



Stephanie Smith
Chair

Adrienne Johnston
President & CEO

April 11, 2023

The Honorable Governor Ron DeSantis
State of Florida
The Capitol
400 S. Monroe St.
Tallahassee, FL 32399-0001

Dear Governor DeSantis:

Under the federal Workforce Innovation and Opportunity Act, the Governor is granted the authority to designate and redesignate local workforce development areas that are served by local workforce development boards. As you know, the state Reimagining Education and Career Help (REACH) Act that you signed into law on June 24, 2021, calls for a reduction in the number local workforce development boards in Florida to eliminate layers of administration and improve coordination and consistency within the state workforce development system.

In response to the REACH Act directive and on behalf of your CareerSource Florida Board of Directors, please find attached the state board-approved Florida Workforce System Transformation Plan that includes a recommendation to you for reducing the number of local workforce development boards in Florida from 24 to 21, through a series of realignments and consolidations of existing local workforce development areas and boards.

Also attached are recently submitted public comments related to these alignment and consolidation recommendations, following the conclusion of a federally required public comment period regarding proposed changes to local workforce development areas.

We believe the realignment and consolidation recommendations, along with plans for system-wide improvements and regional planning, as reflected in the three-pillar transformation plan, will better position the CareerSource Florida network to advance your goal to make Florida No. 1 in the nation for workforce education by 2030. We look forward to your final determination on the designation of new local workforce areas.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adrienne Johnston".

Adrienne Johnston, President and CEO

Attachments: 2

cc: Stephanie Smith, Chair, CareerSource Florida Board of Directors
Katie Crofoot, Director, Governor's Reimagining Education and Career Help Office
Meredith Ivey, Acting Secretary, Florida Department of Economic Opportunity

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Action Item

REIMAGINING FLORIDA'S WORKFORCE SYSTEM: A THREE-PILLAR PLAN FOR TRANSFORMATION

Advancing system transformation statewide, the Reimagining Education and Career Help (REACH) Act was unanimously approved by the Florida Legislature and signed into law by Governor DeSantis in 2021. The REACH Act addresses the evolving needs of Florida's economy by increasing the level of collaboration and cooperation among state businesses and education communities while improving training within and access to a more integrated workforce and education system. The REACH Act establishes a comprehensive blueprint for the state's talent development ecosystem. It demands customer-focused improvements to reimagine and modernize complementary, but often siloed systems for education, workforce development and public assistance directly affecting the state's talent pipeline through both policy and performance. In the case of the state workforce system — the CareerSource Florida network — the REACH Act directs:

- A reduction in the current number of local workforce development boards to:
 1. Eliminate multiple layers of administrative entities to improve coordination of the workforce development system.
 2. Establish consistent eligibility standards across the state to improve the accountability of workforce-related programs.
 3. Provide greater flexibility in allocating resources to maximize the funds directed to training and business services.

The work to address this statutory directive has resulted in a multi-phase Alignment Evaluation initiative to consider realignment and consolidation opportunities for Florida's 24 local workforce development boards. The approach to this undertaking involved qualitative and quantitative research and discovery to develop a data-driven alignment strategy to achieve these three objectives. Additionally, this work further advances efforts to accomplish the overarching intent of the REACH Act as well as the goals of the federal Workforce Innovation and Opportunity Act (WIOA) for a more effective and accountable workforce development system that maximizes resources directed to services for job seekers, workers and employers, while helping more Floridians facing barriers become self-sufficient and achieve economic mobility and prosperity.

The Alignment Evaluation initiative was launched by CareerSource Florida in collaboration with the Governor’s REACH Office and other vital partners in April 2022. This initiative has resulted in the following recommended three-pillar plan for accomplishing the REACH Act charge to reduce the number of local workforce development boards, allowing the CareerSource Florida network to modernize the local workforce development board governance structure in the nation’s third-largest state and better position the system to be even more customer-centered, cost effective and responsive to meet workforce talent demands today and in the future. The Florida Workforce System Transformation Plan as outlined below focuses on **alignment and consolidation** for local workforce development boards; **system-wide improvements** for improved customer consistency and better leveraging of public funds; and **regional planning** to further promote workforce system alignment with education and economic development and optimize opportunities for regional economic growth.

Key Alignment Evaluation Background

CareerSource Florida contracted with Ernst & Young LLP (EY) to conduct research and discovery through an in-depth evaluation process that included the review and analysis data from all 24 local workforce development boards and the state of Florida as well as a look at local workforce development board realignment processes in three other states — Alabama, North Carolina and Tennessee.

Data research included, but was not limited to, the review of available education and training providers, commuter flows, economic development regions, industry composition, labor force conditions, labor market areas and Florida College System service areas.

The intensive Florida stakeholder engagement and input process directly involved more than 700 individuals representing local workforce development boards, employers, chief local elected officials, economic development organizations, education providers, community development/nonprofit organizations and state leaders. The work followed guiding principles focused on legislative direction and federal criteria, addressing the needs of job seekers and business customers, and ensuring transparency, holistic listening and proactive communication.

Planning, research and initial stakeholder engagement for Phase One began in April 2022, and EY’s data analysis and stakeholder engagement have expanded through Phase Two, which was launched in September 2022. EY has conducted 145 virtual and in-person engagement sessions with stakeholders since last spring.

EY’s comprehensive work led it to complete its Future State Options Report in February 2023, outlining three options that reflect the combined realignment and consolidation of local workforce development areas and an overall reduction in the number of local workforce development boards to comply with state law.

Alignment and Consolidation

A realignment represents the movement of one or more counties from one local workforce development area to a new local workforce development area. A consolidation of areas is combining two complete local workforce development areas to create an entirely new local workforce development area.

Through EY's work with CareerSource Florida and the Governor's REACH Office and after careful consideration and deliberation, the **CareerSource Florida professional team recommends a reduction in the number of local workforce development boards from 24 to 21**. Designation of new local workforce development areas would occur consistent with the authorities afforded to the Governor in WIOA.

When designating or redesignating a local workforce development area, WIOA requires that the local workforce development area share a common economic development area, a consistent labor market area and have appropriate education and training institutions to support workforce development activities. Additional factors such as population centers, labor force conditions, industry composition and other geographic boundaries also may be considered.

Under WIOA, the Governor is responsible for designating local workforce development areas served by local workforce development boards. WIOA further charges local workforce development boards and local elected officials with designing their local system with a regional focus to address their community's workforce needs.

Additionally, the REACH Act requires that population and commuting patterns be considered when reducing the number of local workforce development boards. To comply with the REACH Act directive for local workforce development board reduction, the recommendation for reducing the number of local workforce development boards to 21 includes consolidating six local workforce development areas and realigning two counties affecting four additional areas. These changes would directly affect 10 current local workforce development boards and the areas they serve. Changes being recommended to the state workforce development board that, if approved, would be recommended next to Governor DeSantis, who holds the authority for the designating and redesignating of local workforce development areas, are as follows:

- Realignment:
 - Realigning Jefferson County with CareerSource Capital Region (Local Workforce Development Area 5, currently Leon, Gadsden and Wakulla counties) resulting in a new four-county area instead of with CareerSource North Florida (Local Workforce Development Area 6), resulting in a new five-county area for North Florida that includes only Madison, Taylor, Lafayette, Hamilton and Suwannee counties.
 - Realigning Monroe County with CareerSource Southwest Florida (Local Workforce Development Area 24) instead of with CareerSource South Florida (Local Workforce Development Area 23). CareerSource Southwest

Florida would become a six-county area by adding Monroe County to its service area that already includes Charlotte, Collier, Glades, Hendry and Lee counties. CareerSource South Florida would become a single-county service area for Miami-Dade County only, Florida's largest county.

- Consolidation:
 - Consolidating CareerSource Florida Crown (Local Workforce Development Area 7) and CareerSource North Central Florida (Local Workforce Development Area 9). The new combined six-county local workforce development area would include the following: Alachua, Bradford, Columbia, Dixie, Gilchrist and Union counties.
 - Consolidating CareerSource Flagler Volusia (Local Workforce Development Area 11) and CareerSource Brevard (Local Workforce Development Area 13) to create a new three-county local workforce development area for Flagler, Volusia and Brevard counties.
 - Consolidating CareerSource Pinellas (Local Workforce Development Area 14) and CareerSource Tampa Bay (Local Workforce Development Area 15) to create a new, two-county local workforce development area composed of Hillsborough and Pinellas counties.

These changes would further efforts to join highly interconnected counties to reduce administrative redundancies and maintain or improve economic development alignment to drive regional growth. In several instances, these changes reinforce strong commuting patterns, align labor market areas and reduce the number of local workforce development boards serving in some Metropolitan Statistical Areas. The proposed changes largely maintain or improve access to education and training providers.

While local leaders in communities directly affected by realignment will need to come together in their new local workforce development areas to evaluate and make appropriate administrative and operational changes, this work should not affect the continuation of services provided locally through career centers to businesses and job seekers. The number and location of career centers is not tied to how many local workforce development areas exist but is instead a locally driven decision that also must comply with federal and state policies for ensuring quality services are accessible to every community.

More detailed descriptions on impact and information about the option to reduce the number of local workforce development boards to 21 as well as other options outlined by EY for potentially reducing the number of boards and local workforce development areas to 19 or 16 can be found in the Future State Options Report included with the agenda materials for this meeting and on CareerSource Florida's REACH Act Implementation information page at careersourceflorida.com.

The local workforce development areas for 11 other boards would remain the same. However, every local workforce development board in the state would be subject to improvements reflected by the two additional pillars for transformation that will be discussed later in this action item.

A new local governance structure of 21 boards would address the REACH Act directive for board reduction while maintaining a strong localized approach to service delivery in Florida's vast and diverse communities. This recommendation additionally considers extensive stakeholder input highlighting successes in a workforce system that performs well overall on both the federal and state level and requesting to minimize changes to the current governance structure. It also opens a door for identifying additional strategies with statewide impact that can further address the three REACH Act objectives for board reduction to eliminate layers of administration to improve coordination, establish consistency that improves accountability and help maximize resources directed to training and business services. Thus, emerging from the EY research are future considerations for system-wide improvements that can be achieved beyond alignment and consolidation to combine and leverage resources across the entire workforce system while maintaining and improving local service levels.

System-wide Improvements

During its stakeholder engagement and research work, EY identified potential improvements through organizational and structural changes, streamlined user experiences and modernized processes and technologies. These system-wide improvements in areas such as technology, administration, fiscal, procurement/contracts and programmatic policies reflect a second pillar for transformation. EY's findings, as noted by CareerSource Florida and the REACH Office, provide an unprecedented opportunity to combine strategic local workforce development board alignment changes with statewide and state-level improvements in policy and operations to further enhance consistency and coordination among and between local workforce development boards and state workforce partners including CareerSource Florida and the Florida Department of Economic Opportunity. Focusing on greater opportunities for system-wide consistency will help streamline experiences for job seekers, workers and businesses, allowing a more agile workforce system to cultivate and strengthen local and state partnerships to advance workforce development priorities and outcomes and better adapt to changing marketplace and consumer expectations.

Regional Planning

The third and final pillar recommended for system transformation is the development of WIOA planning regions. Currently, Florida has 24 local workforce development boards and areas and an equal number of planning regions. However, WIOA strongly encourages states to create planning regions that combine two or more local workforce development boards and areas to "align workforce development activities and resources with larger regional economic development areas and available resources to provide

coordinated and efficient services to both job seekers and employers.” Further, the U.S. Department of Labor, strongly supports greater collaboration among local workforce development boards to build system capacity through regional service strategies, promote better alignment with economic development and education partners, improve workforce service quality and performance, including through coordinated and pooled funds for administrative costs, as well as regional planning and the coordination of supportive services for job seekers in need. A future structure for planning regions in Florida among a newly structured 21 local workforce development boards would also allow the CareerSource Florida network to continue seeking system-wide access, alignment and accountability improvements expected by the REACH Act.

Conclusion

The CareerSource Florida Board of Directors serves as the Governor’s principal workforce policy and investment board. In addition, the state board works closely with the Department of Economic Opportunity, which is responsible for the state workforce system’s fiscal and administrative affairs. Together they provide policy leadership and oversight for Florida’s local workforce development boards that serve job seekers, workers and businesses through about 100 career centers. Collectively, these entities make up the CareerSource Florida network, a key contributor to Florida’s overall workforce development efforts. The REACH Act defines Florida’s broader workforce development system as the “entities and activities that contribute to the state’s talent pipeline system through education, training, and support services that prepare individuals for employment or career advancement, and the entities that are responsible for oversight or conducting those activities such as CareerSource Florida, Inc., local workforce development boards, one-stop career centers, the Department of Economic Opportunity, the Department of Education, and the Department of Children and Families.”

The Florida Workforce System Transformation Plan underscores the CareerSource Florida network’s commitment to continuous improvement and creates a framework for innovation. The plan will create accessible and enhanced approaches to service delivery for job seekers, workers and businesses as well as improved opportunities for leveraging regional partnerships and workforce development strategies and resources. Together, the recommended three pillars represent a transformational shift to improve access to and performance outcomes by the CareerSource Florida network for years to come. More details about EY’s research and findings that examine the state workforce system and support these recommendations can be found in the following four reports available on the CareerSource Florida website:

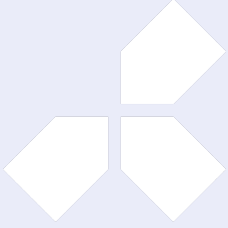
- [Future State Options](#) (February 2023)
- [Operational and Organizational Research](#) (February 2023)
- [Stakeholder Engagement Summary](#) (January 2023)
- [Statewide Data Collection and Analysis](#) (November 2022)

Consolidated Action Item – Reimagining Florida’s Workforce System: A Three-Pillar Plan for Transformation.

* * * * *

FOR CONSIDERATION

1. Approve a recommendation to the Governor for a combination of four realigned and six consolidated local workforce development areas (six consolidated into three) and the continuation of 11 existing areas with no geographic and local workforce development board governance changes that would reduce the number of local boards in Florida from 24 to 21 to comply with the state REACH Act.
2. Direct the CareerSource Florida professional team and the Department of Economic Opportunity, in collaboration with the Governor’s REACH Office and local workforce development boards, to develop a plan for specific system-wide improvements for consistency, improved customer experience and efficiencies to include, but may not be limited to, technology, administration, fiscal, procurement/contracts and programmatic policies.
3. Direct the CareerSource Florida professional team, in collaboration with the Governor’s REACH Office, the Department of Economic Opportunity and local workforce development boards, to develop recommendations to the Governor and state workforce development board for the designation of WIOA-compliant planning regions made up of two or more local workforce development areas and boards to further improve workforce system alignment with larger economic development areas to support economic mobility, growth and prosperity.



Monday, March 6, 2023

Name

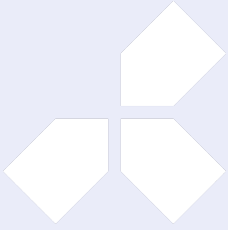
Mary Keen

Email

mary.keen@suwannee.k12.fl.us

Comment

I feel Jefferson county would benefit to remain with CareerSource North Florida, as this workforce region strongly supports rural counties and their unique attributes.



Monday, March 6, 2023

Name

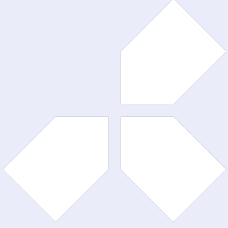
Tanya Knaap

Email

tnk2429@yahoo.com

Comment

I don't think this plan goes far enough in consolidation/realignment of Workforce Regions. Each workforce has different rules/requirements, which makes it very difficult for customer's to navigate. There should be way fewer regional boards so that there is less discrepancy in program rules/requirements, thereby, making it easier for customer's to know what's expected.



Friday, March 10, 2023

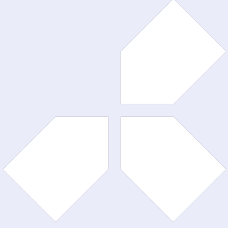
Name Jakub Prokop

Email prokopj@pcsb.org

Organization/Company Personal

Comment

I applaud the proposal to re-combine Pinellas and Hillsborough counties under one workforce board. As a citizen of the area and a workforce professional I believe that this alignment can have tremendous benefit to the overall scope of workforce development and workforce post-secondary education. Such a large metro area should be united in its workforce efforts as all the communities rely on each other for economic benefit. I believe that a concentrated effort in a few key areas can support the economic well-being of the entire community. Currently working in one county and living in the other has taught me how economically dependent we really are. This perspective comes from my years working in workforce education in both counties and meeting with our employers to meet their needs.



Monday, March 13, 2023

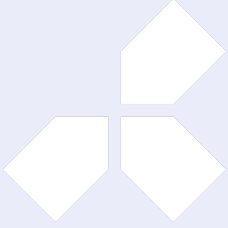
Name Pam Whittle

Email Pam@northfloridachamber.com

Organization/Company North Florida Regional Chamber of Commerce

Comment

I am very concerned about Bradford and Union counties. I serve them through our Chamber and I have been a partner to the Workforce Boards for over 20 years. We have tried to server our businesses with the services provided by workforce and their employees. The Chamber has been instrumental in helping with the need for talent and hiring events as well as other benefits introduced by the workforce board. I have seen the smaller rural counties struggle and I am afraid going to these larger groupings will prove detrimental to the smaller counties. Union County does not currently have a career center and the one in Bradford has been closed for over 6 months, while both counties were in the smaller regional groupings. It distresses me to think of the services that will disappear from these employers and job seekers as the regions enlarge and the bigger counties gobble up even more of the benefits. I just wanted to express my fears and concerns on behalf of small rural communities.



Tuesday, March 14, 2023

Name

Rachel Rutledge

Email

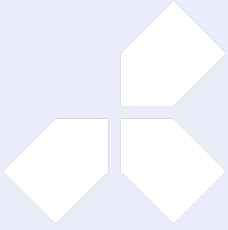
rutledge.rachel@brevardschools.org

Organization/Company

Brevard Public Schools

Comment

I served in a leadership capacity in Career & Technical Education in both Volusia and Brevard counties. They have extremely different goals, priorities, and workforce demands. Aligning these counties, if recommended, will be a heavy lift for both the Flagler/Volusia and Brevard Career Source entities. Concessions will need to be made to streamline services, potentially at the detriment of important community priorities.



Wednesday, March 15, 2023

Name

Mary jo Schmick

Email

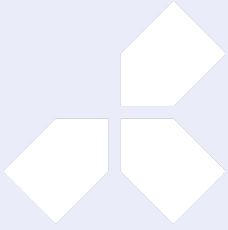
mjschmick@careersourcepinellas.com

Organization/Company

CareerSource Pinellas

Comment

Will the feedback comments be made public?



Name Jonathan Gueverra

Email jonathan.gueverra@cfk.edu

Organization/Company The College of the Florida Keys

Comment

The proposed realignment moves Monroe County into a new region where it will supposedly be clustered with smaller counties with similar interests - "Realigning Monroe County with CareerSource Southwest Florida (Local Workforce Development Area 24) instead of with CareerSource South Florida (Local Workforce Development Area 23)." CareerSource Southwest Florida would become a six-county area by adding Monroe County to its service area that already includes Charlotte, Collier, Glades, Hendry and

Lee counties. According to the proposal's rationale, Monroe County will be aligned with smaller counties that have similar interests. The stakeholder section cites, "A local elected official from Monroe County expressed similar sentiments during one of the Chief Local Elected Officials Webinars hosted by CareerSource Florida. Stakeholders also reported that Monroe County previously attempted to leave area 23. While this set of realignment actions could present challenges related to commuting to Monroe County, the desires of the stakeholders to make this switch present an opportunity for an improved working relationship with counties within the newly created local workforce development area." One of the goals of the realignment process is to

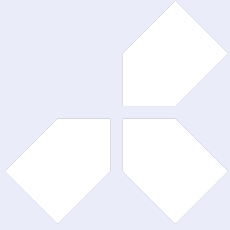
"Provide greater flexibility in allocating resources to maximize the funds directed to training and business services." How will alignment with counties that are not easily accessible create flexibility in resource allocation? If you are in Monroe or any of the newly aligned counties, one can safely say, you can't get there from here.

I recognize that many of us believe that our concerns are unique and must be given special attention. Those of us in Monroe are no different. At the same time, the state must recognize that Monroe's circumstance is indeed unique. It is the very reason that the county was declared an area of state critical concern. Where else in Florida does one find a very strict Rate of Growth Ordinance that severely limits the number of homes and buildings that can be constructed? It is an area of contrasts that is bordered by water and while parts are on the mainland, the majority of families and business are located on the archipelago that is connected by the 42-bridges of a fragile lifeline. Those individuals from Monroe who serve on the CareerSource Board in its current configuration, lose two days whenever they are needed at meetings which are held exclusively on the mainland and this is only the tip of the iceberg. In most instances, the Monroe Board members learn of meeting schedules less than 24 hours before they are scheduled. Putting Monroe in a new collective that is even further away will not help.

As president and CEO of The College of the Florida Keys, I refused to let our community be treated as an after thought and worked alongside our community to allow the College to become the service provider for CareerSource in Monroe County. Prior to the College's involvement, business and the community were skeptical of what CareerSource provided for the community. Is it not possible to simply make Monroe its own sub-region to allow it to flourish? Why not allow this entrepreneurial experimentation that is designed to provide a true one-stop and allows students who may not normally utilize CareerSource to have better access to its services to develop into something that could be a better model for the state? Let us not continue to try and place a large square peg into a small round

hole. At best Monroe receives scant attention in the current model and continuing to force this approach with the creation of the new region will only serve to continue the ineffectiveness of the current model.

Finally, regardless of the model that is selected and approved, the system needs to create oversight that prevents the kind of corrupt practices that are well documented.



Monday, March 20, 2023

Name Barclay Harless
Email barclay.harless@ozk.com
Organization/Company Bank OZK

Comment

After the troubles with CareerSource Pinellas in 2018, the Pinellas County Commission reached out and appointed me and several other business leaders to come in, clean house, setups process and policies, and find quality people to lead the agency into the future after all of the corruption and bad actors had been removed. We have accomplished that. We have, after 4+ years, a team of honest, dedicated, mission-driven individuals and agency policies that I know we as a board can be proud of.

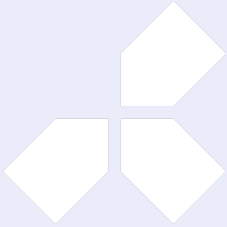
Additionally, the Pinellas organization is policing itself. As board chair last year, the board and I responded to some issues with the prior CEO and they were handled in-house, with strong support from our new general counsel from the Gray Robinson firm. The board is engaged now more than ever. In addition, I cannot stress how much time, energy and frankly, money, has been spent over the past 4 years separating the Tampa Bay and Pinellas organizations.

Several board members, including myself, and stakeholders participated in several of the Ernst & Young workgroups to solicit feedback on any local Tampa Bay mergers. I took half of my business day to participate. It was time well-spent.

I was truly shocked by the outcomes that have been listed for the merging of the two largest Tampa Bay agencies. Nothing could be further from making sense. To be brutally honest, I simply question the facts that were selected to be included and also note certain facts that were omitted. Commuting patterns were used as an illustrative fact as to why Pinellas and Tampa made sense. But Pasco County has more commuters to Hillsborough than Pinellas. So then why wasn't Pasco included. Additionally, several industries were included to show similarities, but certain industries where there is a large gap between the counties, such as tourism, was not mentioned at all.

As someone who serves on various boards locally, I will certainly stress the wide gap in transportation, economic, socioeconomic and political differences between the counties. The area has non-profits and other efforts like economic development corporations that remain and have been separate. There are acute differences in the needs of both counties.

I sincerely hope this message from a current board member and immediate past chair will give you pause as to moving this merger forward. It has been so difficult to move the needles over the past 4 years, and honestly to have such a move come with so little notice, little input and abrupt change, I fear will damage the outlook upon the state CareerSource in the future. We are all here to enhance our communities, employment opportunities, and to assist job-seekers in gaining a better life. Please let us continue the positive road we are on here in CareerSource Pinellas.



Wednesday, March 22, 2023

Name ESTHER MATTHEWS
Email esther@alladministrativesolutions.com
Organization/Company All Administrative Solutions, LLC

Comment

I'm a board member for CareerSource Pinellas, but I am also a small business owner, and the President of the St. Petersburg, FL NAACP.

I am concerned about the proposed consolidation of Pinellas and Hillsborough County as one CareerSource board – through my business and community involvement I believe Pinellas County is best served when our workforce development efforts are focused

here

and not diluted across the bay.

I intentionally built my business in South St. Pete to be of service to that community, and one of my biggest concerns is that by spreading resources out between the two counties, the residents of South St. Pete, and specifically the CRA in that area, will be the most disadvantaged and it will compound the challenges they face.

There is no direct public transportation option between that part of Pinellas County and Hillsborough. It is a several hour commute by bus. Opportunities on the other side of the bay are not advantageous to south St. Pete residents served by CareerSource Pinellas.

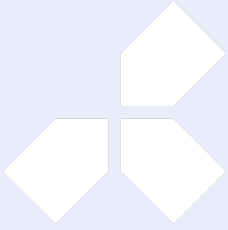
One of the factors stressed in the report are commuting patterns; however, the customers that we serve and those in the most underserved areas of Pinellas County **DO NOT** commute to Hillsborough County. Many of our customers, have not been to Tampa in years. In fact, some of our customers in closed Youth Build grant had never been to Tampa in their lives.

15% of our customers that registered with Employ Florida in the last 12 months, rely on public transportation. And close to 19% of individuals that accessed our system in the last 12 months, rely on public transportation. To take a bus from south County to the Westshore District in Tampa, the closest business district to Pinellas, is two hours. That would be four hours per day. How would this consolidation benefit them?

While the counties are adjacent, there are very limited routes to commuting between them due to Tampa Bay, mass transit is not efficient and there is not a regional transit authority (TBARTA sunsetting). However, Pasco and Hillsborough have similar commuting numbers without the geographic barrier but not considered for consolidation.

I applaud CareerSource Pinellas for being very intentional about making resources available within the CRA, including locating one of their four career centers within the CRA where they offer weekly trainings and hiring events. ZIP codes 33705 and 33712 made up 13% of CareerSource customers last year but are only 5% of the Pinellas County population. I will not stand by and allow the South St. Pete community to be forgotten in this decision.

Ultimately, there is nothing about the proposed plan to consolidate that makes me feel like it is in the best interests of Pinellas County businesses and job seekers. I am concerned we have a lot to lose and very little, if anything, to gain.



Name Steven Meier

Email smeier@careersourcepinellas.com

Organization/Company WorkNet Pinellas, Inc. d.b.a. CareerSource Pinellas

Comment

Please accept the undersigned letter from the staff leadership team at CareerSource Pinellas as part of the public comment process for the implementation of the REACH Act.

On February 23, 2023, the CareerSource Florida board voted to approve an implementation plan that would combine Pinellas and Hillsborough counties under one CareerSource board. We did not have an opportunity to provide feedback on the report produced by EY before the board vote (other than our representative attorney Chris Carmody that spoke for a few minutes during public comment at the meeting to express concern), and unfortunately it contained a number of items in its analysis that we believe are incomplete or inaccurate.

- **Economic Development:** While it is true that Hillsborough and Pinellas fall within the same Enterprise Florida region, the economic development entities for **Pinellas** and **Hillsborough** are separate organizations. While each economic development entity will occasionally collaborate with surrounding counties if it is advantageous, their obligation is to the economic development stakeholders in their own county. A **2019 editorial in the Tampa Bay Times** documents the conflict between these organizations, making it clear that the Tampa Bay Economic Development Corporation exclusively advocates for economic development in Hillsborough County alone in spite of its more inclusive name.

- **Commuting and Public Transportation:** Hillsborough and Pinellas are served by two separate public transportation agencies. The Tampa Bay Regional Transit Authority (TBARTA) was formed in 2007 to spearhead regional mass transit but its board voted last month to sunset the organization and the legislature is expected to dissolve the organization during session and cease its operations by the end of the year. **WUSF Public Media reported** that "Lack of agreement among the five counties involved (Hillsborough, Pinellas, Pasco, Hernando, and Manatee counties) – along with a lack of funding – contributed to TBARTA's demise."

- o An analysis of countywide commuting patterns is not the same thing as an analysis of our customers' commuting patterns. The customers that CareerSource Pinellas primarily serves DO NOT have the means to commute to Hillsborough County. Meanwhile, although there is an exchange of commuters between our two counties, it is worth considering that an even higher percentage of Pasco County residents commute into Hillsborough for work than percentage of Pinellas County residents.
- o Pinellas County is unique among Florida counties for its urban density. We have housing and transportation challenges that no other county faces. And as a peninsula, there are geographic realities that make transportation to neighboring counties more difficult.

- **Adult Education:** These two counties are not grouped together for this purpose. Pinellas and Hillsborough are served by separate state colleges which are exclusive to each county, St. Petersburg College and Hillsborough Community College. For the most part these entities are community-focused in nature, and typically serve county-specific residents.

- **WIOA-eligible Training Providers:** While nine WIOA providers are physically present in Pinellas County, our website clearly documents that we make 27 different training providers available to our customers.

Industry Composition: The report indicated that the two counties have similar employment share across a variety of industries; however, the report makes no mention that Pinellas County is home to the third largest manufacturing employment base in the state. In fact, in January, **Forward Pinellas reported** that Pinellas County has a larger manufacturing base than Hillsborough and Pasco counties combined. In addition, tourism is a major industry for Pinellas County, far outpacing Hillsborough. Additionally, St. Petersburg's population alone is larger than the populations of five current local CareerSource boards (Chipola, Gulf Coast, North Florida, Florida Crown and Heartland). WIOA and the REACH Act identified factors such as shared economic development entities, adult education institutes, and public transportation agencies as necessary precursors to realignment because they unify a geographic area to make shared workforce development goals possible. To combine Pinellas and Hillsborough so that the third and fifth largest cities in the state (Tampa and St. Pete, respectively) are under a single workforce board

without

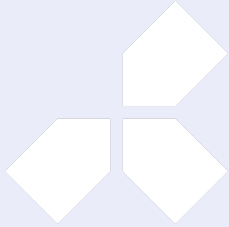
any of these factors in place would hamstring our efforts and make it significantly more difficult to serve the most economically challenged and underemployed populations in Pinellas County, such as the residents in South St. Pete, Lealman and the North Greenwood section of Clearwater.

Finally, we would point out that after the leadership difficulties that have publicly plagued CareerSource Pinellas in recent years, we are very proud to finally have a stable leadership team in place. Results from the 2022 Employee Engagement Survey show that morale has improved, and we have made important strides toward improved transparency and increased confidence in the organization and leadership. The proposed realignment would make all of that rebuilding effort futile.

Pinellas and Hillsborough Counties do not have a successful history of working together. Attempts have either failed miserably or leave behind ineffective organizations. Concerns are already being expressed on both sides of the bay as to who will have more representation based on population size and land area. While the unknown can be concerning, historically, this has been the underlying concern with regional efforts between Pinellas and Hillsborough.

The Pinellas Board of County Commissioners expressed their concerns about the proposed realignment at two County Commission workshops in March. The Pinellas legislative delegation had a similar discussion at their recent meeting in Clearwater. Meanwhile, we are fielding concerns from employees who feel the proposed realignment would be disruptive to the rebuilding efforts we have made as an organization.

We, the CareerSource Pinellas leadership team, ask that the CareerSource Florida board reject the proposal to create a combined workforce board for Hillsborough and Pinellas. Based on our experience in the region and serving our clients, this would not be beneficial. Please contact our interim CEO, Steven Meier, at smeier@careersourcepinellas.com or 727-365-8642 to discuss this matter further.



Sunday, April 2, 2023

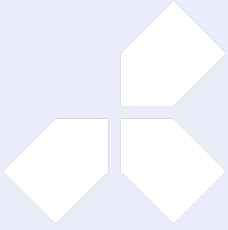
Name Elizabeth Siplin
Email esiplin@empactsolutions.info
Organization/Company Empact Solutions

Comment

As a certified HUBZone business owner in South St. Petersburg, I rely on finding candidates within the HUBZone zip codes to maintain the company's qualifications status. Through the process of combining the CareerSource Pinellas and Tampa , the change would greatly impact the location-demographics of where candidates would be selected from (Tampa and St. Petersburg). I feel that CareerSource exists to not only assist candidates get quality jobs, but also to allow small businesses to scale and grow by receiving quality personnel within their communities.

Furthermore, it's imperative for the Board of Directors to thoroughly understand the locations and people that are being serviced in their areas. Equal representation of the local areas that are being affected must be an essential priority for CareerSource to provide confidence to our current and future clients. All signs of instability within CareerSource possibly will cause a tremendous negative impact of obtaining quality clients and preserving businesses that receive service from the organization.

I strongly recommend that CareerSource Pinellas and Tampa Board of Directors remain intact without combining the two entities.

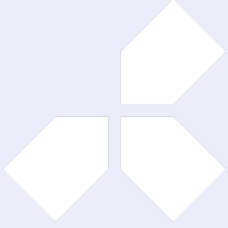


Monday, April 3, 2023

Name	Anonymous Feedback
Email	ucanemail.sc@gmail.com
Organization/Company	CareerSource Pinellas

Comment

As an employee of CareerSource Pinellas. The alignment should take place. Although there has been sincere intents to clean up the aftermath of the two formal CEO's we still need guidance. We need senior management with in depth workforce experience who understands how to work workforce programs putting teams in place with accountability.



Monday, April 3, 2023

Name

Elizabeth Siplin

Email

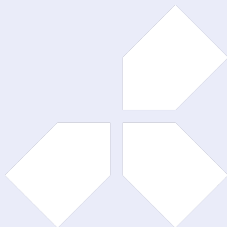
Esiplin@empactsolutions.info

Organization/Company

Empact Solutions

Comment

I strongly recommend that CareerSource Pinellas and CareerSource Tampa Bay remain separate entities.



Name Kevin Knutson

Email kknutson@pinellas.gov

Organization/Company Pinellas County

Comment

The following letter from the Pinellas Board of County Commissioners has been submitted by email.

April 06, 2023

Dear CareerSource Florida Board Members

We write as the chief elected officials of Pinellas County to share our concerns about the proposed realignment of the workforce development boards in Pinellas and Hillsborough counties. While we understand we will have the opportunity to vote on this matter later, we feel it is important to highlight for you and Gov. DeSantis and his REACH Act office some of the concerns we have about this realignment and its impacts on Pinellas County.

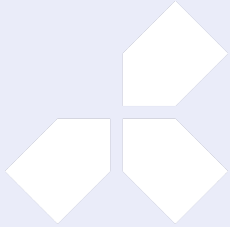
Most importantly, we wish to confirm you are aware of the impact these changes will have on a significant ongoing litigation matter affecting both Pinellas and Hillsborough counties. CareerSource Pinellas and CareerSource Tampa Bay were covered by directors' and officers' insurance policies when a 2018 U.S. Department of Labor investigation required us to pay back a combined \$3.4 million to USDOL due to actions of the former CEO of both agencies. We are now in an active lawsuit with the insurance carrier to recover those funds. Mr. Rob McNeely of Messer Caparello P.A. provided a briefing on this matter to CareerSource Florida President and CEO Adrienne Johnston during her appearance at a CareerSource Pinellas board meeting on March 15, 2023, and identified the possible impacts of the proposed realignment to the course of the litigation. As Mr. McNeely advised Ms. Johnston, while it is impossible to predict the outcome of the case, the estimated timeline of realignment conflicts with the likely timeline of a trial if the case is not settled sooner. The dissolution of both CareerSource entities in Pinellas and Hillsborough prior to the establishment of a single new board covering both counties also presents litigation hurdles under Florida law. We feel we have a duty to our constituents to warn against any action that would make it more difficult for our region to recover these millions of dollars under our insurance policy.

As chief elected officials who will be assigned many of the organizing tasks that come with establishing a new local CareerSource board, we are eager to ensure that Pinellas County, with a population of almost one million people, will have equal representation in the new organization. If we are giving up a local board which is exclusively focused on Pinellas County customers and businesses, we want to be certain that the existing level of service will be maintained, including continuity of operations at all existing CareerSource service centers throughout Pinellas County. This consistency throughout the transition will be very meaningful in addressing concerns from customers and business partners about the CareerSource realignment.

In closing, we encourage you to be responsive to the concerns from Pinellas County business and education leaders, elected officials, and other stakeholders as we realign the CareerSource entities in Pinellas and Hillsborough counties. As a county commission, we stand ready to support CareerSource Pinellas and its successor in any way we can, so it has the best chance of success at serving our local businesses and jobseekers. Please contact Kevin Knutson, assistant county administrator at (727) 464-3485 or kknutson@pinellas.gov with any questions or feedback on this issue.

Sincerely,

Janet C. Long
Chair, Pinellas County Commission
Commissioner, At-Large District 1



Friday, April 7, 2023

Name Rob McNeely
Email rmcneely@lawfla.com
Organization/Company MESSER CAPARELLO, P.A.

Comment

Dear CareerSource Florida:

We were asked to provide our analysis and recommendation regarding the impact, if any, that the proposed consolidation of CareerSource Pinellas (CSPN) and CareerSource Tampa Bay (CSTB) would have on insurance coverage litigation pending in federal district court in Tampa. The litigation seeks to recover \$3.4 million under similar Directors and Officers liability policies that the Complaint asserts are covered losses under the insurance policies.

From a litigation perspective, we recommend that the consolidation be abated until the litigation has concluded. Dissolving each existing entity to create a new consolidated entity, while not fatal to the claims being made, could be expected to provide additional challenges to the prosecution of the case.

First, CSPN and CSTB are distinct entities. Each had its own D & O insurance policy through Chubb-affiliated insurance companies. Dissolving them will raise a legal argument as to whether they have abandoned their claims. As insurance coverage counsel to the two entities, dissolution at this time would require us to defend against any "abandonment" argument, thus extending the coverage litigation and making it more expensive. It would be in the best interests of the \$3.4 million claim to avoid unnecessary complications.

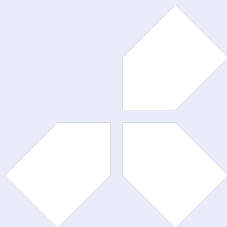
Second, based on the explanation of the timing of the proposed consolidation provided to the CSPN Board, we understand it would not be implemented until June of next year. Based on the pace and progress of federal litigation, if this case were not resolved at a summary judgment stage, it would be possible that the case to be going to trial by that same time next year. The timing of consolidation at or around trial would be an unfortunate complication.

Accordingly, our recommendation from the litigation perspective is to abate any consolidation of CSPN and CSTB until the conclusion of the current insurance coverage litigation. We make no analysis nor recommendation of the proposed consolidation from a policy perspective.

Very truly yours,

Rob McNeely

Friday, April 7, 2023



Name Steve Meier

Email smeier@careersourcepinellas.com

Organization/Company Submitting on behalf of Board of Directors of CareerSource Pinellas

Comment

We write as the governing board of CareerSource Pinellas to express our concerns about the proposal to realign CareerSource Pinellas with CareerSource Tampa Bay and create a new CareerSource entity uniting the two counties for many reasons, not all listed below.

First and foremost, as our insurance coverage counsel stated at the recent board meeting, their recommendation is to abate any consolidation until the conclusion of the \$3.4 million federal coverage litigation. CareerSource Florida is receiving a letter to this effect from coverage counsel directly.

Many of our individual board members have submitted their own comments specific to the industries or communities they represent within Pinellas County, and we support those comments. As a board, we have worked hard over the past several years to help CareerSource Pinellas right the ship after Ed Peachey's departure as CEO and the USDOL investigation that followed. We finally have a leadership team on staff that is focused on staff retention and morale, along with rebuilding community trust and relationships. We appreciate that our organization's history does not have to repeat itself if CareerSource Pinellas and CareerSource Tampa Bay dissolve to form a new cross-bay organization. We have new, principled leadership and a new governance model in place, and that's a positive thing we are thankful for. However, we are concerned that such significant upheaval will forfeit that progress.

CareerSource Pinellas and Career Source Tampa Bay will also be challenged by a long history of failed collaboration between the two counties in transportation and economic development, two key components of workforce development, as these counties operate dramatically differently in all aspects as one county is a land locked archipelago and the other is not. This cannot be discounted, as it affects all policy decisions on the local level on a daily basis. The EY report wrote that a high degree of change management would be needed for the merger of CareerSource Pinellas and CareerSource Tampa Bay, and that is an understatement. CareerSource Florida is proposing to reunite two local boards who split only five years ago under notorious circumstances, and in the process overcome a history of difficult working relationships between elected officials on each side of the bay as they stand up the new CareerSource entity.

Thank you for receiving these comments and taking our concerns into consideration as you execute the plan to realign CareerSource assets in Pinellas and Hillsborough counties.