



North Central Texas Council of Governments

April 27, 2023

Ms. Lennis Dounley
Program Director
Curantis Group, LLC
Child Care Services
5800 N. I-35 Service Rd Unit 100
Denton, TX 76207

Dear Ms. Dounley:

NCTCOG completed the second review for FY2023 related to Contract #FY23-TWC-01, between Curantis Group, LLC and NCTCOG, for the provision of Child Care Services for Workforce Solutions for North Central Texas.

The attached final report details the scope of the monitoring and includes the Curantis response to the required corrective action. All errors are resolved pending follow-up monitoring of the successful implementation of your proposed corrective actions.

My staff are available to answer questions about this report and to provide technical assistance as needed.

Sincerely,

Phedra Redifer
Executive Director of Workforce Development

Cc: Kara Waddell, President/Chief Executive Officer, Curantis Group
Patricia Looper, Regional Director of Continuous Learning and Development, Curantis Group
Carlton Tidwell

SharePoint URL: <https://nctcog.sharepoint.com/sites/CurantisCC-QAExchange>



***FY2023 NCTCOG CHILD CARE SERVICES QTR 2
REPORT***

For

Curantis Group, LLC

Contract FY23-TWC-01

April 27, 2023

Prepared by

Workforce Development Compliance and Continuous Improvement

**North Central Texas Council of Governments
Workforce Solutions for North Central Texas**

Table of Contents

Glossary of Acronyms	3
Background, Risk, Objective	4
Scope, Methodology	5
Summary of Results	5 - 6
Conclusion – Gap Analysis	6 - 7
Findings	7 - 8
Required Corrective Actions, Curantis Management Response	8

Glossary of Acronyms

ADR	Alternative Dispute Resolution (for Appeal cases)
CCA	Child Care Associates
CCI	Compliance and Continuous Improvement (formerly QA - NCTCOG)
CCS	Child Care Services
CSM	Customer Satisfaction Meeting (for Appeal cases)
COVID	Coronavirus Disease
DFPS	Department of Family and Protective Services
DOL	Department of Labor
ELP	Early Learning Program (formerly Child Care Provider)
Curantis	Curantis Group, LLC
Form 2450	Authorization for Child Care Enrollment
Form 2050	Eligibility Certification for Child Care Services
Form 2054	Child Protective Services Service Authorization - 2054
HHSC	Health and Human Services
MS	Microsoft
NCTCOG	North Central Texas Council of Governments
NCTWDB	North Central Texas Workforce Development Board
PIRTS	Program Integrity Reporting Tracking System
PSOC	Parent Share of Cost
QA	Quality Assurance
QC	Quality Control (Curantis staff)
SIA	Service Improvement Agreements
SMI	State Median Income
TWC	Texas Workforce Commission
TWIST	The Workforce Information System of Texas
UI	Unemployment Insurance
WD	Workforce Development
WSNCT	Workforce Solutions for North Central Texas

North Central Texas Council of Governments
Workforce Solutions for North Central Texas
FY2023 NCTCOG Child Care Services Qtr 2 Report
Curantis Group, LLC
North Central Texas Child Care Services Contract FY23-TWC-01

BACKGROUND

Curantis Group, LLC. was awarded the contract with the North Central Texas Workforce Board area, following the adoption of a resolution by the North Central Texas Workforce Board of Directors at the July 28, 2022, Board meeting. This resolution endorsed Curantis as the provider for the delivery of Child Care Services to include appropriate contractual sanctions and/or remedies to ensure Curantis meets all established performance measures and provides services consistent with the policy principles of the Workforce Board and the North Central Texas Council of Governments. After an initial transitional period from August 1, 2022 through September 30, 2022, Curantis assumed the full contractual responsibilities for FY2023 beginning October 1, 2022 through September 30, 2023.

RISK

The NCTCOG risk assessment continues to identify the highest areas of risk for Child Care Services as:

- Data Integrity
- Data Security
- Customer Service

Additional identified risk exists due to:

- Staffing shortages requiring hiring and subsequent training.
- Changes to the Child Care rules effective October 1, 2022, including new funding, requiring new processes or process changes.
- New areas assigned to Subrecipient related to quality procurement and fraud/fact finding.

OBJECTIVE

NCTCOG conducts program and fiscal monitoring as required by TWC to provide:

- Targeted information to the Child Care Services Subrecipient for implementing timely corrective actions to meet requirements and performance measures as contracted.
- Assurance to TWC that Child Care Services programs are compliant 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 monitoring review was limited to Subrecipient:

- Standard Operating Procedures (SOPs)
- Desk Aids
- Appeal Log

METHODOLOGY

Desk reviews of all new SOPs uploaded February 3, 2023, and all Desk Aids uploaded February 6, 2023, to the Curantis-QA Exchange SharePoint site were performed. A review of the Appeal Log in the Curantis-QA Exchange SharePoint site was used for the appeal review.

SUMMARY OF RESULTS

Standard Operating Procedures (SOP) Review

Curantis provided 19 SOPs for review. All SOPs were reviewed for adherence to federal, state, and local Board policies. Errors found included:

- 2 SOPs for eligibility determination, as well as the denial processing and waitlist SOPs do not have steps for, or references to, the Initial Job Search policy.
- 2 SOPs state court documents or in loco parentis documents are required for legal guardians, but they are not required for either parents or legal guardians.
- Process incorrectly requires Former DFPS and former WF programs to submit a signed Orientation to Discrimination Complaint (OTC) form at application.
- DFPS referrals SOP should state that an email is insufficient in lieu of a new 2054. However, an email can be accepted (temporarily) once a request for a new 2054 is made and an email response is received and documented to avoid data validation errors.
- For denials being sent 15 days prior to the eligibility end date, SOP states care will end, even if all paperwork is received during that time unless there is prior management approval. However, TWC allows an extra 30 days to be added to processing time for a quality determination.
- Denial SOP does not address when the appeal is received late to send a forfeiture letter.
- Fact-Finding SOP does not mention the need to complete the investigation in 90 days or document by the 90th day in PIRTS valid reason(s) the investigation is taking longer. The policy is missing the entire fact-finding process as outlined in Board policy IAQA01-201711, including all investigative steps, and how to complete the recoupment and RID-58 templates at the end of the SOP, and is missing the Request for Appeal form that must be sent with the RID-58. It also does not have steps to deny care (or refer to the Discontinue/Denial SOP) if care is ongoing during the investigation.
- Recoupment SOP is missing the need to add recoupment to the intake common family tab in TWIST and uses an incorrect income calculation method for determining if a customer is over income. It does not mention sending a Request for Appeal form and states it is for both parents and providers (ELPs). There is no reference to the ELP recoupment process.
- Waitlist processing SOP incorrectly instructs automatic creation of a new TWIST ID if there is no SSN without searching other parameters first, is missing instructions to send duplicate TWIST IDs found to NCTCOG TWIST liaison to be combined into one TWIST ID by TWC, has incorrect grouping and order of priority groups, and is missing some

priority groups.

Desk Aids Review

Curantis provided 16 Desk Aids for this review. A 100% review of Desk Aids was conducted. Errors found included but are not limited to:

- The Desk Aide for Homelessness is missing processing steps for homeless working/school customers who return proof of work/school documents initially. Desk Aide bases homelessness only on where children are sleeping, but other factors can be used to determine homelessness. It is incorrect not to generate a 2050 (or 2450) for the first 3 months as they are eligible for 3 months of care initially. NOTE: an updated 2050 would also need to be generated if they start an activity at any level for the remainder of the 12-month eligibility period.
- In Loco Parentis Desk Aide incorrectly requires legal guardians to produce documentation.
- Initial Job Search Desk Aids all state initial PSOC is \$0 but initial PSOC is maximum PSOC for household size, then reduced (\$0) a maximum of 3 months (then recalculated).
- Initial Job Search Counselor Note Template Desk Aide refers to the Authorization Scripts and Templates Desk Aide for phone and email scripts. There were no scripts for Initial Job Search found in that Desk Aide that explain to the customer the differences between Initial Job Search authorization versus authorization for income eligible customers.
- Missing how to process the Initial Job Search customers beyond the authorization for 3 months of care.
- The Supporting Docs Desk Aide is missing instructions on documentation of income required to calculate PSOC for working teens and incorrectly states no form is required to be filled out for Veterans (or spouse of a Veteran).

Appeal Log Review

A review of the Appeal Log kept for customers who file an appeal was performed. Each customer's appeal case was up to date with a clear determination of where the case was in the process through to completion of the appeal. The new procedures instituted by the appeal staff and Curantis demonstrates improved timeliness in processing appeals. Additionally, there is improved communication with the customers during the appeal. Finally, there has been an increase in the number of customers returning required documentation and, therefore, reduced the number of appeal cases being sent to NCTCOG for an Appeal Hearing.

CONCLUSION-GAP ANALYSIS

Based on the Curantis Statement of Work (SOW), it was anticipated with Child Care Associates (CCA) oversight, that Curantis would use the CCA policies (modified for local WSNCT Board policy) to train any retained or new staff beginning October 1, 2022. Therefore, it was determined a review of Curantis procedures (SOPs and Desk Aids) should be completed during the first and second quarters of FY23 to ensure policy alignment with federal, state, and local Board policies.

- Curantis was expecting to use the Workflow case management system.
- A new case management system is being implemented by TWC and will be used by all Board areas starting in FY24 (October 2023). The time and cost to convert all customer files from Laserfiche to Workflow and then again to the new system within one year was prohibitive.

- Curantis determined to use the Laserfiche filing system in place in WSNCT, a program unfamiliar to them and without the same case management features as Workflow. Therefore, Curantis could not use the CCA procedures as they were specific to Workflow and there is a significant learning curve to navigate the Laserfiche system.

Gaps from the SOP review included (but were not limited to) the following:

- Requiring prior management approval to process paperwork received during the eligibility period may lead to disparate treatment of customers by staff.
- Data validation errors will occur when all documentation is not required to match as in the DFPS SOP.
- Incorrect income calculations can lead to improper payments.
- Not adding recoupment to intake common could cause an ineligible customer's care to restart.
- Failing to send a Request for Appeal form seen in several SOPs could deny customers their appeal rights.
- A thorough search for new applicants and/or a call for more information needs to be done to avoid duplications in the system and missing vital customer information.
- The Fact-finding SOP requires revision to fill in the gaps in the process that could lead to a finding when monitored.
- Errors in the Waitlist SOP could lead to incorrect processing of priority groups by staff.

Gaps from the Desk Aide review included (but were not limited to) the following:

- Gaps seen in processing homeless customers could lead to a finding with TWC in future reviews as well as deny homeless customers their priority rights.
- The Initial Job Search Desk Aids all need updating to state the maximum parent share of cost (PSOC) initially or there could be a finding for increasing the PSOC without informing the parent of maximum PSOC at eligibility for Initial Job Search care.
- Not collecting all required documentation could lead to a data validation error for certain priority groups.
- Scripted emails and TWIST Counselor notes could lead to documentation errors if staff do not correctly remove or add information that was communicated or not communicated to the customer.

Some policies cited by Curantis were out of date in the SOPs. It is suggested that current federal, state, and local policies be used when updating SOPs or Desk Aids to ensure that any changes to rules have been incorporated. Also, every change in policy needs a review with attention to what changed, and an analysis of which SOPs and Desk Aids were impacted and require updating as they go into effect. Training on any changes in rule and processes impacted should occur promptly with all staff.

FINDINGS

There is one finding. The contract requires services be provided according to all applicable federal, state, and local rules (see citation below). Some, but not all, SOPs and Desk Aids could be validated as meeting all applicable rules, policies, and procedures on their date of review.

Finding Citation:

Curantis, LLC, North Central Child Care Services Contract # FY23-TWC-01, Section 5: Contract

Performance and Section 9 Reporting Requirements:

Section 5.3 The Sub recipient shall provide such services in compliance with all applicable federal and state laws, regulations, and rules.

Section 5.4 The Sub recipient 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 9.3 The Sub recipient understands that it will be held liable for completeness, accuracy, and consistency of all data under its control.

Section 9.8 Failure to data input or to report in accordance with the terms of this Contract may result in withholding by the Administrative Entity of 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 Actions:

Curantis will be required to respond to all the areas indicated in red on the two review attachments uploaded into SharePoint. Corrections to the SOPs and Desk Aids will need to be made so that they align with federal, state, and local policy and is required to clear the errors and issue the final report. Curantis will be expected to train all staff on any changes made to the procedures so that all staff process CCS cases consistently going forward.

NOTE: A new Child Care Services Guide was issued on 3/9/2023, which was after this review had been completed. A copy that tracks the changes in the newly revised Child Care Guide can be found on the TWC website at <https://www.twc.texas.gov/partners/workforce-program-guides#childCare>. Any changes reflected in that guide were not used because they were not available to Curantis' staff to use to update procedures, nor for NCTCOG QA staff to use during the time the SOPs and Desk Aids were reviewed. It is suggested that Curantis review the changes and update their SOPs and Desk Aids with any changed guidelines as soon as possible.

Curantis Management Response:

- 1) SOP's and Desk Aids have been updated
- 2) Staff will receive training on updated process