



## **EXTENSION OF DESIGNATION REQUEST AS DIRECT SERVICES PROVIDER**

As indicated in the attached statement of intent, WorkNet Pinellas, Inc., d/b/a and herein referred to as CareerSource Pinellas, with the approval of the CareerSource Pinellas Board of Directors and the Pinellas County Board of County Commissioners, submits the following extension of designation request to CareerSource Florida for approval.

This extension request follows the process outlined by CareerSource Florida in their final guidance adopted in November 18, 2013 and updated on December 21, 2017 (CSF Admin Policy 83) regarding Extension of Designation as Direct Provider of Workforce Services. This final guidance requires:

1. A review of how the provision of direct services during the prior period fit the business model that the local workforce development board (LWDB) proposed in its original request, and any proposed changes in the business model or the particular workforce services the LWDB intends to provide during the extension period.

Per our original request for designation as a Direct Provider of Workforce Services, CareerSource Pinellas has a business model that reflects CareerSource Florida's emphasis that each local workforce development board increase flexibility in their delivery of workforce programs and services, allowing for a swift response to both local and statewide demands, economic shifts and strategic priorities.

In order to meet CareerSource Florida's emphasis on flexibility, as well as its unified plan goal that "Florida will have a business-led, market-responsive, results-oriented and integrated workforce development system", the Board of Directors of CareerSource Pinellas identified and adopted several specific goals that are included in its approved plan. These goals drive the CareerSource Pinellas Board of Director's business model and decisions, including the Board's and Chief Elected Officials' original decision to seek approval to be a Direct Provider of Workforce Services and this subsequent request to seek an additional extension of the designation.

In addition, the CareerSource Pinellas Board of Directors has consistently acted to maximize the ability of the Local Workforce Development Board to respond effectively and efficiently to the demands of our customers, both employers and job seekers, within the workforce system in Pinellas County. The original proposal to directly provide services and this new request to extend for an additional three year period, as well as a being a continued priority of the Board, is a reflection of this position.

The proposed changes to the business model, in addition to promoting accountability and transparency, will focus on the deliberate collaboration among education, workforce, and economic development networks to increase prosperity of the Region's workforce.

2. The effective date for when the extension would begin.

This extension is requested to be effective July 1, 2020.

3. The period of time, not to exceed three years that the LWDB will directly provide the service.

This extension is requested to be effective July 1, 2020 and continue through June 30, 2023.

4. A review of the LWDB's stated reason(s) in its previous request why the LWDB has decided to directly provide the workforce services, and an explanation of how it is still in the best interest of the LWDB's customers that the LWDB continue to provide these services.

As described in our original request for designation, the CareerSource Pinellas Board of Directors is committed to meeting CareerSource Florida's challenge of increased flexibility and ability to quickly respond to economic shifts and strategic priorities. This is accomplished more effectively and in a more timely manner as the Board has the ability to move forward directly without the need to negotiate changes through a contract modification with a third party. With the designation as the Direct Provider of Workforce Services, CareerSource Pinellas has been able to work with our many partners in the area to better meet any new and/or changing needs of our business community and job seekers.

Additionally, CareerSource Pinellas originally estimated that by directly providing services to job seekers and employers, it would be able to redirect/reallocate approximately \$15,000 per year that was being paid in indirect costs to previous service providers. This estimate was achieved, and surpassed to an average of \$107,000 in savings annually. We estimate that the savings realized were reallocated to a minimum of 10 additional ITAs for occupational skills training for demand jobs in Pinellas County and in increased OJT enrollments.

Due to anticipated budgetary reductions, the streamlined process for delivering services and the more transparent stewardship of human and financial resources, it continues to be in the best interest of CareerSource Pinellas' customers that this LWDB continue to provide these services directly.

5. A review of the effectiveness of the firewall established by the LWDB to clearly separate existing roles as oversight body for the region's workforce delivery system and its role as the operational services directly provided by the LWDB, and an explanation of changes to be made to the firewall.

The administrative entity for LWDB–Region 14 is WorkNet Pinellas, Inc., d/b/a CareerSource Pinellas (CSPIN). CSPIN operates as the local sub-grant recipient and local fiscal agent for all WIOA and workforce development programs operating within the Local Workforce Development Area (LWDA). The board has developed appropriate firewalls between staff providing services and staff responsible for oversight and monitoring of services. The same person or department does not both provide services and oversee the provision of those services.

The board's committee structure is fully described in CareerSource Pinellas' By-laws, with a full description of each committee's functions and the responsibilities of each. The Committee structure is specifically designed to empower the board to perform its fiduciary, policymaking, goal setting, and oversight responsibilities.

For example, the responsibilities of program development and implementation, as well as infrastructure, are assigned to the One-Stop Committee, oversight for business services and economic development activities falls under the purview of the Workforce Solutions Committee, and the responsibilities of budgeting and monitoring are assigned to the Finance Committee. CSPIN's ad-hoc Compensation Committee actively oversees internal staff and HR issues, such as benefits, HR policies, and employee performance guidelines.

Committees operate and report independently, with final approval and oversight for any proposed actions falling to the Board of Directors. A separate Audit Committee comprised of members of the Pinellas Board of County Commissioners and CareerSource Pinellas Board members provides additional oversight.

The scope and leadership of each CareerSource Pinellas Board committee ensure a deliberate, continuous pattern of identifying the needs of its customers and the community, as well as development of effective short- and long-range goals. The committees establish best practices for monitoring program services, outcomes, and overall program performance, and the ongoing review process facilitates integration of stakeholder feedback into the planning process.

As described in the CareerSource Policy 2012.05.24.A.2 – State and Local Workforce Development Board Contracting Conflict of Interest Policy, each board member must complete a Disclosure and Certification of Conflict of Interest in a specific contract form. Our policy requires notification of conflicts of interest regarding board members and board employees to be disclosed prior to the board's vote to approve contracts. A board member who benefits financially or who has a relationship with the contracting vendor must abstain from the vote, and the contract must be approved by a two-thirds vote of the board after a quorum has been established.

Active and ongoing board-committee engagement results in the following:

- A. All programs directly delivered by CareerSource Pinellas are formally monitored on an annual basis and are also subject to unannounced and random monitoring throughout the program year. Monitoring activities are reported in detail to the One-Stop Committee and made available for further review.
- B. Programmatic monitoring includes –
  - i. Analysis of data;
  - ii. Comparison of actual processes against policy;
  - iii. Compilation and delivery of a monitoring report within thirty (30) calendar days of the end of the monitoring;
  - iv. Development of a plan for corrective action(s) (if necessary); and
  - v. Prompt implementation of corrective action(s).

The establishment and adherence to board best-practices result in a sufficient “firewall” between the Board of Directors of CareerSource Pinellas and the conduct of LWDA operations. The board and its staff will have sole authority for the oversight, monitoring, and evaluation of the performance of the One-Stop Operator.

6. An identification of the grant program(s) that currently fund the workforce service delivery model.

CareerSource Pinellas will charge all expenses incurred in accordance with our approved cost allocation plan. Therefore, the costs associated with directly providing the services as proposed shall be allocated or directly charged to all grants (WIOA, Wagner-Peyser, Veterans, TANF, SNAP, etc.) as appropriate.

This extension will not change the description of grant programs and/or services currently contained in the approved plan and subsequent modifications. All such portions of the approved plan will remain in effect.

7. An analysis of the costs of the services that documents the actual reduction in costs with the LWDB providing the services rather than contracting that service to another provider, and an estimate of such costs and savings for the upcoming period.

CareerSource Pinellas has completed a cost analysis and estimates that the cost savings proposed (approximately \$15,000/year originally) in our original designation request has been realized. This savings was exclusively the past service providers' indirect costs. This estimate was achieved and surpassed to an average of \$107,000 in savings annually.

As mentioned prior, we estimate that the savings realized were reallocated to approximately 10 additional ITAs for occupational skills training for demand jobs in Pinellas County and increased OJT enrollments. We also expect to continue to exceed this original estimated savings with the approval of our extension request dependent on overall funding.

8. A review of any other realized improvement to service delivery and performance outcomes, and description of anticipated improvements.

CareerSource Pinellas originally projected that our area's performance would improve in the areas of increased enrollments and placements as related to funding availability. CareerSource Pinellas has maintained performance, and continued robust enrollments and placements related to funding availability. CareerSource Pinellas also maintained performance during the three year period.

In addition, the streamlining of management and oversight duties was another key improvement to service delivery and performance outcomes.

9. Documentation that the public was provided a meaningful opportunity for review and comment on the proposed extension for a period not less than 10 days. Any submitted comments must be included.

A request was posted for public comment on *CareerSource Pinellas'* request for an extension of its designation as a *Direct Provider of Workforce Services in Pinellas County* on the CareerSource Pinellas' website ([www.careersourcepinellas.com](http://www.careersourcepinellas.com)) on March 6, 2020.

CareerSource Pinellas also placed a notice in the local paper advising the public of the same opportunity to comment. In addition, the public was offered the opportunity to submit or voice comments about the proposed extension request at a publicly held CareerSource Pinellas Board of Directors meeting in March 2020 where this extension request was discussed.

No comments were received from the public. See Attachment 2 - Public Notice

10. Documentation that the Chief Elected Official has agreed to the planned extension.

See Attachment 1 - Request for Extension

**ATTACHMENT 1  
REQUEST FOR EXTENSION**

<b>LOCAL WORKFORCE AREA INFORMATION</b>	
Name of Local Area: <i>CareerSource Pinellas</i>	
LWDB Number: <i>14</i>	
Date of Submission:	
Contact Person Name: <i>Jennifer Brackney</i>	Phone: <i>727-608-2554</i>
	Email Address: <i>jbrackney@careersourcepinellas.com</i>
<b>AMENDMENT TO THE LOCAL WORKFORCE SERVICES PLAN</b>	
<p>The Local Workforce Development Board seeks to extend its designation as a direct service provider of certain services by agreement of the Chief Elected Official and the Governor. This extension to the designation of the Local Workforce Development Board as a direct service provider of certain services is to be effective for the period <u>July 1, 2020</u> through <u>June 30, 2023</u>.</p> <p>The signatures below certify agreement to the request for extension submitted by the Local Workforce Development Board and the assurance that the Local Workforce Development Board will operate in accordance with this extension, its Workforce Service Plan, and applicable federal and state laws and regulations.</p>	

<b>LOCAL WORKFORCE DEVELOPMENT BOARD CHAIRMAN</b>	
Name: <i>Karla Lewelle</i>	Title: <i>Chair</i>
Signature: <i>Karla Lewelle</i>	Date: <i>3-18-20</i>

<b>LOCAL CHIEF ELECTED OFFICIAL</b>	
Name and Title: <b>Pat Gerard, Board Chair</b>	County: <b>Pinellas</b>
Signature: <i>Pat Gerard</i>	Date: <b>April 7, 2020</b>

ATTEST: **KEN BURKE, CLERK**  
By: *Ken Burke*  
Deputy Clerk



*Donald S. Crowell, Chief Asst. County Attorney: APPROVED AS TO FORM*

ATTACHMENT 2

**SOLICITATION FOR PUBLIC  
COMMENTS**

**CareerSource Pinellas** is proposing to extend its designation as the direct provider of services through June 30, 2023. The Proposal may be viewed at <https://careersourcepinellas.com/reports-and-publications/> or at the Administrative Office. You may make public comments by submitting in writing to CareerSource Pinellas-Administrative Office, 13805 58th St N, #2-140, Clearwater, FL 33760. Public comments will be taken under consideration through March 17, 2020.  
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