirements are submitted for each finding, ONI, and any additional program specific issues identified in the report.

### General Program CAP Requirements

- A copy of updated local operating procedures/policies that address the requirement, if applicable. (#1)
- A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored. (#2)
- Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topics. (#3)
- Documentation of written communication to staff informing them of the requirements. (#4)

## WELFARE TRANSITION

*The sample size consisted of 18 participant case files. The review did not reveal any Findings or ONIs; however, the following Observation was noted:*

### Observation

One participant did not have documentation of an exit survey in the case file or an attempt to orally contact the participant documented in OSST case notes. CSOW must administer the exit survey to participants during the hardship extension interview when a participant is approaching the 48-month lifetime limit for Temporary Cash Assistance. When a participant is determined eligible for transitional services and when contacting participants regarding the pre-penalty/sanction process, case notes must be entered in OSST and documentation must be retained in the participant's case file. It should be noted that CSOW staff submitted the Intake/Exit Survey during the 10-day response period. More information on exit survey requirements can be found at the following link: House Bill 1267 Implementation Memorandum.

### CareerSource Okaloosa Walton's Response/Corrective Action Plan (CAP):

#### Observation

#### Category: Documentation of Exit Survey

The LWDB submits the following responses for this CAP:

- #1. A specific plan of action outlining the reasons for noncompliance as well as efforts taken to prevent future occurrences.

**Response #1:** It should be noted that CSOW staff submitted the Intake/Exit Survey during the 10-day response period.

Regarding this observation, CSOW staff will attempt to orally contact participants and document in OSST case notes. CSOW staff will administer the exit survey to participants during the hardship extension interview when a participant is approaching the 48-month lifetime limit for Temporary Cash Assistance. When a participant is determined eligible for transitional services and when contacting participants regarding the pre-penalty/sanction process, staff will enter case notes in OSST, and documentation will be retained in the participant's case file.

**ASSURANCE:** CSOW assures that staff will ensure the Intake/Exit Surveys are conducted and documented in OSST and case files.

**TRAINING:** The staff conduct training at least quarterly. The training has been consistent with policy and covers relevant subject areas. **OVERSIGHT:** The COO will ensure supervision over program staff to assess what changes may be needed going forward. CSOW will continue to ensure training and communication with staff on the proper procedures for documenting the intake/exit surveys.

<**Going forward**> CSOW has developed a local policy and will require the Program Manager to periodically review the policy with the staff members. The staff have already reviewed and signed the PRAF stating they understand the procedures.

## **#2. A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.**

**Response #2:** CSOW local operating procedures require monitoring to be conducted on a quarterly basis. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal. Quarterly monitoring is completed no later than 60 days after the end of each quarter (i.e., February 28/29, May 31, August 31, and November 30). Completed monitoring files were uploaded to the FloridaCommerce Portal.

The FloridaCommerce Monitoring Checklist is the primary tool used by staff to conduct monitoring. The focus on activities and services is on those identified on the FloridaCommerce Monitoring Checklist. Other activities or services may be added depending on trends. Internal monitoring and training will focus on IRP and safety plan development as appropriate. Completed monitoring checklists over the past 12 months were previously uploaded to the FloridaCommerce Portal.

Internal monitoring will continue to review the documentation of intake/exit surveys to ensure participant files are complete.

- **#3. Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topics.**

**Response #3:** To ensure staff are fully trained and kept up to date on policies and procedures, the COO ensures Program Managers/Coordinators conduct formal training at least once each quarter. Ongoing training of program staff is an important part of CSOW continual process improvement. The CSOW local operating procedures require training to be conducted on a quarterly basis (i.e., Jan-Mar, Apr-Jun, Jul-Sep, and Oct-Dec). The LOP also requires an agenda be developed based on trends and needs identified by the program staff. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal.



All training includes an agenda and handouts as appropriate. All training schedules are coordinated with the COO and QAM. See the **Attachments** for the documentation staff training.

Staff training conducted since the FloridaCommerce monitoring is also included with the **Attachments**.

- **#4. Documentation of written communication to staff informing them of the requirements.**

**Response #4:** Staff were required to certify that they reviewed the write-ups identified in the FloridaCommerce Monitoring Report. The certifications will be provided with this CAP in the **Attachments**.

## SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM – EMPLOYMENT AND TRAINING

*The sample size consisted of 18 participant case files.*

*The following issues were identified:*

### Other Noncompliance Issues

#### ONI SNAP #02.25.01

##### Category: Assignment of Activity Hours

Condition: Of the 10 case files reviewed of participants that were assigned activity hours, three (30.0 percent) participants were engaged in Job Search Training as a standalone activity which does not meet the definition outlined in the SNAP E&T State Plan.

Criteria: The FY 2024 SNAP E&T State Plan states, in part, that, “Job Search Training is limited to 39 hours and must be combined with other program components”. The plan also states that, “Job Search is a subsidiary activity limited to less than half of the total time spent in the allowable component”.

Cause: Insufficient staff training, lack of consistent policies and procedures, or the inadvertent hastiness in completing the engagement process may be causes for incorrect assignment and data entry.

Effect: Instances of participants not being assigned to the required number of hours or assigned to program components that do not comport with program requirements could result in a participant filing a grievance, complaint, or request a fair hearing for being assigned to hours and program components that are not required.

Required Action: CSOW must provide documentation that the case files have been updated with other program components the participant should have been assigned to, in conjunction with JS, if the case file is still open. Additionally, an assurance must also be provided with the CAP that CSOW staff will thoroughly review each case transaction in the future to ensure that when assigning JS, it is combined with another allowable program component and the data is accurately recorded in OSST. A plan or process outlining CSOW’s efforts for preventing a recurrence of this issue in the future including routine monitoring, staff training, and written notification to staff informing them of the requirements must also be submitted with the CAP.

### **CareerSource Okaloosa Walton’s Response/Corrective Action Plan (CAP):**

## ONI SNAP #02.25.01

### Category: Assignment of Activity Hours

The LWDB submits the following responses for this CAP:

- **#1. A specific plan of action outlining the reasons for noncompliance as well as efforts taken to prevent future occurrences.**

**Response #1:** CSOW acknowledges the write-up that says of the 10 case files reviewed of participants that were assigned activity hours, three participants were engaged in Job Search Training as a standalone activity which does not meet the definition outlined in the SNAP E&T State Plan. However, a review of the identified participants in OSST reveals in each case that the Job Search Activity is entered as a subsidiary activity of another E&T component, totaling less than half of the total assigned hours. The screenshots are attached to this report.

The three participants were also assigned to an Education activity in OSST and therefore the Job Search was not a standalone activity. The Criteria states that "Job Search is a subsidiary activity limited to less than half of the total time spent in the allowable component." The Job Search was assigned as 39 hours and Education was assigned as 41 hours. This policy has been updated as of April/May 2024 and no cases since then have had the above stated issue.

**ASSURANCE:** CSOW assures that staff will ensure the documentation to support the Job Search is recorded in OSST and the case file.

**TRAINING:** The staff conduct training at least quarterly. The training is consistent with policy and covers relevant subject areas. **OVERSIGHT:** The COO will ensure supervision over program staff to assess what changes may be needed going forward. CSOW will continue to ensure training in the use and documentation of the Job Search activity.

**<Going forward>** CSOW will require the Program Manager to provide more focus on the Job Search activity through targeted monitoring. The targeted focus approach has proven to be successful in the past. This added focus on accountability should prevent this event from reoccurring.

- **#2. A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.**

**Response #2:** CSOW local operating procedures require monitoring to be conducted on a quarterly basis. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal. Quarterly monitoring is completed no later than 60 days after the end of each quarter (i.e., February 28/29, May 31, August 31, and November 30). Completed monitoring files were uploaded to the FloridaCommerce Portal.

The FloridaCommerce Monitoring Checklist is the primary tool used by staff to conduct monitoring. The focus on activities and services is on those identified on the FloridaCommerce Monitoring Checklist. Other activities or services may be added depending on trends. Internal monitoring and training will focus on IRP and safety plan development as appropriate. Completed monitoring checklists over the past 12 months were previously uploaded to the FloridaCommerce Portal.

Internal monitoring will continue to review the Job Search activity and focus on accountability to ensure participant files are complete.

- **#3. Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topics.**

**Response #3:** To ensure staff are fully trained and kept up to date on policies and procedures, the COO ensures Program Managers/Coordinators conduct formal training at least once each quarter. Ongoing training of program staff is an important part of CSOW continual process improvement. The CSOW local operating procedures requires training to be conducted on a quarterly basis (i.e., Jan-Mar, Apr-Jun, Jul-Sep, and Oct-Dec). The LOP also requires an agenda be developed based on trends and needs identified by the program staff. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal.

All training includes an agenda and handouts as appropriate. All training schedules are coordinated with the COO and QAM. See the **Attachments** for the documentation on staff training.

WT staff training conducted since the FloridaCommerce monitoring is also included in the **Attachments**.

- **#4. Documentation of written communication to staff informing them of the requirements.**

**Response #4:** SNAP staff were required to certify that they reviewed the write-ups identified in the FloridaCommerce Monitoring Report. The certifications will be provided with this CAP in the **Attachments**.

#### **ONI SNAP #02.25.02**

##### **Category: Initial Engagement Process**

Condition: Of the 16 case files reviewed where a 590 – appointment setting code was entered in OSST, one (6.3 percent) participant did not have their initial appointment status ended within two business days of completion of the appointment.

Criteria: FloridaCommerce Memorandum – Supplemental Nutrition Assistance Program Employment and Training Able-Bodied Adults without Dependents Initial Engagement Process Changes, dated January 5, 2017, states, in part, that, “SNAP E&T Case Managers are responsible for selecting the appointment status within two business days of completion or have No-show indicated as required.”

Cause: Not entering information in the system timely may indicate that insufficient staff training, input errors, or follow-through by staff may be reasons for noncompliance.

Effect: Failure to expedite the assignment of and participation in qualifying SNAP activities regarding the initial engagement process could potentially result in overpayment of food assistance benefits to an ineligible individual. It could also affect performance reporting.

Required Action: CSOW must provide an assurance that all future initial appointments and status codes (either a 590 or 594) will be ended in OSST within two business days of completion of the appointment or have “No Show” recorded as required. Documentation of staff training or written notification to staff informing them of the requirements must also be provided with the CAP.

CSOW should also consider establishing some type of tickler system to set future alerts such as options in Outlook or use the case “To Do” screen in OSST as a way of reminding or alerting staff of timelines for completing required actions. This helps ensure that a check and balance system is in place to prevent further occurrences.

CareerSource Okaloosa Walton's Response/Corrective Action Plan (CAP):

ONI SNAP #02.25.02

Category: Initial Engagement Process

The LWDB submits the following responses for this CAP:

- **#1. A specific plan of action outlining the reasons for noncompliance as well as efforts taken to prevent future occurrences.**

**Response #1:** CSOW acknowledges that of the 16 case files reviewed where a 590 – appointment setting code was entered in OSST, one (6.3 percent) participant did not have their initial appointment status ended within two business days of completion of the appointment.

CSOW has taken necessary steps through training to ensure staff do not repeat this write-up.

**ASSURANCE:** CSOW assures that all future initial appointments and status codes (either a 590 or 594) will be ended in OSST within two business days of completion of the appointment or have “No Show” recorded as required.

**TRAINING:** The staff conduct training at least quarterly. The training has been consistent with policy and covers relevant subject areas. **OVERSIGHT:** The COO will ensure supervision over program staff to assess changes that may be needed going forward. CSOW will continue to ensure training and communication to staff on the proper procedures for documenting the initial appointments and status codes (either a 590 or 594).

**<Going forward>** CSOW will require the Program Manager to review the initial appointments and status codes (either a 590 or 594) through targeted monitoring. A targeted focus will serve to remind staff of the need to have the initial appointment status ended within two business days of completion of the appointment.

- **#2. A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.**

**Response #2:** CSOW local operating procedures require monitoring to be conducted on a quarterly basis. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal. Quarterly monitoring is completed no later than 60 days after the end of each quarter (i.e., February 28/29, May 31, August 31, and November 30). Completed monitoring files were uploaded to the FloridaCommerce Portal.

The FloridaCommerce Monitoring Checklist is the primary tool used by staff to conduct monitoring. The focus on activities and services is on those identified on the FloridaCommerce Monitoring Checklist. Other activities or services may be added depending on trends. Completed monitoring checklists over the past 12 months were previously uploaded to the FloridaCommerce Portal.

- **#3. Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topics.**

**Response #3:** To ensure staff are fully trained and kept up to date on policies and procedures, the COO ensures Program Managers/Coordinators conduct formal training at least once each quarter. Ongoing training of program staff is an important part of CSOW continual process improvement. The CSOW local operating procedures require training to be conducted on a quarterly basis (i.e., Jan-Mar, Apr-Jun, Jul-Sep, and Oct-Dec). The LOP also requires an agenda be developed based on trends and needs identified by the program staff. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal.

All training includes an agenda and handouts as appropriate. All training schedules are coordinated with the COO and QAM. See the **Attachments** for documentation on staff training.

**#4. Documentation of written communication to staff informing them of the requirements.**

**Response #4:** The SNAP staff were required to certify that they reviewed the SNAP write-ups identified in the DEO Monitoring Report. The certifications are included with this CAP in the **Attachments**.

## WORKFORCE INNOVATION AND OPPORTUNITY ACT

### WIOA ADULT AND DISLOCATED WORKER PROGRAM

*The sample size consisted of 22 Adult and Dislocated Worker participant case files (16 Adults and 6 Dislocated Worker). The following issues were identified:*

#### Other Noncompliance Issues

#### ONI WIOA #02.25.03

##### Category: Eligibility Documentation

Condition: Of the 22 Adult/DW participant case files reviewed, low-income determination documentation in one participant's (4.5 percent) case file did not match what was entered into Employ Florida.

Criteria: CareerSource Florida Adult and Dislocated Worker Program Eligibility Policy 122 Section G. states that, "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. WIOA establishes specific participant eligibility, priorities, and requirements for participation to account for the proper use of title I funds. LWDBs must establish a local process for collecting and maintaining eligibility verification documentation and ensure the documentation collected is made 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."

Cause: Lack of follow-through, staff training, or simple oversights could be causes for not obtaining sufficient documentation.

Effect: Failure to maintain documentation to verify eligibility can lead to potential questioned costs and negatively impact data results and performance reporting.

Required Action: CSOW must provide documentation to support the low-income determination if the participant's case file is still open. Documentation must also be provided showing CSOW has a check and balance system in place that ensures eligibility information is supported by case file documentation and is verified before services are rendered. CSOW must also provide an assurance that all participant eligibility documentation will be maintained in participant case files and match the information recorded in Employ Florida. CSOW must also provide a plan or process with the CAP for preventing a recurrence of this issue in the future including more in-depth monitoring, staff training, and written notification to staff informing them of the requirements.

CareerSource Okaloosa Walton's Response/Corrective Action Plan (CAP):

ONI WIOA #02.25.03

Category: Eligibility Documentation

The LWDB submits the following responses for this CAP:

**#1. A specific plan of action outlining the reasons for noncompliance as well as efforts taken to prevent future occurrences.**

**Response #1:** CSOW acknowledges that of the 22 Adult/DW participant case files reviewed, low-income determination documentation in one participant's case file did not match what was entered into Employ Florida.

CSOW will provide documentation to support the low-income determination if the participant's case file is still open. CSOW has a local policy in place with checks and balances to ensure eligibility information is supported by case file documentation and is verified before services are rendered. The policy has been uploaded to the FloridaCommerce Monitoring Portal.

**ASSURANCE:** CSOW assures that staff will ensure that all participant eligibility documentation will be maintained in participant case files and match the information recorded in Employ Florida.

**TRAINING:** The staff conduct training at least quarterly. The training has been consistent with policy and covers relevant subject areas. **OVERSIGHT:** The COO will ensure supervision over program staff to assess changes that may be needed going forward. CSOW will continue to ensure training and communication to staff on the proper procedures for documenting low-income determination in participant case files and ensure documentation matches the data entered in Employ Florida.

**<Going forward>** CSOW will require the Program Manager to conduct more in-depth monitoring, staff training, and reporting on low-income determination through targeted monitoring. A targeted focus will serve to remind staff that low-income eligibility documentation maintained in participant case files must match the information recorded in Employ Florida.

**#2. A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.**

**Response #2:** CSOW's local operating procedures require monitoring to be conducted on a quarterly basis. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal. Quarterly monitoring is completed no later than 60 days following the end of each quarter (i.e., February 28/29, May 31, August 31, and November 30). Completed monitoring files were uploaded to the FloridaCommerce Portal.

The FloridaCommerce Monitoring Checklist is the primary tool used by staff to conduct monitoring. The focus on activities and services is on those identified on the FloridaCommerce Monitoring Checklist. Other activities or services may be added depending on trends. Completed monitoring checklists over the past 12 months have been uploaded to the FloridaCommerce Portal.

Internal monitoring will review work-based learning files to ensure the IEP includes all required elements.

- **#3. Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topic.**

**Response #3:** To ensure staff are fully trained and kept up to date on policies and procedures, the COO ensures Program Managers/Coordinators conduct formal training at least once each quarter for each Program under the operational control of CareerSource Okaloosa Walton. Ongoing training of program staff is an important part of CSOW continual process improvement. The CSOW local operating procedures require that training be conducted on a quarterly basis (i.e., Jan-Mar, Apr-Jun, Jul-Sep, and Oct-Dec). An agenda is developed based on trends and needs identified by program staff. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal.

All training includes an agenda and handouts as appropriate. All training is coordinated with the COO and QAM. See the **Attachments** for a sample of staff training.

A sample of WIOA staff training conducted since the FloridaCommerce monitoring on November 13-17, 2023, is also included in the **Attachments**.

- **#4. Documentation of written communication to staff informing them of these requirements.**

**Response #4:** WIOA staff were required to certify that they reviewed the WIOA write-ups identified in the FloridaCommerce Monitoring Report. The certifications will be provided with this CAP in the **Attachments**.

#### ONI WIOA #02.25.04

##### Category: Measurable Skills Gains

Condition: Of the 22 Adult/DW case files reviewed of participants that were enrolled in an education or training program, one (4.5 percent) did not have an MSG captured and recorded in Employ Florida.

Criteria: TEGL WIOA No. 10-16, Change 3 Section (E), states, in part, that, “The measurable skills gain indicator is used to measure interim progress of participants who are enrolled in education or training services for a specified reporting period. Therefore, it is not an exit-based measure. Instead, it is intended to capture important progressions through pathways that offer different services based on program purposes and participant needs and states should record all measurable skill gains achieved by participants in a program year and report the most recent gain of each gain type.”

Cause: Insufficient staff training, a lack of guidance or procedures, or a lack of awareness and understanding of the proper way to enter and record MSGs.

Effect: Failure to enter and accurately record MSG information in Employ Florida negatively impacts performance results.

Required Action: CSOW must provide an assurance that documentation to support an MSG attainment is retained in participant case files or made available upon request and that it matches what is recorded in Employ Florida. CSOW must also provide an assurance that all future MSGs will be documented and recorded within the applicable program year(s). Additionally, CSOW must provide training to staff to ensure they understand the requirements and intent of MSGs including how to review, document, and timely record results. If technical assistance or training is needed, CSOW should contact the Workforce Training and Coordination unit at WFSTraining@commerce.fl.gov. Documentation of staff training and written notification informing them of the requirements must also be provided with the CAP.



CareerSource Okaloosa Walton's Response/Corrective Action Plan (CAP):

ONI WIOA #02.25.04

Category: Measurable Skills Gains

The LWDB submits the following responses for this CAP:

**#1. A specific plan of action outlining the reasons for noncompliance as well as efforts taken to prevent future occurrences.**

**Response #1:** CSOW acknowledges that of the 22 Adult/DW case files reviewed of participants that were enrolled in an education or training program, one (4.5 percent) did not have an MSG captured and recorded in Employ Florida.

CSOW has reminded staff that if a participant is enrolled in an education or training program at any time during the Program Year (PY): (1) At least one Measurable Skill Gain must be recorded in Employ Florida during each applicable Program Year; (2) If enrolled, the participant case file must contain documentation of a Measurable Skill Gain showing the participant's interim progress toward the completion of their educational or training requirements; and (3) If enrolled, the documentation in the case file must match the Measurable Skill Gain entered in Employ Florida.

**ASSURANCE:** CSOW provides assurance that all participant eligibility documentation will be maintained in participant case files and match the information recorded in Employ Florida.

**TRAINING:** The staff conduct training at least quarterly. The training is consistent with policy and covers relevant subject areas. **OVERSIGHT:** The COO will ensure supervision over program staff to assess what changes may be needed going forward. The CSOW will continue to ensure training and communication with staff on the proper procedures for documenting Measurable Skill Gain.

**<Going forward>** CSOW will continue to require the Program Manager to report on Measurable Skill Gain cases through targeted monitoring. A targeted focus will serve to remind staff of the need to document the elements of the MSG.

**#2. A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.**

**Response #2:** CSOW's local operating procedures require monitoring to be conducted on a quarterly basis. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal. Quarterly monitoring is completed no later than 60 days following the end of each quarter (i.e., February 28/29, May 31, August 31, and November 30). Completed monitoring files were uploaded to the FloridaCommerce Portal.

The FloridaCommerce Monitoring Checklist is the primary tool used by staff to conduct monitoring. The focus on activities and services is on those identified on the FloridaCommerce Monitoring Checklist. Other activities or services may be added depending on trends. Completed monitoring checklists over the past 12 months were previously uploaded to the FloridaCommerce Portal.



Internal monitoring will review Measurable Skill Gain files to ensure all required elements are included.

- **#3. Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topic.**

**Response #3:** To ensure staff are fully trained and kept up to date on policies and procedures, the COO ensures Program Managers/Coordinators conduct formal training at least once each quarter for each Program under the operational control of CareerSource Okaloosa Walton. Ongoing training of program staff is an important part of CSOW continual process improvement. The CSOW local operating procedures require that training be conducted on a quarterly basis (i.e., Jan-Mar, Apr-Jun, Jul-Sep, and Oct-Dec). An agenda is developed based on trends and needs identified by program staff. A copy of the LOP is uploaded to the FloridaCommerce Monitoring Portal.

All training includes an agenda and handouts as appropriate. All training is coordinated with the COO and QAM. See the **Attachments** for a sample of staff training.

A sample of WIOA staff training conducted since the FloridaCommerce monitoring on November 13-17, 2023, is also included in the **Attachments**.

- **#4. Documentation of written communication to staff informing them of these requirements.**

**Response #4:** WIOA staff were required to certify that they reviewed the WIOA write-ups identified in the FloridaCommerce Monitoring Report. The certifications will be included with the CAP in the **Attachments**.

## WIOA YOUTH PROGRAM

*The sample size consisted of 13 Youth participant case files (9 Out-of-School and 4 In-School). The following issues were identified:*

### Finding

#### Finding WIOA #02.25.01

##### Category: Supportive Service

Condition: Of the 12 Youth participants who received supportive services, one (8.3 percent) participant case file did not contain documentation to verify the supportive service activity type entered in Employ Florida.

Criteria: CareerSource Florida Supportive Services and Needs-Related Payments Administrative Policy 109 Section D. states, in part, that, "LWDBs are required to maintain documentation sufficient to satisfy the requirements of this policy to ensure that funds are allowable and used for the intended purpose." Additionally, the Employ Florida Service Code Guide outlines the various service code titles and definitions as well as the documentation/case note requirements.

Cause: Insufficient staff training, lack of guidance and procedures, staff data entry errors, and inadequate collection of proper documentation may be causes for noncompliance.

Effect: Failure to maintain documentation of supportive services and enter and accurately record the type or date of the supportive service provided may negatively impact performance accountability and reporting and may lead to potential questioned costs.

Required Action: CSOW must provide documentation to verify the supportive service activity recorded in Employ Florida as well as the participant's receipt of the supportive service. CSOW's supportive services system must ensure that funds to participants are provided in the actual amount of the expenditure, are based on need, approved and allowable, are of the proper type, and that the service activity and the amount are documented and match what is entered in Employ Florida. Documentation of written notification to staff informing them of the requirements must also be provided with the CAP.

#### CareerSource Okaloosa Walton's Response/Corrective Action Plan (CAP):

##### Finding WIOA #02.25.01

##### Category: Supportive Service

The LWDB submits the following responses for this CAP:

- **#1. A specific plan of action outlining the reasons for noncompliance as well as efforts taken to prevent future occurrences.**

**Response #1:** CSOW acknowledges that of the 12 Youth participants who received supportive services, one participant case file did not contain documentation to verify the supportive service activity type entered in Employ Florida.

CSOW staff have been instructed to maintain and provide documentation to verify the supportive service activity recorded in Employ Florida as well as the participant's receipt of the supportive service. The procedures will ensure that funds to participants are provided in the actual amount of the expenditure and are based on need. It will also ensure the funds are approved and allowable and for the proper type and service activity; and the amount is documented and matches what is entered in Employ Florida.

**ASSURANCE:** CSOW assures that staff will ensure the documentation to support the supportive service activity is recorded in Employ Florida and maintained in the case file.

**TRAINING:** The staff conducts training at least quarterly. The training is consistent with policy and covers relevant subject areas. **OVERSIGHT:** The COO will ensure supervision over program staff to assess changes that may be needed in the future. CSOW will continue to ensure training and communication with staff on the proper procedures for documenting supportive services.

**<Going forward>** CSOW will require the Program Manager to report on cases with supportive services through quarterly targeted monitoring. A targeted focus will serve to remind staff of the need to correctly manage their cases that include supportive services.

- **#2. A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.**

**Response #2:** CSOW's local operating procedures require monitoring to be conducted on a quarterly basis. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal. Quarterly monitoring is completed no later than

60 days after the end of each quarter (i.e., February 28/29, May 31, August 31, and November 30). Completed monitoring files were uploaded to the FloridaCommerce Portal.

The FloridaCommerce Monitoring Checklist is the primary tool used by staff to conduct monitoring. The focus on activities and services is on those identified on the FloridaCommerce Monitoring Checklist. Other activities or services may be added depending on trends. Completed monitoring checklists over the past 12 months were previously uploaded to the FloridaCommerce Portal.

- **#3. Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topic.**

**Response #3:** To ensure staff are fully trained and kept up to date on policies and procedures, the COO ensures Program Managers/Coordinators conduct formal training at least once each quarter for each Program under the operational control of CareerSource Okaloosa Walton. Ongoing training of program staff is an important part of CSOW continual process improvement. The CSOW local operating procedures require that training be conducted on a quarterly basis (i.e., Jan-Mar, Apr-Jun, Jul-Sep, and Oct-Dec). An agenda is developed based on trends and needs identified by program staff. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal.

All training includes an agenda and handouts as appropriate. All training is coordinated with the COO and QAM. See the **Attachments** for a sample of staff training.

A sample of WIOA staff training conducted since the FloridaCommerce monitoring on November 13-17, 2023, is also included in the **Attachments**.

- **#4. Documentation of written communication to staff informing them of these requirements.**

**Response #4:** WIOA staff were required to certify that they reviewed the WIOA write-ups identified in the FloridaCommerce Monitoring Report. The certifications will be included with the CAP in the **Attachments**.

## WIOA SPECIAL PROJECTS

*The sample size consisted of nine Adult and Dislocated Worker participant case files (6 Adults and 3 Dislocated Worker). The review did not reveal any Findings, ONIs or Observations.*

## RAPID RESPONSE

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

## WAGNER-PEYSER PROGRAM

*The sample size consisted of 45 participant case files (26 job seekers, 15 job orders, and 4 job seeker placements). The following issues were identified:*

## Finding

### Finding WP #02.25.02

#### Category: New Employer Account Validation

Condition: One (50 percent) of the two newly registered employer-entered accounts reviewed was missing documentation that a validation and approval attempt was conducted by staff within two days of registration in Employ Florida. It was noted that CSOW staff conducted and documented the validation a month after the initial employer registration.

Criteria: CareerSource Florida AP 098 (IV)(B) states, in part, that, "Employer accounts must be verified within two business days of the date of the initial registration."

Cause: Staff oversight and follow-up may have been factors in noncompliance.

Effect: Failure to validate new employer accounts timely can lead to companies entering job orders in Employ Florida with the intent to defraud job seekers or acquiring job seekers personal protected information.

Required Action: CSOW must provide an assurance that CSOW staff will conduct and document verification and validation efforts within two business days of initial employer registration entry. Documentation of staff training and written notification informing staff of the requirements must also be provided with the CAP.

#### CareerSource Okaloosa Walton's Response/Corrective Action Plan (CAP):

### Finding WP #02.25.02

#### Category: New Employer Account Validation

The CSOW submits the following responses to the CAP:

**#1: A specific plan of action outlining the reasons for noncompliance as well as efforts taken to prevent future occurrences.**

**Response #1:** CSOW acknowledges that One of the two newly registered employer-entered accounts reviewed was missing documentation that a validation and approval attempt was conducted by staff within two days of registration in Employ Florida. And that it was noted that CSOW staff conducted and documented the validation a month after the initial employer registration. However, our review reveals that the validation and all necessary steps to create a new employer account did take place within the allowed timeframe (and mentioned in the job order creation note) what was missing is a separate case note documenting and detailing said validation.

The following is the Business Services Team training and discussion concerning this Finding:

*"Resolution: As we discussed, in reality - the new employer verification took place as BT created the account utilizing the information sent to him by the employer POC before he could create the Job Order... however, there was no separate note documenting the steps BT took to verify the information presented in that Job Order form,*

*and that's where the oversight happened on our part. Moving forward, we must document the steps taken to vet any employer (doesn't matter if we create the account or they do so) and document those steps in EF before we enable the account. The recording of this employer access rights note must happen at the time of creation (if BSR created the new account) or within the customary 2 business days (if the account was created by the employer)."*

**ASSURANCE:** CSOW assures that staff will ensure the documentation of validation is completed. And approval attempts are conducted by staff within two business days of a newly registered employer-entered accounts in Employ Florida.

**TRAINING:** The staff conduct training at least quarterly. The training is consistent with policy and covers relevant subject areas. The training for this Finding was conducted on 12/2/2024. **OVERSIGHT:** The COO will ensure supervision over program staff to assess changes that may be needed going forward. CSOW will continue to ensure training and communication to staff on the proper procedures for documenting newly registered employer-entered accounts in Employ Florida within two business days.

**<Going forward>** CSOW will require the Program Manager to report on newly registered employer-entered accounts in Employ Florida through targeted monitoring. A targeted focus will serve to remind staff about the requirement for validation and approval attempts conducted by staff within two business days of newly registered employer-entered accounts in Employ Florida.

## **#2. A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.**

**Response #2:** CSOW's local operating procedures require monitoring to be conducted on a quarterly basis. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal. Quarterly monitoring is completed no later than 60 days after the end of each quarter (i.e., February 28/29, May 31, August 31, and November 30). Completed monitoring files were uploaded to the FloridaCommerce Portal.

The FloridaCommerce Monitoring Checklist is the primary tool used by staff to conduct monitoring. The focus on activities and services is on those identified on the FloridaCommerce Monitoring Checklist. Other activities or services may be added depending on trends. Completed monitoring checklists over the past 12 months were previously uploaded to the FloridaCommerce Portal.

## **• #3. Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topic.**

**Response #3:** To ensure staff are fully trained and kept up to date on policies and procedures, the COO ensures Program Managers/Coordinators conduct formal training at least once each quarter for each Program under the operational control of CareerSource Okaloosa Walton. Ongoing training of program staff is an important part of CSOW continual process improvement. The CSOW local operating procedures require that training be conducted on a quarterly basis (i.e., Jan-Mar, Apr-Jun, Jul-Sep, and Oct-Dec). An agenda is developed based on trends and needs identified by program staff. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal.

All training includes an agenda and handouts as appropriate. All training is coordinated with the COO and QAM. See the **Attachments** for a sample of staff training.

A sample of WP staff training conducted since the FloridaCommerce monitoring on November 13-17, 2023, is also included in the **Attachments**.

- **#4. Documentation of written communication to staff informing them of these requirements.**

**Response #4:** WP staff were required to certify that they reviewed the write-ups identified in the FloridaCommerce Monitoring Report. The certifications will be provided with this CAP in the **Attachments**.

#### Other Noncompliance Issue

**ONI WP #02.25.05**

**Category: Placement Verification**

Condition: Of the 10 job seeker files reviewed with placements, one (10 percent) was missing documentation of the source of verification of the placement.

Criteria: CareerSource Florida AP 099 (IV)(C) states, in part, that, "Verification information must be documented and must include: 1) a case note identifying the customer's name, 2) the name of the employer, 3) the source of verification..."

Cause: Lack of staff training and staff data entry errors may be causes for noncompliance.

Effect: Noncompliance with placement guidelines has an impact on performance reporting (Monthly Management Report and other staff reports), as well as erroneous information being recorded in the system if placements are not valid.

Required Action: CSOW must provide documentation with the CAP that the placement has been reviewed and verification has been conducted and documented in case notes in Employ Florida if the job order is still open and the job seeker is still active. CSOW must also provide an assurance that verification of placements will occur, and case notes will be entered on all job orders and/or the job seeker activity service screen documenting staff verification of the placement in the future. Additionally, documentation of staff training and written notification to staff informing them of the requirements must be provided with the CAP.

#### **CareerSource Okaloosa Walton's Response/Corrective Action Plan (CAP):**

**ONI WP #02.25.05**

**Category: Placement Verification**

**The CSOW submits the following responses to the CAP:**

**#1: A specific plan of action outlining the reasons for noncompliance as well as efforts taken to prevent future occurrences.**

**Response #1:** CSOW acknowledges that of the 10 job seeker files reviewed with placements, one was missing documentation of the source of verification of the placement.

The staff member entered a placement code of **\*\*850 – Local Placement\*\*** on **\*\*02/13/24\*\*** but did not properly case note the entry. Staff members were trained in the importance of case noting all participant activities, ensuring compliance with reporting standards. The CSOW staff have been briefed that the placement must be reviewed and verification conducted and documented in case notes in Employ Florida.

**ASSURANCE:** CSOW assures that staff will ensure that documentation and verification of placements will occur, and case notes will be entered on all job orders and/or the job seeker activity service screen documenting staff verification of the placement in the future.

**TRAINING:** The staff conduct training at least quarterly. The training is consistent with policy and covers relevant subject areas. **OVERSIGHT:** The COO will ensure supervision over program staff to assess what changes may be needed going forward. The CSOW will continue to ensure training and communication to staff on the proper procedures for documenting verification of placements in the future.

**<Going forward>** CSOW will require the Program Manager to report on placements through targeted monitoring. A targeted focus will serve to remind staff to document staff verification of the placement in the future.

## **#2. A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.**

**Response #2:** CSOW's local operating procedures require monitoring to be conducted on a quarterly basis. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal. Quarterly monitoring is completed no later than 60 days after the end of each quarter (i.e., February 28/29, May 31, August 31, and November 30). Completed monitoring files were uploaded to the FloridaCommerce Portal.

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- **#3. Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topic.**

**Response #3:** To ensure staff are fully trained and kept up to date on policies and procedures, the COO ensures Program Managers/Coordinators conduct formal training at least once each quarter for each Program under the operational control of CareerSource Okaloosa Walton. Ongoing training of program staff is an important part of CSOW continual process improvement. The CSOW local operating procedures require that training be conducted on a quarterly basis (i.e., Jan-Mar, Apr-Jun, Jul-Sep, and Oct-Dec). An agenda is developed based on trends and needs identified by program staff. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal.

All training includes an agenda and handouts as appropriate. All training is coordinated with the COO and QAM. See the **Attachments** for a sample of staff training.

A sample of WP staff training conducted since the FloridaCommerce monitoring on November 13-17, 2023, is also included in the **Attachments**.

- **#4. Documentation of written communication to staff informing them of these requirements.**



**Response #4:** WP staff were required to certify that they reviewed the write-ups identified in the FloridaCommerce Monitoring Report. The certifications will be provided with this CAP in the **Attachments**.

## REEMPLOYMENT SERVICES AND ELIGIBILITY ASSESSMENT PROGRAM

The RESEA program review focused on CSOW's compliance with the requirements of the grant to assist reemployment assistance claimants in returning to work faster by connecting claimants/participants with in-person assessments, and reemployment services and opportunities to further their reemployment goals and successful employment outcomes.

*The sample size consisted of five participant case files. The following common issue was identified in both the RESEA and WP programs:*

### Other Noncompliance Issue

#### ONI WP #02.25.06

##### Category: Employability Development Plans

Condition: Of the six (five RESEA and one WP) participant EDPs reviewed, four (66.7 percent) were either missing or had non-occupational short and/or long-term goals identified.

Criteria: CareerSource Florida AP 068 states, in part, that, EDPs must "Be completed jointly with the REA [RESEA] participant and should reveal the participant's strengths, weaknesses, barriers, and employment or training goals." The Employ Florida Service Code Guide also states, in part, that the code 205, "...also includes short- and long-term goals..." and that the EDP must "...focus on 'occupational goals' instead of 'educational goals' to meet program requirements."

Cause: Lack of staff training and understanding of specific program requirements may have impacted EDP development.

Effect: Absence of specific and individualized employment goals on the EDP reduces staff's ability to work effectively and efficiently with participants in delivering services, tracking employability goals, and determining what the participant is required to do to attain their short-term and long-term occupational goals.

Required Action: CSOW must provide an assurance with the CAP that all future EDPs will be documented, meet the definition of an EDP, and contain all required elements. All future EDPs must be personalized for each participant to address their specific needs including individualized short-term and long-term occupational goals, the action steps needed to achieve those goals. Documentation of staff training and written notification to staff informing them of the requirements must also be provided with the CAP.

### CareerSource Okaloosa Walton's Response/Corrective Action Plan (CAP):

#### **ONI WP #02.25.06**



### Category: Employability Development Plans

The CSOW submits the following responses to the CAP:

**#1: A specific plan of action outlining the reasons for noncompliance as well as efforts taken to prevent future occurrences.**

**Response #1:** CSOW acknowledges that of the six (five RESEA and one WP) participant EDPs reviewed, four were either missing or had non-occupational short and/or long-term goals identified.

The CSOW staff have been briefed that all future EDPs will be personalized for each participant to address their specific needs including individualized short-term and long-term occupational goals, and the action steps needed to achieve those goals.

Program Manager's Comments: This was a training deficiency. Then the Career Advisor will provide staff with some ideas on developing EDPs. We do have several customers that have certifications or degrees listed for their LT Goals to increase their potential salary for an upgrade to living conditions. Met with the RESEA team right after State Monitoring results came and discussed/trained on alternative goals options instead of the client's long term educational goals. They are aware that they are not to use the educational goals that the customer puts on their questionnaire for their EDP ST & LT Goals. This should not be an issue moving forward.

**ASSURANCE:** CSOW assures that staff will ensure that all future EDPs will be documented, meet the definition of an EDP and contain all required elements, such as short-term and long-term occupational goals.

**TRAINING:** The staff conduct training at least quarterly. The training is consistent with policy and covers relevant subject areas. **OVERSIGHT:** The COO will ensure supervision over program staff to assess changes that may be needed going forward. CSOW will continue to ensure training and communication to staff on the proper procedures for developing and documenting EDPs.

**<Going forward>** CSOW will require the Program Manager to report on EDPs and on short-term and long-term occupational goals through targeted monitoring. A targeted focus will serve to remind staff to ensure EDPs are personalized for each participant to address their specific needs and contain short-term and long-term occupational goals.

**#2. A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.**

**Response #2:** CSOW's local operating procedures require monitoring to be conducted on a quarterly basis. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal. Quarterly monitoring is completed no later than 60 days after the end of each quarter (i.e., February 28/29, May 31, August 31, and November 30). Completed monitoring files were uploaded to the FloridaCommerce Portal.

The FloridaCommerce Monitoring Checklist is the primary tool used by staff to conduct monitoring. The focus on activities and services is on those identified on the FloridaCommerce Monitoring Checklist. Other activities or services may be added depending on trends. Completed monitoring checklists over the past 12 months were previously uploaded to the FloridaCommerce Portal.

- **#3. Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topic.**

**Response #3:** To ensure staff are fully trained and kept up to date on policies and procedures, the COO ensures Program Managers/Coordinators conduct formal training at least once each quarter for each Program under the operational control of CareerSource Okaloosa Walton. Ongoing training of program staff is an important part of CSOW continual process improvement. The CSOW local operating procedures require that training be conducted on a quarterly basis (i.e., Jan-Mar, Apr-Jun, Jul-Sep, and Oct-Dec). An agenda is developed based on trends and needs identified by program staff. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal.

All training includes an agenda and handouts as appropriate. All training is coordinated with the COO and QAM. See the **Attachments** for a sample of staff training.

A sample of WP staff training conducted since the FloridaCommerce monitoring on November 13-17, 2023, is also with the **Attachments**.

- **#4. Documentation of written communication to staff informing them of these requirements.**

**Response #4:** WP staff were required to certify that they reviewed the write-ups identified in the FloridaCommerce Monitoring Report. The certifications will be provided with this CAP in the **Attachments**.

## CAREER CENTER CREDENTIALING

The career center credentialing review focused on ensuring administrative requirements and records were posted and maintained, and that front-line staff had completed all required Florida Certified Workforce Professional Tier I certification and continuing education courses.

*The review did not reveal any Findings or ONIs; however, the following Observation was noted:*

### Observation

The reviewer noted that the local and statewide branding and logo usage policy was available for review; however, the policy did not directly provide guidance on the use the American Job Center (AJC) network common identifier and branding requirements. Following the exit, CSOW provided an updated policy that specifically addressed the AJC common identifier usage. No further action is necessary.

## COMPLAINT SYSTEM

*A total of 36 complaint logs were reviewed. The review did not reveal any Findings, ONIs, or Observations.*

## JOBS FOR VETERANS STATE GRANT PROGRAM

*The sample size consisted of 35 participant case files (15 participant files, 15 LVER employer files, and five VRE Chapter 31 files). The following issues were identified:*

### Other Noncompliance Issue

**ONI JVSG #02.25.07**

**Category: JVSG Employment Services**

Condition: Of the 15 veteran case files reviewed, one (6.7 percent) had entry of a specific service code recorded in Employ Florida (code V03 – Individual Career Counseling); however, case notes in the files did not meet the requirements for the specified services recorded.

Criteria: CareerSource Florida AP 117 Section IV.B.3. states, in part, that, “Individual career counseling must be recorded in Employ Florida using service code V03 (JVSG - Individual Career Counseling) and include a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.”

Cause: Lack of staff oversight and programmatic training are likely factors leading to noncompliance.

Effect: Noncompliance has an impact on veteran service delivery and may result in a negative federal review of the Veterans Program.

Required Action: CSOW must provide an assurance that DVOP staff will properly document employment services provided to participants in Employ Florida and ensure the requirements in CareerSource Florida AP 117 and the Employ Florida Service Code guide are followed. Documentation of staff training and written notification to staff informing them of the requirements must also be provided with the CAP.

**CareerSource Okaloosa Walton’s Response/Corrective Action Plan (CAP):**

**ONI JVSG #02.25.07**

**Category: JVSG Employment Services**

CSOW submits the following responses for this CAP:

**#1. A specific plan of action outlining the reasons for noncompliance as well as efforts taken to prevent future occurrences.**

**Response #1:** CSOW acknowledges that of the 15 veteran case files reviewed, one had entry of a specific service code recorded in Employ Florida (code V03 – Individual Career Counseling); however, case notes in the files did not meet the requirements for the specified services recorded.

**Case Note for V03 Activity:** One participant received V03 activity, but the case notes in the file were not appropriate to document the placement process. The JVSG staff have been briefed that a lack of documentation for the V03 activity will lead to compliance issues and hinder tracking of participant progress.

**ASSURANCE:** CSOW assures that DVOP staff will properly document in case notes employment services provided to participants in Employ Florida and will ensure the requirements in CareerSource Florida AP 117 and the Employ Florida Service Code guide are followed.

**TRAINING:** The DVOP staff are required to conduct training at least quarterly. The training is consistent with policy and covers relevant subject areas. **OVERSIGHT:** The COO will ensure supervision over program staff to assess what changes may be needed in the future. CSOW will continue to ensure training and communication to staff on the

proper procedures for documenting JVSG employment services in accordance with CareerSource Florida AP 117 Section IV.B.3.

**<Going forward>** CSOW will require the Program Manager to periodically review JVSG employment services through targeted monitoring of case files. A targeted focus will serve to remind staff of the proper documentation and case notes required for entry in Employ Florida.

**#2. A copy of a monitoring schedule showing timeframes and the activities and services that will be monitored.**

**Response #2:** CSOW's local operating procedures require monitoring to be conducted on a quarterly basis. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal. Quarterly monitoring is completed no later than 60 days after the end of each quarter (i.e., February 28/29, May 31, August 31, and November 30). Completed monitoring files were uploaded to the FloridaCommerce Portal.

The FloridaCommerce Monitoring Checklist is the primary tool used by staff to conduct monitoring. The focus on activities and services are those identified on the FloridaCommerce Monitoring Checklist. Other activities or services may be added depending on trends. Completed monitoring checklists over the past 12 months were previously uploaded to the FloridaCommerce Portal.

• **#3. Documentation showing staff training or refresher training has been or will be provided. Documentation must include training date(s), a training roster, and an agenda listing training topics.**

**Response #3:** To ensure staff are fully trained and kept up to date on policies and procedures, the COO ensures Program Managers/Coordinators conduct formal training at least once each quarter for each program under the operational control of CareerSource Okaloosa Walton. Ongoing training of program staff is an important part of CSOW continual process improvement. The CSOW local operating procedures require that training be conducted on a quarterly basis (i.e., Jan-Mar, Apr-Jun, Jul-Sep, and Oct-Dec). An agenda is developed based on trends and needs identified by program staff. A copy of the LOP is uploaded to the FloridaCommerce SharePoint Portal.

All training includes an agenda and handouts as appropriate. All training is coordinated with the COO and QAM. See the **Attachments** for a sample of staff training.

• **#4. Documentation of written communication to staff informing them of these requirements.**

**Response #4:** JVSG staff were required to certify that they reviewed the write-ups identified in the FloridaCommerce Monitoring Report. The certifications will be provided with this CAP in the **Attachments**.

### III. FINANCIAL DISCLOSURE REVIEW

The Financial Disclosure review focused on determining CSOW's compliance with financial disclosure requirements as referenced in F.S., Chapters 112.3145 and 445.07; and CareerSource Florida FG-075.

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

## IV. COLLECTION OF DEMOGRAPHIC DATA

The purpose of this section of the review is to determine compliance with the nondiscrimination and equal opportunity provisions of 29 CFR Part 37, and FloridaCommerce's Guidelines for Compliance with Section 188 of WIOA regarding Collection of Demographic Data.

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

## V. MANAGEMENT PROCESS REVIEW

The purpose of this review is to determine whether CSOW is implementing requirements associated with local merit staffing responsibilities for FloridaCommerce staff assigned to work under the functional supervision of CSOW's local sector strategy implementation, and local board governance activities.

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

## VI. MANAGEMENT INFORMATION SYSTEMS

The MIS security check focused on the effectiveness of CSOW's information security controls and whether business processes and policies are in place that protect FloridaCommerce information system data and resources and complies with FloridaCommerce's IT guidelines and the FloridaCommerce/CSOW Grantee-Subgrantee agreement requirements.

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

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## CORRECTIVE ACTION PLAN REQUIREMENTS

A CAP is required to address how the CSOW will correct any programmatic findings and other noncompliance issues identified in the report. For the noted deficiencies, corrective actions and recommendations have been provided to help respond to the issues identified, and develop and implement processes that result in positive program practices and performance outcomes to improve the quality and integrity of the data collected.

## VIII. ENTRANCE AND EXIT CONFERENCE ATTENDEES

**A programmatic monitoring entrance conference with CSOW staff was conducted on November 4, 2024, and a programmatic exit conference was conducted on November 8, 2024.**

Name	Agency	Entrance Conference	Exit Conference
Terry Wester-Johnson (Review Lead)	FloridaCommerce	X	X
Nancy Garcia	FloridaCommerce	X	
Yolanda Garcia	FloridaCommerce	X	X
Matrecia Bryant	FloridaCommerce	X	X

Tevin Robinson	FloridaCommerce	X	X
Alyssa Raulerson	FloridaCommerce	X	X
N'Deye Delgado	FloridaCommerce	X	
Sharmarie Gray	FloridaCommerce	X	
Andy Windsor	FloridaCommerce	X	X
Lavetta Williams	FloridaCommerce	X	X
Carol Booth	FloridaCommerce	X	X
Katina Williams	FloridaCommerce	X	X
Barbara Walker	FloridaCommerce	X	X
Vincent Lynn	FloridaCommerce	X	X
Lonnie Saunders	FloridaCommerce	X	X
Andrew Merchel	FloridaCommerce	X	X
Marybeth Allegood	FloridaCommerce	X	X
Alexia Sweet	FloridaCommerce	X	
Kenton Buggs	FloridaCommerce	X	
Sarah Rudnick	FloridaCommerce	X	
Michelle Burns	CSOW	X	X
Will Miles	CSOW	X	X
Shawn Knobel	CSOW	X	
Kelly Jordan	CSOW	X	X
Mary Travis	CSOW	X	X
Brandon Elkins	CSOW	X	X
Brad Balfanz	CSOW	X	X
Cheryl Hall	CSOW	X	X
Randy Hunter	CSOW	X	X
Ken Wallace	CSOW	X	X
Mayra Reynoso	CSOW	X	X
Emmy Epperson	CSOW	X	X