



PERFORMANCE IMPROVEMENT PLAN

2025-2026

APPROVED

Performance Improvement Plan (PIP)

1. Introduction and Purpose

The purpose of this Performance Improvement Plan (PIP) is to outline targeted strategies CSP will implement to improve performance outcomes in key Workforce Innovation and Opportunity Act (WIOA) indicators.

2. Summary of Identified Performance Gaps

PY2023 Negotiated Performance metrics not met:

- Dislocated Worker Entered Employment Rate 2nd Quarter After Exit
- Dislocated Worker Median Earnings 2nd Quarter After Exit
- Youth Credential Attainment Rate

PY2024 Negotiated Performance metrics not met:

- Dislocated Worker Entered Employment Rate 2nd Quarter After Exit
- Youth Credential Attainment Rate

Prior to PY2023, CareerSource Polk consistently met or exceeded performance expectations in all three measures, demonstrating organizational capability and historical success.

3. Root Cause Analysis

A. Dislocated Worker Program

1. Lack of Clear Co-Enrollment Guidance

From September 24, 2022, through September 30, 2025, CareerSource Polk received Special Project funding for the Hurricane Ian Dislocated Worker Grant (DWG 40). Staff were required to enroll participants under the project code IAN DW 852, as these funds carried unique Special Project codes that had to be used for Dislocated Worker customers.

Grant language included:

“Make sure all employment information is entered before closing the case... all activities associated with this project must be closed effective 9/30/2024. If the LWDB wishes to continue serving the participant, a new activity using local or other funds must be opened.”

Additionally, under the **Get There Faster** grant (October 1, 2021–June 30, 2024), participants were to be enrolled in Employ Florida using specific project codes tied to adults, dislocated workers, or youth.

Due to a lack of structured guidance:

- Eligible participants were not consistently co-enrolled in the WIOA Dislocated Worker program
- Positive outcomes from set-aside funded participants were excluded from DW performance pool
- Resulting performance metrics underreported program impact.

2. Loss of Access to The Work Number (Equifax)

Due to escalating costs, CareerSource Polk discontinued access to Carahsoft (Equifax – The Work Number). This decision:

- Eliminated a fast, reliable means of verifying employment
- Increased dependence on slower or incomplete free databases (FLORIDA, Suntext, etc.)
- Resulted in missed deadlines, delayed verification, and reduced measurable outcomes

B. Youth Program

Youth Credential Attainment declines were tied to:

- Documentation delays from training providers or participants
- Inconsistent follow-up or re-engagement strategies
- Staff transitions and limited monitoring tools
- Barriers faced by youth that were not fully addressed

4. Corrective Action Strategies

A. Strengthen Strategic Co-Enrollment Practices

CareerSource Polk will reinforce intentional, performance-driven co-enrollment practices to ensure customers receive coordinated services that improve employment outcomes, support compliance, and optimize system performance across workforce programs. The following actions will be implemented:

1. Establish Clear, Performance Aligned Co-Enrollment Protocols

CareerSource Polk will formalize clear expectations for identifying participants who meet WIOA eligibility and for whom co-enrollment in Wagner Peyser or other relevant programs is appropriate, beneficial to the customer, and aligned with program requirements. Co-enrollment decisions will continue to require documented supervisory review and approval to ensure consistency, appropriateness, and alignment with regional and state guidance.

2. Update and Standardize Co-Enrollment Local Operating Procedures (LOPs)

CareerSource Polk will develop and publish updated LOPs that clearly define co-enrollment as a coordinated service delivery strategy. The LOPs will clearly outline eligibility considerations, approval processes, staff responsibilities, documentation standards, outcome attribution, and application during special grant operations.

- Criteria for determining when co-enrollment is appropriate and advantageous to participant outcomes
- Required supervisory review and approval processes
- Staff roles, documentation standards, and outcome attribution requirements
- Application of co-enrollment protocols during special grant and targeted initiative operations

These procedures will support consistent implementation while reducing service duplication and missed co-enrollment opportunities.

3. Implement Ongoing Co-Enrollment Monitoring and Quality Assurance

CareerSource Polk will conduct monthly reviews of co-enrollment activity to ensure adherence to protocols, identify gaps or missed opportunities, and implement timely corrective actions that support continuous improvement.

This review process will support continuous improvement and reduce compliance risk while strengthening performance outcomes.

4. Deliver Targeted Staff Training and Reinforcement

CareerSource Polk will provide focused refresher training to reinforce the role of supervisor-approved co-enrollment in improving participant outcomes and overall system performance. Training will emphasize proper application of LOPs, documentation standards, and the connection between co-enrollment and performance accountability.

Training will emphasize how intentional co-enrollment supports both customer success and overall local board performance.

B. Improve Employment Verification Processes

In the absence of The Work Number, CareerSource Polk will strengthen employment verification through structured leadership collaboration, expanded use of allowable alternative verification methods, and centralized oversight to improve the accuracy, timeliness, and consistency of employment outcome documentation.

1. Leadership Focus Group and Peer Technical Assistance

CareerSource Polk will convene a leadership focus group comprised of representatives from high-performing and similarly sized Local Workforce Development Boards, as identified by FloridaCommerce and CareerSource Florida. It is our hope that this focus group will support CareerSource Polk through guided discussions, technical assistance, and peer review to inform proposed enhancements to employment verification policy, procedure, and operations.

The focus group will:

- Share effective and scalable employment verification practices
- Provide technical assistance related to alternative verification data sources
- Conduct pre-implementation reviews of proposed policy and procedural changes
- Support alignment with statewide performance and compliance expectations

Focus group recommendations will be documented and incorporated into final policy and procedure updates.

2. Explore Partnerships and Memoranda of Understanding (MOUs) for Data Sharing

Informed by focus group input, CareerSource Polk will explore partnerships and MOUs, where permissible, with local governments, large employers, chambers of commerce, and educational institutions to support employment verification efforts.

3. Expand Use of Alternative Employment Verification Resources

- State wage data (where permissible)
- SUNtax
- Professional licensing directories
- Employer verification forms
- Public employment platforms (supplemental use)
- Pilot follow-up incentives when all other efforts fail

4. Centralize Employment Verification Functions

Based on focus group recommendations and operational feasibility, CareerSource Polk will assess and implement a centralized employment verification approach, such as a dedicated verification unit or shared services model, to promote consistency, accountability, and timely documentation of employment outcomes.

5. Integrate Participant-Driven Employment Verification Tools

CareerSource Polk will enhance participant-driven verification methods through the use of secure, accessible digital tools, including:

- Secure document upload links
- Text-to-upload systems
- DocuSign or Adobe Sign employer verification forms
- Follow-up exit surveys with incentives, when appropriate

Additionally, CareerSource Polk will prioritize engagement with training providers demonstrating strong post-training employment outcomes to support more efficient verification processes.

CareerSource Polk expects that these actions will strengthen employment verification processes, reduce reliance on a single data source, and support improved performance reporting and outcome validation across workforce programs.

5. Assessment and Career Planning Framework for Training and Co-Enrollment

A. Challenges Related to Suitability and Co-Enrollment

During PY2023–PY2024, some participants were not co-enrolled because they were informally assessed as having a low likelihood of completing program requirements. Without a structured process:

- Decisions were inconsistent
- Documentation varied
- Participants who could have benefitted from services were not fully engaged
- Performance outcomes were negatively impacted

B. Assessment and Career Planning Framework

CareerSource Polk will ensure that employed and unemployed adults and dislocated workers are provided an interview, evaluation, or assessment and career planning, consistent with 20 CFR 680.210 and state policy, to determine:

- Whether the individual is unlikely or unable to obtain or retain employment leading to economic self-sufficiency through career services alone; and
- Whether the individual has the skills, qualifications, and support, necessary to participate successfully in a specific training service, recognizing that lack of readiness for one training program does not preclude access to other training options, career services, or supportive services.

Supervisory review will be required for training determinations to ensure decisions are based on documented assessment results and aligned with state policy.

C. Documentation Standards for Training Determinations

CareerSource Polk will update local policies and procedures to clearly define documentation requirements supporting training determinations, including cases where training is deferred or redirected. Documentation will reflect:

- Assessment results and career planning discussions
- The specific training option evaluated
- Identified barriers or gaps related to that training option
- Recommended alternative services, training pathways, or supportive services

Documentation will emphasize that a determination related to one training option does not constitute a determination of ineligibility for all training or workforce services.

D. Readiness and Service Pathway Prior to Training Decisions

CareerSource Polk will implement structured service pathways that may be used, as appropriate, to support participant readiness prior to or concurrent with training, including:

- Career services and individualized career planning
- Supportive services to mitigate participation barriers
- Foundational or short-term skill development activities

- Referrals to alternative training programs better aligned with current readiness levels

These pathways will support participant success while maintaining access to services consistent with WIOA and state policy.

E. Monitoring, Training and Continuous Improvement

CareerSource Polk will:

- Review updated state policies and guidance and align all related local policies and procedures accordingly
- Provide staff training on revised assessment, documentation, and career planning requirements
- Conduct periodic file reviews and trend analysis to ensure compliance, consistency, and equitable access to services

6. Youth Credential Attainment Improvement Strategy

CareerSource Polk will implement a comprehensive, state-aligned strategy to improve WIOA Youth credential attainment outcomes through enhanced provider engagement, data tracking, case management, and staff development.

A. Internal Policy and Procedure Alignment Review

CareerSource Polk will conduct an internal review of existing local policies and procedures related to WIOA Youth services to ensure alignment with current State Workforce Policies, including but not limited to:

- P95-WIOA-Youth-Eligibility-Service-Provider-Selection-Policy
- Youth eligibility, service strategy development, credential attainment, and follow-up requirements
- Training provider selection and performance monitoring standards

Any necessary updates to local policies, procedures, and staff guidance will be completed and implemented based on this review.

B. Leadership Focus Group Engagement

Youth credential attainment will be included as a dedicated topic within the leadership focus group referenced in Section 4B. The focus group, consisting of high-performing and similarly sized Local Workforce Development Boards as identified by FloridaCommerce and CareerSource Florida, will provide:

- Peer best practices related to youth credential attainment and re-engagement strategies
- Technical assistance on effective training provider partnerships
- Pre-review of proposed procedural or operational enhancements impacting youth services

Feedback and recommendations from the focus group will be documented and incorporated into final implementation strategies.

C. Operational Enhancements to Support Credential Attainment

In alignment with updated state policies and focus group guidance, CareerSource Polk will:

- Strengthen relationships with youth training providers demonstrating strong credential and employment outcomes
- Implement a credential tracking dashboard to monitor progress, completions, and barriers in real time
- Increase case management frequency for youth participants approaching credential milestones
- Utilize targeted re-engagement strategies for youth who disengage prior to credential completion

- Provide staff training focused on credential tracking, documentation requirements, and youth engagement best practices

7. Performance Monitoring, Reporting, and Continuous Improvement

CareerSource Polk will implement a structured performance monitoring and reporting framework to support continuous improvement, accountability, and alignment with state guidance.

A. Ongoing Performance Review and Quality Assurance

CareerSource Polk will:

- Conduct monthly performance review meetings to assess progress against performance measures
- Complete quarterly audits to evaluate data integrity, documentation, and policy adherence
- Monitor performance trends, emerging challenges, and corrective actions taken

Findings will be documented and used to inform operational adjustments and improvement strategies.

B. Quarterly Reporting to FloridaCommerce and CareerSource Florida

CareerSource Polk will submit a quarterly written progress report to FloridaCommerce and CareerSource Florida that includes:

- Summary of corrective actions implemented
- Performance trends and progress toward improvement goals
- Identified challenges and mitigation strategies
- Status of audits, reviews, and monitoring activities.

C. Staff Training with State Review and Approval

CareerSource Polk will provide staff training aligned with approved corrective actions and updated state policies. Documented approval from CareerSource Florida and/or FloridaCommerce will be obtained prior to the delivery of any staff training associated with this Performance Improvement Plan to ensure consistency with statewide guidance and expectations.

Training content will be adjusted as necessary based on state feedback prior to implementation.