

**Florida Department of Commerce (FloridaCommerce)  
Statewide Standardization of Tools and Services – Consultation Matrix**

<u>Policy Section</u>	<u>Stakeholder Comment</u>	<u>Submitted by</u>	<u>Policy Language Change</u>	<u>FloridaCommerce Comments</u>	<u>Authority</u>
General Comment	Requiring CareerSource Florida Board to be involved with approving waivers is not something we think the Board wants to be involved with. They should be involved with policy making and strategies; not involved in local operating decisions.	LWDB 14	No	The policy does not include a requirement for approval by the state board. Waiver requests will be reviewed by FloridaCommerce, in consultation with the CareerSource Florida professional team.	N/A
General Comment	As brought up previously, this policy overcomplicates a procedure/policy that should be very simple, too much bureaucracy.	LWDB 14	No	Thank you for your feedback.	N/A
General Comment	Recommend that the policy be integrated within the Regional Planning policy where local regional planning can determine the need for consistent tools and services, therefore accomplishing the goals of the REACH Act while not subverting the intent of WIOA and existing Florida Statutes.	LWDB 21	Yes	The policy language has been updated.	CareerSource Florida Strategic Policy 2023.10.12.A.1.
General Comment	Recommend the policy establish minimum standards of engaging local areas for consultation. Recent abrupt changes to the system have been pushed through with minimal engagement of local areas, specifically individuals who work within the system (below the CEO level). If the State could establish a minimum process such as engaging the FWDA [Florida Workforce Development Association] recommended areas or conducting work groups inclusive of all local areas, that would be helpful for establishing buy-in and ensuring SMEs are present in the decision-making process.	LWDB 21	No	Thank you for your feedback.	N/A

General Comment	Given the State’s track record of timeliness on the selection and implementation of state technology – could a provision of the policy read that the State will limit selection of standardized tools and services to the greatest extent possible with an emphasis on back-end administrative tools and services? Or, that the State will focus on adopting a base-level of standard tools and services, while allowing room for local areas to innovate and enhance those tools and services provided by the State (absent a waiver).	LWDB 21	No	The current policy language aligns with the state’s intention.	CareerSource Florida Strategic Policy 2023.10.12.A.1.
Section IV. Policies and Procedures	The first sentence is incredibly broad and vague (must be used by all LWDBs). What if the LWDB doesn’t have a need for the product? Must a reason be contrived to use the tool?	LWDB 6	Yes	The policy language has been updated.	CareerSource Florida Strategic Policy 2023.10.12.A.1.
Section IV. Policies and Procedures	<p>The policy states, “As such, LWDBs are prohibited from using funds subgranted by FloridaCommerce for the purchase of tools and services that are duplicative of state-procured resources without an approved waiver request”.</p> <p>This really seems like an administrative burden on FloridaCommerce/CareerSource Florida. Can they ensure there is no lapse of service by turning around the approvals quickly? However, my caution is that a tool or system may be procured at the state level for a particular purpose may have functionality beyond the purpose for which it was procured. So while it does A, C and E very well, it may also do B and D but at a diminished functionality. So can an LWDB purchase another product for purposes B and D on its own? Example Employ Florida has a labor market information module. Are we limited to EF for this data? Employ Florida also has a file/document storage module. Must we use it?</p>	LWDB 6	No	It is the state’s intention that as tools and services are procured or negotiated at the state level, the state will issue corresponding guidance governing the use of the tools and services.	CareerSource Florida Strategic Policy 2023.10.12.A.1.

	My suggestion is for each statewide purchase there be a primary function or purpose that is being procured for...then anything outside those functions may be procured separately.				
Section IV. Policies and Procedures	<p>On page 2 of the policy, the first sentence states that:  “Tools and services negotiated and acquired at the state level must be used by all LWDBs”.</p> <p>In the workgroup, I believe that we understood “Acquired” but I do not recall a discussion on “negotiated” as being required. My remembrance is that you could opt out where the state negotiated a price, if you did not want to use that product or it was costly for your region. I would like to see the negotiated removed.</p>	LWDB 10	No	Tools and services negotiated and acquired at the state level must be used by all LWDBs that have an identified need for the specific purpose the tools and services have been acquired to fulfill. The state may not directly purchase all tools and services that are identified to have a statewide need. Where it is not feasible for identified tools and services to be purchased at the state level, the state may negotiate tools and services that will be purchased at the local levels. The policy outlines the parameters for LWDBs to request a waiver to opt-out of using statewide negotiated and acquired tools and services.	CareerSource Florida Strategic Policy 2023.10.12.A.1.
Section IV. Policies and Procedures	The policy states the “Tools and services negotiated and acquired at the state level must be used by all LWDBs.” I believe that “must” should be changed “whenever practical”. What if multiple tools or services are negotiated for the same type of service? The LWDBs should be able to choose one of the choices; not required to use all.	LWDB 14	Yes	The policy language has been updated.	CareerSource Florida Strategic Policy 2023.10.12.A.1.
Section IV. A. Establish Statewide Common Need(s)	What is the use threshold for FloridaCommerce/CareerSource Florida to move forward—90% of the boards use the product so then the state will consider moving forward?	LWDB 6	No	Such a threshold has not been established.	N/A

Section IV. A. Establish Statewide Common Need(s)	Need to ensure that all stakeholder input is solicited AND considered when determining what is good for the system. Ongoing focus groups should be established to make recommendations.	LWDB 14	No	The policy indicates that, at the state level, a variety of steps may occur to establish the need for a particular standardized tool or service including soliciting information on potential tools and services from appropriate stakeholders and interested parties, and consulting with stakeholders to determine whether there is a statewide need for specific tools and services.	CareerSource Florida Strategic Policy 2023.10.12.A.1.
Section IV.A. Establish Statewide Common Need(s) (1) Solicit information on potential tools and services from appropriate stakeholders and interested parties.	Change stakeholders to FWDA or local areas.  The policy states: “Solicit information on potential tools and services from appropriate stakeholders and interested parties.” Recommend the policy be updated to clarify what entities would solicit.	LWDB 21	No	Stakeholders include the Governor, Legislature, state board, CareerSource Florida, FloridaCommerce, workforce system partners, as well as LWDBs.	CareerSource Florida Strategic Policy 2023.10.12.A.1.
Section IV. A. (2) Consult with stakeholders to determine whether there is a statewide need for specific tools.	The policy states: “Consult with stakeholders to determine whether there is a statewide need for specific tools and services.” Recommend the policy be updated to clarify what entities would consult in this sentence.	LWDB 21	Yes	The policy language has been updated.	CareerSource Florida Strategic Policy 2023.10.12.A.1.
Section VI. B. Needs Plan Development	Recommend the policy include accountability requirements that measure the cost savings and effectiveness (survey of stakeholders) of tools and services procured by the state.  In addition to ensuring the best services and tools are made standard for Florida’s workforce system, steps need to be taken in this policy to reduce the influence of lobbying firms who assist with securing and retaining statewide contracts in Tallahassee.	LWDB 21	No  No	The policy includes cost savings as one of the considerations when determining whether it is practical to procure services and tools at the state level.  Thank you for your feedback.	CareerSource Florida Strategic Policy 2023.10.12.A.1.

	<p>The policy should also include a timeline for when statewide tools, once procured, are reviewed by stakeholders (to include LWDBs) to ensure the product is meeting the expectations set forth in the review process and is still the best cost/value for that tool or service.</p> <p>Recommend the policy include under “Additional Considerations” that the State will ensure availability of the tool or service in all local areas of the state.</p>		<p>Yes</p> <p>No</p>	<p>The policy language has been updated.</p> <p>The policy currently outlines that FloridaCommerce will ensure that tools and services that are procured and/or negotiated by the state are available to all LWDBs.</p>	
Section IV. C. Tool and Service Evaluation and Recommendation	I would like to see a statement about dollars. Are statewide procurements paid by the state...or will each board be invoiced to pay out of allocations? For example, Employ Florida is procured at the state level for all boards to use. Will FloridaCommerce/CareerSource Florida continue to fund this through their dollars, or will each board have to pay in a certain amount? Or will FloridaCommerce/CareerSource Florida hold back funds from our allocations to pay for these tools/services?	LWDB 6	No	For tools acquired at the state level, state-level funds will be used; however, if a tool or service is negotiated at the state level for the benefit of the LWDBs, local funds will be used to acquire the tools and services within the terms negotiated at the state level.	N/A
Section IV. D. Waiver Request Review Process	<p>FloridaCommerce, in consultation with CareerSource Florida, will review waiver requests for completeness and determine whether to approve the LWDB’s request. FloridaCommerce will notify the LWDB of the outcome of the waiver review process within 30 days from the date the waiver request was received.</p> <p>Suggested verbiage to add-Failure of the State to respond within 30 days will qualify as an approval.</p>	LWDB 8	No	Under no circumstances may LWDBs move forward without the state’s approval of the requested waiver.	CareerSource Florida Strategic Policy 2023.10.12.A.1.
Section IV. D. Waiver Request Review Process	I appreciate the waiver turnaround of 30 days, but what happens if that deadline is not met? Can the local board move forward with the use of the waiver as approved. Additionally, there was a discussion about the processing of a request from an employer to use a certain product. Most often this would come as part of a local board’s response to support an economic development prospect.	LWDB 10	No	Under no circumstances may LWDBs move forward without the state’s approval of the requested waiver. LWDBS may request an expedited review when such is warranted.	N/A

	The response is often requested within couple of days. If the local board has the financial ability to honor that request from the employer, such an employer requested service should be an automatic waiver for that employer and not require “prior approval.” The documentation of the employer request should be treated as a “sole source” where the procurement and the employer request are filed together.				
Section IV. D. Waiver Request Review Process	In addition, the waiver process appears to be too complex.	LWDB 14	No	Thank you for your feedback.	N/A
Section V. Attachments. Attachment A – Standardization of Tools and Services Request Form	On page 2 in the Executive Director Heading, Executive has a typo, the E and C are switched. (EX <u>C</u> EUTIVE instead of EXECUTIVE).	LWDB 19	Yes	The attachment has been updated.	N/A