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**Policy/procedure
 Number:
 WIOA-ADDW-01**

Title:	Adult and Dislocated Worker Program Local Operating Procedure		
Program:	WIOA		
Effective Date:	June 12, 2025	Revised Date:	
Approval:			

I. PURPOSE

The purpose of this Local Operating Procedure (LOP) is to provide CareerSource Southwest Florida (CSSWF) the framework and design of the Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated Workers program.

Staff should use this as a guide to provide clarity, information, and resources, which can enhance and improve service delivery and performance. This document is a living document that will be updated and expanded regularly. An emphasis will be placed on highlighting best practices.

II. BACKGROUND

The Workforce Innovation and Opportunity Act (WIOA) establishes a framework to build a comprehensive, high-performing workforce system that is accessible, integrated, and responsive to the needs of both job seekers and employers. The Act emphasizes a customer-centered approach that supports career pathways, sector strategies, and the alignment of workforce, education, and economic development systems.

The WIOA Adult and Dislocated Worker (AD/DW) programs are designed to provide eligible individuals with access to employment, education, training, and supportive services needed to succeed in the labor market. These services are delivered through the CareerSource Southwest Florida one-stop system, which serves as the primary access point for program participation.

CSSWF, in collaboration with local employers, economic development partners, training providers, and community organizations, delivers a full range of services—from basic career services to individualized and training services. These efforts ensure that participants are connected to high-demand occupations through career pathways that lead to self-sufficiency. The local system also prioritizes strategies that promote work-based learning, including on-the-job training, customized training, and apprenticeships, to address current and projected skills gaps in the regional economy.

III. POLICIES AND PROCEDURES

A. WIOA REGISTRATION

The Workforce Innovation and Opportunity Act (WIOA) addresses an important distinction between registration and participation. Individuals who are primarily seeking information are not treated as participants, and their self-service or information search requires no registration. When an individual seeks more than minimal assistance from staff in taking the next step towards self-sufficient employment, the person must be registered, and eligibility must be determined.

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

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

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

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

Equal Opportunity data (data on race and ethnicity, age, sex, and disability) must be collected on every individual who is interested in receiving WIOA services. Disability information must be maintained apart from any other information regarding the individual. This must be accomplished by creating a separate file to store disability information, when applicable.

B. TYPES OF SERVICES FOR ADULTS AND DISLOCATED WORKERS

WIOA merges Core and Intensive services into one category – "Career Services."

WIOA removes the sequence of service requirements established under WIA. Under WIA, participants were required to undergo a sequence of Core and Intensive services to receive training. WIOA clarifies that there is no sequence of service requirements to receive training. However, proposed §680.220 states that, at minimum, to be eligible for training, an individual must receive either an interview, evaluation, or assessment and career planning or any other method through which the one-stop operator/partner can obtain enough information to make an eligibility determination for training services. Where appropriate, a recent interview, evaluation, or assessment conducted within the last 60 days may be used for the assessment purpose.

C. CAREER SERVICES:

There are three types of "career services": basic career services, individualized career services, and follow-up services. These services can be provided in any order; there is no sequence requirement for these services. Career services under this approach provides flexibility to target services to the needs of the customer. The three categories of career services are defined as follows:

Basic Career Services - Basic career services are available to all job seekers and are a foundational component of the workforce system. These services are offered universally and do not require intensive staff involvement. Basic career services may be provided to individuals enrolled in the WIOA Adult, Dislocated Worker, and Wagner-Peyser programs.

Basic career services fall into two general categories:

- **Information-Only Services or Activities:** These services provide readily available information and do not involve staff assessment of an individual's skills, education, or career goals.
- **Self-Service:** Services accessed independently by individuals, without staff assistance. These may be accessed on-site, such as in a career center resource room, or remotely through electronic platforms.

The following basic career services must be made available at a minimum:

1. **Eligibility Determinations and Outreach**
 - a. Program eligibility determinations for WIOA programs
 - b. Outreach and intake, including identification through the state's Worker Profiling and Reemployment Services (WPRS) system for Reemployment Assistance (RA) claimants likely to exhaust benefits
 - c. Orientation to available services within the one-stop delivery system
 - d. Individuals seeking assistance under the Temporary Assistance for Needy Families (TANF) program must be provided an opportunity to initiate an application for TANF assistance, including non-assistance benefits
2. **Initial Assessment**
 - a. Evaluation of skill levels, including literacy, numeracy, and English language proficiency
 - b. Assessment of aptitudes, abilities (including skills gaps), and supportive service needs
3. **Labor Exchange Services**
 - a. Job search and placement assistance
 - b. Career counseling when needed, including:
 - i. Information on in-demand industry sectors and occupations
 - ii. Information on nontraditional employment opportunities
 - iii. Access to career profiles and interest inventories
4. **Referrals and Coordination**
 - a. Referrals to, and coordination with, other appropriate programs and services
5. **Labor Market Information (LMI)**
 - a. Job vacancy listings in local labor market areas
 - b. Information on job skills required for listed vacancies
 - c. Data on in-demand occupations, earnings potential, skill requirements, and advancement opportunities
6. **Training Provider and Service Information**
 - a. Performance and cost information for eligible training providers, by program and provider type
 - b. Information on workforce services and performance by program and provider
7. **Local Area Performance Information**
 - a. Details on local area performance outcomes and accountability measures
 - b. Additional information regarding CareerSource Southwest Florida's performance metrics
8. **Supportive Services Information**
 - a. Information and appropriate referrals for supportive services and assistance
9. **Financial Aid Assistance**

- a. Support in establishing eligibility for financial aid for education and training not funded by WIOA

10. **Reemployment Assistance (RA) Claim Filing Assistance**

Provision of information and support to individuals filing RA claims, including:

- a. *Meaningful Assistance*: Only merit staff may provide direct assistance impacting RA eligibility. Career center staff may accept claim-related information but may not provide guidance that affects eligibility.
- b. *Dedicated Access*: Career centers must offer direct phone lines or remote access technology specifically for RA claim support. General call center referrals are not sufficient.
- c. *Funding Sources*: Costs associated with providing meaningful RA claim assistance may be charged to the RA program, WIOA Adult/DW, Wagner-Peyser, or a combination thereof.

Note: Provision of "meaningful assistance" during RA claim filing constitutes WIOA participation and must be documented accordingly.

Individualized Career Services - Individualized career services are designed to address specific barriers and employment needs identified through staff assessment. These services involve significant staff involvement and are tailored to support a participant's successful entry or reentry into the workforce. Individualized services are available to eligible WIOA Adult and Dislocated Worker participants and are provided based on the determination that such services are necessary. Individualized career services go beyond basic services and require active staff engagement. These services include, but are not limited to:

- Comprehensive and specialized assessments of the skill levels and service needs (e.g., diagnostic testing, in-depth interviewing and evaluation)
- Development and implementation of an Individual Employment Plan (IEP)
- Career Counseling, which involves two or more participants
- Individual counseling
- Career planning (e.g. case management, see WIOA sec 3(8))
- Short-term pre-vocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services
- Internships and work experiences (including transitional jobs)
- Workforce preparation activities
- Financial literacy services as described in WIOA sec 129(b)(2)(D) and 20 CFR part 681.500
- Out of area job search assistance and relocation assistance
- English language acquisition and integrated education and training programs pursuant to 20 CFR 680.200(j)

Individualized career services trigger and extend participation. The service codes can only be recorded with the knowledge and current agreement of the participant.

Objective Assessment Summary (OAS)

The Objective Assessment Summary (OAS) is a documented evaluation of the participant's academic and occupational skills, career interests, personal and developmental needs. It is a critical tool used by staff and participants to inform service planning.

The OAS must include:

- Prior work experience and transferable skills
- Academic history and basic skill levels
- Aptitudes and interests (for both traditional and nontraditional careers)

- Work readiness, barriers to employment, and support service needs

Requirements:

- The OAS must be completed using the wizard in Employ Florida.
- If the system is temporarily unavailable, staff may use an alternate assessment tool that captures equivalent information. The system must be updated within **3 calendar days**.
- Staff must review the OAS results with the participant to ensure accuracy.
- If an existing OAS is available and completed within the past six months, it does not need to be duplicated. Staff should collaborate with partner programs to update and maintain a shared OAS, as appropriate.

Individual Employment Plan (IEP)

The Individual Employment Plan (IEP) is a jointly developed strategy between staff and the participant that identifies career goals and outlines the necessary services and steps to achieve those goals.

IEP Requirements:

- Must include at least one **short-term goal** (less than one year) and one **long-term goal** (one year or more).
- Must address barriers to employment and strategies to overcome them.
- Must be developed using the Employ Florida IEP/Service Strategy wizard.
- If the system is unavailable, a locally developed form may be used, with a requirement to enter the data into Employ Florida within **3 calendar days**.
- Must be signed by both the participant and the staff and retained in the case file. A copy must also be provided to the participant.
- Coordination with partner programs is required when participants have existing or shared IEPs to avoid service duplication and ensure a collaborative approach.

Refer to the *Virtual OneStop® User Guide for Staff, Section 4: Individuals - Case Management* for step-by-step instructions.

Statutory Priority of Service for Adult Funds

CareerSource Southwest Florida must adhere to WIOA’s **statutory priority of service** when providing individualized career services and training under the WIOA Adult program. The following individuals must be prioritized:

1. **Recipients of Public Assistance**
2. **Low-Income Individuals**
3. **Individuals who are Basic Skills Deficient**, including English language learners

Priority must be applied at all times, regardless of available funding.

Veterans and Eligible Spouses

In accordance with the Jobs for Veterans Act (38 USC 4215) and 20 CFR §1010.200:

- Veterans and eligible spouses must be given priority of service over non-covered individuals for all USDOL-funded programs.
- Eligible separating service members who meet dislocated worker criteria must be prioritized for individualized and training services under the Dislocated Worker program.

Employment Status Clarification

To ensure that CareerSource Southwest Florida (CSSWF) staff can appropriately identify and serve individuals who are considered **underemployed**, in alignment with TEGL 19-16 and WIOA guidance.

Definition of Underemployment:

Underemployed individuals may qualify for WIOA Adult or Dislocated Worker services if they meet one or more of the following criteria:

1. **Employed Less Than Full-Time**
 - Individuals working part-time but seeking full-time employment.
2. **Employment Inadequate Relative to Skills/Training**
 - Individuals employed in a position that does not utilize their education, training, or prior occupational experience.
3. **Low-Income Employed Individuals**
 - Individuals employed but meeting the low-income definition under WIOA Section 3(36).
4. **Earnings Significantly Lower Than Prior Job**
 - Individuals employed, but earning significantly less than they did in their previous job.

Bridge or Maintenance Employment for Dislocated Workers:

Dislocated Workers who have obtained part-time, bridge, or income maintenance employment after losing a full-time job may still qualify for WIOA Dislocated Worker services based on local policy. Staff must assess eligibility based on documentation of job separation and income loss, and services must be aligned with reemployment goals outlined in the IEP.

Supportive Services and Needs-Related Payments**Eligibility:**

Supportive services may be provided to WIOA Adult or Dislocated Worker participants who:

- Are actively participating in career or training services, and
- Are unable to obtain similar services through other programs or community resources, and
- Have a documented need for such services within their IEP (Individual Employment Plan) or ISS (Individual Service Strategy).

Key Guidelines:

- Supportive services must be reasonable and necessary to facilitate participation in services.
- Participants must be enrolled in WIOA Adult or Dislocated Worker programs; supportive services cannot be provided during the follow-up phase.
- Staff must document:
 - The participant's need
 - The coordination with other community resources
 - The supportive service provided
 - The linkage to a career or training activity

Examples of Supportive Services May Include:

- Transportation assistance
- Childcare
- Uniforms or work-related tools
- Testing fees
- Housing or utility assistance (when allowable and necessary)

Work-Based Learning and Training**Work-Based Learning Activities Include:**

- Internships and Work Experience
- Pre-Apprenticeship Programs
- Transitional Jobs

These activities are classified as Individualized Career Services and are intended to provide participants with exposure to workplace environments, build experience, and address barriers to employment.

Work-Based Training Activities Include:

- On-the-Job Training (OJT)
- Customized Training
- Incumbent Worker Training (IWT)
- Registered Apprenticeships

These are classified as Training Services and must be aligned with local labor market demand and employer engagement strategies.

Implementation Requirements:

- All work-based activities must be supported by an IEP.
- Activities must align with regional economic development goals and sector strategies.
- Staff must follow all documentation and reporting requirements per EF and state guidance.

D. TRAINING SERVICES

CareerSource Southwest Florida (CSSWF) may provide training services to eligible WIOA Adult and Dislocated Worker participants, in accordance with federal and state guidance.

Eligibility for Training Services:

LWDB staff may authorize training services following an interview, evaluation, or assessment and career planning. Participants must meet all of the following criteria:

- 1. Need for Training to Achieve Economic Self-Sufficiency**
 - The individual is unlikely to obtain or retain employment leading to self-sufficiency (or wages comparable to previous employment) through career services alone.
 - The individual requires training to obtain or retain suitable employment and possesses the skills and qualifications to participate successfully in the selected training.
- 2. Lack of Sufficient Grant Assistance**
 - The individual is unable to secure funding for training through other sources (e.g., Pell Grants, state-funded resources), or requires WIOA funding in addition to other available financial aid.
- 3. Pending TAA Petition**
 - If the participant is part of a worker group covered under a TAA petition, they may begin WIOA-funded training while awaiting determination.
 - If certified, the participant transitions to TAA; if denied, WIOA training may continue.
- 4. Statutory Priority (Adult Program Only)**
 - If using WIOA Adult formula funds, the participant must meet the priority of service criteria per WIOA Section 3(36).
- 5. Training Must Align with Local Labor Market Demand**
 - The selected training must be linked to employment opportunities in the local area or an area to which the participant is willing to relocate or commute.

Additional Requirements:

- Training services must be documented in the participant's Individual Employment Plan (IEP).
- Training must be provided through an Individual Training Account (ITA) or through a training contract, as appropriate.
- Except as provided in WIOA Sec. 122(h) and 20 CFR 680.320, training must be delivered by an Eligible Training Provider (ETP) listed on the Eligible Training Provider List (ETPL).

Training Expenditure Requirements:

- Per F.S. § 445.003(3)(a)(1), at least 50% of WIOA Adult and Dislocated Worker formula funds must be used on training services.
- A waiver maybe requested. Refer to Administrative Policy 074 for waiver procedures and documentation requirements.

Training Contracts and Templates:

- CSSWF must use the standardized training contract template provided by FloridaCommerce.
- Template language may not be altered. Any additional terms must be added via a locally developed addendum, subject to compliance monitoring.
- Failure to use the approved template may result in corrective action.

E. FOLLOW-UP SERVICES

To ensure participants who have exited the WIOA Adult or Dislocated Worker program into unsubsidized employment receive continued support for up to 12 months, based on individual need.

Eligibility and Timing:

- Follow-up services are provided only after program exit; individuals still receiving WIOA services are not eligible for follow-up.
- Services may begin immediately after placement into unsubsidized employment if no additional services are anticipated.
- LWDB staff must initiate follow-up within the first quarter after exit, or as soon as exit information becomes available.

Allowable Follow-Up Services:

Services must be participant-centered and go beyond simple contact attempts. Examples include:

- Career counseling and guidance
- Assistance resolving workplace issues
- Referrals to community resources
- Information on employment advancement opportunities
- Supportive peer group engagement
- Help obtaining additional training or credentials

Documentation Requirements:

- All follow-up services must be recorded using the appropriate "F-code" in the Employ Florida Service Code Guide for Jobseeker Services.
- A case note must be entered:
 - When follow-up services are refused by the participant
 - When the participant cannot be located
 - For each contact attempt and service provided during the follow-up period

F. NONDISCRIMINATION

To ensure equal access to services for all individuals and compliance with Section 188 of the Workforce Innovation and Opportunity Act (WIOA), which prohibits discrimination in any WIOA Title I-financially assisted program or activity.

Discrimination is prohibited based on:

- Race
- Color
- Religion

- Sex
- National origin
- Age
- Disability
- Political affiliation or belief
- Citizenship or immigration status (for WIOA beneficiaries, applicants, and participants only)

This protection extends to all individuals who apply to, participate in, or come into contact with WIOA Title I-funded programs or services—including those delivered by required or additional one-stop partners.

Implementation:

CSSWF incorporates nondiscrimination strategies into its four-year Local Workforce Development Plan and local operating policies. These strategies are aligned with the goals of the Florida WIOA State Plan and are designed to ensure equitable access and participation.

G. CO-ENROLLMENT

Co-enrollment promotes coordinated service delivery and maximize the effectiveness of WIOA-funded programs through co-enrollment in multiple core programs.

Eligible individuals may be co-enrolled in the following programs to ensure comprehensive service delivery:

- WIOA Adult and Dislocated Worker programs
- WIOA Youth program
- Adult Education and Family Literacy Act (AEFLA)
- Vocational Rehabilitation (VR)
- Trade Adjustment Assistance (TAA)
- Other partner programs as applicable

Guidelines for Co-Enrollment:

- Staff must assess individual needs, occupational goals, work readiness, and service requirements when determining appropriate program co-enrollment.
- Co-enrolled participants must have distinct and non-duplicative services across programs, clearly documented in Employ Florida.
- Funding sources must be tracked to avoid duplication.
- Use career pathway planning and integrated service strategies to coordinate services between programs.

Examples of Enhanced Coordination:

- Referring 18–24-year-olds to the Youth program for intensive support under WIOA Sec. 129(c)(2)
- Using Adult program-funded ITAs for co-enrolled Youth to support career pathway development
- Leveraging work-based training opportunities (e.g., OJT, internships) across programs

Coordination with Key Programs

WIOA Youth Program

- Participants aged 18–24 may be eligible for both WIOA Youth and Adult programs.
- Staff must determine the most appropriate enrollment based on assessments of occupational skills, employability, and support needs.

- Objective assessments under WIOA Youth (Sec. 129) do not trigger participation in performance calculations, whereas Adult/DW assessments do.
- Coordinate services and funding documentation to ensure effective service delivery without duplication.

Trade Adjustment Assistance (TAA)

- LWDBs must continue serving workers in TAA-certified groups issued prior to July 1, 2022.
- These individuals may be concurrently eligible for Dislocated Worker services.

Reemployment Services and Eligibility Assessment (RESEA)

- RESEA participants identified as unlikely to return to their previous occupation or industry (based on declining status) may be eligible for WIOA Dislocated Worker services.
- Staff should assess eligibility and document referral and enrollment actions accordingly.

H. TIMELY AND ACCURATE DATA ENTRY

To maintain accurate and timely reporting for federal performance accountability and ensure program compliance.

- Data must be entered into Employ Florida no later than 3 calendar days after a service is provided.
- Best practice: Enter service data on the same day the service occurs.
- Service entry must reflect the actual date of service and align with the service code definitions in the *Employ Florida Service Code Guide for Jobseeker Services*.
- Demographic, service, and outcome data are included in FloridaCommerce's quarterly reports to USDOL. Inaccurate or late entries may negatively affect local performance.

I. REFERENCES

The following federal laws, regulations, and state policies provide the foundational guidance for the implementation of WIOA Adult and Dislocated Worker Programs and must be consulted to ensure compliance and consistency:

Federal Law and Guidance

- Workforce Innovation and Opportunity Act (WIOA) of 2014 – Public Law 113-128
- WIOA Section 3(36) – Definition of Low-Income Individuals
- WIOA Section 108 – Local Plan Requirements
- WIOA Section 122 – Eligible Training Provider Requirements
- WIOA Section 129 – Youth Program Elements
- WIOA Section 134 – Use of Funds for Employment and Training Activities
- WIOA Section 188 – Nondiscrimination Provisions
- 20 CFR Parts 676–681 – WIOA Final Rules
- 20 CFR Part 680 – Adult and Dislocated Worker Activities
- 20 CFR Part 681 – Youth Activities
- Training and Employment Guidance Letter (TEGL) 19-16 – Guidance on WIOA Adult, Dislocated Worker, and Youth Programs
- TEGL 13-21 – TAA and WIOA Dislocated Worker Co-Enrollment
- Unemployment Insurance Program Letter (UIPL) 20-15 – Meaningful Assistance for RA Claimants

Florida Administrative Policies (FloridaCommerce)

- Administrative Policy 074 – Individual Training Account Expenditure Requirements and Waiver Request Process
- Administrative Policy 100 – Work-Based Training and Work-Based Learning Opportunities
- Administrative Policy 105 – Priority of Service for WIOA Adult Program

- Administrative Policy 109 – Supportive Services and Needs-Related Payments
- Administrative Policy 111 – Priority of Service for Veterans and Eligible Spouses
- Administrative Policy 116 – Trade Adjustment Assistance and WIOA DW Co-Enrollment

CareerSource Florida Board Policies

- Policy 2021.12.09.A.1 – Comprehensive Employment, Education, and Training Strategy

Other State and Program Resources

- Employ Florida Service Code Guide for Jobseeker Services – Required reference for accurate service coding and documentation
- Virtual OneStop® User Guide for Staff – Instructions for using the IEP, OAS, and other case management tools in Employ Florida
- Florida WIOA Unified State Plan – Outlines state-level workforce development goals and strategies

Record of Change

Date of Change	Changes made
6/12/2025	Policy Implementation

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