FY2021 NCTCOG WORKFORCE 2

For

Equus Workforce Services

Contract FY21-TWC-02

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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 and Definitions

COLTS	Choices Online Tracking System
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
FY2021 NCTCOG Workforce Review 2
Equus Workforce Services
North Central Texas Workforce Services Contract FY21-TWC-02

BACKGROUND

Equus Workforce Services, formerly ResCare Workforce Services, became the provider for the delivery of Workforce Services for Workforce Solutions for North Central Texas on October 1, 2015. After four one-year extensions of the initial contract a Request for Proposals (RFP) was sent to solicit bids. Equus Workforce Services 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 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 (with options for renewal) which includes specific language for appropriate contractual sanctions and/or remedies to ensure that all established performance measures will be met.

RISK

The FY2021 Risk Assessment determined that Data Integrity and Customer Service continue to be the primary areas of risk for all Workforce programs. COVID-19 triggered changes that affected the participation requirements for Choices and SNAP programs, and work search requirements for WIOA Significant consideration was given to the following:

- continued risk for SNAP in following the requirements for the form H1822, Good Cause, and Reconsideration actions to HHSC,
- the conversion of Choices, NCP, and SNAP programs to Laserfiche,
- significant reforms in State TAA guidance, including the requirement to co-enroll all TAA customers in WIOA, and
- 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, 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

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

- WIOA Adult, DW and Youth assessments and employment plans
- WIOA orientation to discrimination complaint forms
- TAA benchmarks and 30-day contacts
- TAA waivers
- TAA case management
- Support Services and Incentives for Choices, NCP and SNAP
- NCP Full Review
- SNAP 1817 Reconsideration
- SNAP Work Activities

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 Reconsiderations

A slant review of the Reconsideration process was conducted for the SNAP ABAWD population to ensure all requirements were met based on the finding identified by TWC in January 2020. The scope of the review was November 2020 through January 2021. Twenty-seven files were reviewed.

The Reconsideration review indicates that there has been an improvement in this process but is still below the required accuracy rate of ninety percent. The accuracy rate increased from 50% to 85.19%.

There were four errors overall and they were all related to the submission date of the 1817 to HHSC: the documents in the file did not match the TWIST counselor notes and the 1817 fax submissions to HHSC were untimely. Out of the eleven centers reviewed, seven had 100% accuracy rate.

SNAP Work Activities

A review of SNAP Work Activities that encompasses the entry into the SNAP program through exit was conducted for the scope period of review December 2020 through January 2021. The accuracy rate for this review was 87.50% and fourteen files were reviewed. There were three centers that did not have any errors, Greenville, Plano and Weatherford. Most of the errors were for Eligibility, Good Cause Claims and Temporary Interruptions and Case Management documentation.

- Eligibility errors consisted of monthly verifications not being conducted, there was no documentation of the eligibility verified or the documentation in case notes did not match the forms in the file or vice versa.
- Good Cause and Temporary Interruptions errors, staff did not have monthly contact with the customer to determine good cause, Service 91 Good Cause was not entered in Service tracking, and staff did not document the Good Cause reason in counselor notes.
- Errors relating to Case management actions were not documented in TWIST counselor notes and TWIST Service Tracking timely and accurately.

Staff appears to have knowledge with the SNAP process but needs to continue to review the SNAP Guide and Board Policies to ensure that appropriate case management processes are followed.

NCP

A full review of nine files was conducted for the scope period of October 2020 through January 2021. The overall Accuracy Rate is 91.58%.

There were errors were in the following areas:

- Hours on participation forms did not match case note documentation and there was improper calculation of participation hours,
- For Employment retention, the TWIST Performance Data Employment Outcomes tab was not populated,
- Medical Confidentiality Requirements - there were 2 cases in McKinney that had specific medical documentation in the case notes,
- Support services were issued to customers that did not meet the weekly 30 hours of participation,
- The Intake Common tabs were not populated to match case notes.

Staff continues to demonstrate knowledge of the NCP process.

Choices

Nine Choices files were reviewed for the scope period of January through February 2021. Due to the COVID-19 pandemic, participation is not required but if a customer chooses to participate staff must follow the program requirements.

Errors identified were that HHSC was not notified within 24 hours of customer reporting changes and participation activity documents, data entry in TWIST Service tracking and case notes do not match.

The accuracy rate for this quarterly review improved from 84.11% to 96.30%.

Support Services and Incentives

Twenty-two files were reviewed for the scope of October through December 2020 for the Choices, SNAP, and NCP programs. The overall accuracy rate is 90.70%.

- Case notes did not support the date the customer received the near cash, check, or incentive; for vendors, case notes did not document when the payment was made, or the method used to process the payment.
- TWIST Support Service Screen entries, the Support Service documents, the TWIST counselor notes, and the Data in WORCS did not match.

WIOA Adult, Dislocated Worker and Youth

Twenty adult/dislocated worker and fifteen youth cases were reviewed for compliance with regulations related to assessing customers skills and needs. Gaps were found in the use of TWIST service codes 8 and 68 in both adult and youth cases. Other errors include:

- 8 of 20 adult cases going beyond 30 days without customer contact or late data entry of contacts made,
- 3 of 15 youth cases that did not have test results in the customers file or in the assessment section of TWIST, and
- adult and youth cases with data discrepancies between TWIST, Laserfiche and case notes.

All cases were compliant with rules on the initial assessment of the customers abilities, need and barriers. Five adult cases were found to have automatically closed due to lack of case activity or customer contact.
Twenty-two adult, dislocated worker and youth files were read for compliance with confidentiality and *Limited English Proficiency* requirements. All customer files contained a completed orientation to discrimination complaint form as required. One correctable confidentiality error was found; this error *did not* rise to the level of a Personally Identifiable Information (PII) breach.

TAA

Educational benchmark reviews and thirty-day contacts were completed as required. A review of 5 waivers found that all waivers were completed accurately and entered in TWIST in a timely manner. Ten cases were reviewed for the case management of intake, training activity and exits, WorkInTexas registrations and the provision of labor market information were completed without exception.

Gaps were found in data validation elements including a case with errors related to the documentation of measurable skills gains. One co-enrolled customers WIOA case was allowed to close due to lack of activity or customer contact.

CONCLUSION-GAP ANALYSIS

The SNAP review focused on the findings identified by TWC during the visit in January 2020. The review indicates that there is continued lack of staff knowledge and policy interpretation in these areas. The accurate and timely data entry of customer information into TWIST is a basic aspect of effective case management that has great significance for the correct and accurate reporting of data to State and Federal entities. Targeted improvement is needed in these areas specifically in the SNAP program. Conflicting or inconsistent data in and between systems, regardless of the program, calls into question what services the customer has or has not received. If not improved, it will continue to result in data validation/data integrity errors. Improvement in management controls to mitigate these circumstances is needed.

PROGRAM FINDINGS

Finding 1*:* Eighty-seven data integrity and case management errors were identified during the file review of nine-hundred-ninety-one 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 # FY21 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. Training on applicable rules and regulation regarding data collection is needed.

Equus Response

Summary

Equus Workforce Solutions Management has reviewed the report and its findings and have worked with Talent Development Specialists (TDS) to correct what is correctable. Program Managers reviewed each error with the TDS to ensure appropriate correction was applied if applicable and provided technical assistance on all correctable and non-correctable errors.

The Operations Team consisting of the Program Managers and Youth Manager operate under the continuous improvement model – ***Identify, Plan, Execute, Review*** - in an ongoing effort to improve communication with staff including Standard Operating Procedures, Desk Aids, Training, Technical Assistance, weekly meetings with TDS, and Quarterly Trainings with TDS.

Equus developed a staffing plan that addresses both how vacancies are filled and how work is completed when a vacancy occurs. Equus is creating a retention plan to address the high rates of turn-over.

Internal program monitoring, quality reviews, and competency training scores have confirmed staff training is sufficient. Staff are more closely monitored and identified when weekly goals are not achieved to ensure early intervention. In addition, the Operations Team is committed to keeping in regular communication with the Deputy Director and the Project Director to report trends and areas of concern on individual TDS and/or Centers. The Team is committed to gathering necessary documentation to allow the Deputy Director and Project Director to make informed decisions on accountability including requesting additional training/Technical Assistance, individual performance improvement plans (PIP), or other actions as needed.

SNAP

All errors have been discussed with the responsible TDS, and the errors that were correctable have been corrected. Findings were reviewed during weekly TDS meetings and will be reviewed again during the Quarterly Training which will be held prior to July 1, 2021.

SNAP Quarterly Training was held on 02-23-21 and program management 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.

Program Manager continues to conduct spot checks for data entry for case actions during weekly program calls. Program Management has also created and reviews a report that focuses on the timeliness of the 1822. It is the expectation of this effort that case work will improve with immediate feedback to TDS and Management.

Choices

All errors have been discussed with the responsible TDS, and the errors that were correctable have been corrected. Findings were reviewed during weekly TDS meetings and will be reviewed again during the Quarterly Trainings which will be held prior to July 1, 2021.

Equus also implemented a Quality Improvement Plan on 03-08-21 for the Choices Program. This plan includes a full review of the case by the TDS' with Center Managers, Quality Assurance and Program Management conducting quality review checks on a percentage of the cases reviewed.

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.

NCP Choices

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 March 23, 2021. Program Management continues to have weekly calls with staff to get case updates, review issues, and provide technical assistance.

WIOA Adult, Dislocate Worker, and Youth

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 and during the Quarterly Trainings which will be held prior to July 1, 2021. An updated Desk Aid on WIOA Needs Determination was posted on the K Drive on April 15, 2021, which will provide expectation on timely and accurate usage of TWIST Service Code 68.

Program Managers will continue to share weekly active/inactive lists with TDS and Management staff. Program Managers will request a status update, including whether a contact or attempted contact, was made on those inactive over 20 days. These status updates will correct the no services within 30 days and the soft closures.

During weekly meeting and quarterly trainings Youth Manager/Program Manager will review the importance of documenting Traitify results in TWIST; and the data integrity expectation of ensuring consistency in documents/information in Counselor Notes, LaserFiche, and TWIST.

TAA

Staff training has been scheduled for the second week in May 2021 that will be facilitated by Data Management staff and will include an example of acceptable documentation and time frames for entering the MSG into TWIST. In addition, staff will be provided with monthly reports to identify customers enrolled in a training activity that have yet to reflect the MSG in TWIST; this will be an ongoing proactive approach that will be monitored closely.

With the implementation of weekly review for 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.

CONCLUSION-GAP ANALYSIS

Equus Workforce Solutions Management created an internal SNAP Quality Improvement Plan (QIP) which focused on Center Managers review of files and a check and balance with QA Manager and Operations Support Manager reviewing the Center Managers reviews. The scope was November 2020 through January 2021. In addition, Program Manager has provided training and technical assistance on an individual basis, during weekly meetings, and during Quarterly Trainings. Leadership is working with Center leadership to identify and address areas of staff accountability.

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 each area of deficiency. All files were corrected if allowable, and support documentation is included as an attachment to this response.

Internal monitoring by the Equus 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.

The Program Management Team will provide information on trends or areas of concern to Deputy Director and Project Director and will be available to assist in any way necessary to assist with staff accountability.

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
CHOICES	Full Case Management	January – February 2021	9	5/135	130	5	135	96.30%
NCP	Full Case Management	October 2020 - January 2021	9	15/189	174	15	189	92.06%
SNAP	Reconsiderations	November 2020 – January 2021	27	4/27	23	4	27	85.19%
SNAP	Work Activities	December 2020 – January 2021	14	26/216	190	26	216	87.96%
Choices, NCP, SNAP	Support Services and Incentives	October – December 2020	22	12/129	129	12	135	90.70%
WIOA Adult DW	Assessment and IEP	October - Dec 2020	20	12/77	65	12	77	84.42%
Youth	Assessment and ISS	October 2020 -Jan 2021	15	9/75	66	9	75	88.0%
TAA	Benchmarks and 30-day contact	October 2020 -Jan 2021	12	1/86	85	1	86	98.84%
TAA	Waivers	October 2020 -Jan 2021	5	1/10	9	1	10	90.0%
TAA	Case Management	October 2020 – Feb 2021	10	2/47	43	2	47	95.74%