



FY2022 NCTCOG WORKFORCE 2 REPORT

For

Equus Workforce Services

Contract FY22-TWC-02

May 3, 2022


Prepared by

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North Central Texas Council of Governments

Workforce Solutions for North Central Texas

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Glossary of Acronyms and Definitions

AOP	Affirmative Outreach Plan
COLTS	Choices Online Tracking System
EOS	Explanation of Services
ETPS	Eligible Training Provider System
EQUUS	Equus Workforce Services
HHSC	Health & Human Service Commission
LEP	Limited English Proficiency
NCP	NCP Non-Custodial Parent
NCTCOG	North Central Texas Council of Governments
NCTWDB	North Central Texas Workforce Development Board
NDWG	National Dislocated Worker Grant
OAG	Office of Attorney General
ONET	Occupational Information Network
OTDC	Orientation to Discrimination Complaints
PII	Personally Identifiable Information
PRA	Personal Responsibility Agreement
REP	Re-employment Plan
WORCS	Equus Workforce Operations and Re-employment Case System
RESEA	Reemployment Services and Eligibility Assessment
SNAP	Supplemental Nutrition Assistance Program
TANF/Choices	Temporary Assistance for Needy Families/Choices
TAA	Trade Adjustment Assistance
TDS	Talent Development Specialists
TRA	Trade Readjustment Allowance
TWC	Texas Workforce Commission
TWIST	The Workforce Information System of Texas
UGMS	Uniform Grant Management Standards
WD	Workforce Development
WIT	WorkInTexas.com, TWC's online job matching system
WSNCT	Workforce Solutions for North Central Texas
Laserfiche	The electronic document management system for customer records. The migration of Workforce program records began September 24, 2018.
Merit Staff	State case management staff that provide services through the American Job Center Network Delivery system, and have their salaries paid from program specific funding streams such as Trade Adjustment Assistance or Wagner Peyser.

North Central Texas Council of Governments

Workforce Solutions for North Central Texas

FY2022 NCTCOG Workforce Review 2

Equus Workforce Services

North Central Texas Workforce Services Contract FY22-TWC-02

BACKGROUND

Following the adoption of a resolution by the North Central Texas Workforce Board of Directors at the May 19, 2020, Board meeting endorsing Equus Workforce Services as the provider for the delivery of Workforce Services, the North Central Texas Council of Governments executed a new one - year contract. The contract contains options for renewal and includes language for appropriate contractual sanctions and/or remedies to ensure that all established performance measures will be met. After a brief period of negotiations, the parties renewed the contract for the period of October 1, 2021, through September 30, 2022.

RISK

The FY2022 Risk Assessment determined that Data Integrity and Customer Service continue to be the primary areas of risk for all Workforce programs. There was a resumption of pre-COVID-19 participation requirements for Choices and SNAP programs. Significant consideration was given to the following:

- SNAP continues to be high risk in the overall case management including the requirements for the form H1822, Good Cause, and Reconsideration actions to HHSC.
- For Choices, TWC recently added additional allowable activities for performance measures and are required to be verified in TWIST effective October 1, 2021.
- The potential for continued gaps in the accuracy and integrity of WIOA data in TWIST and Laserfiche, as revealed in FY2021 monitoring.
- Continued integration of Vocational Rehabilitation Services requiring resources for larger numbers of individuals with significant barriers to employment.
- High rates of turn-over in Subrecipient staff.
- Insufficient evaluation methods for the effectiveness of subrecipient staff training.

OBJECTIVE

NCTCOG conducts program monitoring as required by TWC to provide:

- Enough information to the workforce services subrecipient for implementing timely corrective actions to meet requirements and performance measures as contracted.
- Assurance to TWC that workforce services programs are operated with compliance with regulations and policies so TWC may rely on system data for their reports to federal partners.
- Pertinent information to the North Central Texas Workforce Board to fulfill their oversight responsibilities.
- Assurance to the public and participants that quality and compliant services are being equitably delivered throughout the Workforce Solutions for North Central Texas area.

SCOPE

This review focused on data integrity and customer service through review of:

- SNAP 1822 and Reconsideration Process
- SNAP Good Cause, Penalty, and Temporary Interruption Process
- Choices Non-Cooperation Process
- NCP Review
- WIOA Adult and Dislocated Worker Case Management of Intake and Training
- WIOA Youth Case Management of Intake and Training
- TAA Intake Activities, and
- AOP Log Review.

Desk reviews included a sample of work from the 11 centers in the North Central Texas Board area.

METHODOLOGY

Sample cases were chosen by simple random selection. The reviews utilized data and reports from The Workforce Information System of Texas, WorkInTexas.com, COLTS, and individual case files from Laserfiche.

SUMMARY OF RESULTS

SNAP 1822 and Reconsideration

A review of 19 SNAP files was conducted for the scope period of October through December 2021. The review consisted of the proper submission of the form H1822 Work Verification form and the Reconsideration process.

The following errors were found:

- Staff failed to send to HHSC the 1822 form within two weeks of an ABAWD's SNAP Employment Planning Session.
- The 1817 and 1822 forms were not in the file.
- The 1817 form reporting employment was not sent to HHSC.
- A Reconsideration was not entered in the TWIST SNAP *Good Cause* tab.
- There were gaps in counselor notes, late documentation of case notes and a lack of or no case note documentation.
- Employment Service 39 and sub fund 44 was not entered in TWIST Service tracking.
- Program Detail was closed inappropriately and not left open for job retention.
- The Program Detail and Services soft closed.

The accuracy rate for the review is 67.78%.

SNAP Good Cause, Penalty and Temporary Interruption

A review of fifteen cases was conducted for the scope period of October through December 2021. The Good Cause, Penalty, and Temporary Interruption actions were monitored to ensure that they were processed appropriately.

The following errors were found:

- Good Cause claims were not processed appropriately to HHSC when customers provided a good cause reason for non-participation.
- There were improper actions entered in the TWIST SNAP Penalty and Good Cause tabs.
- For customer placed in Temporary Interruption; there was no documentation that good cause was determined monthly.
- There were seven errors for staff failing to initiate a sanction request; sanctions that were requested were untimely or there were improper penalties.
- The SNAP E&T case was not closed timely and appropriately due to inappropriate and untimely penalty actions.

The accuracy rate for this review is 47.37%.

CHOICES Non-Cooperation

Ten Choices files were reviewed for the scope period of October through January 2022 for the Non-Cooperation process.

Errors consisted of the following:

- Timely and reasonable attempts were not initiated within 24 hours of non-compliance or discovery of noncompliance.
- Staff failed to document in case notes the non-compliance date or the date of discovery of the non-compliance.
- A sanction was not entered within 7 days of the non-compliance or discovery of non-compliance, if good cause was not determined. A sanction was not entered within 24 hours for a missed initial or rescheduled Employment Planning Session.
- For Sanctioned families and Conditional Applicants, staff did not send a notice of cooperation immediately to HHSC upon the successful completion of a Mandatory Choices participant's demonstrated cooperation period or Good Cause determination.

The accuracy rate for the review is 50%.

NCP

A review of four files was conducted for the scope period of November 2021 through February 2022.

There were errors found in the following areas:

- In multiple cases, it was observed that the Job Search logs submitted by a customer did not indicate the location/city of the job applied for.
- In one case, it was noted in TWIST Counselor notes that the NCP submitted the signed Wagner Peyser/WIT form, however, it was not found in Laserfiche.
- In more than one instance, there were verification of participation forms either missing from Laserfiche or not uploaded timely in Laserfiche.
- Monthly contact with the NCP was not attempted for one month, in one case.
- In one recently closed case, it was noted in COLTS that there is an e-mail from the OAG confirming the case could be closed, however, this e-mail was not found in Laserfiche.

The accuracy rate for the review is 92.5%.

WIOA Adult, Dislocated Worker Case Management of Intake and Training

Thirteen Adult and Dislocated Worker files were reviewed for required customer intake activities including the development of reemployment plans. Customer needs assessments were conducted according to administrative policy with one exception. Regulation related to placing customers in training was followed. Significant gaps were found in basic aspects of case management including:

- Incorrect use of service codes 8 and 68.
- Reemployment plans that document completed actions that were not supported by case notes or file documents.
- Customer files that did not include a copy of the reemployment plan or had only an outdated copy of the plan.
- Cases that did not maintain (or attempt) 30- day contact or did not enter case notes for the contact in a timely manner.

The accuracy rate for the review is 82.56%.

WIOA Youth Case Management of Intake and Training

Eight Youth files were reviewed for required customer intake activities including the development of reemployment plans. Significant gaps were found in the needs assessment process and other basic aspects of case management including:

- Customers that did not receive fully compliant needs assessments.
- Required documents missing from customer files.
- Errors in the use of service codes 8 and 68.
- Data discrepancies between TWIST tabs, case notes, and/or customer files.

Thirty-day contacts were well maintained with only minor exceptions and regulation related to placing customers in training was followed. The accuracy rate for the review is 78.57%.

TAA Intake Activities

Ten cases were reviewed for intake activities including the requirements for issuing waivers in training. All customers were registered in WorkInTexas and co-enrolled in WIOA as required. Significant gaps were found in areas of case management that impact data validation or data integrity as evidenced by:

- Seven customer files that did not contain a document to support the date of birth.
- Cases that did not document the provision of labor market information.
- Cases that did not calculate the average weekly wage correctly or did not make the calculation in a timely manner.
- Cases in which staff did not document the failure of customers to make contact for

waiver reviews.

The accuracy rate for the review is 73.97%.

AOP Log Review

A sample review of twenty-two outreach activities was conducted for the scope period of October 2021 through December 2021. The review consisted of 173 applicable elements with 165 of them correct and 8 in error.

The following errors were cited:

- One outreach did not include the name of the business/organization.
- Multiple outreaches did not include adequate documentation of the groups outreached to. (e.g., Low income or Unemployed was noted as the group rather than a targeted or specific group underserved within the community such as Foster Youth, etc.).
- Additional errors found included a lack of documentation to specify what services or programs were offered. (e.g., in one outreach the "Services offered" is noted only as "hiring event").

The accuracy rate for the review is 95.38%.

CONCLUSION-GAP ANALYSIS

Overall, for both the Choices and SNAP programs there continues to be a lack of adherence to TWC Choices and SNAP policy guides. Untimely and inappropriate actions can lead to loss of customer benefits. Failure to document actions timely and accurately reflects improper case management. The review of SNAP 1822 and Reconsideration process did not reflect a positive improvement for the specific scope. Additional gaps in basic aspects of case management for the NCP, WIOA and TAA programs, including the lack of complete Laserfiche files indicates improvement in Management oversight is needed. The AOP Log review revealed that the process gaps to be addressed include a need for more thorough documentation of the business/organization names that were contacted, the services/programs offered, and the groups outreached to.

PROGRAM FINDINGS

Finding 1: One hundred and twenty-eight data integrity and case management errors were identified during the file review of six hundred and forty-two applicable elements. Specific case errors are detailed in the attachments provided with the draft report.

Citation: Equus Workforce Services, North Central Texas Workforce System Contract # FY22

TWC-02:

Section 5: Contract Performance:

- *5.3 The Subrecipient shall provide such services in compliance with all applicable federal and state laws, regulations, and rules.*
- *5.4 The Subrecipient shall comply with all Texas Workforce Commission (TWC) policies and procedures or guidance manuals, attached hereto or incorporated herein by specific reference and other Administrative Entity directives as issued. In the event of a conflict between such laws and regulations and the terms and conditions the Contract, precedence shall be given to the laws and regulations.*

Section 9: Reporting Requirements:

- *9.3 The Subrecipient understands that it will be held liable for completeness, accuracy, and consistency of all data under its control.*
- *9.6 Failure to data input or to report in accordance with the terms of this Contract may result in withholding by the Administrative Entity of any payments otherwise due or, it may result in financial sanctions to be imposed in accordance, with the Administrative Entity's policies and procedures. Recurring failure to meet the terms and conditions for data input or reporting may result in the termination of this Contract.*

Required Corrective Action

Equus Management must correct individual file errors *where possible* and provide evidence of the corrective actions with their response to this report. For Choices and SNAP findings, Equus must provide documentation to support the implementation of training specific for each program that is noncompliant. The responses should be documented on the PIP (Performance Improvement Plan) templates for Choices and SNAP E&T. Elements that specifically identify program performance and actions that could impact the eligibility benefit for participants should be more heavily reviewed.

Equus Response

Equus Workforce Solutions Management has reviewed the report and its findings and have worked with Talent Development Specialists (TDS) to correct errors where possible. Program Managers reviewed each error to ensure appropriate corrections were applied. All errors have been discussed with the responsible TDS with technical assistance provided to ensure staff understood the errors, how to access desk aids and policy guidance for future use to mitigate re-occurrence.

The Operations Team, which consists of the Operations Manager and Program Managers, operate under the continuous improvement model – Identify, Plan,

Execute, and Review - in an ongoing effort to improve communication and guidance with staff. The Program Managers hold weekly meetings (virtual or phone) with TDS by program to review current caseload activity, updates, etc. while quarterly meetings are dedicated to detailed updates, topical technical assistance, performance improvement reviews, and training for any new processes. In each of these communications staff are provided review of Standard Operating Procedures, Desk Aids, and TWC policy and guidance. Staff are most successful when they understand how to access and use all available resources.

In addition, the Operations Team stays in regular communication with the Project Director to report trends and areas of concern of individual centers and/or TDS performance. This leadership team is committed to gathering relevant documentation to allow the Project Director and center managers to make informed decisions on accountability including requesting additional training, technical assistance, individual performance improvement plans (PIP), or action toward the progressive disciplinary process.

In all trainings referenced within the response Equus will invite board operations to attend. Each training will have an agenda, presentation materials such as a PowerPoint, policies, WD letters, etc. and pre- and post-test to document attendee understanding. All materials and sign in sheets will be provided for documentation of training implementation.

SNAP 1822 and Reconsideration Process

The Operations team continues to focus on 1822 and Reconsideration documentation requirements, case management actions, timelines for entry and case action and documenting case management actions in TWIST. Equus team will invite appropriate board staff to the SNAP 1822/Reconsideration training on 4/22/2022. An agenda and Power Point presentation will be provided to all attendees.

SNAP Good Cause, Penalty, and Temporary Interruption Process

The Operations Team created a SNAP Strategy Improvement Plan to improve accuracy rates. The plan included input from Center Managers and TDS that attended the 4/5/22 meeting.

A SNAP Call Center Team (temporary) is under development to focus on outreach and communication activities up to orientation. This structure will allow TDSs to focus on case management and quality, while providing important messaging of participation benefits to individuals outreached for SNAP. The call center team will be fully trained by 4/30/22.

A SNAP Training for all staff is scheduled for 4/30/22 and will provide specific case management instruction on good cause, initiation and application of penalties and temporary interruption. Equus team will invite appropriate board staff to the training and will provide agenda and PowerPoint presentation.

CHOICES Non-Cooperation

All errors have been discussed with the responsible TDS, and the errors that were correctable have been corrected. Specific focus related to Timely and Reasonable attempts were not initiated within 24 hours of non-compliance or discovery of noncompliance were addressed.

During the weekly center denominator reviews with the program manager cases are reviewed for action and performance however to emphasize the need of attention to timely and accurate action the cases also review requirements related to Choices Non-cooperation.

This includes:

- Case notes, and sanctions must be entered within seven (7) days of the non-compliance or discovery of non-compliance, if good cause was not determined.
- Enter sanctions within 24 hours for a missed initial or rescheduled EPS.
- Sending notice of cooperation to immediately notify HHSC upon the successful completion of a mandatory Choices participant's demonstrated cooperation period or Good Cause determination for Sanctioned families and Conditional Applicants.

The practice of a 100% review of case by the TDS' with Center Managers, Quality Assurance and Program Management conduct quality review checks on

20 percent of the cases reviewed. To further enhance case management and quality of the case files, management created a “CHOICES Call Center Team” to focus on outreach activities up to orientation. The call center team will be fully trained by 4/30/22.

Equus recognizes the need for continuous improvement with data integrity, case notes and timeliness. It is the expectation of this effort that case work will improve with immediate feedback to TDS and Management.

Choices Non-Compliance Training will be held by April 30, 2022. Equus team will invite appropriate board staff to the training and will provide agenda and PowerPoint presentation.

NCP

All errors have been discussed with the responsible TDS, and the errors that were correctable have been corrected. All findings were reviewed in depth at the NCP Quarterly Training which was held on April 12, 2022. Program Management continues to have weekly calls with staff to get case updates, review issues, and provide technical assistance.

Operations Manager and/or Program Manager will schedule NCP training by 5/31/22. Training will address Job Search logs emphasizing: the location/city of the job applied for; upload documents in Laserfiche; and proof of action in case notes. Equus team will invite appropriate board staff to the training and will provide agenda and PowerPoint presentation.

WIOA Adult and Dislocated Worker Case Management of Intake and Training

All errors have been discussed with the responsible TDS, and the errors that were correctable have been corrected. Findings will be reviewed once again during weekly TDS meetings on April 12, 2022. The updated desk aid on WIOA Needs Determination was posted on the all staff accessible I- Drive on April 15, 2021. was reviewed to provide expectation on timely and accurate usage of TWIST Service Codes 68/ 8. Proper documentation regarding Reemployment plans entered case notes or file documents were emphasized.

Weekly 25% file review on active files will be conducted by the Operations team to review assessments and service plans. Once significant improvement has been made, 25% reviews will be conducted monthly. Internal processes on service plans will be reviewed quarterly and updated as necessary.

To reinforce the expectation of up to date service plans, all cases submitted for ITAs, SWE, Support Services, and OJT approval will require the IEP to accompany the request. This action will reinforce case management expectation of accurate plans for service delivery. This will continue for one quarter or until significant improvement is substantiated in all centers. Data will be used to make necessary corrections, plan technical assistance and training.

Program Managers will continue to run weekly Active and Inactive lists to share with staff for quality case management. Program Managers will review 25% of files to ensure that 30-day contact is made or attempted contact and documented as required.

For cases that are inactive, case notes will be reviewed for status update.

WIOA Youth Case Management of Intake and Training

During weekly meeting and quarterly trainings Youth Manager/Program Manager will review the importance of documenting service codes 8 and 68; needs assessment and data discrepancies expectation of ensuring consistency in documents/information in Counselor Notes, Laserfiche, and TWIST. This “hands-on” approach will allow staff to practice while learning to enhance retention. To ensure learning Program Managers will randomly select and review 10 files per month.

The youth program managers will train TDS on the needs assessment process to ensure each assessment is unique to the individual customer this will occur no later than 5/6/22. In addition, Program Management staff will conduct quarterly meetings with each center to complete a full review of 2 cases (1 active and 1 inactive) and notate errors to TDS and CM. Technical training will be tailored based on the review of errors. Equus team will invite appropriate board staff to the training and will provide agenda and PowerPoint presentation.

TAA Intake Activities

Program Managers held training for the TDS' and CM on 04/12/2022, to review the elements of DOB, LMI, Average Weekly Wage, and 30-day contact for waivers. Program Managers will review all new TAA files for these elements. With the implementation of review of all new TAA files, cases that have been without contact/ service for 20+ days, the issue of soft-closed cases should reverse itself as staff will be required to provide a response to program managers for the customers on the inactive list that is provided to them weekly.

AOP Log Review

All errors have been discussed with the responsible staff, and the errors that were correctable have been corrected. Equus updated our internal AOP policy and outreach effort log on 1/31/22 to align with NCTCOG AOP and address areas of opportunity. AOP policy & log update training was held for staff responsible for outreach and center management on 3/30/22 and 4/8/22. Training agenda and sign in sheets are posted in SharePoint.

CONCLUSION-GAP ANALYSIS

Equus Workforce Solutions is focused on Center Managers reviewing 100 percent of files and a check and balance with QA Manager and Operations Team confirming the Center Managers reviews. In an effort to understand root cause for errors, staff discussed errors made in both the boards and internal review for trends, finding errors on both new and some tenured staff. The conclusion after testing for understanding is that new staff are making errors due lack of experience with complex programs, while tenured staff are assuming some additional responsibilities to fill in gaps in staffing, resulting in careless errors. The correction is focused attention to staff training and immediate oversight of new staff case management actions with coaching for implementation.

PROGRAM FINDINGS

Equus Workforce Solutions strives to achieve the highest standards in the delivery of quality services to meet all Board, State, and Federal rules. We will continue to utilize our continuous improvement model – Identify, Plan, Execute, Review – in our plan to address noted deficiencies.

Internal monitoring by the Quality Assurance Team will continue to identify gaps in program compliance and trends to be addressed through training, technical assistance, and review of current Standard Operating Procedures/Desk Aids.

APPENDIX A

Program Reviewed	Area of Review	Period of Review	Number of Records Reviewed	Number of Errors found in the Number of Elements Reviewed	Total Elements Yes	Total Elements No	Total Applicable	Overall Case Accuracy Rate
SNAP	1822 and Reconsideration	Oct. 2021-Dec. 2021	19	29/90	61	29	90	67.78%
SNAP	Good Cause, Penalty, Temporary Interruption	Oct. 2021-Dec. 2021	15	20/38	18	20	38	47.37%
Choices	Non-cooperation	Oct. 2021-Jan. 2022	10	16/32	16	16	32	50.00%
NCP	Non-Custodial Parent	Oct. 2021-Dec. 2021	4	6/80	74	6	80	92.50%
WIOA Adult DW	Intake and Training	Oct. 2021-Jan. 2022	16	15/86	71	15	86	82.56%
WIOA Youth	Intake and Training	Oct. 2021-Jan. 2022	8	15/70	55	15	70	78.57%
TAA	Intake Activity	Oct. 2021-Jan. 2022	10	19/73	54	19	73	73.97%
AOP	Outreach Log	July 2021-September 2021	22	8/173	165	8	173	95.38%