



March 26, 2021

The Honorable Ray Wesley Rodrigues
Chair
Senate Committee on Government
Oversight and Accountability
330 Knott Building
402 South Monroe Street
Tallahassee, FL 32399

The Honorable Joe Gruters
Vice Chair
Senate Committee on Government
Oversight and Accountability
330 Knott Building
402 South Monroe Street
Tallahassee, FL 32399

Internet Association Supports Florida's Reemployment Assistance Modernization Through SB1640

Dear Chair Fischer, Vice-Chair Stevenson, and Ranking Member Slosberg:

Internet Association (IA) represents the world's leading internet companies and supports policies that promote and enable internet innovation, including commercial cloud solutions. Our member companies are global leaders in the drive to develop lower cost, more secure, innovative, and most importantly, enjoyable, digital government services, with a focus on both the civil servants delivering those services and the residents receiving them.

On behalf of our members, I thank you for your consideration of [Senate Bill 1640](#) (SB1640), which will provide the unemployed residents of the state of Florida the tools they need to find their way back into the great economy the Sunshine State has built - and maintained- through a very difficult year. With just a few changes, the state will be able to provide key stakeholders with the support necessary to deliver a successful modernization plan, resulting in an always accessible and claimant-focused digital service that can serve as a national model.

Much like the Florida Virtual School (FLVS)¹ showed other states how to successfully roll out a scalable remote learning system², the suggested changes will provide Florida the opportunity to deliver a Reemployment Assistance Claims and Benefits Information System that would pave the way for even more pandemic response-related recognition.³

Specifically, the changes include an addition under the new subsection (5) that would require the website to support future implementation of automation, and three additions to the present subsection (5), now new subsection (6), that would add the state chief information officer, the state chief information security officer, and the Florida Digital Service (FDS) to the group of stakeholders involved.

¹ See Florida Virtual School, <https://www.flvs.net/> (accessed March 12, 2021)

² See Florida Department of Education, Best Practices for Distance Learning, <http://www.fldoe.org/em-response/distance-learning.stml> (accessed March 12, 2021)

³ See, e.g., Politico, "Which states had the best pandemic response?", <https://www.politico.com/news/2020/10/14/best-state-responses-to-pandemic-429376> (October 15, 2020)



First, a new addition in 443.1113(5)(a)(9) would allow the state to future-proof the new website by requiring claimant submissions and the associated data be submitted in a way that the state will be able to implement partial or total automation of the work associated with processing these claims. As more of the world begins to re-open, the demand for Florida's talented workers will undoubtedly be higher than most other states, especially since so much of the commercial and industrial infrastructure is already up and running, leaving the state workforce supporting this program in need of the additional support automation will bring them.

Second, adding two additional individuals to the executive steering committee in 443.1113(6)(b) - the state chief information officer (CIO) and the state chief information security officer (CISO) - will ensure this project is effectively integrated into the state information technology (IT) infrastructure while also being secured and protected against fraud and cyber attacks. The additional responsibility outlined added to 443.1113(6)(c) is aimed at making sure that this website does not become a legacy system in the future itself by giving the insight necessary as it relates to recommended follow-on work, including migrating the system to the cloud to take advantage of cloud-native features and functionality.

Third, including the FDS among the members of the project management team outlined in 443.1113(6)(d) will give staff and contractors working on this project confidence in knowing that the state of Florida is putting every resource available behind their efforts, making sure what happened to the Florida CONNECT System never happens again. Utilizing the agile methodologies that saved Healthcare.gov⁴, among other high-profile and in-demand public sector websites⁵, FDS will be able to help apply universally recognized and proven best-practices in web and software development⁶ with a Florida-centric approach as well as the Cybersecurity Task Force and Master Data Management framework in mind⁷.

It is imperative that the state prepares to back the state's businesses with a robust and modern Reemployment Assistance Claims and Benefits Information System. Requiring support for current or future implementations of automation on the back-end along with additional statewide support for development of the front-end will make sure the staff at DEO are ready and waiting to help Floridians get back to work, no matter where in the state, when in the day, or on what device.

This is a rare opportunity to provide the state of Florida the starting point and long-term support necessary to make the state a role model throughout the nation when it comes to a statewide unemployment and reemployment modernization effort. With your support and inclusion of these

⁴ See U.S. Department of Health and Human Services, Office of Inspector General, "HealthCare.gov: Case Study of CMS Management of the Federal Marketplace", <https://oig.hhs.gov/oei/reports/oei-06-14-00350.asp>, which found that agile techniques, such as "adopting a "badgeless" culture for the project [...] and a practice of "ruthless prioritization" that aligned work efforts with the most important and achievable goals" is what allowed for recovery of the website. Page ii (February 22, 2016)

⁵ See Government Accountability Office, Agile Assessment Guide: Best Practices for Agile Adoption and Implementation, [GAO-20-590G](https://www.gao.gov/products/GAO-20-590G) (September 28, 2020); Science & Tech Spotlight: Agile Software Development, [GAO-20-713SP](https://www.gao.gov/products/GAO-20-713SP) (September 29, 2020)

⁶ See, e.g., Digital Services Playbook, <https://playbook.cio.gov/>; The Lab at OPM HCD Guides on GitHub, <https://github.com/The-Lab-at-OPM/HCD-Guides>; 18F Methods, <https://methods.18f.gov/> (all accessed March 12, 2021)

⁷ See FDS, Our Work, <https://digital.fl.gov/our-work/> (accessed on March 12, 2021)



suggested changes in the final version of the SB1640, everyone in the Sunshine State will soon be able to take advantage of all the services the DEO offers, in a seamless and consistent fashion, whether they are on the road or in the comfort of their own home.

We appreciate your time in considering our feedback and look forward to the opportunity to discuss the benefits of the bill and the proposed changes with you in further detail.

Most sincerely,

A handwritten signature in black ink, appearing to read 'James Hines'.

James Hines
Director, Government Affairs, Southern Region

A handwritten signature in black ink, appearing to read 'Omid Ghaffari-Tabrizi'.

Omid Ghaffari-Tabrizi,
Director, Cloud Policy

Cc: The Honorable Debbie Mayfield
The Honorable Kelli Stargel
The Honorable Linda Stewart
The Honorable Victor M. Torres, Jr.

Enc: Suggested Redlines

By Senator Cruz

18-01504-21

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A bill to be entitled

An act relating to online access to reemployment assistance program; amending s. 443.1113, F.S.; requiring the Department of Economic Opportunity to develop a mobile-optimized website to make the reemployment assistance program accessible to the public through mobile devices; providing requirements for the mobile-optimized website; providing a name for the mobile-optimized website implementation project; providing a timeline for the full operational status of the mobile-optimized website deployment; providing that the implementation of the mobile-optimized website is contingent upon legislative appropriation; providing a governance structure for the project; providing an effective date.

Be It Enacted by the Legislature of the State of Florida:

Section 1. Present subsection (5) of section 443.1113, Florida Statutes, is amended, a new subsection (5) is added to that section, and subsection (1) of that section is republished, to read:

443.1113 Reemployment Assistance Claims and Benefits Information System.—

(1) To the extent that funds are appropriated for each phase of the Reemployment Assistance Claims and Benefits Information System by the Legislature, the Department of Economic Opportunity shall replace and enhance the functionality

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provided in the following systems with an integrated Internet-based system that is known as the "Reemployment Assistance Claims and Benefits Information System":

- (a) Claims and benefit mainframe system.
- (b) Florida unemployment Internet direct.
- (c) Florida continued claim Internet directory.
- (d) Call center interactive voice response system.
- (e) Benefit overpayment screening system.
- (f) Internet and Intranet appeals system.

(5) The Department of Economic Opportunity shall develop a mobile-optimized website to make the reemployment assistance program accessible to the public through mobile devices.

(a) The mobile-optimized website must allow a claimant to:

- 1. File a reemployment assistance claim.
- 2. View all of the claim information in one convenient place, 24 hours a day, 7 days a week.
- 3. Update information anytime, including a change of address or telephone number.
- 4. Choose the manner to receive notification from the department, either electronically or by United States mail.
- 5. Establish or cancel payment by debit card or direct deposit.
- 6. Create or change a personal identification number (PIN).
- 7. Get claim and payment information, request benefits, and print tax forms.
- 8. Submit work search contacts.
- 9. Submit information in a manner that allows the department to

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automate all or part of the work required to analyze, process, and if applicable, approve, a reemployment assistance claim.

(b) The project to implement the mobile-optimized website may be cited as the "Modernization Project." The mobile-optimized website shall be deployed to full operational status no later than the end of fiscal year 2022-2023.

(c) This subsection is contingent upon appropriation by the Legislature.

(6)(5) The Department of Economic Opportunity shall implement the following project governance structure until such time as the Reemployment Assistance Claims and Benefits Information System project and, upon appropriation by the Legislature, the Modernization Project as described in subsection (5) are is completed, suspended, or terminated:

(a) The ~~project~~ sponsor for the projects ~~Reemployment Assistance Claims and Benefits Information System project~~ is the department.

(b) The projects ~~project~~ shall be governed by an executive steering committee composed of the following voting members or their designees:

1. The executive director of the department.
2. The executive director of the Department of Revenue.
3. The director of the Division of Workforce Services within the department.
4. The program director of the General Tax Administration Program Office within the Department of Revenue.
5. The chief information office of the department.
6. The state chief information officer or designee.

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7. The state chief information security officer or designee.

(c) The executive steering committee has the overall responsibility for ensuring that the projects meet their ~~project~~ ~~meets its~~ primary objectives, and the committee is specifically responsible for:

1. Providing management direction and support to the project management team.

2. Assessing the projects' alignments ~~project's alignment~~ with the strategic goals of the department for administering the reemployment assistance program.

3. Reviewing and approving or disapproving any changes to the projects' scopes, schedules ~~project's scope, schedule,~~ and costs.

4. Reviewing, approving or disapproving, and determining whether to proceed with any major project deliverables.

5. Recommending suspension or termination of the projects ~~project~~ to the Governor, the President of the Senate, and the Speaker of the House of Representatives if it determines that the primary objectives cannot be achieved.

6. Upon conclusion of the project, whether due to completion, suspension, termination, or otherwise, recommending any necessary follow-on work that may be necessary to move the Reemployment Assistance Claims and Benefits Information System and any associated DEO infrastructure to the cloud.

(d) The project management team shall work under the direction of the executive steering committee and shall be minimally composed ~~comprised~~ of senior managers and stakeholders from the department, ~~and~~ and the Department of Revenue, and the Florida

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Digital Service (FDS). The project management team is responsible for:

1. Providing daily planning, management, and oversight of the projects ~~project~~.
2. Submitting ~~an~~ operational work plans ~~plan~~ and providing Quarterly updates to the plans ~~that plan~~ to the executive steering committee. The plans ~~plan~~ must specify the projects' ~~project~~ milestones, deliverables, and expenditures.
3. Submitting written monthly project status reports to the executive steering committee which include:
 - a. The planned versus actual projects' ~~project~~ costs;
 - b. An assessment of the status of major milestones and deliverables;
 - c. Identification of any issues requiring resolution, the proposed resolution for these issues, and information regarding the status of the resolution;
 - d. Identification of risks that must be managed; and
 - e. Identification of and recommendations regarding necessary changes in the projects' scopes, schedules ~~project's scope, schedule~~, or costs. All recommendations must be reviewed by the projects' ~~project~~ stakeholders before submission to the executive steering committee in order to ensure that the recommendations meet required acceptance criteria.

Section 2. This act shall take effect July 1, 2021.