



Executive Committee
College of Central Florida
Enterprise Center, Suite 206
Ocala, FL

AGENDA

Wednesday, August 28, 2019 – 9:30 a.m.

Call to Order		R. Riley
Roll Call		C. Schnettler
Approval of Minutes, June 5, 2019	Page 2 - 4	R. Riley

DISCUSSION ITEMS

DEO Policy Issuance/Impact on Operations	Page 5	K. Woodring
DEO Response to USDOL	Pages 6 - 7	R. Skinner
Changes to Meeting Agendas/Improvement Suggestions	Page 8	K. Woodring
FWDA 2020 Legislative Agenda	Pages 9 - 10	R. Skinner
Training Provider	Pages 11 - 12	R. Skinner
Workforce Issues that are Important to Our Community		R. Skinner

ACTION ITEMS

NAWB – Disaster Event Sponsorship	Pages 13	R. Skinner
Banking Services RFP	Pages 14 - 20	K. Woodring
2019/20 Budget	Pages 21 - 23	K. Woodring
Independent Monitoring Services RFP	Pages 24 - 38	R. Skinner
2018-2019 Experiential Learning Monitoring Initial Review	Pages 39 - 47	R. Skinner
Corrective Action Plan	Pages 48 - 60	R. Skinner

Executive Session

Organizational/Personnel Update	To Be Provided	R. Skinner
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PROJECT UPDATES

None

MATTERS FROM THE FLOOR

ADJOURNMENT

2019 – 2020 MEETING SCHEDULE

Business and Economic Development	Performance/Monitoring	Marketing/Outreach	Career Center	Executive	Full Board	
All committee meetings are held at the CF Ocala Campus, Enterprise Center, Room 206						
Thursday, 9:00 am	Tuesday, 9:00 am	Wednesday, 9:00 am	Thursday, 9:30 am	Wednesday, 9:30 am	Wednesday, 11:30 am	
8/22/2019	8/6/2019	8/21/2019	8/1/2019	8/28/2019	9/4/2019	CF Chiefland
11/7/2019	11/5/2019	11/13/2019	11/21/2019	12/4/2019	12/11/2019	MTC Ocala
2/6/2020	2/4/2020	2/12/2020	2/20/2020	3/4/2020	3/11/2020	CF Lecanto
5/14/2020	5/5/2020	5/13/2020	5/7/2020	5/27/2020	6/3/2020	CF Ocala

OUR VISION STATEMENT

To be recognized as the number one workforce resource in the state of Florida by providing meaningful and professional customer service that is reflected in the quality of our job candidates and employer services.



**CAREERSOURCE CITRUS LEVY MARION
Executive Committee**

MINUTES

DATE: June 5, 2019
PLACE: College Of Central Florida, Enterprise Center, Building 42, Ocala, FL
TIME: 9:30 a.m.

MEMBERS PRESENT

Albert Jones
Charles Harris
Fred Morgan
Kathy Judkins
Kimberly Baxley
Pete Beasley
Rachel Riley
Ted Knight

MEMBERS ABSENT

OTHER ATTENDEES

Kathleen Woodring, CSCLM
Brenda Chrisman, CSCLM
Dale French, CSCLM

Cira Schnettler, CSCLM
Robert Stermer, Attorney

CALL TO ORDER

The meeting was called to order by Rachel Riley, Chair, at 9:30 a.m.

ROLL CALL

Cira Schnettler called roll and a quorum was declared present.

APPROVAL OF MINUTES

Kathy Judkins made a motion to approve the minutes from the May 17, 2019 meeting.
Fred Morgan seconded the motion. Motion carried.

ACTION ITEMS

Form 990

Charles Harris made a motion to approve the 990. Al Jones seconded the motion.
Motion carried

2018/19 Budget to Expenditures

Kathleen Woodring noted there were no areas of concern. The final budget will reflect any areas that include funds to be carried forward.

Kathy Judkins approved the financial report. Al Jones seconded the motion. Motion carried.

2019/20 Budget

Kathleen Woodring advised the board that DEO funding levels have been received. The finance department has estimated that next year will track close to the current year. The only item projected to change is the carry forward estimation. Charles Harris approved the draft budget. Fred Morgan seconded the motion. Motion carried.

CEO Contract and Staff Increases PY2019-2020

Al Jones made a motion to accept the CEO Contract Review Committee's action; 4.5% salary increase for all staff and the amendment of section 4.2 of Rusty's contract to align with the current CLM leave policy. Kathy Judkins seconded the motion. Motion carried.

Joint Auditing Selection

Dale French reviewed the Joint Audit RFP Review. He highlighted the top three auditing firms that met the general requirements, had prior experience working with workforce boards, and proposed fees. All members reviewed the scoring matrices for the RFP respondents to determine the best selection.

Rusty Skinner stated that state law requires a change in the auditing company every 5 years and that the current auditing firm could not reapply.

Al Jones made a motion to approve Purvis, Gray, and Associates as the designated auditing firm for CareerSource CLM. Kathy Judkins seconded the motion. Motion carried.

Incumbent Worker Training – Policy Change

Dale French stated that the change in policy is being requested to utilize local Incumbent Worker training, as permitted under WIOA. In this training program wage guidelines are not an eligibility factor when a business requires the training to retain their workforce or avert layoff. All other eligibility criteria must be met for Incumbent Worker trainees (age, citizenship/right to work and compliance with Selective Service registration). Incumbent Worker training allows for the same levels and categories of cost reimbursements to assist businesses with training their employees as Employed Worker Training.

Charles Harris made note that the action item came before the Career Center committee, but due to a lack of a quorum it could not go to vote.

Charles Harris made a motion to approve the policy change. Al Jones seconded the motion. Motion Carried.

CDS Renewal

Ted Knight made a motion to extend the CDS contract for a third year and retain them for the 2019-2020 year. Kim Baxley seconded the motion. Motion carried.

TPMA Renewal

Dale French stated that TPMA has been integral in working with the management during the business refocusing and assisting with increasing employee satisfaction.

Rusty Skinner noted that the TPMA team suggested the 180 Skills program that will become instrumental in meeting the needs of community businesses and customers. Each year a scope of work is developed with the TPMA team and they provide quarterly reports of progress.

Fred Morgan made a motion to extend the TPMA contract a third year and retain them for the 2019-2020 year. Ted Knight seconded the motion. Motion carried.

Grant Nursing Application

Al Jones approved the Grant Professional School of Nursing as a provider for RN remediation classes. Kim Baxley seconded the motion. Motion carried.

Al Jones rejected the Grant Professional School of Nursing's application for approval of the Associate Degree Nursing program to be added to our local targeted occupation list. Kim Baxley seconded the motion. Motion carried.

Independent Monitoring Services RFP

Due to committee members wanting additional information regarding the RFP, Charles Harris made a motion to table the item and bring it back at the next executive committee meeting. The RFP is to be sent to the committee members for review. Ted Knight seconded the motion. Motion carried.

Automobile Usage

Al Jones made a motion to approve the automobile policy change with amendments to Section 1.d and Section 3. Kim Baxley seconded the motion. Motion carried.

Eckerd Contract Renewal

Kathleen Woodring applauded the Eckerd team for doing an outstanding job and consistently making quality contributions to the youth program.

Al Jones made a motion to approve the 2019-2020 Eckerd Connects contract. Fred Morgan seconded. Motion carried.

Outreach Position

Charles Harris made a motion to add the part-time outreach position to the staffing plan. Al Jones seconded. Motion carried.

DISCUSSION ITEMS

2019 – 2020 Plan of Services

Rusty Skinner reviewed the 2019-2020 Work Plan highlighting adjustments to the business services department, adding the 180 Skills web application to the program of services, tightening metrics, creating a position to handle experiential learning and apprenticeships, and the 2020 State of the Workforce Conference.

PROJECT UPDATES

Unrestricted Revenue Income

Brenda Chrisman provided a recap of the unrestricted revenue income streams and their annual results.

MATTERS FROM THE FLOOR

None

ADJOURNMENT

There being no further business, the meeting was adjourned at 10:53 a.m.

APPROVED:

DEO Policy Issuance and Impact on Operations

In response to the report issued by DOL/ETA to DEO regarding the specifics of actions and lack of oversight in regions 14 & 15, DEO is making some procedural changes.

On May 24, 2019, DEO issued 3 policies

099 – Job Orders and Placements

098 – Employer Services

096 – Job Seeker Registration

These policies are their attempt to put into place procedures that will deter the other 23 regions from falsifying job seeker registrations, referral to job openings, placements, and the actual assistance to business with posting a job order. All of these were items that region 14 & 15 did in order to increase their performance.

Changes that we have made to our procedures to be in compliance with these policies are:

- We are struggling with the requirement to use the full registration on all candidates who receive a staff service. The partial registration is especially helpful during hiring events, where multiple individuals want to be entered into our system quickly in order to benefit from the hiring event. This new policy requires a full registration before we provide a service. We are now encouraging a full registration, but have instances where we will use the short form, so that we don't lose the candidate. Both registrations include a new section where the customer marks whether or not they give us permission to create or revise their registration, along with the requirement to case note.
- We must have the full registration before we can refer a candidate to a job and we must have the candidate's permission to refer. This is documented with a case note.
- We now must have proof of an employer authorizing us to post their job. Proof is a completed job order form, e-mail from employer, or case note regarding phone conversation.
- DEO is now sending an automatic e-mail to employers when we take a placement in Employ Florida. Unfortunately, the e-mail is branded heavily with DEO and not the brand that employers recognize from the CareerSource system.

We have communicated our displeasure with the way in which the policies were presented and with how checking a box or case noting permission is not going to solve the issue, it just increases work at the front end.

We have also submitted an e-mail to DEO with 22 questions asking for clarification on the 3 policies. We have not yet received any clarification.

From: Dale French
Sent: Wednesday, July 17, 2019 7:49 AM
To: Rusty Skinner; Brenda Chrisman; Kathleen Woodring; Steven Litzinger
Subject: Fwd: Automated Communication to Employers Regarding Hires and Placements

FYI-

More measures being taken by DEO. Got this email from EF.

Dale French

----- Forwarded message -----

From: Employ Florida <systemalert@geosolinc.com>

Date: Jul 17, 2019 12:47 AM

Subject: Automated Communication to Employers Regarding Hires and Placements

To: Dale French <dfrench@careersourceclm.com>

Cc:

Thank you for being a valued business in the state of Florida and helping Florida's job seekers get back to work! The Department of Economic Opportunity appreciates your partnership and commitment to Florida's economy.

Records indicate the following position(s) have been hired for your job order(s) in Employ Florida:

Job Order #	Position Filled	Position Location	Hire Date
10966609	DVOP Employment Security Rep II: CG 56	Ocala	07/10/2019

IMPORTANT NOTE: If you did not authorize the posting of these position(s) in Employ Florida and/or if the position(s) were not hired, please contact the Department of Economic Opportunity Customer Information Center at 1-800-438-4128 or via email at CustomerInfoCenter@deo.myflorida.com.

You are receiving this email, because you are a registered member of Employ Florida, and you were selected as a recipient for an email from another member, staff, or an automated process. If you would like to unsubscribe to all emails from Employ Florida, [Click Here](#).

From: Rusty Skinner
Sent: Friday, July 12, 2019 10:46 AM
To: Dillard, Ruth (Ruth.Dillard@deo.myflorida.com)
Cc: Dennard, Michelle; Robin King (robinking@careersourcefv.com)
Subject: Follow up

I appreciated the call from Ms. Johnson on my email to Director Lawson. I thought that I would share with you the comments that I gave her and amplify somewhat.

First, while I am speaking for myself, I know of no other director who was not embarrassed, and even shamed, by the stories that emerged out of Tampa and St. Pete. We all want a system that we are proud of representing and have been eager of assist in identifying ways to better detect abuse. This is why receiving three policies, 97, 98 and 99, without any opportunity to provide input was so troubling.

When policies are issued simultaneously the fact that we are given 21 days to comment is a rather shallow opportunity. At the local level policies are reviewed by front line managers/supervisors as well as board staff to determine front line impact and insure that our direct service leaders have "buy-in." This becomes even more troublesome when the policies do not have a clear statement as to the problem that they are addressing and are issued without some form of highlighting the changes/additions to previous policies. I can't imagine that such drafts that indicate changes are not provided to the management review team at DEO. We ask for that same courtesy.

As to some specifics of the policies and your corrective action response to USDOL, I would offer the following thoughts.

- With regard to getting "permission of the job seeker", this is a normal business practice for us. We do not document it in case notes. What does that requirement solve? It increases the work for our front line staff, but nothing else. For the abuse that was documented, if someone is falsifying the actual services, falsely entering a case note is nothing that they will flinch at. What is needed is an objective validation. You included that in your response to USDOL saying that you would conduct random contacts of those served. That is the solution. Coupled with an analysis that takes into consideration memory lapse on the part of the jobseeker, it provides meaning full validation. A case note is only a box your monitors will check, rather than the type of qualitative review necessary to prevent future problems.
- Permission to list a job from the employer tracks the same as the above. More work for front line, a box for monitors to check and nothing else.
- With regard to the statement about board member conflicts in the USDOL response, leaving the room during the discussion/vote on an item seems unnecessary. Board member conflicts are recorded in our minutes, they are required to complete Form 8B provided by the Florida Commission on Ethics and that form is attached to the minutes. What is solved by them leaving the room? In my years I have never seen the presence of a board member as a deterrent to comments from other board members- favorably or unfavorably- about a matter.

Had I been provided the opportunity to comment on the three policies and discuss some of the larger issues I would have provided these comments and more so that the policies and approaches taken to provide meaningful oversight. I am sure that my colleagues would have offered meaningful options as well.

Sometimes I feel that the local system is not regarded as a partner, but a subject. I can assure you that while we may push for an approach that is different, we all want a system of integrity and top caliber service.

Thank you for your time and I hope that in the future my comments on reviewing documents can be considered.

Suggested Changes to Meeting Format

We have successfully focused on increasing participation/attendance at the committee meetings and the quarterly board meetings. This is a good sign for the operations of our business, gaining interested and invested board members who have a solid understanding of our business.

We have had the same agenda order for quite some time and wish to have each committee review and suggest any other changes that will be beneficial to sustaining board engagement.

We are suggesting the following change to greater engage communication between staff and the committee chairs. We will designate an upper level staff member to work with the committee chairs both in preparation for the meetings and for reporting committee activity to the full board. Following is our suggested enhancement.

Committee	Staff
Career Center Committee	Dale
Business & ED	Brenda
Performance/Monitoring	Dale
Marketing & Outreach	Kathleen
Executive	Rusty

- Basically on those committee meetings, designated staff will be the main support to the committee chair to discuss the action items and updates or to provide the segway to another staff if necessary. We usually note that on the agenda now, so that should happen pretty smoothly, this part really won't change.
- The designated staff will contact the committee chair prior to the meeting to see if they have any questions about the agenda items and to give any necessary briefings beforehand.
- Following the meeting, the designated staff member will summarize the highpoints of the meeting and provide this summary in writing to the Committee Chair for them to use to report out on the meeting to the full board.
- These committee reports will occur on the Board agenda after the approval of minutes. If the committee chair is absent at the Board meeting, then staff of that committee will step in and provide the summary. This will assist in giving background to business items, so that when we get to the consent agenda, board members are better briefed for the vote.

Should we have a new committee chair; the "staff" will assist through the first few meetings as needed for Robert's Rules.

Rusty and I will attend all of the meetings and will be able to step in if needed. This will continue to provide the focus on our main lines of business.

Florida Workforce Development Association

Florida 2020 Legislative Agenda

1. Continued Apprenticeship Expansion (Marcie and Pam)

The 2019 Legislature took bold steps to increase workforce competitiveness with changes to FS 446 to expand Apprenticeship Training. We believe additional changes would continue that expansion and would be in line with Gubernatorial and legislative intent. These changes are :

- a. Have pre-apprentices covered by state worker compensation coverage similar to that which is provided to work experience participants. This would be for High School Juniors and Seniors
- b. Allow Bright Futures scholarships to be used to fund apprenticeships and career and technical education.
- c. Eliminate tuition and fee exemption for students in Apprenticeship programs in school districts, or colleges or university degree seeking or career certificate programs. Exemption currently exists in FSS 1009.25.
- d. Allow prior learning to substitute for up to 1000 hours of OJT as allowed in federal law.
- e. Industry Recognized Apprenticeship Programs are a recent expansion of the path to apprenticeships by the US Department of Labor. We recommend no further restrictions at the state legislative or administrative level. Please allow all the flexibility allowed under the new rules from the US Department of Labor.
- f. Move all marketing and program development to the CareerSource system;
- g. Establish simple process for local Workforce Investment Boards to serve as Sponsoring Agents

2. Support full use of the Sadowski Act funding for affordable housing benefiting employers, the workforce and seniors. (Richard)

Lack of affordable housing has now been identified as a major barrier to attracting and retaining our workforce. The ALICE report shows that a significant number of households young and old are cost burdened in securing housing. We recommend full funding of the Sadowski Act for the purposes of affordable housing.

3. Workforce funding from General Revenue/Florida Business Competitiveness Fund. (Mason- I'll reduce this narrative. Just wanted to get it on paper)

Restrictions placed on federal dollars often hamper creativity and nimbleness when trying to respond to the training needs of businesses. We would like a source of non-federal dollars to augment federal dollars for use in creative ways. For example, when using our workforce funding for Apprenticeships, we are limited to WIOA eligibility requirements which directs the funds to people with barriers to employment. This limits our capability to help many businesses. If you are a student living with your parents and going to school, you are usually under their income requirements. Using Florida's Workforce Competitiveness Funds for Apprenticeship and Pre-Apprenticeship and other work based learning strategies such as internships and customized training will open up a wide range of opportunities to help our businesses that otherwise wouldn't be available.

We also support using part of the Re-employment Insurance program trust fund to support training when the economy produces trust fund surpluses. Employers pay into the fund and employers should benefit when the funds has more than is needed for emergencies. Since the fund is used to mitigate the effects of unemployment on workers, it would seem logical to benefit businesses by using the money to increase the skills of their workforce to avoid layoffs and stay competitive. The allocations would decline when unemployment increased and there was a need for funds for Re-employment assistance.

4. Establish CareerSource as the single source of talent for Florida state agencies. (Rusty)

The CareerSource network should be the single source for a wide range of talent within Florida. It should connect with graduates from our High Schools, State College and State University Systems. Separate systems should not be developed within other state departments. This would also improve the career links for all graduates of our educational system. It would also improve coordination and reduction of unnecessary duplication.

5. Maintain Temporary Assistance for Needy Families workforce allocations for the local workforce system. (Need volunteer for this and we need statewide data research to support- Frank?)

Even though TANF caseloads continue to fall, the people who remain without jobs are the hardest to serve. They take the most intensive staff time in counseling and follow up and often require work experience, soft skills or occupational training to become employed.

Online Course Sources as Training Providers

Background

Federal law, WIOA, requires that training provider designation procedures be established by each state. CareerSource Florida in Administrative Policy 90 has established Florida's process requires training providers to utilize FETPIP to report their outcomes. Policy 90 also provides for "Other institutions", that is non-public educational institutions, to become licensed by the Commission for Independent Education.

The structure of the policy seems to be built around "brick and mortar" institutions that provide "training programs." Today's educational marketplace has gone digital with a number of educational course sources to be available for use by the local workforce system. Some states have incorporated online course providers into their training provider system, thereby allowing local workforce boards to offer and expanded educational certification ability to their eligible populations.

For WIOA youth, whose education often incorporates digital courses at the K-12 system level, as well as adults, this offers unique opportunities to increase their skills at times that are convenient. For those in rural areas, or other locations where local educational institutions cannot offer expanded skill courses because of the inability to garner enough students to make the training affordable to both the institution and the student, online courses offer expanded certifications and skills that enhance their students' abilities to seek employment.

With the recent emphasis on apprenticeships, especially IRAPs, online courses and certification provide new avenues to handle single employer and small employer education that accompanies their hands-on experiential learning. At the same time, they provide a platform that can transition into conventional classroom instruction, when the apprenticeship program has grown into a number of trainees that will justify this conventional approach.

Today we find many job seeking customers that enter our career centers lacking a limited number of specific skills that will qualify them for our current job openings. Employers, wishing to upgrade specific skills of their current workforce are also focused on accessing very specific skill courses, not programs of instruction, to allow their current workforce to advance within their companies.

These providers also offer these courses at extremely competitive rates. Some providers offer enrollment into their online system for as low as twenty-five dollars (\$25.00) per month and allow that enrollee access to unlimited skill courses. It is not inconceivable for an enrollee to earn a single certification/skill completion in four (4) months at a cost of approximately one hundred dollars (\$100.00)

Currently local workforce boards that utilize these online providers must do so by coding their customers as being in “pre-vocational training.” As such the cost of such courses is not treated as a training cost. It does not count towards meeting the Florida required training cost definition, nor does it qualify under WIOA for federal reporting purposes.

Proposed Solution

Florida can move its workforce training process into the 21st Century by revising Administrative Policy 90 to allow the following:

- Allow online course providers to become training providers
 - For individual courses that provide industry/employer required skills, if the total training is less than a two-year degree/certification program;
 - Local boards provide outcome data, by course, by provider through the training provider section of Employ Florida, allowing the state to consolidate and publish statewide performance information to all local workforce boards for review and inclusion into their local ETPL;
 - If the provider is licensed by any other state’s licensing system; or,
 - On the ETPL list of any state; or
 - The course is recognized by any industry, locally or nationally.



RECORD OF ACTION/APPROVAL

Executive Committee Meeting August 28, 2019

TOPIC/ISSUE:

Sponsorship of NAWB Workforce Disaster Conference

BACKGROUND:

NAWB is planning on hosting a conference in the Panama City area the first of January 2020 that will bring together workforce leaders throughout the US and its territories to discuss the workforce issues that they have experienced when a natural disaster substantially disrupts their communities. The hope of this conference is that NAWB will be able to assist, at the national level, with bringing both best practices and issues to Congress with the purpose of supporting legislation that will address concerns that affected the ability of the workforce system to fully respond.

CareerSource Florida is supporting the conference by assisting with facility costs and I will be asking FWDA to provide support for other related conference expenses,

POINTS OF CONSIDERATION:

As one of the regions that responded to support CS Gulf Coast, this will provide information on disaster responses and issues from other workforce areas that will enable us to be better prepared to respond to any future disasters.

STAFF RECOMMENDATIONS:

Request consideration/approval to support with \$5,000 from unrestricted funds and to provide staff support to assist with conference logistics.

COMMITTEE ACTION:

BOARD ACTION:



RECORD OF ACTION/APPROVAL

Executive Committee Meeting August 28, 2019

TOPIC/ISSUE:

Banking Services- Request for Proposal

BACKGROUND:

We were visited by representatives of Community Bank and Trust (CBT), our current bank, to advise us that they were merging with Mid-Florida Credit Union. The merger is expected to take place in early December 2019. The merger, which will bring CBT into Mid-Florida Credit Union, will affect our ability to continue to use them as our financial institution. We are required to use a financial institution that is a Qualified Public Funds Depositor. While banks can qualify, credit unions cannot. Therefore, effective the date of the merger we are prohibited from continuing our business relationship.

Because of our financial business relationship with Region 6, CareerSource North Florida, we have a mutual interest in selecting the bank that we both use.

POINTS OF CONSIDERATION:

Because of the logistics of switching banks, we should have a new bank approved by November 1, allowing us 30 days to transition.

STAFF RECOMMENDATIONS:

1. Authorize the issuance of a joint RFP with Region 6;
2. Authorize the Executive Committee, in conjunction with the Executive Committee of Region 6, to approve a new bank.
3. Ratification to be brought to the December Board meeting.

COMMITTEE ACTION:

BOARD ACTION:

**CITRUS LEVY MARION REGIONAL
WORKFORCE DEVELOPMENT BOARD, INC.
DBA CAREERSOURCE CITRUS LEVY
MARION**

REQUEST FOR PROPOSALS:

Professional Banking Services

Release Date: September 5, 2019

**PROPOSALS DUE – 4:00 P.M.,
Thursday, September 19, 2019**

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REQUEST FOR PROPOSAL AND STATEMENT OF QUALIFICATIONS FOR BANKING SERVICES

I. Banking Services Solicitation

CareerSource Citrus Levy Marion is releasing this Request for Proposals (RFP) with intent to secure professional banking services designed for government entities and non-profit agencies.

II. Procurement Information

- A. The Citrus Levy Marion Regional Workforce Development Board, Inc. dba CareerSource Citrus Levy Marion (CSCLM), located in Ocala, Florida, will accept proposals with Statements of Services from professional financial Institutions for banking services. **Interested firms should submit their proposal in hardcopy form per the guidelines in section VII no later than 4:00pm on Thursday, September 19, 2019.**
- B. Technical information regarding this request may be obtained from Susan Heller (352) 873-7939 ext. 1207, sheller@careersourceclm.com.
- C. The proposals will be evaluated by the CSCLM Executive Committee. The three highest rated institutions may be invited to make oral presentations. The Executive Committee will evaluate the institutions and make a final selection. Final selection will be made upon the approval by the Board of Directors after Committee selections.
- D. Both the Committee and Board reserve the right to reject any or all proposals and to select the institution which, in their judgment, best meets the needs of CareerSource Citrus Levy Marion.
- E. The tentative schedule for selection and award is shown in Appendix 1.
- F. The selection process contemplated by this request for proposals will result in the selection of a financial institution to provide banking services to CareerSource Citrus Levy Marion to include general business rules, financial processes and technology capabilities.

III. Statement of Organizational Purpose

The purpose of CareerSource Citrus Levy Marion is to establish programs to prepare youth, unskilled/economically disadvantaged adults, dislocated workers, employed workers, and long term unemployed individuals for entry into the labor force and to afford job training to those individuals facing serious barriers to

employment, and who are in special need of assistance to obtain productive employment. These efforts are executed using funds allocated through Florida's Department of Economic Opportunity from the Department of Labor.

IV. Services Sought:

- Provide an operating account with optimum interest rate
- Provide a line of credit with competitive interest rate
- Provide corporate credit cards
- Recommend other available services applicable to the purpose mentioned above such as ACH, Positive Pay, account transfers, stop payments, and account alerts

Other Required Information:

- A breakdown of interest rates by each type of service offered
- A breakdown of fees related to each type of service offered
- Details of fees and interests as they pertain to account balance thresholds

V. Period of Performance:

Use of services will begin on December 1, 2019 and will be evaluated on an annual basis which coincides with our fiscal year which runs from July 1 to June 30.

VI. Evaluation Criteria:

The Following will be used to evaluate the responses to this RFP:

1. The highest return on investment
2. The most competitive fees
3. Professional abilities of the organization

VII. Submissions and Review

Responses to this RFP should be addressed and mailed to:

CareerSource Citrus Levy Marion
ATTN: Dale French
3003 SW College Road - Suite 205
Ocala, FL 34474

Submissions must contain One (1) original hardcopy. Two (2) copies of the RFP must also be enclosed and may be in hardcopy or electronic format. Submissions are due no later than 4:00pm on Thursday, September 19, 2019 at the address stated above. Any responses received after 4:00pm will not be opened and will not be considered.

Review and Selection Information

1. This solicitation does NOT bind Citrus Levy Marion Regional Workforce Development Board to select any respondent. At its sole discretion, Citrus Levy Marion Regional Workforce Development Board may reject all responses.
2. Citrus Levy Marion Regional Workforce Development Board is not responsible for any costs associated with responding to this solicitation. Any respondent does so at their own expense.
3. The decision to select any provider will be made after a review of all information and facts submitted in response to this RFP. A decision will be made with interest yield potential and associated fees in consideration. This is a bid for banking services; therefore, the cost must be weighed against the professional abilities of the organization, and not take precedence over those characteristics.

VIII. Protest Procedures

Parties wishing to protest the recommendations of the Executive Committee should file a written protest within three business days of the Committee's action. Such protest should include the basis of the protest and any other pertinent material the party wishes to have considered as justification for its protest.

Letters of protest should be addressed to:

Rachel Riley, Chair
CareerSource Citrus Levy Marion
c/o CareerSource Citrus Levy Marion
3003 SW College Road, Suite 205
Ocala, FL 34474

Upon receipt of a protest, the Chairman will convene a meeting to hear the protest. The Chair will notify all parties involved in the protest of the time and place of the hearing. Any affected party will present, in writing at the time of filing a protest, a detailed response regarding the protest for consideration by the Board.

CareerSource Citrus Levy Marion and CareerSource North Florida are Equal Opportunity Employers/Program. Auxiliary aids and services are available upon request to individuals with disabilities using TTY/TDD equipment via the Florida Relay Service at 711. A proud member of the American Job Center Network.

Appendix 1

Tentative Schedule for Selection

Release RFP on Thursday, September 5, 2019

Proposals are due no later than Thursday, September 19, 2019 at 4:00pm

Workforce Staff reviews proposals by Friday, November 1, 2019

Executive Committee Review by Wednesday, December 4, 2019

Contract awarded by Thursday, December 12, 2019



RECORD OF ACTION/APPROVAL

Executive Committee – 8/28/19

TOPIC/ISSUE:

Updated 2019-2020 Budget (attachments)

BACKGROUND:

POINTS OF CONSIDERATION:

Budget was updated for carry forwards after prior year was closed.

STAFF RECOMMENDATIONS:

Approve updated budget for program year 2019.

COMMITTEE ACTION:

BOARD ACTION:

ATTACHMENT 1																						
BUDGET - CSCLM																						
PY 2019(JULY 2019 - JUNE 2020)																						
8/28/2019	ADULT	YOUTH	TAA	DISL. WORKER	Apprenticeship 1	Apprenticeship 2	SOFT SKILLS	SECTOR STRATEGIES	RURAL INITIATIVES	VOC REHAB	WAGNER PEYSER	VETERAN DVOP	UC	WTP	SNAP	FL Corrections	BRIDGE SKILLED	YOUTH BUILD	RWB 6	REA	UN- RESTR	TOTAL
REVENUE																						
P.Y. 2019 CONTRACTS	1,379,079	1,346,572	5,972	939,480	94,220	52,500	62,625	215,369	31,250	40,000	179,996	-	20,979	1,687,825	210,341	113,432	-	-	6,034	-	-	6,385,674
CARRYFORWARD	76,693	837,753	-	-	-	-	-	-	-	-	92,690	31,019	-	88,877	179,353	-	467,403	472,073	-	50,519	201,979	2,498,359
INCENTIVES/SUPPLEMENTAL	157,213	-	-	720,048	-	-	-	-	-	-	8,860	-	-	-	-	-	-	-	-	-	-	886,121
TRANSFER	810,000	-	-	(810,000)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL REVENUE	2,422,985	2,184,325	5,972	849,528	94,220	52,500	62,625	215,369	31,250	40,000	281,546	31,019	20,979	1,776,702	389,694	113,432	467,403	472,073	6,034	50,519	201,979	9,770,154
EXPENDITURES																						
TOTAL ITA	32%																					
TRAINING:																						
ITA %	31%																					
ITA/TRAINING	172,000	-	-	17,000	17,000	-	-	90,000	-	-	-	-	-	-	-	-	350,000	-	-	-	-	646,000
OJT	106,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	106,000
EMPLOYED WORKER	15,000	-	-	922	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	15,922
INTERNSHIPS	40,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40,000
ECKERD	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TRAINING STAFF	276,757	-	-	184,504	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	461,261
TOTAL TRAINING	609,757	-	-	202,426	17,000	-	-	90,000	-	-	-	-	-	-	-	-	350,000	-	-	-	-	1,269,183
OPERATING:																						
SUPPORTIVE SVS.	7,000	288,564	-	5,000	6,500	-	-	-	-	-	-	-	-	155,000	-	-	21,000	135,013	-	-	-	618,077
DIRECT CHARGE (STAFF)	-	-	-	-	-	-	46,900	-	-	13,973	-	-	9,650	391,820	110,552	56,900	-	-	-	18,500	-	648,295
ECKERD	15,000	679,391	-	11,145	-	-	-	-	-	-	-	-	-	-	-	-	-	69,036	-	-	-	774,572
DEO STAFF TRAVEL	-	-	-	-	-	-	-	-	-	-	7,000	2,000	-	-	-	-	-	-	-	-	-	9,000
OPERATING	-	40,000	-	-	49,000	40,000	-	50,000	12,220	-	120,000	3,500	-	-	-	750	-	-	-	-	-	315,470
TOTAL OPERATING	22,000	1,007,955	-	16,145	55,500	40,000	46,900	50,000	12,220	13,973	127,000	5,500	9,650	546,820	110,552	57,650	21,000	204,049	-	18,500	-	2,365,414
PROGRAM SUPPORT:																						
FACILITIES	53,074	104,184	218	26,391	-	-	9,233	10,397	-	4,362	56,054	16,067	7,125	55,037	14,904	-	-	3,126	6,034	5,235	-	371,443
PROGRAM	90,725	135,717	-	24,475	8,118	4,479	-	15,677	1,368	1,565	14,221	616	1,081	61,232	12,379	-	-	-	-	2,072	-	373,725
INFORMATION TECHNOLOGY	89,660	102,256	-	18,441	-	-	-	-	1,031	1,179	10,715	464	814	46,135	9,327	-	-	-	-	1,561	-	281,582
OUTREACH	76,200	86,905	-	15,672	-	-	-	-	876	1,002	9,106	394	692	39,209	7,927	-	-	-	-	1,327	-	239,310
BUSINESS	415,565	-	-	85,471	-	-	-	-	4,779	5,464	-	-	-	213,830	43,231	-	-	-	-	7,234	-	775,574
SELF SERVICES	266,632	-	-	54,839	-	-	-	-	3,066	3,506	-	-	-	137,197	27,737	-	-	-	-	4,642	-	497,619
CAREER SERVICES	313,429	-	-	71,949	-	-	-	-	4,023	4,600	-	-	-	180,001	36,391	36,391	-	-	-	6,090	-	652,874
TOTAL PROGRAM SUPPORT	1,305,286	429,062	218	297,238	8,118	4,479	9,233	26,073	15,143	21,677	90,097	17,542	9,712	732,640	151,897	36,391	-	3,126	6,034	28,159	-	3,192,126
TOTAL EXPENDITURES	1,937,043	1,437,017	218	515,809	80,618	44,479	56,133	166,073	27,363	35,650	217,097	23,042	19,362	1,279,460	262,449	94,041	371,000	207,175	6,034	46,659	-	6,826,723
ADMIN POOL	209,027	39,063	24	53,000	9,002	4,967	5,104	17,234	3,055	3,431	17,177	548	1,264	135,935	27,428	9,411	41,428	139	-	4,550	-	581,789
GENERAL POOL	55,902	10,447	7	14,174	2,408	1,328	1,365	4,609	817	918	4,594	147	338	36,354	7,335	2,517	11,079	37	-	1,217	-	155,592
TOTAL INDIRECT COST RATE	264,928	49,510	31	67,174	11,410	6,295	6,470	21,843	3,873	4,349	21,771	694	1,602	172,289	34,763	11,928	52,507	177	-	5,767	-	737,381
BALANCE	221,014	697,798	5,723	266,545	2,192	1,726	22	27,452	15	1	42,678	7,283	15	324,953	92,482	7,463	43,896	264,721	(0)	(1,908)	201,979	2,206,050
INDIRECT RATE CALCULATION																						
DIRECT TOTAL COSTS	1,937,043	1,437,017	218	515,809	80,618	44,479	56,133	166,073	27,363	35,650	217,097	23,042	19,362	1,279,460	262,449	94,041	371,000	207,175	-	46,659	-	6,820,689
LESS: LEASES	(26,697)	(62,614)	-	(15,992)	-	-	(5,549)	(6,248)	-	(2,622)	(33,688)	(9,656)	(4,282)	(33,077)	(8,957)	(5,200)	-	(1,879)	-	(3,146)	-	(219,607)
	(23,441)	(56,627)	-	(14,042)	-	-	(4,872)	(5,486)	-	(2,302)	(29,579)	(8,479)	(3,760)	(29,042)	(7,865)	(4,565)	-	-	-	(2,762)	-	(192,823)
SUBAWARD (ECKERDS)	(15,000)	(967,955)	-	(11,145)	-	-	-	-	-	-	-	-	-	-	-	-	-	(204,049)	-	-	-	(1,198,149)
TOTAL MTDC	1,871,904	349,822	218	474,630	80,618	44,479	45,712	154,339	27,363	30,727	153,829	4,907	11,320	1,217,341	245,627	84,276	371,000	1,247	-	40,751	-	5,210,110

ATTACHMENT 4				
FUNCTIONAL BUDGET				
PY 2019				
7/1/2019-6/30/2020				
Direct charge staff	648,295			
Supportive/Special Svs./Operating/DEO staff trv	518,970			
50% ITA	646,000			
OJT	106,000			
Training staff	461,261			
Internships	40,000			
Employed worker	15,922			
Eckerd contract	774,572			
Eckerd participant	423,577			
Carryforward	2,206,050			
Overhead	3,192,126			
Indirect Costs	<u>737,381</u>			
Total Budget	9,770,154	-		



RECORD OF ACTION/APPROVAL

Executive Committee Meeting - August 28, 2019 (Item tabled from June 5, 2019 meeting)

TOPIC/ISSUE:

Independent Monitoring Services RFP

BACKGROUND:

With recent developments in the CareerSource Tampa Bay and CareerSource Pinellas workforce areas we feel it is good business practice and pro-active to have a complete review of our internal processes and procedures conducted by an outside monitoring firm. This monitoring will include a review of our general business practices, organizational structure and authority, business services, service delivery and participant eligibility, support services administration and contracting and procurement. We will need to put forth a Request for Proposals (RFP) for competitive procurement of an outside monitoring firm to conduct these services. This firm will provide a full report of their review to the Executive Committee and Board. Our intent is to conduct ongoing reviews bi-annually and annually.

POINTS OF CONSIDERATION:

This RFP will solicit proposals for a new contractor. Costs for these services are not known at this time and will be negotiated with RFP respondents.

STAFF RECOMMENDATIONS:

Approve release of a Request for Proposals for Independent Monitoring Services.

COMMITTEE ACTION:

Executive Committee 6/5/19: Due to committee members wanting additional information regarding the RFP, Charles Harris made a motion to table the item and bring it back at the next executive committee meeting. The RFP is to be sent to the committee members for review. Ted Knight seconded the motion. Motion carried.

BOARD ACTION:

**CITRUS LEVY MARION REGIONAL
WORKFORCE DEVELOPMENT BOARD, INC.
DBA CAREERSOURCE CITRUS LEVY
MARION**

**REQUEST FOR PROPOSALS:
Independent Monitoring Services
AND
STATEMENT OF QUALIFICATIONS**

Release Date: June 13, 2019

**PROPOSALS DUE – 4:00 P.M.,
Friday, July 1, 2019**

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REQUEST FOR PROPOSAL AND STATEMENT OF QUALIFICATIONS FOR Monitoring SERVICES

I. Independent Monitoring Solicitation

CareerSource Citrus Levy Marion is releasing this Request for Proposals (RFP) with intent to secure a contract with an Independent Monitoring firm to complete a full independent monitoring of our programmatic processes and procedures encompassing all activities from center level activity to finance distribution.

II. Procurement Information

- A. The Citrus Levy Marion Regional Workforce Development Board, Inc. dba CareerSource Citrus Levy Marion (CSCLM), located in Ocala, Florida, will accept proposals with Statements of Qualifications from professional Independent Monitoring firms for Independent Monitoring services for up to four Independent Monitoring periods beginning with the fiscal period July 1, 2019 through June 30, 2020. The established contract may be renewed up to three additional years and all proposals should include Independent Monitoring costs for the additional periods ending: June 30, 2021, June 30, 2021 and June 30, 2022. **Interested firms should submit their proposal in the format described in Part IX by 4:00 p.m. local time, Friday, July 19, 2019 to CareerSource Citrus Levy Marion, ATTN: Dale French, 3003 SW College Road, Suite 205, Ocala, FL 34474**
- B. Technical information regarding this request may be obtained from Dale French, (352) 873-7939 ext. 2204, dfrench@careersourceclm.com.
- C. The proposals will be evaluated by the CSCLM Executive Committee. The three highest rated firms may be invited to make oral presentations. The Executive Committee will evaluate the firms and make a final selection. Contract awards will be made upon the approval by the Board of Directors after Committee selections. The criteria and assigned point values for scoring proposals are shown in Appendix 1.
- D. Both the Committee and Board reserve the right to reject any or all proposals and to select the firm which, in their judgment, best meets the needs of CareerSource Citrus Levy Marion.
- E. The tentative schedule for selection and award is shown in Appendix 2.
- F. The selection process contemplated by this request for proposals will result in the selection of a firm to Independent Monitoring the internal processes

- and procedures of CareerSource Citrus Levy Marion to include general business rules, financial processes and technology capabilities.
- G. This Independent Monitoring will be funded 100% through use of funds issued by the Department of Labor. The final amount of the funds used will be determined by the selected proposal.
 - H. CareerSource Citrus Levy Marion is budgeting \$40K-\$50K annually to secure these services.

III. Statement of Organizational Purpose

The purpose of CareerSource Citrus Levy Marion is to establish programs to prepare youth, unskilled/economically disadvantaged adults, dislocated workers, employed workers, and long term unemployed individuals for entry into the labor force and to afford job training to those individuals facing serious barriers to employment, and who are in special need of assistance to obtain productive employment. These efforts are executed using funds allocated through Florida's Department of Economic Opportunity from the Department of Labor.

IV. Contract Performance by the Independent Monitoring firm(s)

Initial Monitoring:

- Independent Monitoring services to include reviews of CareerSource Citrus Levy Marion programmatic procedures, and finance distribution and processes against findings and concerns contained in the US Department of Labor's report on CareerSource Pinellas and CareerSource Tampa Bay (copy available upon request).

On-going Monitoring to include:

- Financial transactions as they relate to programmatic activities to ensure compliance with all applicable State and Federal regulations as specified by the requirements of Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Independent Monitoring Requirements for Federal Awards (Uniform Guidance).
- All local programmatic policies and procedures to ensure compliance with applicable State and Federal guidelines as specified in Florida statute, the Workforce Innovation and Opportunity Act (WIOA), and the Wagner Peyser Act.
- General processes for documenting job seeker referrals and placements
- A random sample of work-based training agreements with local businesses executed in the prior two program years (for first independent monitoring). The review should include examination of the participant referral processes, contract provisions, participant eligibility, training plans, adherence to established training plans, payment issuances and follow up.

- A random sample of WIOA participants to ensure eligibility and analysis of services provided and need for services provided.
- Supportive service payment and tracking procedures for workforce program participants.
- Senior level staff salary composition and increase authority.
- Board composition, recruitment and nomination processes in relationship to requirements as established in the WIOA.
- Board member conflict of interest compliance.
- Organizational by-laws creation and adherence to requirements as established by the Consortium.
- Brevity of Committee and Board oversight of operations.
- Established internal firewalls for compliance and quality assurance.
- Sub-recipient/Contractor procurement compliance.
- Compliance with WIOA transparency and Sunshine provisions.
- Processes for Board member orientation and training.
- Local programmatic monitoring processes.
- Local Grievance Procedures and Equal Opportunity representation.

The Independent Monitoring should involve visits to the individual workforce centers and include interviews with frontline, mid- and senior- level staff. Independent Monitoring services must include an opinion as to whether local programmatic processes and procedures conform to applicable State and Federal regulations. The Independent Monitoring report must state whether the examination discloses instances of non-compliance with laws or regulations. The findings of non-compliance should identify which law or regulation has been violated. Any expenditure that is questioned or recommended for disallowance should be clearly identified and the reason(s) therefore indicated.

V. Independent Monitoring Objectives and Scope of Services

The objective of the Independent Monitoring is to provide an opinion on the efficiency and conformity of local operating procedures for all levels of program administration and operation.

The Independent Monitor or, as part of its Independent Monitoring services, will conduct a midyear review of all processes and procedures and determine if any prior documented inadequacies or findings reached resolution. The Independent Monitor will report to the Board of Directors as appropriate based upon its review.

The Independent Monitor will submit a Management Letter of Comments and Recommendations for improvement of program and financial management per the Independent Monitor's opinion after examining the Board's systems.

An electronic copy and one (1) hard copy of the Independent Monitoring report

shall be submitted to CareerSource Citrus Levy Marion upon completion. The Independent Monitor shall be responsible for distributing reports in compliance with Federal and State requirements.

VI. Work Papers

The Independent Monitoring firm shall retain work papers for a minimum of three years or until resolution of the Independent Monitoring report with the Board of Directors or the Florida Department of Economic Opportunity as needed.

VII. Restrictions Against Disclosure

The Independent Monitoring firm agrees to keep the information related to all Independent Monitorings and related contracts in strict confidence. Other than reports submitted to the Board the Independent Monitoring firm agrees not to publish, reproduce or otherwise divulge such information, in whole or in part, in any manner or form or authorize or permit others to do so, taking such reasonable measures as are necessary to restrict access to the information to those employees on its staff, the Boards' staff, or State/U.S. Department of Labor staff who must have information on a need-to-know basis.

VIII. The Board and associated Accounting Systems

CSCLM is designated as a Special District of the State of Florida and has a 501c(3) private non-profit corporate status. CSCLM was incorporated in June 1996 and began operation January 1, 1997. It was created solely as an administrative entity. CSCLM is one of 24 Workforce Regions in the State of Florida and is responsible for the administration of the Workforce Innovation and Opportunity Act (WIOA) of 2015, Temporary Assistance for Needy Families (TANF), Department of Economic Opportunity (DEO) pass through funds (Veterans, Wagner Peyser, and Trade Adjustment Act), and Reed Act allocations for the three county region. The amount of funds are determined by formula or competition and distributed or contracted respectively by the State of Florida. Representatives of the public and private sector of Citrus, Levy, and Marion Counties serve on the Workforce Board, which is the governing board of the corporation.

CSCLM as a sub recipient or grantee receives approximately \$9,500,000 in federal grant funds per fiscal year as the Area 10 Administrative entity. CSCLM contracts with various non-profit organizations, State agencies, School Boards, and private companies to provide services (see Appendix 3). The expenditures are controlled in accordance with written policies and procedures. Accounting records consist of a computerized general ledger system with the primary source of data coming from the accounts payable system and all other data, such as

deposits, is journalized into the system. The data is entered so that financial statements can be prepared for each program. All records pertaining to CSCLM fiscal matters are located in the board's Fiscal Department, Ocala, Florida. Additional source documents are filed with organizations (subcontractors), which maintain their own accounting records. The board's Fiscal Department staff is prepared to assist in the Independent Monitoring process, answer any questions, and locate documents as needed. Workspace will be provided, with copy machine available at no charge, but Independent Monitors must provide labor to make any necessary copies.

IX. Information to be Included in the Proposal

In order to facilitate the evaluation of the proposals, it is requested that the required information be arranged in the following format:

Section 1. Individual Independent Monitoring Staff Technical Qualifications

1. Describe the experience in Independent Monitoring of workforce programs of each senior and higher level person assigned to the Independent Monitoring, including years on each job, and their position while on each Independent Monitoring. Indicate the percentage of the time the senior staff will be on-site.
2. Describe the relevant educational background and experience of each individual to be assigned to the Independent Monitoring. This should include all relevant continuing education, seminars, national training, etc.
3. Describe experience of assigned individuals in Independent Monitoring programs, activities, and functions similar to those administered by CareerSource.
4. Describe any specialized skills, training, or background in workforce processes by assigned individuals. This may include participation in state or national professional organizations, speaker, or instructor roles in conferences or seminars, or authorship of articles and books.

Section 2. Independent Monitoring Organization/Local Office Technical Qualifications

1. State whether your Independent Monitoring organization is national, regional or local. Describe the organization, size, and structure of your firm.
2. State the address of the local office, which will be conducting the Independent Monitoring.
3. Indicate the number of people by level within the local office that will handle the

unit. Indicate which other Independent Monitorings this staff will be working on concurrently. Also indicate the overall supervision to be exercised over the Independent Monitoring team by the firm's management.

4. Indicate your experience in Independent Monitoring entities similar in size and complexity to CareerSource.
5. Indicate the local office's experience in providing additional services to government funded clients by listing the name of each client, the type(s) of services performed, and the year(s) of engagement.

Section 3. Independent Monitoring Approach

In this section, describe your approach to the Independent Monitoring. Describe your understanding of the work to be performed and indicate time estimates for each Independent Monitoring program. Please include an outline of the primary areas that you will focus on during the initial and mid-year monitorings.

Section 4. Client References

In this section, list the names, addresses, and phone numbers of government Independent Monitoring client references.

Section 5. Other Information

In this section, include any other information as you deem appropriate. Also describe any regulatory action taken by any oversight body against the proposing Independent Monitoring organization or local office.

X. Proposals

Respondents must submit their responses in sealed envelopes so that they will arrive at the address listed below no later than 4:00 p.m. on Friday, July 19, 2019. Electronic media on CD or flash drive are preferred for one response; however that response must also be accompanied by three (3) hard copies of the response. Inside the mailing package, the responses should be in an envelope(s) marked "Response to Systemic Independent Monitoring 2019 RFP to be opened July 19, 2019". Also include a contact name, contact information, company name and street mailing address. Responses not received by the deadline will not be considered. All copies must be received by the deadline listed above. Responses should be mailed/delivered to the following address:

Dale French
Director of Operations
Enterprise Center

3003 SW College Rd, Suite 205
Ocala, FL 34474
(352) 873-7939, ext. 2204/FAX (352) 873-
7956 dfrench@careersourceclm.com

The Board shall have the right to terminate this agreement if it fails to receive funding appropriate to continue operation. In such an event, CSCLM shall give 60 days advance notice of intent to do so. If such a timeframe is not possible depending on funding restrictions then the notice shall be no less than 30 days. CSCLM reserves the right to make no award on this RFP, if most advantageous to the Board.

XI. Proposed Charges

1. Proposals should include the fees to perform this Independent Monitoring. Fees should be listed as the total cost per program year Independent Monitoring including the mid-year review). The board's accounting staff will assist any firm requiring information needed to determine fees.
2. Proposals should include a fixed hourly rate for additional Independent Monitoring and management services, which would be determined as needed.

XII. Protest Procedures

Parties wishing to protest the recommendations of the Executive Committee should file a written protest within three business days of the Committee's action. Such protest should include the basis of the protest and any other pertinent material the party wishes to have considered as justification for its protest.

Letters of protest should be addressed to:

Rachel Riley, Chair
CareerSource Citrus Levy Marion
c/o CareerSource Citrus Levy Marion
3003 SW College Road, Suite 205
Ocala, FL 34474

Upon receipt of a protest, the Chairman will convene a meeting to hear the protest. The Chair will notify all parties involved in the protest of the time and place of the hearing. Any affected party will present, in writing at the time of filing a protest, a detailed response regarding the protest for consideration by the Board.

CareerSource Citrus Levy Marion and CareerSource North Florida are Equal Opportunity Employers/Program. Auxiliary aids and services are available upon request to individuals with disabilities using TTY/TDD equipment via the Florida Relay Service at 711. A proud member of the

American Job Center Network.

APPENDICES

Begin on following page

APPENDIX 1

Recommended Point Value for Evaluation Criteria - Independent Monitoring RFP

CRITERION	MAXIMUM POINTS
The FIRM:	
1. Number of people (by level) located within the local office that will handle the Independent Monitoring.	5
2. List of local office's current and prior government Independent Monitoring clients indicating the service performed and number of	10
3. Experience in Independent Monitoring similar entities.	15
4. Organization, size, and structure of firm.	5
5. Firm's participating in continuing education for workforce development systems.	5
6. Firm understands have the work to be performed and ability to complete work on time.	5
7. Firm's experience in Independent Monitoring Job Training Programs including: Years, number of Independent	5
PERSONNEL:	
1. Governmental Independent Monitoring experience of senior or higher staff to be assigned to the Independent Monitoring.	15
2. Overall supervision to be exercised over Independent Monitoring team by firm's management.	5
3. Relevant educational background of individuals to be assigned, including seminars and courses within the last three years.	5
OTHER:	
1. Independent Monitoring Cost	25
TOTAL - MAXIMUM POINTS	100

APPENDIX 2

Tentative Schedule for Selection and Award

Release RFP on June 13, 2019

Proposals are due no later than July 19, 2019

Workforce Staff reviews proposals for minimum qualifications by August 2, 2019

Executive Committee Review by XXXXXXXXX

Contract awarded by XXXXXXXXX

APPENDIX 3

CSCLM FUNDING SOURCES AND SUB-CONTRACTORS

REGION 10 ADMINISTRATIVE ENTITY

Funding Sources:	Amount (Includes Carry forward):
WIOA Adult	\$ 2,050,472
WIOA Youth	\$ 2,157,700
WIOA Dislocated Worker	\$ 864,039
SNAP	\$ 281,095
Reemployment and Eligibility Assessments	\$ 49,053
Wagner Peyser	\$ 327,039
Disable Veterans	\$ 36,868
Bridge Skilled	\$ 835,327
Reemployment Assistance Program	\$ 40,920
Welfare Transition Program	\$ 1,611,592
Youth Build	\$ 685,182
Other grants	\$ 293,805
Unrestricted funds	\$ 250,809
Total	\$ 9,843,901
Sub-contractor (Service Provider):	Contract Amount:
Eckerd Connects	\$ 1,285,502
Total	\$ 1,285,502



2018-19 Quality Assurance Report: Work Based Learning Agreements

Introduction

This report was prepared by Kathleen Woodring, Iris Pozo, Cory Weaver and Dale French as a result of a programmatic quality assurance review conducted on June 26 and 27, 2019 for Work Based Learning Agreements including On the Job Training (OJT) Custom Business Training (Customized Training for Employed Workers) and Paid Internship and Work Experience.

This review substantiated the extent to which staff are following our existing policies, the newly released State Policies, the WIOA regulations, and the report issued by USDOL/ETA regarding the issues in Regions 14 and 15. Prior to this monitoring effort, the Chief Executive Officer sent out the detailed USDOL/ETA report to all staff and requested, that if anyone knew of any action or lack of action such as reported, that they immediately let him know.

This report will be submitted for review by the CareerSource CLM Performance and Monitoring Committee at the next committee meeting, currently set for August 20 at 9:00 am. A written response will be submitted by Business Services staff for review by management and once approved will be made part of this committee agenda. The committee will make formal review and acknowledge actions and programmatic changes to resolve the issues and institute the recommendations made within.

It is the recommendation of the review committee that future staff training for experiential learning agreement development be conducted by the Sr. Director of Business Development, the Director of Operations, the Program Development & Reporting Manager and, the Administrative Manager and EO Officer. This staff will be interim subject matter experts during the previously planned staffing changes for the implementation of a dedicated Experiential Learning Coordinator. This staff will work as long-term technical assistance once the Experiential Learning Coordinator has been trained.

Additionally, the aforementioned staff will work with designated Business Services staff to revise and update local policy and operating procedures as detailed in this report to ensure compliance with all State and Federal laws and regulations.

Purpose of Review

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The review team reviewed a total of 38 agreements that were written in the specified time period. The review included a multi-faceted approach to insure that policies and procedures were being followed which included the following elements:

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Below is a detail of agreement-specific issues noted:

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This agreement was reviewed for quality assurance by the writer of the agreement. A firewall must exist with appropriate separation of duties when developing contracts at any level.

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- This agreement did not have a signature in the quality assurance section of the agreement. All agreements should be reviewed to contain necessary documentation, certification of participant eligibility and proper reimbursement amounts prior to execution.
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OJT-18-04-02EV Paul E. Anderson, OD, PA

- The job order in Employ Florida was not properly coded as an OJT order at the time that it was placed out.
- All OJT orders should be reviewed to ensure the job title, O*Net code match the training plan and customer IEP.
- All orders should be coded under special categories as an OJT order.

OJT-18-09-06MS Central Florida Electric

- The Contractor Disclosure form was not dated.
- A total of three agreements were written with CFE (18-09-06MS, 18-01-02MS, 18-09-07MS). Two of the trainees started at \$12.00 per hour and one started at \$15.00 per hour. While each of the trainees appear to have varied skill sets each of the trainees' training plans is nearly identical and were training for a duration of 48 hours in each job skill regardless of 'some' or 'not skilled' in the job tasks.

OJT-18-11-13MS A&M Manufacturing

The training plan included a second page of job skills and hours. It is labeled as a continuation of the job skills from page one. However, it appears that the training plan was copied from another customer. The trainee name, last four, and telephone number is whited out and hand written in. Additionally, the O*Net code and starting wage do not match those as listed on page one.

OJT-18-11-14 Mestizo Foods

Documentation in the file was acceptable, however, the review team felt that the job skills to be learned had excessive durations in the training plan: Sweeping/Mopping floors – 60 hours, Seals shipping containers – 70 hours, Palletize shipping cartons & shrink wrap pallets – 80 hours. More details on the specific job tasks may justify longer duration, but generic headings result in the appearance of excessive hours.

Paid Internship and Work Experience

The review consisted of 14 files.

As noted in the On the Job Training section of this review, the majority of the training plans contained in the files do not appear to have been developed for each individual and in several cases appeared to have been reused from previous agreements. Several instances showed trainees with identical job skills and hours to be trained although the trainee's skill levels were not the same as indicated on the plan (listed as 'some' and 'not skilled').

The majority of the agreements also did not have appropriate documentation in the Employ Florida system under the business account detailing the need, origination or execution of the agreement. There were also no notes on any of the agreements detail how the training plan and hours were developed and justified. Agreements were not listed separately on this report if the only issue recognized was lack of documentation for the training plan since it spanned all agreements.

Policy OPS-79, Paid Internship and Work Experience Training was not followed. Policy improvement suggestions follow under recommendations.

It was noticed that staff is entering E30 – Entered into Recruiting Agreement when executing an internship or work experience training agreement. The appropriate code should be E22 Other Training Service Not Specified.

PI-18-05-03GP USA4Sale

The training plans contained in the agreement files do not match the training plan that was signed by D. French on May 29, 2019. This was validated by reviewing a copy of the training plan that was e-mailed to the agreement originator on the same date. The customer and business accounts in the ATLAS system contain two different training plans - each time stamped the same by the

quality assurance review. Neither copy matches the training plan signed by D. French. It was determined that the training plan was changed after it was reviewed without the knowledge of the signing staff. The file did not contain the appropriate modification documentation. The file did not contain any notes from the business services staff detailing agreement origination or modification.

PI-18-06-01MS TMichel Productions, LLC

A business profile for this company could not be located in the Employ Florida system. Therefore no documentation could be obtained to justify the training plan or need for the agreement. The customer file did contain the appropriate documentation from the WIOA case manager.

PI-18-01-01MS SPX Flow, Inc.

The training plan included a task to be learned labeled *Other duties assigned by manager. However, the agreement included a three page job description with detailed duties. Greater care should be involved in ensuring that training plans contain job skills relevant to the occupation.

PI-18-08-03MS Front Street

This agreement did not contain any job skills on the training plan. It simply stated "Please see attached details for specific functions". Review of the attachment did not reveal any associated training hours with the job skills. Eight areas were completed in the training plan detailing hours with no corresponding job skills. See screenshot below:

Section 3: Occupational Information (Complete The Occupational Information For The trainee's Skill Level)			
JOB TITLE: Marketing Assistant		O*NET : 13-1161.00	
JOB DESCRIPTION (may attach)*: See Attached			
WORKSITE'S TYPICAL ENTRY WAGE: \$15.00		TRAINEE WAGE RATE? \$13.50	
#	REQUIRED JOB SKILLS FOR OCCUPATION:	CAPABILITY:	TRAINING HOURS:
1	Please see attached details for specific functions	NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
2		NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
3		NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
4		NOT SKILLED: <input type="checkbox"/> SOME SKILL: <input checked="" type="checkbox"/>	24
5		NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
6		NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
7		NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
8		NOT SKILLED: <input type="checkbox"/> SOME SKILL: <input checked="" type="checkbox"/>	24
9		NOT SKILLED: <input type="checkbox"/> SOME SKILL: <input type="checkbox"/>	
10		NOT SKILLED: <input type="checkbox"/> SOME SKILL: <input type="checkbox"/>	
TOTAL TRAINING HOURS:			192

PI-18-08-04MS Front Street

- This agreement states its duration at 312 hours in Section II. However, it also states that it will be 40 hours per week for 8 weeks. This would equate to 320 hours.
- The agreement does not contain a date of signature by CareerSource Citrus Levy Marion management.
- The file contained a modification form adjusting the total hours and duration of the agreement, but the form is missing the effective date.

PWE-18-05-01GE Hospice of Marion County

- The contract states it is effective from 5-3-2019 through 6-30-2019. Contract was signed by B. Chrisman and H. Shepardson on 5-9-2019 and 5-7-2019 respectively. Contracts must be signed on or before the day they are effective. It was verified in the case file that training did not occur prior to 5-9-2019.
- Contract expires on June 30, 2019. However, the duration of the agreement in the training plan runs through August 3, 2019. There was not an updated agreement or modification form in the case file to permit any payment beyond June 30, 2019. A new agreement will need to be executed prior to any payments for time worked after June 30, 2019.
- The employer profile in Employ Florida did not contain any case notes or activities for the business regarding paid work experience.

PWE-18-01-01MS A Better U Healthcare, dba Acusleep

- No 'E level' activities entered under the business account in Employ Florida.
- The training plan appears to have been adjusted after the agreement was executed as it contains hand written adjustments to the hours for the job skills to be learned.
- No modification form could be located in the file to justify the changing of training hours.

PEW-18-01-02MS Meme's Care at Home, Inc.

- No case notes in the business profile justifying the training plan or hours included.
- No follow up on the agreement was notated in the Employ Florida system on the business account. Follow up was conducted with the trainee by WIOA case management staff.
- The training plan appears to have been modified after the agreement was signed. All of the hours on the original job skills to be learned were adjusted and an additional task of "Networking events as necessary" was hand written onto the training plan.
- No modification could be located in the file to justify the changing of training hours or adjustment of job skills to be learned.

PWE-18-05-02MT

- Contract has handwritten contract number on all pages. Documents are created in fillable .PDF format and should be typed to avoid errors and misprinted information.
- The Federal Identification Number line on the contract appears to have been whited out and hand written over. White out should never be used on a contract. Adjusted errors should be documented on a modification form or 'lined through' and initialed if a non-monetary adjustment is made. Any changes require agreement by all staff involved.

PWE-18-08-02MS Marion County Board of County Commissioners

- The contract contains two numbers: PWE-18-08-02MS and PWE-18-07-02-MS. A modification should be completed verifying the correct number.
- Employer contact name is misspelled on the training plan.

PI-18-01-03MS SPX Flow

This file contained a case note indicating that the worksite agreement started. However, the note shows a contact date of January 23, 2019 and the note was entered on April 4, 2019. The note did not indicate that it was delayed entry. Staff should further develop the agreement desk aid located on the intranet to include all steps of processing an agreement to prevent missing details.

Overall Recommendations

- **Quality Assurance/Monitoring**
The quality assurance check that is currently conducted on all newer formats of agreements was not designed to take the place of programmatic monitoring. The quality assurance check that is conducted has been a check of the final agreement boilerplate to ensure it is properly completed, the training participant(s) are eligible for services and enrolled and the training duration is equal to the maximum reimbursable amount depending on the type of agreement. It is recommended by the review team that this practice be eliminated. In turn, on-going monitoring will be conducted on new agreements as part of routine WIOA programmatic reviews and all agreements will be required to have in-person site visits conducted during the training period as explained in the **Necessary Local Policy Changes** section.
- Business Services staff should work with operations staff to develop processes within local policies **OPS – 68 Custom Business Training**, **OPS – 69 On the Job Training** and **OPS – 79 Paid Internship and Work Experience Training** to standardize how training proposals are submitted to management for review and approval. Proposals should include all documents used to qualify the participating business as well as training hours justification. Proposals should not contain training PII.
- Staff should regularly review the board membership roster at www.careersourceclm.com to be familiar with current board membership. Contracts may not be executed with board members without prior board approval. Prior approval of master contracts is conducted with board members each June.
- Staff should thoroughly case note how they are evaluating the customer and business to determine training hours to overcome identified skills gaps (see additional recommendations in the policy change section below). Staff should research tools that can standardize the skill assessment process to better justify training hours.
- Monthly follow up on OJT and Paid Internship and Work Experience agreements must be conducted with the business and notated in case note form in the business profile in Employ Florida. WIOA staff follow up with the trainee. Review of trainee accounts showed satisfactory follow up on the trainee side.
- Consistent business activity coding processes should be put into place (E level codes in Employ Florida).
- Any changes made to an agreement after execution must be done so using the standardized Contract/Agreement Modification form (FM-CS-021). Under no circumstances should any agreement be altered after being signed by any party without appropriate modification documentation.
- Handwriting should not be permitted on any agreement. Changes made in handwritten form cannot be verified and suggest that the alterations were made after the agreement was executed.
- Staff should verify that all information as it is disclosed on the Questionnaire forms. Any answers that indicate that a business is ineligible for training assistance should be investigated further by staff.
- **OPS-79 Paid Internship and Work Experience** states that each trainee is provided an orientation prior to enrollment by the business services staff originating the training plan. Orientation must include an overview of payroll services, worksite rules and expectations. The review team could not find any case notes in the system that indicated an orientation was conducted by business services staff. Many case files contained documentation and staff signatures that indicates these elements of the agreement development were handled by WIOA staff. Business services staff are responsible for the creation of the training plan.

- Proper development cannot occur if staff have not met with the candidate and the business.
- It is also important to note that new EF coding has been released for additional apprenticeship activities. Staff should be diligent when coding business activities to determine if the training that is being developed/discussed is a first step in an apprenticeship and to make sure to code properly (most relevant for Lockheed Martin considering increased statewide apprenticeship development).

Necessary Local Policy Changes

On-the-Job Training

- Our policy needs to include a discussion of the initial assessment tool and how this tool will be used to determine skills gaps during development of the training plan.
- State policy 009 for OJT (page 9) requires a detailed process for reverse referrals. We need to include this additional detail of the process in our policy.
- The determination of the skills gap and skill requirements for the job needs to be included in the ISS. (State policy 009 - page 5)
- We need to require an on-site visit of the OJT contract by the BDM/BDC who wrote the contract at least one time during contract period. We recommend this occurs mid-way through contract. This will help to remind participants of our inclusion in the process of providing training.
- We need to require that “board” staff or an outside monitor provide on-site monitoring of each employer at least one time annually. This review will include an in-depth review of each agreement, the associated training plans, skills gap determination, Employ Florida and file documentation. An interview will be conducted with each participating business to ensure proper creation and execution of the agreement has taken place. This method will encourage increased scrutiny of content and adherence to procedures by the agreement creators and signors.

Paid Internships and Work Experience

- Need to provide more detail in our definitions as to the difference between a work experience and an internship. It would be helpful if we included transitional jobs into the policy.
- Both of these relationships are intended for serving the customer and providing them the necessary experience to obtain employment. Because of this, we question why we are conducting a background check on every individual? This appears like we are trying to screen our customers out instead of screening them in.
- Paid Internships and Work Experience creates an employee/employer relationship, we calculate our payment based on hours worked, so we recommend that the word stipend be removed and discuss as wage.
- State policy 100, states that Custom Driven Staffing should sign each agreement. (page 2 #5.)
- We need to provide a detailed process for reverse referrals for OJT, Internship and Work

Experience.

- We need to include more details on development of the training plan. These training goals will be different for each individual and for each circumstance. Example: A participant who is in a transitional job WE, may have goals such as demonstrating ability to show up for work on time and every day scheduled, where an internship will be more about taking a skill and learning how to put it into practice.
- Require an on-site visit to employer at least 1 time a year by the BDM/BDC and the “Board” staff for purposes of monitoring.

Local Custom Business Training

- In the regulations and according to State policy, what we have always referred to as employed worker, is now called “customized training for employed workers”.
- We need to remove Incumbent worker training from this policy. Incumbent worker training makes the employer eligible and not necessarily the individuals. This policy needs to stand alone, with all incumbent restrictions removed from the customized training for ***OPS-68 Custom Business Training***.

CareerSource Citrus Levy Marion is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers listed above may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711. If you need accommodations, please call 352-840-5700, ext. 7878 or e-mail accommodations@careersourceclm.com at least three business days in advance. Additionally, program information may be made available in Spanish upon request. A proud partner of the American Job Center Network.



Enterprise Center
3003 SW College Rd, Suite 205
Ocala, FL 34474
352 873-7939/800 434-5627
careersourceclm.com

To: Kathleen Woodring – Executive Vice President

From: Brenda Chrisman – Sr. Director of Business Development

Date: August 5, 2019

Subject: Written Corrective Action Plan – 2018-19 Quality Assurance Report / Work Based Learning

The written Correction Action Plan (CAP) is in response to the monitoring conducted on June 26 and 27, 2019 on Work Based Learning Agreements. The findings of the results on the monitoring do not reflect the image and quality that CareerSource CLM strives to achieve. As the Sr. Director of Business Development, I take full responsibility for the errors and lack of adequate oversight of the program from the business services team.

Upon review of the monitoring findings, the following actions were immediately taken to prevent further errors while we modify our processes and update policies to prevent these types of errors from happening again.

- **Designated Experiential Learning Coordinator (ELC):** We have assigned one designated staff to initiate and manage all E.L. agreements. This process was recently added and part of our new “**Refocus on Business Services**” by assigning one person to be the point person for all E.L. activity. The staff identified was already in a training mode and learning the process during this monitoring review. This monitoring validated the need for a single point of contact, vs. having numerous staff initiate E.L. agreements.
 - As a result of the single ELC, any business service staff that initiates a potential E.L. activity with a business will immediately bring in the ELC to ensure proper procedures; protocols and development of the agreements are adhered to.
- **Quality Assurance Designee:** To ensure a full review of each E.L. agreement is initiated from someone other than the staff that developed the agreement, a new manager has been assigned as the Quality Assurance Designee and will manage all E.L. program activity. The new manager has been updated to the changes needed and will be part of the development of the new policies to ensure all aspects of these issues are addressed, updates of proper forms are developed, support the training for the E.L. program, and will manage the EL Coordinator.
- **Employ Florida (EF) Updates:** To ensure proper business documentation is adhered to in EF, case note templates have been created to have staff enter mandatory language and fill in necessary information to address the need, purposes, hours, and other critical information for each E.L. agreement established. The proper E-Service codes have been identified and are already being utilized for any new agreements.
- **Contract Management & Policy Updates:** Several meetings have taken place to discuss ways in which to improve E.L. contract management, and changes to improve the current processes until we can finalize the policy updates on each of the three programs. Several processes have been added to support the overall management and oversight of the EL agreements.
- **Training Plan Update:** Until we are able to identify a tool or process to help determine skill gap-needs and, hours and duties for an OJT, we have moved from an hourly or weekly plan to identifying and listing job skills/tasks. This change has already improved the development of a training plan with the business.

With implementation of the changes listed above, I feel most if not all, of the prior concerns will be prevented or addressed while we finalize our policy updates and training.

Once we have completed the updates to policies, forms, checklists and other pertinent documents, a training will be provided to the business services team members outlying the changes and new processes. At minimum, the training will cover the following topics:

- Contract Management, maintenance and execution of agreements
- Quality Assurance review – checklists and minimum requirements
- Employ Florida – documentation and procedures
- Skill Development for OJT and/or Work Experience - training agreement outlines and determination of skill gaps
- Business Engagement - follow-up and modifications, billing and payments processes
- Experiential Learning Policy review

While there are numerous errors listed on each of the three Experiential Learning programs (CBT, OJT & Paid Internship/Paid Work Experience), many of these errors came from different staff and were errors that can easily be corrected and or improved with additional documentation and training.

Please note that none of these errors resulted in any financial question or any fraudulent activity. These are primarily staff error in rushing through the completion of forms, data entry, attempting to expedite the process for the convenience of the business or candidate; however these are poor quality case management practices that we do not wish to adhere.

I am in agreement with the Overall Recommendations, the Necessary Local Policy Changes, Paid Internship and Work Experience comments listed on pages 9 through 11, and will be working with our Business Development staff, and will work collectively with the operational management to make all of the necessary changes mentioned, or addresses as needed.

I want to assure you that we take this report seriously and these changes will be corrected as quickly as possible. Additionally, I want to reassure you that we will commit to resolving these types of errors from happening again in the E.L. program and/or other programs that we provide services to businesses and/or candidates.

Cc: Business Development Manager Team



2018-19 Quality Assurance Report: Work Based Learning Agreements

Introduction

This report was prepared by Kathleen Woodring, Iris Pozo, Cory Weaver and Dale French as a result of a programmatic quality assurance review conducted on June 26 and 27, 2019 for Work Based Learning Agreements including On the Job Training (OJT) Custom Business Training (Customized Training for Employed Workers) and Paid Internship and Work Experience.

This review substantiated the extent to which staff are following our existing policies, the newly released State Policies, the WIOA regulations, and the report issued by USDOL/ETA regarding the issues in Regions 14 and 15. Prior to this monitoring effort, the Chief Executive Officer sent out the detailed USDOL/ETA report to all staff and requested, that if anyone knew of any action or lack of action such as reported, that they immediately let him know.

This report will be submitted for review by the CareerSource CLM Performance and Monitoring Committee at the next committee meeting, currently set for August 20 at 9:00 am. A written response will be submitted by Business Services staff for review by management and once approved will be made part of this committee agenda. The committee will make formal review and acknowledge actions and programmatic changes to resolve the issues and institute the recommendations made within.

It is the recommendation of the review committee that future staff training for experiential learning agreement development be conducted by the Sr. Director of Business Development, the Director of Operations, the Program Development & Reporting Manager and, the Administrative Manager and EO Officer. This staff will be interim subject matter experts during the previously planned staffing changes for the implementation of a dedicated Experiential Learning Coordinator. This staff will work as long-term technical assistance once the Experiential Learning Coordinator has been trained.

Additionally, the aforementioned staff will work with designated Business Services staff to revise and update local policy and operating procedures as detailed in this report to ensure compliance with all State and Federal laws and regulations.

Purpose of Review

The purpose of the review was to assess program operations during the previous year (beginning July 1, 2018) through June 27, 2019. The goal of the review was to determine if the management and execution of the work-based learning programs was operated in compliance with state and federal regulations, state and local plans, policies and guidance, and all contract and agreement terms.

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- A review of the general elements and execution of each agreement and applicable related documents.
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Overall, it was the general consensus of the review team that the Custom Business Training agreements were well managed and required documentation was present in the case files. All of the files contained adequate details regarding the training to be administered as well as appropriate backup information for the payments that were made against each agreement.

It was noticed that staff is entering E30 – Entered into Recruiting Agreement activities in Employ Florida when executing Employed Worker training agreements. The appropriate code is E25 - Customized Training.

Custom Business Training - Response/Recommendations:

- *The current CBT checklist will be updated to reflect additional measures taken to review documents such as the questionnaire of taxes. This error should be prevented by adding a question verifying that the business is current on all state and local taxes.*
- *The issue of staff initiated their own self quality assurance review was corrected several months back – no staff can conduct their own quality assurance on any agreement they develop.*
- *Staff training on the proper Employ Florida (EF), E-service codes will be conducted along with*

programmatic and operational policies to ensure proper coding. The proper codes will be updated on the checklist and updated policy once finalized and approved.

- *Any new agreement approved prior to the training will have the proper E-service code entered.*

On the Job Training (OJT)

The review consisted of 20 files.

Of the OJT agreements reviewed all of the files (excluding the five agreements with Lockheed Martin) appeared to have generic training plans. Most often the total numbers of hours included for reimbursement in the agreements were equally divided among the listed job skills to be learned in the plan. Additionally several training plans included skills to be learned listed as: "Work in a team environment", "Other duties to be assigned" and "Assist in warehouse". These are not job specific tasks where quantifiable skills can be learned or documented and should not be included in a training plan unless specific job skills can be attached to them.

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Below is a detail of agreement-specific issues noted:

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This agreement was reviewed for quality assurance by the writer of the agreement. A firewall must exist with appropriate separation of duties when developing contracts at any level.

- *Administrative changes have been made to ensure the developer of the agreement does not conduct the final quality assurance on the final agreement.*

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This agreement was reviewed for quality assurance by the writer of the agreement. A firewall must exist with appropriate separation of duties when developing contracts at any level.

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- This agreement did not have a signature in the quality assurance section of the agreement. All agreements should be reviewed to contain necessary documentation, certification of participant eligibility and proper reimbursement amounts prior to execution.
- The Union Concurrence was signed after the first agreement was in place. Additionally, the Union Concurrence in the file only covered a two week period. The form indicated a two week period (May 7, 2018 through May 20, 2018) in which to train 48 individuals. Training was ongoing beyond the concurrence dates.
- *New administrative oversight and quality assurance have been made to ensure all proper documentation and signatures have been completed prior to final signature authority.*

OJT-18-04-02EV Paul E. Anderson, OD, PA

- The job order in Employ Florida was not properly coded as an OJT order at the time that it was placed out.
 - *Employ Florida has been updated to the correct coding – staff error on the proper selection of the posting. This question has been added to a checklist to ensure quality assurance.*
- All OJT orders should be reviewed to ensure the job title, O*Net code match the training plan and customer IEP.
 - *Staff errored on coding on different forms – this will be added to checklist to compare the proper coding on all the required forms.*
- All orders should be coded under special categories as an OJT order.
 - *Staff errored in the proper coding of the job order properly – a Job Order details category will be added to the checklist to assure quality assurance.*

OJT-18-09-06MS Central Florida Electric

- The Contractor Disclosure form was not dated.
 - *Administrative changes have been made to ensure the agreement is completed and contains all the necessary elements prior to signing the final agreement; this will be added to the quality assurance process.*
- A total of three agreements were written with CFE (18-09-06MS, 18-01-02MS, 18-09-07MS). Two of the trainees started at \$12.00 per hour and one started at \$15.00 per hour. While each of the trainees appear to have varied skill sets each of the trainees' training plans is nearly identical and were training for a duration of 48 hours in each job skill regardless of 'some' or 'not skilled' in the job tasks.
 - *More guidance and training will be provided on the development of suitable personalized training plans. Additional resources/tools are being sought and/or best practices from other workforce regions. Proper documentation would have explained the variation in skill set and the mandated training from the business to justify similar training.*

OJT-18-11-13MS A&M Manufacturing

The training plan included a second page of job skills and hours. It is labeled as a continuation of the job skills from page one. However, it appears that the training plan was copied from another customer. The trainee name, last four, and telephone number is whited out and hand written in. Additionally, the O*Net code and starting wage do not match those as listed on page one.

- *Administrative changes have been made to ensure the agreement and all corresponding documents are properly completed, contain all the necessary elements prior to final signature, and are not duplicated but are customized for each trainee. Training on the proper management and execution of agreements will be reviewed along with the "no hand written notes or white out."*

OJT-18-11-14 Mestizo Foods

Documentation in the file was acceptable, however, the review team felt that the job skills to be learned had excessive durations in the training plan: Sweeping/Mopping floors – 60 hours, Seals shipping containers – 70 hours, Palletize shipping cartons & shrink wrap pallets – 80 hours. More details on the specific job tasks may justify longer duration, but generic headings result in the appearance of excessive hours.

- *Administrative changes have been made to change from an hourly or weekly based training outline to a skill or task outline to justify hours and more accurately describe the skills needed. Additional tools and resources are being sought out to support this issue.*

Paid Internship and Work Experience

The review consisted of 14 files.

As noted in the On the Job Training section of this review, the majority of the training plans contained in the files do not appear to have been developed for each individual and in several cases appeared to have been reused from previous agreements. Several instances showed trainees with identical job skills and hours to be trained although the trainee's skill levels were not the same as indicated on the plan (listed as 'some' and 'not skilled').

The majority of the agreements also did not have appropriate documentation in the Employ Florida system under the business account detailing the need, origination or execution of the agreement. There were also no notes on any of the agreements detail how the training plan and hours were developed and justified. Agreements were not listed separately on this report if the only issue recognized was lack of documentation for the training plan since it spanned all agreements.

- *New procedures and documentation will be initiated to properly document the development of training plans. Additional tools and resources are being sought out to help determine skills needed for the development of a training plan, vs. utilization of a "cookie cutter" plan for all individuals.*
- *Proper documentation in Employ Florida will be resolved through the development of case note templates that explain the development of a plan, reason for plan with accommodating justification. Case note templates have been developed and awaiting approval.*

Policy OPS-79, Paid Internship and Work Experience Training was not followed. Policy improvement suggestions follow under recommendations.

It was noticed that staff is entering E30 – Entered into Recruiting Agreement when executing an internship or work experience training agreement. The appropriate code should be E22 Other Training Service Not Specified.

- *OPS-79 will be reviewed and updated to support appropriate changes needed in the development of the agreements.*
- *The checklist designed for PI/PW will be updated to assure quality assurance on all aspects including forms, Employ Florida data entry, case notes, and agreement development.*

PI-18-05-03GP USA4Sale

The training plans contained in the agreement files do not match the training plan that was signed by D. French on May 29, 2019. This was validated by reviewing a copy of the training plan that was e-mailed to the agreement originator on the same date. The customer and business accounts in the ATLAS system contain two different training plans - each time stamped the same by the

quality assurance review. Neither copy matches the training plan signed by D. French. It was determined that the training plan was changed after it was reviewed without the knowledge of the signing staff. The file did not contain the appropriate modification documentation.

The file did not contain any notes from the business services staff detailing agreement origination or modification.

- *This was a staff error attempting to correct a prior signed agreement where the employer made several changes to the plan that were administrative and non-monetary – the staff allowed the employer to make the changes on the plan, and took the signature page and connected it to the updated agreement. The staff should have initiated a modification to the agreement. Staff has been counseled on proper requirements, impact and potential fatal error of this practice. Proper execution and management of contracts, modifications will be addressed in the training on E.L.*

PI-18-06-01MS TMichel Productions, LLC

A business profile for this company could not be located in the Employ Florida system. Therefore no documentation could be obtained to justify the training plan or need for the agreement. The customer file did contain the appropriate documentation from the WIOA case manager.

- o This was a staff error in launching an agreement without properly creating an employer account and then entering necessary information into Employ Florida. An Employ Florida account has been added with proper documentation as required for the agreement.
- o The PI/PW checklist will have this added to support the agreement prior to executing of an agreement.

PI-18-01-01MS SPX Flow, Inc.

The training plan included a task to be learned labeled *Other duties assigned by manager. However, the agreement included a three page job description with detailed duties. Greater care should be involved in ensuring that training plans contain job skills relevant to the occupation.

- o New procedures and documentation will be initiated to properly document the development of training plans. Additional tools and resources are being sought out to help determine skills needed for the development of a training plan, vs. utilization of a "cookie cutter" plan for all individuals.

PI-18-08-03MS Front Street

This agreement did not contain any job skills on the training plan. It simply stated "Please see attached details for specific functions". Review of the attachment did not reveal any associated training hours with the job skills. Eight areas were completed in the training plan detailing hours with no corresponding job skills. See screenshot below:

Section 3: Occupational Information (Complete The Occupational Information For The trainee's Skill Level)			
JOB TITLE: Marketing Assistant		O*NET : 13-1161.00	
JOB DESCRIPTION (may attach)*: See Attached			
WORKSITE'S TYPICAL ENTRY WAGE: \$15.00		TRAINEE WAGE RATE? \$13.50	
#	REQUIRED JOB SKILLS FOR OCCUPATION:	CAPABILITY:	TRAINING HOURS:
1	Please see attached details for specific functions	NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
2		NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
3		NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
4		NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
5		NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
6		NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
7		NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
8		NOT SKILLED: <input checked="" type="checkbox"/> SOME SKILL: <input type="checkbox"/>	24
9		NOT SKILLED: <input type="checkbox"/> SOME SKILL: <input type="checkbox"/>	
10		NOT SKILLED: <input type="checkbox"/> SOME SKILL: <input type="checkbox"/>	
TOTAL TRAINING HOURS:			192

- o The staff failed to attach the proper documentation that outlined the training details. It has since been located and attached to the agreement.

PI-18-08-04MS Front Street

- This agreement states its duration at 312 hours in Section II. However, it also states that it will be 40 hours per week for 8 weeks. This would equate to 320 hours.

- The agreement does not contain a date of signature by CareerSource Citrus Levy Marion management.
- The file contained a modification form adjusting the total hours and duration of the agreement, but the form is missing the effective date.

o *These issues will be addressed in the policy training on management and execution of agreements as well as the new quality assurance requirements.*

PWE-18-05-01GE Hospice of Marion County

- The contract states it is effective from 5-3-2019 through 6-30-2019. Contract was signed by B. Chrisman and H. Shepardson on 5-9-2019 and 5-7-2019 respectively. Contracts must be signed on or before the day they are effective. It was verified in the case file that training did not occur prior to 5-9-2019.
- Contract expires on June 30, 2019. However, the duration of the agreement in the training plan runs through August 3, 2019. There was not an updated agreement or modification form in the case file to permit any payment beyond June 30, 2019. A new agreement will need to be executed prior to any payments for time worked after June 30, 2019.
- The employer profile in Employ Florida did not contain any case notes or activities for the business regarding paid work experience.

o *Each of these issues will be addressed in the policy training on management and execution of the agreement, proper documentation on agreements and quality assurance requirements.*

PWE-18-01-01MS A Better U Healthcare, dba Acusleep

- No 'E level' activities entered under the business account in Employ Florida.
- The training plan appears to have been adjusted after the agreement was executed as it contains hand written adjustments to the hours for the job skills to be learned.
- No modification form could be located in the file to justify the changing of training hours.

o *Each of these issues will be addressed in the policy training on management and execution of the agreement, and on proper documentation in all Employ Florida business accounts.*

PEW-18-01-02MS Meme's Care at Home, Inc.

- No case notes in the business profile justifying the training plan or hours included.
- No follow up on the agreement was notated in the Employ Florida system on the business account. Follow up was conducted with the trainee by WIOA case management staff.
- The training plan appears to have been modified after the agreement was signed. All of the hours on the original job skills to be learned were adjusted and an additional task of "Networking events as necessary" was hand written onto the training plan.
- No modification could be located in the file to justify the changing of training hours or adjustment of job skills to be learned.

o *Each of these issues will be addressed in the policy training on management and execution of the agreement, maintenance of agreements through follow-up, adequate and proper documentation on all changes made.*

PWE-18-05-02MT

- Contract has handwritten contract number on all pages. Documents are created in fillable .PDF format and should be typed to avoid errors and misprinted information.
- The Federal Identification Number line on the contract appears to have been whited out and hand written over. White out should never be used on a contract. Adjusted errors should be documented on a modification form or 'lined through' and initialed if a non- monetary adjustment is made. Any changes require agreement by all staff involved.

- *Each of these issues will be addressed in the policy training on management and execution of the agreement.*

PWE-18-08-02MS Marion County Board of County Commissioners

- The contract contains two numbers: PWE-18-08-02MS and PWE-18-07-02-MS. A modification should be completed verifying the correct number.
- Employer contact name is misspelled on the training plan.

- *Each of these issues will be addressed in the policy training on management and execution of the agreement, quality assurance of agreements and basic contract management.*

PI-18-01-03MS SPX Flow

This file contained a case note indicating that the worksite agreement started. However, the note shows a contact date of January 23, 2019 and the note was entered on April 4, 2019. The note did not indicate that it was delayed entry. Staff should further develop the agreement desk aid located on the intranet to include all steps of processing an agreement to prevent missing details.

- *This issue will be addressed in the training and be part of the quality assurance checklist to ensure proper documentation in Employ Florida has been completed on all executed agreements.*

Overall Recommendations

- **Quality Assurance/Monitoring**
The quality assurance check that is currently conducted on all newer formats of agreements was not designed to take the place of programmatic monitoring. The quality assurance check that is conducted has been a check of the final agreement boilerplate to ensure it is properly completed, the training participant(s) are eligible for services and enrolled and the training duration is equal to the maximum reimbursable amount depending on the type of agreement. It is recommended by the review team that this practice be eliminated. In turn, on-going monitoring will be conducted on new agreements as part of routine WIOA programmatic reviews and all agreements will be required to have in-person site visits conducted during the training period as explained in the ***Necessary Local Policy Changes*** section.
- Business Services staff should work with operations staff to develop processes within local policies ***OPS – 68 Custom Business Training, OPS – 69 On the Job Training*** and ***OPS – 79 Paid Internship and Work Experience Training*** to standardize how training proposals are submitted to management for review and approval. Proposals should include all documents used to qualify the participating business as well as training hours justification. Proposals should not contain training PII.
- Staff should regularly review the board membership roster at www.careersourceclm.com to be familiar with current board membership. Contracts may not be executed with board members without prior board approval. Prior approval of master contracts is conducted with board members each June.
- Staff should thoroughly case note how they are evaluating the customer and business to determine training hours to overcome identified skills gaps (see additional recommendations in the policy change section below). Staff should research tools that can standardize the skill assessment process to better justify training hours.
- Monthly follow up on OJT and Paid Internship and Work Experience agreements must be conducted with the business and notated in case note form in the business profile in Employ Florida. WIOA staff follow up with the trainee. Review of trainee accounts showed satisfactory follow up on the trainee side.
- Consistent business activity coding processes should be put into place (E level codes in Employ Florida).
- Any changes made to an agreement after execution must be done so using the standardized Contract/Agreement Modification form (FM-CS-021). Under no circumstances should any agreement be altered after being signed by any party without appropriate modification documentation.
- Handwriting should not be permitted on any agreement. Changes made in handwritten form cannot be verified and suggest that the alterations were made after the agreement was executed.
- Staff should verify that all information as it is disclosed on the Questionnaire forms. Any answers that indicate that a business is ineligible for training assistance should be investigated further by staff.
- ***OPS-79 Paid Internship and Work Experience*** states that each trainee is provided an orientation prior to enrollment by the business services staff originating the training plan. Orientation must include an overview of payroll services, worksite rules and expectations. The review team could not find any case notes in the system that indicated an orientation was conducted by business services staff. Many case files contained documentation and staff signatures that indicates these elements of the agreement development were handled by WIOA staff. Business services staff are responsible for the creation of the training plan.

- Proper development cannot occur if staff have not met with the candidate and the business.
- It is also important to note that new EF coding has been released for additional apprenticeship activities. Staff should be diligent when coding business activities to determine if the training that is being developed/discussed is a first step in an apprenticeship and to make sure to code properly (most relevant for Lockheed Martin considering increased statewide apprenticeship development).

Necessary Local Policy Changes

On-the-Job Training

- Our policy needs to include a discussion of the initial assessment tool and how this tool will be used to determine skills gaps during development of the training plan.
- State policy 009 for OJT (page 9) requires a detailed process for reverse referrals. We need to include this additional detail of the process in our policy.
- The determination of the skills gap and skill requirements for the job needs to be included in the ISS. (State policy 009 - page 5)
- We need to require an on-site visit of the OJT contract by the BDM/BDC who wrote the contract at least one time during contract period. We recommend this occurs mid-way through contract. This will help to remind participants of our inclusion in the process of providing training.
- We need to require that “board” staff or an outside monitor provide on-site monitoring of each employer at least one time annually. This review will include an in-depth review of each agreement, the associated training plans, skills gap determination, Employ Florida and file documentation. An interview will be conducted with each participating business to ensure proper creation and execution of the agreement has taken place. This method will encourage increased scrutiny of content and adherence to procedures by the agreement creators and signors.

Paid Internships and Work Experience

- Need to provide more detail in our definitions as to the difference between a work experience and an internship. It would be helpful if we included transitional jobs into the policy.
- Both of these relationships are intended for serving the customer and providing them the necessary experience to obtain employment. Because of this, we question why we are conducting a background check on every individual? This appears like we are trying to screen our customers out instead of screening them in.
- Paid Internships and Work Experience creates an employee/employer relationship, we calculate our payment based on hours worked, so we recommend that the word stipend be removed and discuss as wage.
- State policy 100, states that Custom Driven Staffing should sign each agreement. (page 2 #5.)
- We need to provide a detailed process for reverse referrals for OJT, Internship and Work

Experience.

- We need to include more details on development of the training plan. These training goals will be different for each individual and for each circumstance. Example: A participant who is in a transitional job WE, may have goals such as demonstrating ability to show up for work on time and every day scheduled, where an internship will be more about taking a skill and learning how to put it into practice.
- Require an on-site visit to employer at least 1 time a year by the BDM/BDC and the “Board” staff for purposes of monitoring.

Local Custom Business Training

- In the regulations and according to State policy, what we have always referred to as employed worker, is now called “customized training for employed workers”.
- We need to remove Incumbent worker training from this policy. Incumbent worker training makes the employer eligible and not necessarily the individuals. This policy needs to stand alone, with all incumbent restrictions removed from the customized training for ***OPS-68 Custom Business Training***.

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