

RWB ITN COMMENTS

<b>RWB</b>	<b>Section Comments</b>	
<b>4</b>	<p><b>1.1</b> -states that DCF staff will be afforded an opportunity to apply. The procurement officer for this ITN is a DCF employee; further, the Evaluation sections states that “the department will conduct...evaluation of all Replies.” This seems like a real conflict. FSP regulations state that only “public workers/merit personnel” may process food stamp applications and conduct food stamp interviews (I don’t know if this applies to cash assistance, etc, but suspect so). This is not something that states can get a waiver on, according to an FNS grant I read. In talking to Mike Switzer, I found out that the plan in Florida (if DCF doesn’t get the contract) is for DCF staff to review the documentation provided by applicants and process applications. Apparently the thinking is that technology in the form of kiosks and phone bank application services will make this possible. It seems to me that this places DCF staff in a position to hamper the vendors efficient delivery of services and while we cannot get around the regulation it would make sense to follow the RWB/AWI model when it comes to AWI staff in One Stops: the DCF personnel who perform those duties should be under the functional supervision of the vendor. This way recalcitrant workers may be removed from the system and replaced with individuals who will work cooperatively with the vendor. I also think that we need to know how much DCF intends to keep for this function, including the costs of Tallahassee-based support staff. I’d really like to see a complete budget for the system as it now stands.</p>	
<b>3</b>	<p><b>1.2</b> Page 5/1.2-The term of agreement should be changed to be one year with renewal available for a total of “X” number of years. In addition, if not implemented until after July 1, 2004, I would suggest the initial contract period cover through June 30, 2006 with renewals available for a set period of time without bidding again. This is suggested because, in my view, an initial contract period of less than twelve months would not provide any time for review and it would seem to be beneficial to have the contract period match state fiscal periods.</p>	
<b>10</b>	<p><b>1.2-</b> Page 5; Term of Agreement The language provides for a contract to be “..up to five years.” It is suggested that the contract length be clarified. Suggested change: A contract for a five, one- year periods will be awarded as a result of this ITN. The renewal of the contract annually will be subject to successful performance of the contract (as negotiated within the contract document) for each year. Such a review will be conducted annually during the ninth (9<sup>th</sup>) month of the contract and based upon performance goals as of that date. Statewide contracts or multi-zone contracts may be renewed, but areas (zones) where non-performance is noted may be eliminated from the renewal contract. In such instances, the state reserves the right to negotiate with a vendor of its choice to perform those services within the zone(s) excluded until such time as a formal procurement can take place.</p>	
<b>3</b>	<p><b>2.3-</b> Page 6-A mechanism needs to be put in place to allow potential vendors to talk with local employees to better understand the current system from a ground floor view as well as understand</p>	

RWB ITN COMMENTS

	potential areas for improvement. This could be accomplished through some sort of prearranged meetings at various local offices. This would allow vendors to design programs that meet the needs arising from regional differences in both populations and resources.	
3	<p><b>2.7E-</b> Page 9The line “Materials may no be removed from the building and must be returned to the library,” could be interpreted to mean items the vendor pays to be copied so that they my write on them could then not be removed.</p> <p><i>Will DCF officials responsible for the DCF proposal be held to the same requirements regarding use of documents that reside with the agency?</i></p>	
4	<p><b>2.7 -</b> If DCF replies, are they going to have to pay for copies of information from the Documentation Library? Why not put the thing on line? Also, DCF should shoulder some responsibility regarding the inaccuracy or incompleteness of materials in the library as it pertains to this ITN. A statement to the effect that responders who include inaccuracy/incompleteness in responses due to DCF’s library problems will not be considered non-responsive or have points removed should be inserted</p>	
1	<p><b>2.9</b> Page 10, Item (toward bottom) of page – Regarding “Engage a quality assurance monitor to review all aspects of the eligibility determination and service delivery system”, need to further define “service delivery system”. If it in fact relates to non-DCF/prospective vendor(s), it’s very probably touching on organizations and issues that fall outside of DCF authority.</p>	
3	<p><b>2.15</b> Page 13/-Reply guarantee could exclude RWDB’s from responding. Consider eliminating or modify to allow RWDB to respond without. Fees and guarantees should be in smaller amounts for those responding to only regional or super region areas.</p>	
10	<p><b>2.15 -</b>Page 13, a Reply Guarantee of \$100,000 is required for “Each Reply...” Consideration of this requirement is requested. A single proposal, submitted for a statewide project, would require the same reply guarantee as three proposals, each for different zones. However, the three zone proposals would require a total guarantee of \$300,000. If sub state proposals are acceptable, such a requirement effectively discourages proposals from smaller entities whose focus of service is within their communities. Consideration should be given to using the \$100,000 for statewide replies, with a \$10-15,000 bond being required for zones.</p>	
5	<p><b>2.15</b> Page 13 Reply guarantee could exclude RWDB’s from responding. Consider eliminating or modify to allow RWDB to respond without.</p>	
1	<p><b>2.15 and 2.16</b> Page 13, – Guarantee and Bond amounts seem extreme.</p>	
4	<p><b>2.15-16</b> – Why must there be a Reply Guarantee of \$100,000 and a Performance Guarantee/Letter of Credit for \$100,000,000 in the first year and \$50,000,000 thereafter? This is going to cut some very viable vendors (i.e. local boards) out of the bidding.</p>	
5	<p><b>2.16</b> Page13 Same as above (2.15) for performance guarantee</p>	
3	<p><b>2.16 -</b>Page 13/- If a normal bond fee is 2.5% of the total amount bonded the fee in this case would be \$2,500,000. Would this amount then apply against the 3.5% administrative costs?</p>	

RWB ITN COMMENTS

10	<p><b>2.16</b> requires a \$100 million performance bond. While a bond is understandable, the amount of this bond seems to be overstated. This bond should also be correlated to the size of the proposal being submitted and the “risk” and exposure that the state would be subject to because of that size and scope of the contract. It would seem that a bond equal to over 25% of the entire project funding would be excessive.</p>	
10	<p><b>2.18</b> Page 14, This section addresses Order of Precedence. No federal government citations are listed. Should there be any?</p>	
1	<p><b>3.1</b> Page 16, Item General Statement, 3<sup>rd</sup> paragraph, last sentence – Need to clearly define “Other funds that reside in partner agencies....” Not sure DCF has is authorized to make such a statement Page 20, Item C – Penalties seem extreme, entirely inappropriate for RWB Welfare Transition programs and inappropriate for this ITN’s venue. The ITN should only address penalties to the vendor. Penalties placed on RWBs for each client that does not make his/her activity hours could cripple the RWB’s ability to deliver Welfare Transition services. Substantial penalties could lead to suspended services due to lack of funding or termination of necessary supportive services. DCF’s penalty requires 100% work participation rather than the level required under federal law.</p> <ul style="list-style-type: none"> <li>• Page 21, Item 7 – RWBs do their own tracking of participants on OSST. Why would they have to supply any tracking information (except job placements) to the eligibility department/vendor?</li> <li>• Page 23, Item I. Improved Efficiencies – Why would the ITN address a formal mechanism for identifying and assessing the use of different agency funding sources in serving client needs”? That seems to be a bit beyond DCF’s territory of responsibility. One-Stop Career Centers typically include a systematic client review, needs assessment, and referral process. If all One-Stop partners are truly and fully involved, information on program/funding resources can be shared and utilized.</li> </ul>	
3	<p><b>3.1.</b> Page 16 -All info is on statewide basis. Need for each zone and super zone. Page 18/2<sup>nd</sup> paragraph-The document says incentives will be paid for placements. What steps will be taken to assure no duplication of services? Who is responsible for documenting placement?</p>	
4	<p><b>3.1</b> – Need the caseload and dollars broken out by county – also need zones broken out by county. Also, this section notes the dollar amounts attached to salaries and operating expenses as being approximately \$285,000,000 and benefits at \$100,000,000. However, the Senate Staff analysis for SB 1466 notes that operating expenses for 2002-2003 were \$331,000,000 and benefits were at 13 billion. That’s a pretty big discrepancy – 46 million in operational expenses and billions in benefits. <b>AND,</b> my reading of the proviso language and the bill indicate that only eligibility determination was to be contracted out, not dispensation of benefits.</p>	
5	<p><b>3.1</b> Page 16 All info is on statewide basis. Need for each zone and super zone</p>	

RWB ITN COMMENTS

	Page 18/2 <sup>nd</sup> paragraph The document says incentives will be paid for placements. Will the placement be counted when verified and entered by the RWDB or will the vendor have this responsibility?	
10	<p><b>3.1</b> Page 16, paragraph 3 The last sentence of this paragraph states, “ Other funds that reside in partner agencies may in part be available...” Please provide more information about the funds envisioned, the processes for access of these funds and the potential amount of funds that may be accessed.</p> <p><b>Page 18, Section, paragraph 2</b> at top of page This section describes incentives that are currently, or appear to be currently, part of the workforce system’s funding or achievement/goal requirements. Please:</p> <ul style="list-style-type: none"> <li>• Explain how this paragraph relates to the services sought in this ITN.</li> <li>• Explain if these are in addition to those that have been credited to the workforce system.</li> </ul>	
8	<p><b>3.1 General Statement (Page 16; paragraph 3)</b> Currently, caseloads equal 62,000 TANF clients and 597,000 unduplicated TANF, Food Stamp and Medicaid clients. The budget for these services is approximately \$285,000,000 annually for salaries and benefits to perform all eligibility services and approximately \$100,000,000 for TANF benefits. Other funds that reside in partner agencies may in part be available to the selected vendor for providing additional services when appropriate. <i>Comment: What additional services are envisioned, and from whose monies would this be paid from?</i></p>	
21	<p><b>3.3</b></p> <ul style="list-style-type: none"> <li>• Under the activities performed by the RWB’s – they include upfront diversion but do not mention the relocation or cash severance programs. It may be prudent to have the agency responsible for these two programs identified in the Scope of Service; e.g. Privatization Vendor or RWB’s direct service provider?</li> <li>• At this time, the countable hours are 30 not 24. I think it should be stated as such.</li> <li>• This question/comment is specific to Workforce Alliance (Palm Beach County). It is understood that the intended target date for implementing this TANF privatization program is July 1, 2004. This date may be a bit aggressive. An implementation date of sometime within the first quarter of PY 2004-05 may be more realistic. Palm Beach County is currently involved with the privatization pilot that commences on June 30, 2004. Given the possibility that the state’s privatization program does not begin on July 1, 2004, will the TANF eligibility function revert back to our local Department of Children &amp; Families?</li> </ul>	
4	<p><b>3.3</b> - Even though the language is somewhat ambiguous and refers to “<u>anticipated</u> state workforce board policy,” I find the statement that local boards will be fined up to \$5000 for failure to meet work activity participation requirements fairly offensive and not workable. Will we be having bake sales to pay these fines since we can’t use our funding to do so or will the state withhold more TANF money from us than is already being taken? We don’t really have enough money to serve the people we have; building a performance set-aside to cover this fine would make operating programs impossible.</p>	

RWB ITN COMMENTS

<p>10</p>	<p><b>3.3</b> Page 19, Scope of Service  <u>Eligibility Functions:</u></p> <ul style="list-style-type: none"> <li>• Number 3, orientation, rights and responsibilities is conducted by the RWB. Is there also a separate eligibility orientation that they must attend prior to application? IF not, move down to RWB activities</li> <li>• Number 10, this is a shared responsibility between both the vendor and the WFB</li> <li>• Add in the issuance of Diversion Payments</li> </ul> <p><u>Work Placement and RWB functions:</u></p> <ul style="list-style-type: none"> <li>• Add in initiate sanction requests</li> <li>• Responsibility of the RWB to define the work registration process and conduct</li> </ul> <p>Add in Development of employment opportunities.</p>	
<p>7</p>	<p><b>3.3-</b> Page 20,-Most of us have moved past the concept of penalties. Incentives work far more effectively.</p>	
<p>5</p>	<p><b>3.3 A 8(2<sup>nd</sup>)</b> Page19/Is the reference to the JPR data that has been entered by the RWDB or is this a duplication?</p>	
<p>3</p>	<p><b>3.3 A 1-11</b> - Page19/This is a listing of services provided through the local RWB. This lists items that require direct work with employers. Later in the ITN it appears the door is left open for the vendor to work directly with employers on many of these items. This door needs to be closed to avoid duplication of services and to avoid having multiple agencies/vendors knocking on the doors of employers offering the same or very similar services.</p>	
<p>10</p>	<p><b>3.3, B.</b> Page 20  <u>Item 1</u> of this section provides penalties for not achieving certain time-related functions. Rather than a penalties approach, consideration should be given to reserve part of the \$385 million in funding for an incentives pool to cover the performance that is primary to the provider of the services in this ITN. Furthermore, the ITN appears to attempt to establish a policy and extend penalties beyond the scope of the agency when it addresses penalties to the workforce system. Such an approach is better left to the workforce policy body, Workforce Florida, Inc. and has no place in this ITN.</p> <ul style="list-style-type: none"> <li>• 1 (b), line 5 states: "...and as many Food Stamp applicants allowed with budgetary limitations..." Is this a true statement?</li> </ul> <p><u>Item 2</u> of the section defines the relationship between the Vendor and workforce boards for the purpose or work program plans as collaborative. While all workforce boards desire a collaborative relationship, it should be clear that existing law provide authority over certain of these services to the workforce system. The work registration process comes to mind in this regard.</p> <p><u>Item 5</u> of this section references contracting options open to regional workforce boards. While informative in nature, they have no bearing on this ITN as stated. If the department is establishing a policy that will allow any provide it selects to also bid on other State of Florida or Regional Workforce</p>	

RWB ITN COMMENTS

	Boards services, consideration should be given to stating that policy <u>Item 7</u> discusses the "...tracking of attendance and monitoring with information supplied..." It is unclear what this means. Certainly, no vendor selected has any "work program subcontractors" as these functions reside with the RWB. What attendance tracking and monitoring that is not already being accomplished by RWBs and entered into the system is envisioned?	
8	<b>3.3 Scope of Service; A. Current Business Activities</b> (Page 19, item 3.) 3-Eligibility orientation, including rights and responsibilities <i>Comment: This service is currently being provided by the RWB, has this been mandated to change?</i>	
3	<b>3.3B 1(b)</b> -- Page 20 Hours listed for participation as twenty-four hours per week. This amount should be changed to require those hours necessary to meet local RWB policy requirements.	
5	<b>3.3B1(c)</b> Page20/RWDB does not have the authority or ability to pay a financial penalty. If this concept remands, there needs to be clarification: <ul style="list-style-type: none"> <li>• Will the penalty began from the date of the alert?</li> <li>• Will the penalty be assessed for each and every week the required hours are not met?</li> <li>• Can there be more than one penalty per person?</li> <li>• How and when is the penalty determined?</li> </ul> Will the RWDB's overall performance impact the penalty?	
3	<b>3.3B1(c)</b> - Page 20RWDB--does not have the authority or ability to pay a financial penalty. If this concept remands, there needs to be clarification: <ul style="list-style-type: none"> <li>• Will the penalty began from the date of the alert?</li> <li>• Will the penalty be assessed for each and every week the required hours are not met?</li> <li>• Can there be more than one penalty per person?</li> <li>• How and when is the penalty determined?</li> </ul> Will the RWDB's overall performance impact the penalty?	
8	<b>3.3 Scope of Service; B. 1. (c)</b> (Page 20) (c) Anticipated State workforce board policy will require the Local Workforce Boards to serve all TANF and as many Food Stamp clients as possible based on budget restraints as referred by the DCF eligibility Vendor(s). Failure to meet federal or State mandated work requirements will result in a monetary penalty of up to \$5,000 (comment and justification as to the appropriate amount to ensure the desired incentives for sustained employment of recipients is strongly encouraged) for each client not engaged in the twenty-four hour work requirement (or whatever meets federal requirements). This statement needs to be dropped altogether from the ITN. A potential penalty of this type would need to be negotiated with the WF/AWI/RWB and would be outside the scope of the work of the vendor procured through this ITN.	

RWB ITN COMMENTS

8	<p><b>3.3 Scope of Service; B. 3.</b> (Page 20)          3. The DCF vendor(s) will have responsibility to refer applicants for TANF, and Food Stamp assistance to the Local Workforce Boards when the applicant is not eligible for benefits or when diversion for TANF and/or Food Stamp eligible clients meets a criteria required by law or policy; <i>Comment: The Diversion service has been assigned and successfully operated by the RWB. This statement should be modified to reflect how the service is currently delivered.</i></p>	
5	<p><b>3.3 b 5-</b> Page 20/Says RWDB may contract with vendor for employment services. Does this raise false hopes?</p>	
3	<p><b>3.3 b 5-</b> Page 20/Says RWDB may contract with vendor for employment services. Appears to be in conflict with Page 107 I which appears to bar the vendor from contracting for services, etc deemed to be an outgrowth of the advice or recommendations that the successful Vendor provides under any contract resulting from this ITN.</p>	
8	<p><b>3.3 Scope of Service</b> (Page 21; paragraph 1)          The Vendor’s model for eligibility determination and service delivery should consist of all of the business functions needed to perform the federal and State statutes and applicable case law. How the vendor may choose to implement these business activities within the applicable federal and State statutes and case law will vary based on the business model of the Vendor. Comment The statement should include a description of how the responder will work with the RWB to ensure the creation of the most effective business model to assist the client rapidly reach their employment goals.</p>	
4	<p><b>3.4</b> – Did someone give our One Stops to DCF and forget to tell us? Resource rooms are really for people to do job search, not to apply for DCF services. Also, on page 23 there is discussion of a “Shift in Focus to Whole Family Needs” which is intended to view the client as part of a family unit in need of services rather than as an individual. This shift in service strategy is going to increase the need for staff – yet early portions of the ITN indicate a lower level of staffing necessary due to efforts to automate the process of eligibility. Which is it going to be? Who will make the home visits recommended, the kiosks?</p>	
8	<p><b>3.4 Fewer Trips to the Offices</b> (Page 21 paragraph 1 &amp; Page 22 c. Less Paperwork)          An automated voice response (AVR) system, automated call distribution, and expert agent selection techniques to quickly and efficiently help clients obtain enrollment and service delivery information through Call Centers and to apply by phone for TANF, Food Stamp or Medicaid services could reduce the number of office visits required for most clients. In addition, clients will be able to report changes by phone, receive general information, and retrieve specific information about their case through an automated voice response system. The Vendor must still allow for continued walk-in access for those who may not have access to the phone, be unable to use it successfully, or do not want to use it. DCF maintains a commitment for statewide access to walk-in services.</p>	

RWB ITN COMMENTS

	<p>Once a client has called in or entered into a kiosk his/her application and has been determined potentially eligible for any combination of programs, the automated system will generate a form to the client identifying all the verification information needed to complete the eligibility determination process. The client will send verification documents to the Vendor Mail Center. This information will be entered into the information system and available to employment and training, child support enforcement and other programs as needed and appropriate. Overall, the amount of time and paperwork that the client must contend with will be lessened for most programs, especially when a client is applying for multiple programs. <b>Comments:</b> <i>The responder should be required to articulate how they envision utilization of the automated processes and meanwhile ensuring the client meets the 3 day registration rule once the Request for Assistance has been initiated.</i></p>	
5	<p><b>3.4 B</b> Page 22.-Says "...take advantage of One-Stop RWB/One-Stop Center Resource Rooms in order to allow client to access TANF and other applicable services." It seems presumptive of DCF for them to include in their proposal the use of our resources.</p>	
3	<p><b>3.4 B.-</b> Page 22/Says "...take advantage of One-Stop RWB/One-Stop Center Resource Rooms in order to allow client to access TANF and other applicable services. This would appear to be an item of discussion between the vendor and the local RWB and the subject of a contract between DCF and a vendor.</p>	
10	<p><b>3.4 B.</b> Pages 21 and 22          Consideration should be given to have some sort of "sign-off" as to the linkages to ensure that linkages proposed do not adversely affect RWB operations. Such a "sign-off" would need to include a RWB statement where the linkage causes business problems. It is not envisioned that such a process would be a go/no go sign off, but would be a gauge as to the development of business practices that support the successful business achievements of the 24 regional workforce boards.  <b>Page 22, D.</b> Line 4 states that Face-to-Face time will allow for heightened focus on functional assessments, personal responsibility, self sufficiency....."This seems to be veering away from performing eligibility services into the realm of case management.  <b>Page 22, F.</b> First paragraph, last line. End with "at the One Stop with services provided by the local WFB".The language that discusses third party screening of a disability claim should also include that this service needs to be coordinated with the RWBs( wh9 currently manage this service, if they require it)to develop a comprehensive business approach serving both parties.  <b>Page 28, 2.</b> The definition of specifically what the level of understanding is of the client population should be stated. Is this 4<sup>th</sup> grade, 5<sup>th</sup> grade...?  <b>Page 29, 7.</b> We question the reasoning behind this payment structure for State staff travel. This seems to be a petty requirement that should be managed at the State level.  <i>Page 49, C. Publicity This section would appear to illegally restrain comment by the vendor. It is understandable that the vendor and the department would want a harmonious relationship, but</i></p>	

RWB ITN COMMENTS

	<i>providing prior written consent requirements when the Department does not place the same conditions on itself would seem to fly in the face of such a desire.</i>	
4	<b>3.5</b> – It seems contrary to smooth operations to have the department that will be being downsized manage the contract. Doesn't it make better sense to have that done by DMS or AWI? Page 25 – what is a “cold site facility?” Why must the vendor write business rules to re-write state rule/policy/procedure?? Page 27 says that “eligibility determination services will be housed, operated, supported and warranted by the vendor.” Now, since DCF staff are ultimately responsible for the act of processing RFAs (the merit staff thing), how can the vendor warrant those services? Page 28 – who is going to pay for the client satisfaction survey?	
5	<b>3.10 3.-</b> Page 33-It seems unreasonable to impose the State's late payment provisions on the vendor	
3	<b>3.12 A.13</b> - Page 36-The vendor should be given leeway to make purchases necessary for operations within a manner that meets acceptable business practices as long as provisions are in place to protect tax payer funds. This appears to go well beyond the needed requirements.	
5	<b>3.12 A.13-</b> Page 36-Why does DCF have to determine how the vendor is going to buy IT stuff?	
3	<b>3.13 B. 1.(b)-</b> Page 39-DCF should require a certain level of training and not prescribe the method by which this training is reached. <b>A. 6</b> Page 47- What is the current DCF administrative percentage? This cap appears to be too low.	
5	<b>3.13 B. 1.(b)--</b> Page 39-DCF's approval on staff training plan seems excessive Page 47/A. 6 -3.5% admin allowance is unreasonable	
4	<b>3.16</b> – 85% of calls must be answered by a live voice within 25 seconds and the call centers have to be available 24 hours a day? This is adding staff, not reducing it! The requirements on abandon rates are ridiculous. The vendor cannot control how many people hang up before the call is processed. 3.5% Admin is not realistic. What is DCF getting now? Also, what are DCF's past performances on those standards? Quality Assurance should not be a DCF responsibility but contracted out to a neutral party. Doing it this way is a great deal like expecting the first wife to approve of the way the second wife cooks and keeps house.	
4	<b>3.18</b> – The requirements under item C. seem to violate first amendment rights. Vendor employees should be able to write a letter to the editor saying any damn thing they well please about the state or the department. Item K. requires departmental approval of vendor policies. That is ridiculous. Putting the Department in any capacity that would allow it to interfere with successful operation of service delivery is asinine.	
3	<b>3.18 C-</b> Page 49-Preventing a vendor from announcing they have won a major contract appears to be overly restrictive. Also, could this place a vendor subject to Security and Exchange Commission regulation in a position of deciding between violating SEC regulation or DCF contract requirements? If a SEC regulated company wins the bid they may be required to disclose this fact to current and potential stockholders. Such a requirement would be a release to the press and general public and would therefore	

RWB ITN COMMENTS

	be in violation of this stipulation. If a company official was called by a local news outlet to respond to any issue they would first be required to say we can't comment until DCF gives us the authority to do so, and this could cause a public relations nightmare for DCF, the state and the vendor. This section also forbids the vendor from saying any "product or service provided by the provider has been approved or endorsed by the department, or refer to the existence of this contract in press releases, advertising or materials distributed to the provider's prospective customers. Why? Doesn't signing a contract with a provider mean that you endorse their ability to provide the service for which you have contracted and if not why did you contract with them?	
5	<b>3.18 C</b> -Gag rule? Page 49 <b>3.18 C</b> Page 49-Can't refer to the existence of the contract?	
3	<b>3.18 F</b> - Page 50-Appears to apply to all vendor employees and not just those employed for the purpose outlined in this ITN. Why? Also, the vendor should be eligible to develop their own policies and procedures that meet state and federal requirements.	
5	<b>3.18 F</b> -50-Why must all of the vendor's employees obey and comply with rules governing State employees?	
3	<b>3.18 K</b> - Page 52-The vendor should only be required to develop/implement policies that meet state/federal requirements. The vendor should be able to adapt and adopt policies that meet these requirements	
5	<b>3.18 K</b> - Page 52-Why must DCF approve <u>all</u> policies of the vendor?	
4	<b>3.19</b> – How can the vendor be held responsible for ensuring interface with our (Workforce) systems?	
5	<b>4</b> - Page 62- It appears something is missing	
1	<b>4</b> -Page 80, Is DCF requiring copies of actual or proposed agreements prior to vendor selection? Is that not a very unusual requirement? Is that really justified or reasonable?	
1	<b>Page 4</b> , Item B – “Streamline customer service delivery within the department and partner entities...” seems to extend well beyond the TANF, Medicaid and food stamp eligibility determination	
1	<b>Page 4</b> , Item K – Linking the subject eligibility determination with workforce service delivery outcomes is believed to be out of place	
5	<b>4.1</b> - Page 62 This section says there will be "...performance-based incentives for sustained employment of recipients...". Section 4.2 A following implies some of our resources will be made available to pay the incentives. Why is DCF messing with our work and our funds?	
3	<b>4.1</b> - Page 62 This section says there will be "...performance-based incentives for sustained employment of recipients...". Section 4.2 A following implies some of our resources will be made available to pay the incentives. Why is DCF messing with our work and our funds?	
4	<b>4.1</b> – “start up costs may be negotiated...” “start up costs... are not an allowable cost with this funding...” What???? That's contradictory. Also, we don't have enough FSET for them to pay their fair	

RWB ITN COMMENTS

	share of One Stop infrastructure and our TANF is being dramatically cut. Why even infer that the Workforce system would provide performance based incentives to the vendor?	
4	4.2 – What if the space DCF currently has is inadequate to the vendor? Why should they assume the lease? If the vendor is relocating its workers and DCF’s workers there <u>should</u> be an allowability for relocation costs. If DCF owns buildings, is it paying itself rent?? Why should the vendor pay rent in owned buildings?	
8	<p><b>4.2 Allowable Costs A. Fixed Price Contract (Page 62; paragraph 1 &amp; Page 63; paragraph 1)</b>  The contract basis shall be fixed price contract with funds from the DCF eligibility and TANF budget entities. With consent of the Work Force system, resources above and beyond the fixed price contract in the form of with performance based incentives for sustained employment of recipients may be available from appropriated TANF and FSET funds for additional compensation, where appropriate. If necessary, start-up costs may be negotiated during the contract negotiation process. Start up cost for new programs are not an allowable cost with this funding. The Vendor assumes all responsibility for federal penalties, audit exceptions and disallowed costs. If necessary, an appropriate amount of funding for Florida’s recovery from a natural disaster declaration by the President of the United States will be negotiated into the Vendor’s payment to compensate the Vendor for additional expenses necessary to assist clients in disaster areas.</p> <p>Of the funds available to pay for the Vendor(s) services in any contract resulting from this Invitation to Negotiate, those funds associated with the eligibility functions (\$285,000,000) or less, depending on Cost Replies, will be available to the Vendor(s) as a fixed payment amount. The Vendor will provide the State such savings that accrue through cost avoidance generated through administrative efficiency and operational improvements. The TANF benefits (\$100,000,000) will be paid for each year of the contract at the discretion of the Legislature and Appropriation Committees. The Vendor must submit a proposed plan for achieving welfare caseload reductions in cooperation with the Workforce Florida system by assisting applicants and recipients to avoid the need for public assistance through sustained employment. The Vendor(s) plan should contain an incentive structure for sustained employment of recipients and for the distribution and reinvestment of eligibility services and TANF benefit monies resulting from a reduction in TANF caseload into reducing Medicaid and Food Stamp caseload by moving clients to employment. <i>Comments: It would seem that “sustained employment” would be the responsibility of the RWB not the responder to this ITN.</i></p>	
7	4.2.A.(Also see page 67) Page 62,Once again references relate to workforce resources being available. To the best of our knowledge, there are no resources that are currently pledged outside of the workforce system and its contractors. These sections should be stricken unless WFI approves such a policy. In our opinion, statements such as this throughout the document ( including listed below), confuse the services and will make it difficult for the vendor to have a definitive understanding of the services that	7

RWB ITN COMMENTS

	<p>they are to provide and that they coordinate with workforce</p> <p><b>Page 63, A</b> “The vendors plan should contain an incentive structure for sustained employment of recipients and for the distribution and reinvestment of eligibility services and TANF benefit monies resulting from a reduction in TANF caseload into reducing Medicaid and Food Stamp caseload by moving clients to employment.” This is the RWB responsibility and does not focus on eligibility. Perhaps to should include an incentive structure that rewards the vendor for doing an eligibility function at a prescribed level. <b>(And again on page 67)</b></p>	
3	4.2 D Page 63- Why is DCF involved in lease approvals for the vendor?	
5	4.2 D- Page 63-Why is DCF involved in lease approvals for the vendor?	
4	4.3 – Wait a minute: the department is procuring services from the Vendor but the Vendor has to pay a fee to receive the payments for services? Something seems to be wrong with that scenario.	
3	4.3E Page 65- Why must the vendor pay the MyFloridaMarket Place transaction fee?	
5	4.3 E- Page 65-Why must the vendor pay the MyFloridaMarketPlace transaction fee?	
3	4.4E - Page 67-Another reference to using our funds	
5	4.4 E- Page 67-Another reference to using our funds	
4	4.5 – The liquidated damages seem very severe.	
4	5.5 – Not all regions need bi-lingual workers. Due to funding shortages, not all of the activities listed in 5.5.3.1 are available (i.e. Non-Custodial parent). Will the proposing vendor lose points over this? Also, there is a request for a vendor plan to ensure that clients don’t have to go through multiple orientations after the vendor’s own orientation. That doesn’t seem possible since for the TANF clients the RWB’s service provider(s) must provide WT OR.	
5	<p>5.5.3.1(d)- Page 77 This says that we must provide to the vendor our agreement with their customer flow plan. I assume we would be obligated to review all the vendors’ replies on this section and agree/disagree. Who is going to pay us to do this?</p> <p><b>B 5</b>-Page 94-Describe the process that the vendor is proposing to notify the client of all work opportunities – isn’t this our function? Same as to assisting in obtaining employment</p> <p><b>B 7</b> Page 94--Why is the vendor describing a plan to develop employer relations?</p> <p><b>B 13</b> Page 96-Why does the vendor reply to their plan for an effective working relationship with “Technical Colleges”?</p> <p><b>B 17</b> Page 98-Why is the vendor involved with oversight of job placements and work sited?</p> <p><b>E 3</b> Page 150-Why is DCF concerned with approving the vendor’s procedures related payments, invoices, etc?</p> <p><b>H 1</b>- Page 151-Is DCF going to actually approve</p>	
8	<p><b>Rating Sheet (Pages 94 &amp; 95)</b></p> <p>5-Does the Reply offer services that are consistent with work experience/workfare engagement requirements of TANF and the specifications of the ITN?</p>	

RWB ITN COMMENTS

<p>Does the Reply describe an appropriate program/system in place to engage clients in work?          Does the Reply describe an appropriate program/system in place to track, prioritize and service clients?          Does the Reply describe the process they use to notify the client of all work opportunities for which they may be eligible? Does the Reply describe how clients will be informed of and assisted in obtaining employment for which they may be eligible? <b>6-</b> How well does the Reply satisfy the department's requirements for the Vendor to work with other agencies to ensure program success?          Does the Reply describe an appropriate program/system in place for diverting clients to work opportunities? Does the Reply describe an appropriate program/system in place to work with other entities to identify clients, determine service eligibility and direct prospective clients to the areas where actual services would be available? Does the Reply describe the method and frequency of obtaining updates on service opportunities with other entities? Does the Reply describe the process they use to notify the clients of all service eligibility and the locations where those services can be obtained?  <b>7</b> -How well does the Reply describe a plan to develop employer relations?  <b>9-</b> How well does the present the Vendor's experience in the administration of programs similar in nature to TANF, Food Stamp and Medicaid eligibility determination services required by this Invitation to Negotiate?          Does the Vendor have two or more years of experience administering:          ___a TANF, Food Stamp and Medicaid eligibility determination contract with a State, ___a Federal or State funded employment and training program targeting diverse populations who are economically disadvantaged with multiple barriers to employment.</p> <p>Does the Vendor's experience in serving economically disadvantaged persons with multiple barriers to employment include:          ___programs that require the provision of employment assessments, identifying barriers to employment and developing employability development plans.          ___working with employers to develop work sites and permanent employment for program participants.          ___collaborating and coordinating with other agencies on behalf of participants and improving the participant's personal and family situation.          ___working with social/human services in providing TANF, food stamps, Medicaid and related services for program participants.          ___working with educational institutions in providing training programs for program participants.</p> <p>Does the Vendor have experience in administration of programs that includes:</p>	
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RWB ITN COMMENTS

	<p>___planning, management, tracking and evaluation.          ___provision of direct services to participants or contracting out to providers of direct services.          ___administering \$10,000,000 or more in contract or grant amounts for such programs.          ___caseloads or participant service levels of 100,000 or more.</p> <p>Has the Vendor had a contract or have a current contract with a State or local government providing similar eligibility determination service delivery as described in their corporate references demonstrating the Vendor has performed successfully:          ___by meeting performance indicators of fund sources.          ___by meeting corrective action plan.          ___compliance tracking indicates a successful program, financial and civil rights administration.          ___if under corrective action plan, the Vendor’s current status indicates the Vendor has been responsive and successful in resolution.</p> <p>If the Vendor has not had prior contracts for similar eligibility determination service delivery, successful performance is indicated in the narrative related to the following:          ___successful outcomes for participants in completing training, learning job-seeking skills, finding employment, earning wages above minimum and retaining jobs.          ___successful program, financial and civil rights compliance.</p> <p>Check all that apply and award up to the maximum allowable points based on the Vendor’s response and the review of materials.</p> <p><b><i>Comments: This whole section is very problematic in the fact that the responder is ask to articulate how they would provide services already offered by the local RWB. This at best is a duplication of effort and not a cost effective use of taxpayers dollars. This whole section needs to be reworded to reflect how the responder would work with and support the goals of the RWB, how the RWB would work with and support the goals of the responder, and how effectively, working together they would meet the goals of the ITN.</i></b></p>	
1	<p><b>5.5.2.2</b> Page 76,– This entire item appears to be far reaching and well beyond “Eligibility Determination for TANF, Medicaid and food stamps</p>	
1	<p><b>5.5.3.1</b> Page 77,– Other than coordinating Work Registration and job placement information, why does the vendor functions have to be integrated? What does TANF, Medicaid and food stamp eligibility determination have to do with Non-Custodial programs? Non-Custodial participants will not be receiving TANF checks and do not register with DCF.</p>	
3	<p><b>5.5.3.1(d)</b>- Page 77This says that we must provide to the vendor our agreement with their customer flow</p>	

RWB ITN COMMENTS

	<p>plan. I assume we would be obligated to review all the vendors’ replies on this section and agree/disagree. Who is going to pay us to do this?</p> <p><b>B.5-</b> Page 94 Describe the process that the vendor is proposing to notify the client of all work opportunities – isn’t this our function? Same as to assisting in obtaining employment</p> <p><b>B.7-</b> Page 94 Why is the vendor describing a plan to develop employer relations?</p> <p><b>B13-</b> Page 96/Why does the vendor reply to their plan for an effective working relationship with “Technical Colleges”?</p> <p><b>B13</b> Page 98- Why is the vendor involved with oversight of job placements and work sited?</p> <p><b>E3-</b> Page 150 Why is DCF concerned with approving the vendor’s procedures related payments, invoices, etc?</p> <p><b>H1-</b> Page 151 Is DCF going to actually approve the vendor’s service plan?</p>	
<p><b>10</b></p>	<p><b>5.5.3.4</b> Page 77, First this talks about describing orientation process. Once they are made eligible they then go to the One Stop and go through orientation, then letter d) discusses avoiding multiple orientations. Question again, do they really do an orientation prior to eligibility? The “Jacksonville Model” that most RWBs are implementing would not work under this situation. This is confused and needs clarification as to who and how many orientations the client is supposed to attend and when they are being tracked in the system. Current Law prescribes workforce the responsibility for certifying work registration. The Jacksonville Model is being used as a complete registration model that also includes orientation.</p> <p>e) &amp; f) are both processes that are conducted by the WFB and available in the One Stops, on-line and through AWI and WFI.</p>	
<p><b>10</b></p>	<p><b>5.5.3.14</b> Page 78, One Stops and the services that they provide should be included in this list.</p>	
<p><b>4</b></p>	<p><b>5.7</b> – Why should the vendor state a percentage of positions to be filled by department employees? The vendor should be free to react to the environment and fire them all or keep them all depending upon their quality. Why should the vendor have to pony up money to cover what employees have vested in FRS</p>	
<p><b>1</b></p>	<p><b>6.1</b> Page 86– In light of DCF’s intent to submit its own proposal, should DCF be involved in the ITN and/or rating/selection process? Any concerns about “conflict of interest”?</p>	
<p><b>4</b></p>	<p><b>6.3</b> – RWBs conduct the services of notifying TANF and FSET clients of their work requirements. RWBs conduct employer relations activities. Why would the vendor need to describe its plans for these services?? There seems to be a lot that we do through our service providers listed as tasks for the proposing vendor. If DCF has money for those activities, shouldn’t it be coming to us? Also, I find the personnel issues addresses in the evaluation section to be prime examples of micro-management. Why should the vendor give preference to employees of an entity that is being forced to outsource its services? Why should the vendor create a plan to ‘retain’ said employees once hired?</p>	

RWB ITN COMMENTS

	<p>Page 107, item I – I don’t understand this at all and I read it four items.          Page 137 – Accredited how by what kind of national accrediting body? Why must a subcontract be developed for HR administration? There’s a lot of micro-management in these pages.</p>	
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<b>RWB</b>	<b>General Comments</b>	
1	<p>Note: SB 1466 directs DCF to put out on competitive bid the eligibility determination activities under its Economic Self-Sufficiency (ESS) program. The 2003 Florida Legislature provided direction relative to outsourcing the eligibility determination function for Medicaid, food stamps and Temporary Assistance to Needy Families (TANF).</p> <p>General Observation: On numerous occasions, the DCF ITN appears to go well beyond the subject of eligibility determination and to exceed its authority by intermingling department – partner functions/processes and addressing workforce/one-stop responsibilities, resources and funding. As written, the ITN may discourage rather than entice vendor proposals and limit opportunities for innovative ideas aimed at modernizing the system.</p>	
3	<ul style="list-style-type: none"> <li>• It appears this document was drafted to be much wider in focus than the task that was assigned by the legislature.</li> <li>• Statements/requirements within the document contradict other statements items within the document.</li> <li>• The ITN is overly prescriptive towards the vendor in terms of everyday functions and should concentrate more on outcomes rather than process.</li> <li>• The ITN offers very little, if anything, in protection for the residents of rural areas. Vendors offering outstanding services in potential high profit areas (areas of large population concentrations) and little or no service in rural areas would seem to face no downsides in terms of performance.</li> <li>• The ITN seems designed to give preference to one state-wide vendor. Changes need to be made to the document that would allow regional vendors to be more competitive with proposals that provide unique solutions and the ability to respond to circumstances of particular regions of the state.</li> </ul> <p>The ITN divides workforce regions. It would appear that since this would be a major change in the system, and since the ITN sees the vendor working closely with RWB’s that it would be necessary to have the regions and super-regions match current workforce regions in a manner that would not result in RWB’s working with different vendors in the same region. For example, not every county has a One-Stop located in the county. If a One-Stop primarily serves the residents of two counties and each of those counties is located within a different ITN region how would the client be served?</p>	
7	<p>The ITN does not appear to address the fundamental objective of streamlining and improving the efficiency of DCF in general and the eligibility process specifically. It appears that the entire process is not only going to perpetuate the existing bureaucracy but may actually lead to a whole new layer that is focused on monitoring, contracting, and penalizing. None of this appears to contribute to efficiency. Summary, throughout the document there is an overtone of micro-management and involvement in details that can best be handled at the local level. The Workforce System could bring many positives to this process but most of our strengths would be limited due to the excessive obsession with control that is outlined in this ITN.</p>	

RWB ITN COMMENTS

<p>10</p>	<p>In general, the UTN seems to be steered to a statewide proposal. While this is understandable from one point, the structure of the ITN “wanders” between a statewide emphasis and statements that might support responses by “zones.” A statewide project does raise several concerns.</p> <p><b>First</b>, there is no provision for management of performance by “zone.” If a statewide proposal is accepted, there need to be terms that would define the performance and options of the state by DCF zone. Such a provision would allow DCF to ensure that services are provided on an equitable basis. Without such an approach, the vendor could concentrate on the major metropolitan areas without having to be overly concerned about issues related to services in the more rural ( and therefore most costly per service unit) areas. From a workforce perspective, this could lead to uneven services and reduced performance. Strong consideration should be given to establishing zone-level measurements.</p> <p><b>Second</b>, there is no provision for terminating contracts for underserved or poorly served “zones.” Such a provision is essential if all areas of the state are to be managed properly. The provision should also spell out the authority of DCF to put in a interim service provider/vendor until such time as a procurement process formally selects a replacement.</p> <p><b>Third</b>, provisions should be made for total contract termination if zone-level performance is inconsistent and/or poor in more than one zone. Such a contract termination penalty/option would provide the state with a performance “hammer.”</p> <p>In another area of concern, the ITN places a number of state requirements on the vendor that could cause a loss of cost savings. For example, while the coordination of Information Technology is understandable, placing too many restrictions in this are could negate the efficiency and cost savings that a private vendor might be able to achieve. The area of leases/space also seems excessive.</p> <p>The rule making requirements also appear to be overly cumbersome. Either rule making (development) should fully remain at DCF or the vendor should be the prime entity in development and the lead in marshalling the proposed rule through the rulemaking process. The way in which the process is described in the ITN appears to perpetuate a bureaucracy and do little to streamline the process, which should be a modernization goal. Consideration should be given to requiring the vendor to provide the names and resumes of key management staff that will be assigned to the project as day-to-day staff. It is not clear that this is required. Such an inclusion in the RFP would enable DCF to better evaluate executive management (See Page 76, 5.5.2.3). From a local perspective and experience, corporate level commitment and staff is vital, but a qualified “on-the-ground team” is indispensable.</p>
<p>4</p>	<p>This ITN appears to have been designed in such a way as to make it as unappetizing as possible to potential bidders. It is far “uglier” and more prescriptive than federal solicitations. The level of micro-management is counter to allowing the vendor to create a more streamlined system. The role of the department in managing the contract is inappropriate. It is in the department’s best interest for any entity other than DCF to fail in providing these services and I can see several ways the department could ensure that that happens. Also, as KS pointed out, our understanding was that this ITN was for eligibility services, not the actual handling of benefits, yet the ITN appears to indicate that will be a part of the project.</p> <p>The ITN calls for the vendor to describe how it will perform a number of tasks currently performed by RWB service providers. That’s senseless. The ITN requests cost savings yet is requiring the delivery of services above and beyond those currently provided by the department.</p>

RWB ITN COMMENTS

	<p>There are a lot of unanswered questions and items I'd consider deal-breakers in this ITN. I don't think anyone would really want to apply for this as it stands. And I imagine that's just what DCF wants.</p>
<p>5</p>	<ul style="list-style-type: none"> <li>• The draft document has many references that states or implies that the DCF contract vendor will be performing many functions currently done by the regional boards. This appears to make the document way too broad in scope.</li> <li>• The document seems to be extremely prescriptive: DCF is not only stating what is to be done but is stating or implying how to do it. There are numerous references that DCF will approve policies, procedures, hiring, etc. It appears that DCF wants to still run the system and the process. They should be concentrating on defining the desired results and let the respondents decide how to get there.</li> <li>• The document states that DCF employees will also be preparing a response that will be evaluated in the same manner as all other proposals. There may be a question as to the fairness of the evaluation process if it is performed by anybody at DCF. Also, will the past performance by the “employees” enter into the evaluation of the employee response?</li> </ul>
<p>8</p>	<p><b>Note:</b> SB 1466 directs DCF to put out on competitive bid the eligibility determination activities under its Economic Self-Sufficiency (ESS) program. The 2003 Florida Legislature provided direction relative to outsourcing the eligibility determination function for Medicaid, food stamps and Temporary Assistance to Needy Families (TANF).</p> <p><b>General Observation:</b> On numerous occasions, the DCF ITN appears to go well beyond the subject of eligibility determination and to exceed its authority by intermingling department – partner functions/processes and addressing workforce/one-stop responsibilities, resources and funding. As written, the ITN may discourage rather than entice vendor proposals and limit opportunities for innovative ideas aimed at modernizing the system.</p> <p><b>Specifics:</b></p> <ol style="list-style-type: none"> <li>1. Page 4, Item B – “Streamline customer service delivery within the department and partner entities...” seems to extend well beyond the TANF, Medicaid and food stamp eligibility determination.</li> <li>2. Page 4, Item K – Linking the subject eligibility determination with workforce service delivery outcomes is believed to be out of place.</li> <li>3. Page 10, Item 2.9 (toward bottom) of page – Regarding “Engage a quality assurance monitor to review all aspects of the eligibility determination and service delivery system”, need to further define “service delivery system”. If it in fact relates to non-DCF/prospective vendor(s), it's very probably touching on organizations and issues that fall outside of DCF authority.</li> <li>4. Page 13, Items 2.15 and 2.16 – Guarantee and Bond amounts seem extreme.</li> <li>5. Page 16, Item 3.1 General Statement, 3<sup>rd</sup> paragraph, last sentence – Need to clearly define “Other funds that reside in partner agencies....” Not sure DCF has is authorized to make such a statement. First paragraph, next to last sentence needs to also emphasize that a “modernized eligibility determination delivery system” must be able to integrate with other existing systems (i.e. OSMIS, OSST). Page 19, under current items from One-Stop Center should have a reference to work registration process.</li> <li>6. Page 20, Item C – Penalties seem extreme, entirely inappropriate for RWB</li> </ol>

## RWB ITN COMMENTS

Welfare Transition programs and inappropriate for this ITN's venue. The ITN should only address penalties to the vendor. Penalties placed on RWBs for each client that does not make his/her activity hours could cripple the RWB's ability to deliver Welfare Transition services. Substantial penalties could lead to suspended services due to lack of funding or termination of necessary supportive services. DCF's penalty requires 100% work participation rather than the level required under federal law. RWB's do not have funds to pay such penalties and paying with federal funds has been questioned as to the legality.

7. Page 21, Item 7 – RWBs do their own tracking of participants on OSST.

Why would they have to supply any tracking information (except job placements) to the eligibility department/vendor?

Page 22, top of page “take advantage of RWB Resource Rooms” does not imply a partnership with the RWB to work out a fair share method of cost allocation or resource sharing and instead implies the ability of the vendor to “take advantage” of RWB's in a negative connotation.

Item C – will there only be one Vendor Mail Center or is this intended to be in each area. With only 1 Mail Center it could slow down the process for the customer which impacts other processes.

8. Page 23, Item I. Improved Efficiencies – Why would the ITN address a formal mechanism for identifying and assessing the use of different agency funding sources in serving client needs”? That seems to be a bit beyond DCF's territory of responsibility. One-Stop Career Centers typically include a systematic client review, needs assessment, and referral process. If all One-Stop partners are truly and fully involved, information on program/funding resources can be shared and utilized.

9. Page 76, Item 5.5.2.2 – This entire item appears to be far reaching and well beyond “Eligibility Determination for TANF, Medicaid and food stamps.

10. Page 77, Item 5.5.3.1 – Other than coordinating Work Registration and job placement information, why does the vendor functions have to be integrated? What does TANF, Medicaid and food stamp eligibility determination have to do with Non-Custodial programs? Non-Custodial participants will not be receiving TANF checks and do not register with DCF.

11. Page 80, Item 4 – Is DCF requiring copies of actual or proposed agreements prior to vendor selection? Is that not a very unusual requirement? Is that really justified or reasonable?

12. Page 86, Item 6.1 – In light of DCF's intent to submit its own proposal, should DCF be involved in the ITN and/or rating/selection process? Any concerns about “conflict of interest”?