

## *Appendix H*

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# **Responses from the Workforce Development Board, the Executive Office of the Governor, the Department of Education, the Department of Labor and Employment Security, and the State Board of Community Colleges**

In accordance with the provisions of s. 11.45(7)(d), F.S., a draft of our report was submitted to the various state agencies and other entities for their review and response.

Written responses were received from the Workforce Development Board, the Executive Office of the Governor, the Department of Education, the Department of Labor and Employment Security, and the State Board of Community Colleges and have been reproduced herein beginning on page H-2.



# ENTERPRISE FLORIDA

Government & Business Developing Florida's Economy

## Workforce Development

February 3, 2000

Mr. John W. Turcotte, Director  
Office of Program Policy Analysis and  
Government Accountability  
111 West Madison Street Room 312  
Claude Pepper Building  
Tallahassee, Florida 32399-1475

Dear Mr. Turcotte:

As requested by your letter dated January 27, 2000, enclosed is our response on behalf of the State Workforce Board to your draft report entitled:

### **The Workforce Development System**

We appreciate the opportunity to provide these comments to the draft report and the time spent by your staff in discussing the issues and concerns noted therein. We were most impressed with the professional manner in which this review was conducted and the cooperation extended by your staff.

Please do not hesitate to contact me at (850) 921-1119 if further clarification is required.

Sincerely,

/s/  
Curtis Austin  
President

CA/lc

Attachment

cc: John Anderson, President Enterprise Florida, Inc.  
Tony Villamil, Director, Office of Tourism, Trade and Economic Development  
Phyllis Busansky, Executive Director, State WAGES Board

### **Response of the State Workforce Development Board**

OPPAGA's *Review of the Workforce Development System* is a useful update of the September 1995 *Catalogue of Job Training Programs* issued by the Commerce Committee of the Florida House of Representatives. The OPPAGA review goes significantly beyond the House catalogue in providing information relative to the myriad of Workforce programs and potential for system consolidation. In general, state board staff agree with the recommendations in this review.

#### **In Response to Option 1**

State Workforce Development Board staff concurs that a major reorganization and consolidation of Workforce system programs is appropriate. While the thrust of this option correctly advocates major restructuring, the solution advocated is part of the problem, not part of the solution. Option 1 would result in one more additional layer of government, not one less. If the Legislature is inclined to follow this approach, it should be coupled with a mandated elimination of other portions of the Workforce system concurrently and with the mandated review.

Option 1 also fails to acknowledge that the Governor's office currently has many of the powers that the report recommends be conferred. For example, the recommendation that a Director of Workforce in the Governor's office be given power to "review, approve, or amend any proposed plan related to Workforce issues that requires the final approval of the Governor before submission to the federal government," is authority that the Governor already has. He exercised such authority on submission of the State Workforce Investment Act Plan.

That being said, staff is of the opinion that the creation of a Workforce "czar" is recommended because of the perceived reluctance of the existing players to move fast enough and far enough in the integration process. Forced integration can take place without additional government layers and increased staffing levels. In contrast, we recommend that the Legislature and Governor mandate the consolidation of many of the programs that are identified in the report and set statutory goals for elimination, consolidation, and privatization that are tied to agency funding and other performance mechanisms.

#### **In Response to Option 2**

The recommendation to eliminate the WAGES State Board and transfer its responsibilities to the Workforce Development Board is a logical outcome of the success of the WAGES program. The creation of the WAGES State Board was accomplished so that the large welfare caseload did not overwhelm the entire system as Florida initiated welfare reform. With a caseload decline of nearly 200,000 families, the WAGES program has dramatically reshaped the dynamics of Florida's Workforce development

## *Appendix H*

system. Florida programs created exclusively for individuals receiving cash assistance are being rethought and redesigned to meet the post-WAGES workforce.

Since the inception of the WAGES program, there has been a close working relationship between the two state boards, both in terms of joint projects and overlapping service populations. The boards have overlapping membership, primarily with the governmental mandated members, and have regularly been informed of the direction of the other board on relevant issues. State Workforce Board staff concurs with OPPAGA on the need for a WAGES committee to continue the progress made by WAGES clients. The transition away from cash assistance is only the first step to self-sufficiency, the goal of the WAGES program.

OPPAGA's recommendations relating to worker's compensation and vocational rehabilitation have been discussed for some time. State board staff would only note that it is critically important that these important pieces of the workforce system continue to be linked to the One-Stop delivery system as it evolves, no matter which organization is given primary responsibility for program service delivery.

The recommendations that the State Workforce Development Board continue work of this review by using it as a beginning point for further consolidation is, as pointed out by the review, part of the Board's legislative mandate. The authority granted to the Board in s. 288.9956, F.S., is sufficient to accomplish such an assessment. The Board can and will continue to work with OPPAGA in this endeavor.



JEB BUSH  
GOVERNOR

STATE OF FLORIDA

## Office of the Governor

THE CAPITOL  
TALLAHASSEE, FLORIDA 32399-0001

January 31, 2000

Mr. John W. Turcotte, Director  
Office of Program Policy Analysis  
And Government Accountability  
111 West Madison Street, Room 312  
Claude Pepper Building  
Tallahassee, Florida 32399-1475

In reply to: OPPAGA draft report on the Workforce Development System

Dear Mr. Turcotte:

I have received the OPPAGA revised report, which was delivered to this office on January 27, 2000, and I appreciate this opportunity to respond. While the report is fairly wide-ranging, I believe the three main points of the report that call for a response refer to workforce development governance issues, worker's compensation reemployment services, and consolidation within postsecondary vocational education programs.

You have noted in your report the substantial efforts that are already under way in Florida to reorganize how we deliver workforce development training services. Some of these efforts have been in response to the mandates of the federal Workforce Investment Act of 1998. However, the main impetus for reforming workforce development in Florida is the realization on the part of key decision makers in the Executive and Legislative branches of government and the private sector that in order to be a competitive force in a rapidly changing economy, Florida must have a workforce development system that is customer-driven, consolidated under one clear authority, and that delivers a broad array of services at the local level through "one-stop" career centers.

This vision is clearly outlined in Governor Bush's E-budget for fiscal year 2000-2001. Governor Bush has further stated that in order to effectively link workforce development and welfare reform in a meaningful way, the two programs should be merged. There is broad agreement among all parties involved that having two separate boards at both the state and local levels is not only inefficient in an administrative sense, it is short-changing our citizens who find themselves in need of centrally delivered, easily accessed services.

The Governor's Office agrees with the report in that a streamlined and consolidated workforce development program should be housed under one central entity. This entity will communicate a single state policy to the regional workforce development boards, rather than sending the

## Appendix H

Mr. John W. Turcotte  
January 31, 2000  
Page Two

multiple, often conflicting directions as is the current situation. The Governor's Office does not believe that creating yet another bureaucracy in the form of a Florida Workforce Development Office is needed to effectively accomplish the merger of WAGES and Workforce Development. Primary responsibility for Workforce development policy in the state is currently assigned by the Florida Legislature to the Workforce Development Board of Enterprise Florida, Inc. The Workforce Development Board provides an important link between the Workforce development services provided by local and regional training agencies and the needs of Florida's business community. It is the business community that creates high-paying quality jobs for Floridians, and their needs must be attended to if Florida is to continue our dynamic economic growth.

As for the recommendation to further privatize the reemployment services provided through the Workers' Compensation Program, the Governor agrees that whenever privatization or contracting produces a more efficient program and better services to our citizens, that option should be thoroughly explored. We anticipate that as the Department of Labor reinvents itself into a consolidated, customer-driven organization over the next year that many of the inefficiencies found in the agency's fragmented district operations, including provision of reemployment services, would be minimized or eliminated. Regarding the specific privatization recommendations, the Governor would hesitate to impose a mandate on workers' compensation insurance providers to provide reemployment services; however, voluntary contracting with insurers to provide such services would be an appropriate way to devolve this service as the department moves away from a centralized bureaucratic model to one based on developing and nurturing public-private partnerships.

Regarding the revision of the report as it pertains to the Workforce Development System, the Governor's office heartily supports the elimination of unnecessary duplication of effort and is also examining possible alternatives to streamline the workforce system and eliminate the fragmentation that you mentioned in the service delivery and planning areas.

We will work with the Florida Senate Select Committee on Workforce and the Commissioner's Workforce Development Task Force in the Department of Education and take into consideration the findings and recommendations in the OPPAGA report to derive a plan to improve Florida's Workforce Development System.

Sincerely,

/s/  
Sally Bradshaw  
Chief of Staff

SB/lss



Tom  
Gallagher  
Commissioner

FLORIDA DEPARTMENT OF EDUCATION  
TALLAHASSEE, FLORIDA 32399-0400

January 31, 2000

Mr. John W. Turcotte, Director  
Office of Program Policy Analysis and  
Government Accountability  
111 West Madison Street, Room 312  
Tallahassee, Florida 32302-1735

Dear Mr. Turcotte:

As requested, the Department has prepared a response to the preliminary findings and recommendations included in your draft review report of the Workforce Development System.

**Findings**

*The Legislature should consider two options for a more systematic redesign of Florida's Workforce Development System.*

**Option 1**

*Major restructuring of the Workforce Development System. Establish a Florida Workforce Development Office in the Executive Office of the Governor and appoint a Director as soon as practical. The unit would be responsible for developing and expediting the implementation of a comprehensive plan of action.*

**Option 2**

*Evaluation of the overlap among and within programs. The Workforce Development Board, in consultation with the Department of Education, should evaluate the Postsecondary Vocational Education Program and report its recommendations to the Legislature as to whether the State should consolidate responsibility for postsecondary vocational education within the community college system.*

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## *Appendix H*

Mr. John W. Turcotte  
January 31, 2000  
Page 2

### **Response:**

The role of the Department of Education in the Workforce Development System is to provide the education and training necessary for the citizens of Florida to be employed. To do this, we work closely with business and industry to identify emerging occupations and develop and revise the curriculum for training programs that will provide employees with the skills necessary to be employed in that area. While some specific initiatives in the Department provide additional support services to the general public or to specific targeted groups, the majority of funds are directed to school districts, community colleges, and community-based organizations *specifically* for the delivery of education and training. The education and training is for vocational/technical education and for adult general education, which is designed to provide adults without a high school diploma the opportunity to earn that credential.

### **Option 1:**

While the report has focused on removing duplication, the recommendation for the establishment of the Florida Workforce Development Office in the Executive Office of the Governor appears to be duplicative of the responsibilities of the State Workforce Development Board. In Appendix A of the report, the description of the Workforce Development Board states that the board is responsible for "designing, coordinating, and evaluating the state's Workforce development system." While the Governor and Legislature have been focused on "flattening" government, this recommendation appears to add an additional layer of bureaucracy.

The role of Workforce Development Education is unique. Vocational-technical education and adult education play key roles in implementing educational reform initiatives and higher standards for students in Florida schools, while at the same time meeting the needs of business and industry. While sometimes conflicting, these goals must be balanced. Careful consideration to the governance of Workforce Development Education must focus on what is best for the Workforce and what is best for business and industry, rather than what is best for either delivery system.

### **Option 2:**

Over the last few years, the Legislature has dramatically impacted how postsecondary vocational education programs are delivered and funded. The implementation of Chapter 97-307 and Chapter 98-58, Laws of Florida, have standardized vocational certificate program lengths and have moved the funding for postsecondary vocational and adult general education into a performance model—not on a trial basis or as a pilot, but for all providers. This is currently the only educational sector that has 15 percent of its funding

Mr. John W. Turcotte  
January 31, 2000  
Page 3

based on performance. These changes were all responses to earlier recommendations from OPPAGA related to "poor performing programs" or a "duplication of services." OPPAGA also recommended the standardization of program lengths. The performance funding model that has been implemented has the net effect of "self-regulating" these concerns. If programs are not performing, they will not earn performance funds, with the result of reducing their operating budget.

The only data reference that supports the argument for the recommendation relates to the difference in earnings of vocational certificate graduates who are placed in jobs from community colleges with those from school district technical centers.

The report matches the "Average Earnings" of all placements from vocational certificate programs. This includes full-time and part-time employment. While the data in the report is accurate, if Average Full-Time Earnings had been used the difference would have been much less. The full-time earnings of community college students is \$6,651 per quarter and the full-time earnings of school district completers is \$5,803 per quarter. This is a difference of \$800 per quarter rather than the \$1,143 per quarter difference stated in the report.

Some reasons for this differential include:

- School districts complete over three times the number of students than do the community colleges. This, in itself, would indicate the range of salaries is probably wider and the average salary lower.
- The state has focused a great deal of energy on encouraging school districts and community colleges to focus on high-wage/high-skill occupations. This is critical to the state's economy. However, the state cannot ignore certain service-oriented low paid jobs that require training. Examples of these occupations include Certified Nursing Assistants and childcare workers. School districts provide much more of the instruction in these areas than community colleges.
- School districts are serving a higher number of students who fall within the categories targeted by Section 239.115, Florida Statutes. These students are traditionally harder to serve and are typically more costly to serve. These students may also be on public assistance or other costly programs. By placing these students on the job, there is a better return on investment to the state.

With regard to consolidation of the workforce development education programs, I have established a Task Force comprised of superintendents, community college presidents, workforce development board representatives, and business and industry to advise me on this issue. This task force has already voiced its concern about OPPAGA's focus on

## *Appendix H*

Mr. John W. Turcotte  
January 31, 2000  
Page 4

duplication of services and appears to believe that some duplication is *warranted* and *necessary*.

With regard to consolidation, the Division of Workforce Development is the only entity charged by the Legislature with statewide responsibility to ensure the delivery of quality vocational education across the delivery systems. With consolidation, there is a break in the continuum of services across the delivery systems. (K-12, school district postsecondary, community colleges, and universities.) This division has played a key role in ensuring that there is a coordinated seamless system that begins with career development activities in the K-12 system, continues with vocational/technical programs in grades 6-12, and culminates with seamless articulation into the school districts, technical centers, and the community college system. In addition, we have worked closely with the universities to ensure that teacher preparation programs and teacher staff development activities are consistent with the approach.

Through all of the massive changes in Workforce development, the Legislature has consistently called on the Division of Workforce Development to be responsible for ensuring this coordination.

The Department of Education was pleased to be a part of the review of the Workforce Development System that was done by the Office of Program Policy Analysis and Government Accountability. The development of a trained Workforce is key to the state's growth and its commitment to diversifying its economic base.

Sincerely,

/s/

Tom Gallagher

TG/dmh



Florida Department of Labor and Employment Security  
**Office of the Secretary**

**Jeb Bush**  
Governor

**Mary B. Hooks**  
Secretary

January 14, 2000

Mr. John W. Turcotte, Director  
Office of Program Policy Analysis and  
Government Accountability  
Claude Pepper Building, Room 312  
111 West Madison Street  
Tallahassee, Florida 32399-1475

Dear Mr. Turcotte:

Enclosed is the Department of Labor and Employment Security's response to findings and recommendations directed to our programs in OPPAGA's **Review of the Workforce Development System**. We understand, based on discussions with your staff, that the findings in this preliminary draft related to the Division of Vocational Rehabilitation will not be included in the final report. As a result, we have not included a department response for those recommendations. We appreciate the opportunity to provide information and comments for this report, and look forward to continuing to assist in efforts to improve the efficiency and effectiveness of the workforce development system in Florida.

Should you have questions or require additional information, please call Mr. James F. Mathews, Inspector General, at 488-0050.

Sincerely,

/s/  
Mary B. Hooks

MBH/jfmj

Enclosure

cc: Mr. James F. Mathews  
Mr. Michael Moore  
Ms. Lois Scott  
Mr. Charles Williams

**DIVISION OF WORKERS' COMPENSATION**  
**BUREAU OF REHABILITATION & MEDICAL SERVICES**  
**RESPONSE TO**  
**OPPAGA CONCLUSIONS AND RECOMMENDATIONS**

**CONCLUSION/RECOMMENDATIONS:**

The Legislature should give more responsibility for workers' compensation reemployment services to insurers by directing insurers to provide these services through the workers' compensation managed care system. If the Legislature decides not to pursue this option, we recommend that the program redesign its service delivery mechanism by evaluating the cost-effectiveness of these services due to the program's use of a district-based service delivery system.

**RESPONSE:**

The Division of Worker's Compensation recognizes that folding vocational services into medical services may hold some promise for improving return-to-work outcomes for injured employees through collaboration with workers' compensation managed care arrangements. As a result of this promise, the division has initiated a Pilot where it is currently contacting workers' compensation managed care arrangements statewide to obtain early voluntary referrals for injured employees who may benefit from division sponsored reemployment services. Injured employees who are referred to the division through this pilot are screened to determine their eligibility for program services. The division believes this early intervention initiative through an early voluntary referral process will assist in increasing the return-to-work rates for injured employees provided medical treatment through the workers' compensation managed care arrangements early on in their rehabilitation period. Currently, the workers' compensation managed care arrangements are responsible only for providing remedial medical care to injured employees to get them medically released to return to work. Preliminary findings through our early voluntary referral effort indicates that the workers' compensation managed care arrangements do not have built in return to work components which are designed to fold vocational services into medical services and are therefore inexperienced in dealing with vocational issues. Because of this inexperience factor, we believe the recommendation to transfer the reemployment services' functions to workers' compensation managed care arrangements will only further delay the successful return-to-work of Florida's injured employee to the workforce with no real public policy outcomes to be realized from this change.

Under section 440.491(6), Florida Statutes, the division has the responsibility to determine the eligibility of injured employees for division-sponsored reemployment services. Under proposals to further privatize reemployment services, the responsibility would remain with the division to authorize the expenditures of public monies for the payment of private providers.

Since the initial OPPAGA report recommendations, the division has undertaken a number of process improvement initiatives in response to these recommendations. The division's initiatives are Early Voluntary Referrals from Managed Care Arrangements, the West Palm Beach Pilot, and Program Evaluation.

**EARLY VOLUNTARY REFERRALS FROM MANAGED CARE ARRANGEMENTS:**

The first recommendation made by OPPAGA is that the Legislature change the workers' compensation law to make managed care arrangements responsible for providing reemployment services to injured employees, rather than those services being provided either (a) voluntarily by the workers' compensation carrier, or (b) by the division. As indicated previously, managed care arrangements are responsible only for providing medical care to injured employees to get them medically ready for their release to return to work. They currently do not have the responsibility to provide injured employees with reemployment services.

Although the OPPAGA report recommended that the Legislature consider incorporating reemployment services into the state's workers' compensation managed care system, the Legislature did not choose to address this recommendation in the 1999 Legislative Session. We believe the reason the Legislature did not address this issue is that the workers' compensation managed care arrangements do not have built-in components or the experience to address vocational issues for injured employees. However, to address the spirit of the recommendation, the Bureau of Rehabilitation and Medical Services has initiated a program to contact managed care arrangements and to explain our reemployment services program to them. The bureau seeks to obtain early voluntary referrals from managed care arrangements of injured employees who might benefit from the division's reemployment services program. This initiative has just begun in the past three months, and no data results are available at this time. It should also be noted, however, that even if the Legislature never changes the law in question, the bureau intends to continue to work with managed care arrangements in an effort to increase overall provision of reemployment services to injured employees.

**WEST PALM BEACH PILOT:**

The second OPPAGA recommendation indicated that if the Legislature did not change the law as recommended by OPPAGA, that the division consider further privatization of the reemployment services it provides. It should be noted that the provision of reemployment services to injured employees is already substantially privatized because 98% of vocational evaluations, 100% of on-the-job training and training and education and most job placement initiatives are currently provided by private providers. The main functions currently performed by divisional staff are case intake, eligibility determination, and contact management and oversight. Therefore, the prior OPPAGA report issues regarding bureau productivity in returning injured employees to work apply equally to the current privatization within the division's reemployment services program, as well as to that part performed by state employees. Therefore, we believe the issue is

## *Appendix H*

not privatization versus government since a high level of privatization already exist, rather, ensuring the right mix of private providers and state employees are within the program to ensure that injured employees are treated fairly and are provided services that will assist them in returning to work

Determination of eligibility and contract management of governmental budgets are matters which we feel are best performed by state employees. State employees, unlike private providers are salaried individuals and have no personal pecuniary stake in profit margins or how budget is expended on any particular injured employee. Therefore, the bureau does not propose any pilot program on using private providers for those functions.

The bureau does have a pilot program in West Palm Beach and Fort Myers to evaluate ways in which private providers could assist the bureau in case intake and screening activities. A major bottleneck for the bureau in processing a request for reemployment services is obtaining and evaluating medical information on a case. Before a person can be eligible for division provided reemployment services, the person must be medically stable, must have permanent physical restrictions, and the medical condition must be known before evaluation for reemployment services can be conducted. Therefore, the bureau's pilot is to employ private providers in an adjunct function to do medical file review to speed up this process. Currently, a set of such private providers is being developed for the pilot. When that set of private providers is finalized, cases will be assigned to them for medical file review. After the medical file review, the private provider will transmit their findings to the case manager. The case manager will determine eligibility for reemployment services after receipt of this information. As of this time, there are no data to share on this pilot since private providers are currently being contracted for this pilot. The funds to pay for these medical file reviews by private providers will come from the funds the bureau currently uses for evaluations and for training and education. When a sufficient time has elapsed for mature results to be obtained from the pilot, divisional management will assess the results and make appropriate recommendations to the appropriate authorities (be that the Governor and/or the Legislature) and determinations of statewide implementation.

### **PROGRAM EVALUATION:**

The OPPAGA report also recommended that the division evaluate the effectiveness of the workers' compensation system and the various programs within that system. The Bureau of Rehabilitation and Medical Services has therefore set up a process to identify parameters of how well the workers' compensation program is working relative to medical and rehabilitation issues. Included in these parameters are measures of how well division reemployment services are provided and how well carrier reemployment services are provided. Data is currently being collected on these parameters. Once there is sufficient data for analysis, an analysis will be made and the results will be published to the parties in the workers' compensation system. This process should give further indication of the most efficient and effective manner in which to provide reemployment services in the workers' compensation system.

**FURTHER PRIVATIZATION:**

In addition to current privatization initiatives and pilots, the division is evaluating the cost effectiveness of contracting with private providers in job development and job placement activities for injured employees early in their rehabilitation process. We believe this initiative will assist in increasing the return-to-work rates for injured employees and at the same time assist in the redesign process of the reemployment services program where private providers will be further involved in the program's success. Data obtained from this privatization pilot will be used to determine if the expanded use of private providers in job development/job placement initiatives is more cost effective and efficient than the current systems in place.



Florida Department of Labor and Employment Security  
**Office of the Secretary**

**Jeb Bush**  
Governor

**Mary B. Hooks**  
Secretary

February 2, 2000

Mr. John W. Turcotte, Director  
Office of Program Policy Analysis and  
Government Accountability  
Claude Pepper Building, Room 312  
111 West Madison Street  
Tallahassee, Florida 32399-1475

Dear Mr. Turcotte:

Thank you for the opportunity to respond to the revised recommendations in the draft report on Florida's Workforce Development System issued by your office. The department is continually seeking to evaluate and improve this system to better serve our customers across the state and to foster viable partnerships in Workforce development.

In Chapter 2, Elimination, Consolidation, and Privatization, on page 11 of the draft, it states that the Legislature should consider a major restructuring of the Workforce development system. This would include establishment of a Workforce Development Office in the Executive Office of the Governor, which would be responsible for developing a plan for a comprehensive consolidation of Workforce programs by December 31, 2000. The functions of the proposed Workforce Development Office are specifically outlined in the report.

The department supports the concept of developing a comprehensive plan of action for the continued consolidation of Florida's Workforce Development System. However, we would like to recommend the following three alternatives in lieu of the establishment of a Florida Workforce Development Office in the Executive Office of the Governor:

- The first alternative is to assign the responsibility to Florida's State Workforce Development Board and their staff. That board has previously been charged with the responsibility of designing a unified state workforce strategy and evaluating the effectiveness of all Workforce development programs.
- The second alternative is to assign the responsibility to the Department of Labor and Employment Security. The department's proposed reorganization will result in an "Enterprise Model" which will structure the agency in a manner that would enable it to effectively perform this role.

Mr. John W. Turcotte, Director  
Page 2  
February 2, 2000

- The third alternative is to establish an independent Workforce Development Office as recommended in the draft report, but attach it to the Department of Labor and Employment Security.

The department appreciates the constructive and thorough analysis of the Workforce Development System provided by the draft report. This will be an important tool in continuing to assess changes necessary to ensure the efficiency and effectiveness of these programs. We feel that the alternatives offered herein promote the continued Program progress that we all so desire.

Should you have questions or require additional information, please contact my office at 922-7021.

Sincerely,

/s/

Mary B. Hooks

MBH/jfmj

cc: Ms. Lois Scott

FLORIDA COMMUNITY COLLEGE SYSTEM

PUTTING MINDS TO WORK

J. David Armstrong, Jr.  
Executive Director  
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January 14, 2000

Mr. John Turcotte, Director  
Office of Program Policy Analysis  
and Government Accountability  
Room 312 Claude Pepper Building  
111 West Madison Street  
Tallahassee, Florida 32399-1475

Dear Mr. Turcotte:

Thank you for the opportunity to review the draft report entitled, "The Workforce Development System." Certainly your staff is to be commended on the voluminous data which was analyzed and presented in the report. It captures the complexity and the nuances of the workforce development system and should serve as a good foundation for future work in this area.

After reviewing the report, we have a recommendation which we believe will serve to clarify the relationships between the various program providers. This recommendation emanated from an observation that numerous programs cited that they were providing associate degrees. In reality, those programs were purchasing services (paying for tuition and books) for students that attend one of Florida's community colleges, or one of Florida's private colleges or universities. It is recommended that "providers" be categorized as (1) direct providers of service, or (2) entities, which contract for or purchase services on behalf of an individual client or student. Making that distinction will do much to clarify the relationships shown under the umbrella and in the various spreadsheets. You may also want to consider a third category of "provider." The federal vocational Carl Perkins program and the federal Adult Education and Literacy programs are funding sources to build service delivery capacity. However, they are not used like many of the other programs to purchase services on behalf of an individual student.

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Mr. John W. Turcotte  
Page Two  
January 14, 2000

To reiterate, we would recommend three categories of providers: (1) direct service provider; (2) an entity that contracts for or purchases services; and (3) capacity building programs.

In reviewing the report we found an absence of references to district school boards and boards of trustees for the community colleges, as it relates to the state funded workforce development system. There are numerous references to the local workforce development boards and WAGES coalitions who oversee expenditures and operations funded by federal dollars, but are not direct service providers. The school districts and community colleges are direct service providers with both state and federal funds.

Finally, on page 20, we request that the recommendation be amended to read, "The Workforce Development Board, in consultation with the Department of Education and the State Board of Community Colleges, should evaluate . . ."

Again, I want to commend you and your staff for this fine report. We look forward to working with you on the subsequent study referenced. If you have any questions, please call Dr. Lanny Larson at 488-1721, extension 161.

Sincerely,

/s/

J. David Armstrong, Jr.  
Executive Director

JDA:lld