



North Central Texas Council of Governments

November 5, 2020

Ms. Moneisa Downs
Project Director
Equus
624 Six Flags Drive, Suite 245
Arlington, TX 76011

Dear Ms. Downs:

NCTCOG completed its FY2020 Summary Report related to the Contract # FY20-TWC-02, between ResCare (now known as Equus) and NCTCOG, for the provision of Workforce Services for Workforce Solutions for North Central Texas.

The attached report summarizes the monitoring conducted in FY2020. No new monitoring was conducted, and no response is required.

We appreciate the cooperation and assistance Equus provided throughout the year. If you have any questions, please contact Debra Kosarek (817-695-9179), Debra Reyna (682-433-0473), Phyllis Stewart (817-704-2528) or Linda Hernandez (817-695-9119).

Sincerely,

David K. Setzer, CPSM, C.P.M., CWE
Director of Workforce Development

Cc: Lisa Boyd
Carlton Tidwell

SharePoint URL: <http://connect/extranet/WD/Rescare/SitePages/Home.aspx>



FY2020 NCTCOG WORKFORCE Year End Review

For

ResCare Workforce Services

Contract FY20-TWC-02

November 5, 2020

Prepared by the

Workforce Development Quality Assurance Department

North Central Texas Council of Governments

Workforce Solutions for North Central Texas

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Glossary of Acronyms

COLTS	Choices Online Tracking System
ETPS	Eligible Training Provider System
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
ResCare	ResCare Workforce Services
ResCareWORCS	ResCare 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
TRA	Timely & Reasonable Attempt
TWC	Texas Workforce Commission
TWIST	The Workforce Information System of Texas
UGMS	Uniform Grant Management Standards
WD	Workforce Development
WIT	Work in Texas
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
FY2020 NCTCOG Workforce Year End Summary
Equus (formerly ResCare) Workforce Services
North Central Texas Workforce Services Contract- #FY20-TWC-02

BACKGROUND

Following a brief transition period, ResCare Workforce Services (now Equus) became the provider for the delivery of Workforce Services for Workforce Solutions for North Central Texas on October 1, 2015. The contract was extended for a fourth year, as provided for in the initial contract, beginning October 1, 2018. NCTCOG conducted a Fiscal and Programmatic pre-award review prior to this extension.

RISK

The FY2020 Risk Assessment determined that Data Integrity and Customer Service continue to be the primary areas of risk for all Workforce programs. Significant consideration was given to the following:

- continued risk for errors in following the requirements for Good Cause, Recommendation to HHSC, Timely and Reasonable Attempt, and Penalty Initiation,
- identified risk for NCP case management in properly documented case actions, cited as a concern by TWC in FY2018,
- the conversion of Choices, NCP and SNAP programs to Laserfiche
- implementation of the revised WorkInTexas.com (WIT) and the new requirements of WD 08-19 Change 1,
- changes to TWC Data Validation Requirements related to employment verification at program entry,
- changes to the criteria for WIOA Expedited Eligibility,
- continued risk for errors related to RESEA regulatory requirements,
- continued integration of Vocational Rehabilitation Services requiring resources for larger numbers of individuals with significant barriers to employment,
- historically low numbers of TAA customers co-enrolled in WIOA,
- high rates of turn-over in Subrecipient staff, and
- 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, and
- 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

No formal scored testing was conducted for the Workforce programs; this report is a summary of the monitoring results and gap analysis from the four previous monitoring cycles.

METHODOLOGY

Throughout FY2020 the reviews conducted utilized data and reports from The Workforce Information System of Texas, WorkInTexas.com, and individual case files from Laserfiche.

SUMMARY OF RESULTS

Choices Year End Monitoring Analysis

Full and Slant reviews of the program were conducted and focused on case management, process implementation, data integrity and data validation. The reviews indicated that there continues to be a lack of staff knowledge in these areas. During quarter three and quarter four reviews, the subrecipient failed to meet the compliance requirements. The monitoring results for both quarters contain the same findings.

- Timely and Reasonable Attempts (TRA) were not initiated within 24 hours,
- gap in counselor notes, lack of or no counselor notes, and untimely data entry of counselor notes,
- untimely reporting of compliance, sanctions, and notification of family changes to HHSC,
- incorrect methods used to calculate participation hours,
- participation forms in the file did not match TWIST service tracking and counselor note entries,
- there were misfiled or no documents in the Laserfiche file to support TWIST entries.

Improper case management and the lack of documentation in the file and in TWIST contributed to possible questionable costs for childcare and transportation services. Untimely reporting to HHSC can result in a loss of benefits for the customer and inconsistent services to assist customers in attaining self-sufficient goals.

SNAP Employment & Training Year End Monitoring Analysis

A full review and slant reviews were conducted during FY20. TWC site visit in January 2020 identified a finding for the 1822 and Reconsideration process. The slant reviews focused on specific elements that include Good Cause, Penalty, TRA, 1822 and Reconsideration processes. The results of the FY20 review for all quarters indicate that there continues to be a lack in staff knowledge of the SNAP policy and processes and there is a deficiency in data integrity and data validation. There was no improvement in the reviews and all quarters contained similar findings.

- The paperless system files lack documents to support case management, work activities and HHSC actions documented in TWIST Counselor notes, TWIST Service Tracking and SNAP E&T History Good Cause and Penalty tabs,
- case management and penalty actions are not documented timely and accurately in TWIST,
- untimely data entry of the Reconsideration in the SNAP E&T History Good Cause tab,
- penalties were not initiated timely within seven days of noncompliance,
- the completion and submission of form H-1822 to HHSC was not conducted within two weeks of initial participation.

The lack of documentation in TWIST counselor notes, failure to notify HHSC timely, missing documents in the file and improper case management could impact benefits of SNAP recipients.

NCP Choices Year End Monitoring Analysis

Review of the NCP Choices program indicate the areas of concern as data integrity and data validation. Quarter two and three reviews had similar findings.

- Case management actions were not documented timely and accurately in TWIST and COLTS within three (3) business days,
- participation hours and case management documents are not in the file to verify documentation in TWIST counselor notes and to support TWIST Service tracking entries,
- case management documents were not completed appropriately,
- the 6-month employment retention period was miscalculated due to lack of or no participation hours in the file.

The missing participation forms in the file and lack of documentation in TWIST and COLTS resulted in improper case closures due to non-compliance and in calculating the 6-month employment retention period.

Support Services Choices, NCP, and SNAP Year End Monitoring Analysis

The Support Services process was reviewed for Choices, NCP, and SNAP programs to ensure that the appropriate steps were followed to include the initial request for service to payment issuance. The ResCare WORCS system was used to review the support service process, the correct funding streams were utilized, voucher development, document verification and payment. The Laserfiche electronic file system was used to verify correct documentation was uploaded to the customer file. The review results indicate a gap in data validation and data integrity.

- Copies of supporting documents were not in WORCS or the Laserfiche file,
- data entered in TWIST Support Service tab does not match the documents in the file, TWIST Counselor notes or in WORCS.

Lack of verification of support service documents could result in improper payments or disallowed costs.

WIOA Adult, Dislocated Worker and Youth Eligibility Year End Monitoring Analysis

Eligibility for all WIOA customers was tested in both the first and third monitoring cycles and actual program eligibility remained 100% compliant. Gaps exist in Youth cases related to the validation of employment status at participation as required by WD 27-19 *State Data Validation Requirements* (effective 11-13-19). The Youth files in error either did not contain validating documents or contained documents with ending dates prior to the first WIOA service.

Orientation to Discrimination Complaint forms are being provided as required and no gaps were found in the maintenance of customer confidentiality. Customer registration in WIT was also found to be compliant.

WIOA Adult, Dislocated Worker and Youth Case Management Year End Monitoring Analysis

Staff achieved 100% compliance with Board policy CEW09-201607 (WIOA Needs Determination) for Adult and Dislocated Worker cases. Both Adult and Youth cases were current on 30-day contacts. Training, other than youth work experience, was provided from the Targeted Occupations list by eligible training providers and individual training accounts were established when appropriate, and the necessity of support services was well documented.

Room for improvement in WIOA case management still exists in these areas:

- alignment in case note data with other areas of TWIST and Laserfiche files, especially in the documentation to support the need for and ability to complete training,
- data entry of service code 68 for the development of, or updating of employment plans, and
- the provision of follow-up services for Youth.

Additionally, significant gaps were found in the tracking and documenting of customer employment. Six of 8 Adult cases that documented employment did not have the appropriate data entered in the Performance Data tab or did not have supporting documents in the case file for the entry made. Significant compliance with requirements for Adult case follow up is noted.

RESEA Year End Monitoring Analysis

Twenty- five cases were reviewed for the content of employment plans and orientation attendance. Only 2 plans were missing specific steps for the customer to take to achieve their reemployment goal and 1 other case contained an outdated resume. Two of 25 cases still had the status of "registered" for the RESEA orientation and an open status on the 311 service for orientation attendance. When the registration status is not updated timely and the customer is a no show for the orientation, the Unemployment Insurance staff are not alerted to investigate the case which could result in the customer receiving benefits that they are not eligible for.

TAA Year End Monitoring Analysis

Complete and accurate case management of TAA cases has remained steady. The requirements for WIT registration, eligibility confirmation and intake activity are 100% compliant. Benchmarking and 30 - day contacts were found to be significantly compliant with only minor gaps in timeliness. Other minor gaps found in testing include:

- premature entry of service code 68, and
- incomplete case note data to document compliance with waiver contact review.

CONCLUSION-GAP ANALYSIS

Equus is to be commended for their continued excellence in accurate eligibility determinations, and other positive accomplishments, which include:

- the agile response in acquiring resources to allow staff to work from home due to Covid-19, and
- the progress made toward the goal of 100% co-enrollment of TAA customers in WIOA.

The excellence noted above does not extend to the data integrity of the Choices, NCP Choices, SNAP and WIOA programs. A general deficiency in the data integrity of case records in these programs still exists. Significant improvement is needed in the maintenance of complete and accurate customer files in Laserfiche. The January 2020 TWC site visit resulted in identification of a finding for the SNAP program for the form H-1822 and Reconsideration process, as a result, Equus generated a strategic improvement plan. Subsequent NCTCOG review did not reflect the Equus plan as being successful. The Choices, NCP, and SNAP programs did not meet the compliance requirements for the FY20 program year. Monitoring findings of both Equus and NCTCOG QA staff also indicate that learning outcomes from training are not resulting in improved case management. Sustained and immediate improvements in these areas are needed.

APPENDIX A

SUMMARY MEMO-Fiscal Year 2020

Program Reviewed	Area of Review	Period of Review	Number of Records Reviewed	Number of Errors found in the Number of Elements Reviewed
SNAP	Full Case Management	September – November 2019	10	68/205
WIOA Adult DW	Eligibility	September – December 2019	12	1/63
WIOA Youth	Eligibility	September – December 2019	10	3/64

Program Reviewed	Area of Review	Period of Review	Number of Records Reviewed	Number of Errors found in the Number of Elements Reviewed
SNAP	Good Cause and Penalty	January – February 2020	33	36/122
NCP	Full Case Management	November – December 2019	8	34/121
Choices, NCP, SNAP	Support Services and Incentives	December 2019	33	26/187
WIOA Adult DW	Assessment and Employment Plans	October 2019 – February 2020	11	7/60
WIOA Youth	Assessment and Employment Plans	October 2019 – January 2020	10	9/50
WIOA Adult and Youth	OJT	October 2019 – February 2020	2	4/24
WIOA Adult, DW and Youth	OTDC and PII	October 2019 – January 2020	24	0/47
TAA	Benchmarks and 30 Contact	October 1, 2019 – February 21, 2020	11	7/94

TAA	Waivers	October 2019 – February 2020	6	1/13
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Program Reviewed	Area of Review	Period of Review	Number of Records Reviewed	Number of Errors found in the Number of Elements Reviewed
SNAP	Slant Review–TRA and Penalty	January - February 2020	25	30/97
NCP	TRA and Case Closure	January – May 2020	15	33/58
Choices	Work Activities	January-February 2020	60	85/259
Choices	Non-Cooperation	January-March 2020	27	39/104
WIOA Adult DW	Eligibility	January-March 2020	10	1/52
WIOA Youth	Eligibility	January-March 2020	14	3/91
WIOA Adult DW	Training	December 2019 – February 2020	14	9/90
WIOA Youth	Training	December 2019 – February 2020	11	10/91
TAA	REPS and Training	November 2019 – February 2020	10	4/78
TAA	Eligibility Confirmation	October 2019 – February 2020	9	1/65
RESEA	Employment Plans	January – February 2020	25	5/93

Program Reviewed	Area of Review	Period of Review	Number of Records Reviewed	Number of Errors found in the Number of Elements Reviewed
SNAP	Slant Review 1822 Work Requirement Verification	February – March 2020	41	17/41
SNAP	1817 Reconsideration Request	February - March 2020	27	27/27
Choices	Full Review	December 2019 – June 2020	16	49/255
WIOA Adult DW	Exits	March - June 2020	17	13/52
WIOA Youth	Exits	April to June 2020	12	11/38