

0072500 ON THE JOB TRAINING
COMMENTS FROM INDUSTRY REVIEW

Mike Slade
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Comments: (from Internal Review)

Bob, they have added language that allows the Department to disallow voluntary banking if the Department does not have staff available to monitor compliance with the training criteria. I would not like to lose the opportunity to bank credits just because the Department either chose not to monitor or did not do so because of budget issues. Perhaps we could suggest some type of contractor certification if the Department could not monitor compliance.

Mike

Response: There are very few instances where contractors are not able to utilize the Voluntary On-the-Job Training Program. However, this added language allows the districts the ability to regulate this program based on parameters prescribed by Central Office. It has been the Department's experience that the On-the-Job Training Program requires close scrutiny and a contractor certification would not be appropriate for this program. We appreciate your feedback and if you would like to discuss in detail, please contact Erica Miller, State Contract Compliance Administrator at 850-414-4742.

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Comments:

Those Contractors availing themselves of this opportunity to train personnel on state funded projects and bank trainee hours for credit shall comply with all training criteria set forth in this Section for Federal Aid Projects; ~~voluntary banking may be denied by the Department if staff is not available to monitor compliance with the training criteria.~~

It is the practice of the Districts that an RCS be assigned to all projects (state funded and federally funded). There should not be any instances where there is no one available to monitor compliance with the training criteria as it is not the only criteria that must be monitored and the same person assigned to monitor EEO, DBE and Wages; also monitors OJT when applicable.

Response: While it is recognized that Voluntary On-the-Job Training is rarely denied to contractors, there may be instances where the Districts do not have the staff to adequately monitor this program. As On-the-Job Training is a known area of fraud and abuse, it is essential that if a District does not have the ability to adequately monitor trainees, that they are given the flexibility to exercise this privilege for the Voluntary On-the-Job Program. We will reconsider this process if it proves that contractors' requests for Voluntary On-the-Job Training are denied without adequate justification and results in a dramatic decline in OJT trainees and participants.

Geneva Clark
D5 Contract Compliance Office

Comments:

- 1. Page 1 - No changes
- 2. Page 2 - 1st paragraph, line 5 begin with "Further", instead of Project Engineer, should be Project Administrator.
- 3. Page 3 - paragraph beginning with "Training and upgrading", line 10, instead of "he has", should be he/she has.
- 4. Page 4 – Okay 5.
- Page 5 – 1st paragraph, (revised information) "No credit shall be given", needs to be reworded.

Response: Thanks for your feedback and suggestions for grammatical changes, however the original language will remain for purposes of clarity.

Chris Sweitzer
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Comments:

Suggest modifying the end of the chart in 7-25 1) (b) to read "Over \$130,000,000" in the "Estimated Contract Amount" column and "29*" in the "Trainees Required" column.

Response: Thanks for comments and suggestions, however we will keep this original language.

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Comments:

While the FDOT is looking to revise this specification we would like to see consideration given for projects that are material intensive, and don't offer a scope of work sufficient to support the labor hours needed to fulfill Training requirements. We have been awarded milling and resurfacing projects that just barely exceed the 225 day duration, thereby requiring Trainees. However, the dollar value of these projects is generated mostly due to the high cost of asphalt material and specialized equipment costs for milling and for paving. Such projects do not typically provide for enough labor hours to support the number of trainees required in the standard chart.

We request the FDOT include provision in this specification to exclude projects with specialized scope (i.e. Resurfacing) from the standard requirements for Trainees, even if the duration and dollar value are over the given thresholds.

Response: As recipients of federal funds, the Florida Department of Transportation is required to ensure that contractors provide On-the-Job training to individuals. The goal of this program is to produce competent and efficient workers within this industry, while attracting new employees who are able to replace the existing workers who are leaving the industry due to retirement or other reasons. The Department has made a collective decision based on the length and amount of the project, that contractors receiving federal funding are required to provide training to individuals to assist in producing journeyman in the construction/transportation industry. This decision was made without prejudice to any specialty area within the industry. If you have additional comments or suggestions, please do not hesitate to contact Erica Miller, State Contract Compliance Administrator at 850-414-4742.
