



POLICY

SECTION: CSTB	POLICY# 019-C0038	PAGE: 1 of 5
TITLE: CSTB Policy and Procedure Development		EFFECTIVE DATE: 11.21.19
REPLACES: N/A		DATED:

DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF

PURPOSE: To effectively provide CareerSource Tampa Bay (CSTB) employees and partners the minimum requirements for understanding the development of policy and level of approval process for implementation at the local workforce development board (LWDB) level.

BACKGROUND: The purpose of developing, executing, and implementing policies and procedures are to ensure LWDB's operate in full compliance with federal and state law and regulations. Department of Economic Opportunity (DEO) is responsible for workforce policy implementation and providing guidance to Florida's 24 LWDBs by developing, updating, and issuing administrative policies. DEO routinely monitors activities, responsibilities and the external environment of program areas to identify the need for administrative policies. The monitoring process identifies areas of concerns that draw the need to update (minor revisions) or develop policy. When a need for a new or revised policy occurs, the CareerSource Florida Strategic Policy and Performance Team and DEO's Division of Workforce Services Bureau of One Stop and Program Support receive the policy assignment. Administrative policies will be issued from DEO, while strategic policies are issued from CareerSource Florida.

There are two types of policies: administrative and strategic. Administrative policies focus on specifying business rules, requirements and processes related to the implementation and operational functions of workforce programs, as well as indicate areas of performance on which local workforce development boards are monitored and measured. Strategic policies are defined as visionary, directional statements that guide decision making; while procedures are an official established way of operating a task.

Both strategic and administrative policies are reviewed by the CareerSource Florida Policy Development Workgroup to ensure that they align with the key characteristics of the Policy Development Framework prior to dispersing to Florida's 24 LWDBs.

LWDBs are responsible for adapting the issued policy to a local level within their region, then program managers develop a procedure outlining the daily operating tasks required from staff to successfully execute the LWDBS approved policy. LWDBs must ensure these policies align with federal and state

laws and regulations prior to issuing approval, and then distributing appropriately to staff and the public.

PROCEDURE: Programmatic policies and procedures are administrated by CSTBs Chief of Policy and Performance (CPPO). The CPPO reviews all relevant CSF, DEO policies, USDOL ETA Training Employment Guidance Letter or (TEGLs) and Training Employment Notices (TENs) to determine need for policy, procedure or revisions. Financial Policies and procedures are developed and administered by the CFO.

OVERVIEW:

Policies and procedures are used to ensure the integrity of CSTBs employees and programs are operating in full compliance with local, state and federal law and regulation guidelines. Policies are created with the high level overview purpose to provide clarification, while procedures outline the day-to-day operational duties of a program, service or activity.

POLICY FRAMEWORK:

CSTB follows a similar framework process as CSF and DEO for developing and evaluating organizational policies. CSTB will ensure that BOD level policies are created for the following areas:

- All CSF and DEO policies requiring board policy
- Recommendations by CEO, COO, CFO and senior leadership staff
- Key programmatic areas within organization

CSTB will respond timely to create or modify local policies based on the release of any federal or state policy actions. The CPPO will establish need for the policy and review all applicable federal, state level policies, TEGL's, TEN's to ensure comprehensive subject matter expertise on relevant topics. Additional best practice research is conducted on existing workforce development policies and procedures in Florida and on a national level. Once policy research has been completed, the CPPO will develop the policy utilizing the CSTB standard template that was implemented in our region since PY 18-19.

All policies drafted by the CPPO are sent to the CSTB senior leadership team for review and input. Input is solicited and received prior to a policy being submitted to the appropriate CSTB Committee, Executive Committee or Board of Directors for review, consideration and recommendation for approval. Policies require Board level approval, prior to implementation by CSTB staff. Policies are finalized internally and prepared for CSTB Committee/Board where CPPO presents for approval.

Once approved by the Board of Directors, the policy is updated with official implementation date, formatted in a PDF version and sent out to the CSTB senior leadership team. The policy is then placed on the U Drive at U:\Career Services\2019 Policies and Procedures and then placed on the Intranet (<http://local.careersourcetampabay.com/>) – located under the “CSTB Policy and Procedure” header and also placed on the CSTB website (<https://www.careersourcetampabay.com/reports-and-publications/>) - located under the “Reports and Publications” section under “About Us.”

PROCEDURES (Staff Guides):

Directors and Program Coordinators are responsible for creating draft Procedures that are required to support policy implementation or standalone to address operational needs in their departments. The Director reviews and submits procedure to the CPPO for review and approval, the COO is copied on this request. The CPPO will review and ensure relevant compliance with federal, state level and local policies, TEGl's, TEN's, etc. The CPPO will make required edits/suggestions and send back to the originating Director and copy the COO. Once all required edits/suggestions are made, the Director will submit the final procedure to CPPO for review/approval.

Once CPPO reviews and approves, a procedure # will be assigned and an email confirmation authorizing release of procedure. Director is responsible for dispersing the approved procedure to their team, copying the CPPO and COO and placing on the U: Drive and conducting subsequent staff training. Director is responsible for execution of procedures within their respective department(s).

FORMAT

Each policy/procedure is drafted using the approved template including the CSTB logo. All CSTB Policies and Procedures are presented in Arial 11-point type.

- Header: Identifies the Section (department within the organization impacted by policy); Policy # (see Matrix & Numbering Section below), Title, Effective Date, Replaces and Dated.

SECTION:	POLICY#
TITLE:	EFFECTIVE DATE:
REPLACES: N/A	DATED:

- Distribution: Identifies specific staff/department that is impacted by the release of the policy/procedure.
- Background: Provides a narrative summary of issues which caused the policy to be created. The background may be a timeline including workforce issues the policy seeks to resolve and legislation or administrative law that was passed, changed or repealed.
- Procedure: Identifies what issues are at stake, what the policy/procedure seeks to accomplish and to whom the policy applies.
- Overview: Provide a high level summary overview of the policy/procedure.
- References: A summary of federal and state legislation, executive order, administrative law, or other strategic policies, administrative policy, or guidance, including TEGl's, TEN's, CareerSource Florida and DEO policies.
- Inquiries: Identifies which member of the CSTB leadership team staff should direct questions in relation to policy/procedure.

Other sections may be added as necessary to describe issues, provide a summary or ensure alignment with policy/procedure.

MATRIX & NUMBERING SYSTEM:

CSTB established a matrix to track all approved policies and procedures. Each policy/procedure also is assigned a unique policy/procedure number, consisting of a 7 digit alpha and numeric code. For example: 018-C001 the first three digits are the Program Year, the C – stands for CSTB and the second set of numbers is the chronological assignment based on policy issuance during the PY. The matrix outlines the topic, program impacted, policy/procedure #, effective date, revision date and total # of pages. The CSTB Policy Matrix is located on the U Drive (as outlined above).

IMPLEMENTATION TIMELINE:

1. Once the full BOD approval is received, the CPPO will release the policy to the senior leadership team within two business days.
2. Following the implementation of the policy, the CPPO and COO will conduct a Policy Q&A session with CSTB Directors within 5 business days. Documentation of this Policy Q&A session (agenda and sign-in sheet) will be sent to CEU mailbox. The purpose of this session is to review the policy, ensure that the leadership team fully understands the scope and to provide an opportunity to ask questions prior to implementation with frontline staff. This investment will also expedite the creation of any procedures that need to be created governing daily operations.
3. Two weeks/ten business days from the completion date of the Policy Q&A training, the Directors/Coordinators are responsible for conducting formal staff development training with their teams/departments. Directors/Coordinators are responsible for dispersing the policy to their team. Documentation of this formal training (agenda, sign-in sheet and materials) will be sent to CEU mailbox. NOTE: Training for staff can be conducted earlier than the 10 business days, as needed at discretion of Director based on policy subject and impact to department/organization.

POST IMPLEMENTATION ANALYSIS:

As part of the policy development framework, the CPPO will evaluate new policy effectiveness through formal touch points. Thirty (30) business days from the release of the policy with the Directors/Coordinators. The Directors/Coordinators will be required to complete a Post Implementation Policy form and provide tangible input. The touch point will allow for continuous improvement feedback between operations and the CPPO to determine if any issues/challenges were experienced during implementation phase; identify if any policy modifications are warranted and determine if any additional staff development training is necessary. Documentation of results will be scanned into the CEU mailbox.

ONGOING TRAINING:

The Directors/Coordinators will conduct ongoing programmatic training through the Program Year (PY). Twice a year they will conduct formal refresher training where CSTB Board level policies and internal procedures will be reviewed and discussed. Additionally, off cycle training will be conducted in the departments on a quarterly basis.

PERIODIC REVIEW:

On an annual basis, the CPPO will convene a cross-functional team to review existing policies and procedures to determine validity, identify warranted modifications and develop a plan of action for corrections and timeline for submission to CSTB Committee/BOD as appropriate.

Obsolete or ineffective policies may be eliminated by action or consent of the CSTB Board.

When significant changes are made to applicable federal, state law, CareerSource Florida or Department of Economic Opportunity policies, CSTB must determine if revisions are necessary to existing policies.

Changes in executive leadership, staff, training opportunities, and technology may also be factors in determining the need to review of existing policies.

MODIFICATIONS:

Modification of a policy/procedure could include, but is not limited to minor revisions or major changes at federal, state or local level. Policy and procedure updates are minor revisions needed to the pre-existing policy and procedures that do not affect the intent or objective of the policy, which may include:

- Clarify points outlined in the initial policy or procedure
- Restructure the initial information in the policy for a better flow, description, or explanation
- Corrections to existing definitions, punctuation, spelling, or agency titles
- Addition of new definitions
- Incorporating attachments to assist in policy statements or clarification

As policy and procedure modifications are made the same process outlined above would be adhered to for edits, review, and approval and dispersing to management and staff.

REFERENCES:

<https://careersourceflorida.com/wp-content/uploads/2019/09/Policy-Development-Framework.pdf>

INQUIRIES: Any questions about this procedure should be directed to the CEO, Chief of Policy and Performance Officer or their designee.