

**Department of Economic Opportunity
Targeted Occupations List Policy Consultation Responses**

<u>Concerns</u>	<u>Submitted by (Name/LWDB)</u>	<u>DEO/CSF Comments</u>	<u>Authority</u>
<p>I have some major problems with this new policy. First we have more clients for training than just WIOA clients. We also have WTP and the WIOA performance measures especially on wages will not be suitable for them in terms of interest and likelihood of success (math and reading levels). Plus there is a difference sometimes in occupations in demand and targeted occupations. We have a lot of retail, hospitality/tourism, transportation and materials handling jobs available but they are not “targeted” occupations especially by local economic development. It doesn’t mean that those that aren’t targeted should be on the list of eligible occupations especially for WTP clients (unless we have two sets of occupations in demand for our Success Coaches (case managers). We can certainly use the Econ. Dev. targeted industries as long as we get to add other, more legacy industries.</p>	<p>Mason Jackson CareerSource Broward - LWDB 22</p>	<p>Although the list may be used by other programs to guide occupational linkages, the TOL was established under WIOA and is guided by WIOA law and regulations.</p>	<p>Florida Statutes sections 216.136(7)(b), 445.004(6)(a), 1003.492(2)(b)</p> <p>Action Item 1 WFI BOD 11-07-2013 Agenda Packet</p>
<p>This requires updating quarterly and therefore a process quarterly that involves the community. This is way too frequent. We should do it yearly unless we see a need to change it at which point we could send in updates or a new list at our initiative. In other words we can ask for a change at any time.</p>		<p>The quarterly reference has been removed.</p>	
<p>We cannot list the educational opportunities in the local area aligned with each of the occupational areas. We can list those that have applied to be an <u>ITA provider</u>. Why list those that we can’t use for vouchers? It would only lead to complaints—“why is it on the list if you won’t refer me there?” There are</p>		<p>The requirement has been updated to read:</p> <ul style="list-style-type: none"> • How the occupational areas in the local area align with each of the educational programs. LWDBs must identify the appropriate Standard Occupational Classification (SOC) 	<p>Action Item 1 WFI BOD 11-07-2013 Agenda Packet</p>

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<p>many private institutions that offer training that are not on our ITA list. There are some at the public institution that for one reason or another are not on our ITA list. This is a time consuming requirement that will lead to customer dissatisfaction.</p>		<p>code for each occupational area, using the Classification of Instructional Program (CIP) to SOC crosswalk. The SOC code will be assigned based on the program title and occupational title as reflected in the crosswalk. If there are gaps or misalignments between occupational areas and available training programs, the local area must identify appropriate sector strategy solutions.</p>	
<p>There is a requirement to list “How the targeted occupational area will support the LWDB’s employment and earnings projected outcomes”. If it meets the criteria for the TOL in terms of number of openings and wage, isn’t this sort of obvious. If it is an occupation in demand that would be appropriate for WTP and our goal is to get them into unsubsidized employment then isn’t the applicability pretty obvious? Seems like an unnecessary exercise. We should be as inclusive as possible, not exclusive as long as there are job openings available.</p>		<p>This requirement has been removed from the policy.</p>	<p>Action Item 1 WFI BOD 11-07-2013 Agenda Packet</p>
<p>Lastly (and this is a big one), it says we “must update our list any time a change is made to any of the occupations listed...” Any change? What if the average wage goes up by a buck? What if the number of openings changes slightly say from 1000 to 1100? I can see this if there are substantial changes which might influence public investment or customer choice but <u>any</u> change? This needs a much better and more reasonable definition or explanation.</p>		<p>DEO concurs with this comment and has updated the language in the policy to read: <i>LWDBs must update their TOL when occupations are added or deleted, or when there is a change in demand for occupations.</i></p>	<p>Action Item 1 WFI BOD 11-07-2013 Agenda Packet</p>

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<p>Bottom of page 2 (I italicized the part causing concern): “Each LWDB shall revise, as needed, its local plan to incorporate and describe the following.....” Under this requirement, modifying our local plan each time we update the TOL (see bullet 2 – <u>where the local plan needs to identify the occupations being targeted</u>) <u>will then need to go through the approval processes again and again (submitted to both Counties, submitted to CSF, etc.)?</u> That is a <u>time consuming process</u> providing little value. We believe a description of “how” we’re going to do these things are appropriate for inclusion of the local plan, but periodic updates to TOL lists and frequent changes should be managed outside of the local plan (we would still send them to CSF, update our websites, etc. as noted in the additional requirements section of this proposed guidance).</p>	<p>Meredith Montgomery CareerSource NCFL – LWDB 9</p>	<p>A revised version of this footnote has been added to the updated policy A footnote {<i>RWBs do not need to revise their local plans if these elements are already addressed. However, to the extent that an RWB’s current local plan conflicts with these requirements, it needs to be revised.</i>} was placed in the previous policy (2014).</p>	
<p>In that same section (top of page 3), it proposes that the regions will work with local employers, on a quarterly basis, on any changes to the local TOL. So, we’ll potentially be updating our local plan quarterly? Unless than there is an abbreviated process, potentially updating our local plan is cumbersome, time-consuming, and of questionable value.</p>		<p>The quarterly reference has been removed.</p>	

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<p>P. 3: “The educational programs in the local area aligned with each of the occupational areas. LWDBs will use the Classification of Instructional Program (CIP) to Standard Occupational Classification (SOC) crosswalk developed by the Florida Department of Education to identify the correct codes for each occupational discipline.” We are not clear in our understanding of what is being asked of us here. <u>We are to identify the “correct” codes for each occupational discipline and then do what with the codes?</u> I’m just not clear on this entire section. Also, <u>how often are these codes updated and will the LWDB's be notified of any code revisions? Will any revisions require an update to the local plan?</u></p>		<p>The language has been clarified. The LWDs should use the updated SIP to SOC crosswalk located on DEO’s website at the following link: http://www.floridajobs.org/labor-market-information/publications-and-reports/labor-market-information-reports/regional-demand-occupations-list.</p>	
<p>P. 3 Additional Requirements, second bullet: “All training is limited to two years in duration...” First, I’m not sure why this is in the TOL guidance as opposed to the ITA guidance, but nonetheless this might be somewhat vague language. <u>Is it 2 consecutive years from the date they enter training regardless if there is a lapse in training activities (on hold for whatever reason)? Or is it two years the participant is actually in training so that any breaks in training sessions would not be included in the two years in duration count? Does training have to be limited to 2 years? Increases the difficulty of obtaining a bachelor's degree. What about advanced degrees?</u></p>		<p>The revised policy limits training for up to two years and the attainment of industry-recognized certificates or certifications, an associate’s degree or a bachelor’s degree, pursuant to CSF’s recommendation as recorded in its November 2013 board meeting minutes. The two years is not consecutive and breaks are acceptable. Advanced degrees are excluded.</p> <p>DEO should inquire of CSF for clarification on consecutive vs. breaks in training.</p>	<p>Action Item 1 WFI BOD 11-07-2013 Agenda Packet</p>

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<p>P. 2 - Application of TOL to Different Forms of WIOA Training - unless included in the definition of 'transitional jobs', <u>the policy should not apply to jobs associated with repair/restoration/recovery grants resulting from natural disasters or other state/federally declared emergency conditions.</u></p>		<p>The local area will need to follow the requirements of the associated grant as each grant has its own requirements.</p>	
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