



North Central Texas Council of Governments

November 3, 2021

Ms. Juanita Budd
Project Director
Equus Workforce Services
624 Six Flags Drive, Suite 245
Arlington, TX 76011

Dear Ms. Budd:

NCTCOG completed the fourth quarter review for FY2021 related to the Contract # FY21-TWC-02, between Equus Workforce Solutions and NCTCOG, for the provision of Workforce Services for Workforce Solutions for North Central Texas.

The attached final report details the scope of the monitoring and includes the Equus response to the required corrective action. Your timely completion of the required error corrections and Management response is appreciated. All errors are resolved pending follow-up monitoring of the successful implementation of your proposed corrective actions.

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,

Phedra Redifer
Executive Director of Workforce Development

Cc: Moneisa Downs
Carlton Tidwell

SharePoint URL: <https://nctcog.sharepoint.com/sites/Extranet-WD-ResCare>



FY2021 NCTCOG WORKFORCE Review 4

For

Equus Workforce Services

Contract FY21-TWC-02

November 3, 2021

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 and Definitions	3
Background, Risk	4
Objective, Scope, Methodology	5
Summary of Results	6
Conclusion – Gap Analysis, Program Findings	10
Corrective Actions, Management Response	11
Appendix A Summary Memo	14

Glossary of Acronyms and Definitions

AOP	Affirmative Outreach Plan
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.

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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 (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.
- 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:

- NCP Full Review
- Choices Full Review
- SNAP 1817 Reconsiderations
- SNAP Form 1822 Work Requirement Verifications
- SNAP Full Review
- WIOA Full Case Management, Adult and Dislocated Worker
- National Dislocated Worker Grant (NDWG) Case Management
- TAA Waivers
- RESEA Required Orientation Activities
- 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 1817 Reconsideration

A slant review of the Reconsideration process was conducted for the SNAP program to ensure all requirements were met based on the finding identified by TWC in January 2020. The scope of the review was February 2021 through March 2021. Sixteen files were read, and the review consisted of forty-four applicable elements with thirty-one of them correct and thirteen in error, for an overall score of 70.45%.

The review examined the following elements: timely submissions of form 1817 to HHSC, SNAP E&T Good Cause tab entries, closure of SNAP activities, data entry in Service Tracking, Program Detail closure, file documentation, and reliable counselor notes.

The errors included:

- Service activities were not entered, or service activities were not closed.
- 1817 forms were not in the file.
- Counselor notes do not match documentation in the file and don't match data entry in TWIST.
- Counselor notes do not document the submission of the 1817 form to HHSC.
- The Program Detail was closed and not left open for the 90-day Job Retention Period.
- Job Retention services were not offered to the customer when they reported employment.
- Case was not opened, and a file was not created in Laserfiche when the customer attended EPS.
- Customer was not provided with support services during the Job Retention period.

Seven centers had files for review during this timeframe. Of the seven, three centers had 100% compliance for this process.

SNAP 1822 Work Requirement Verifications

The review focused on the timely submission of the form 1822 to HHSC, accurate completion of the 1822 form and timely and accurate counselor notes as well as documentation placed in the customer file.

Twenty-two files were reviewed for the scope period of April through June 2021. The review consisted of twenty-two applicable elements with nineteen of them correct and three in error, for an overall score of 86.36%.

The errors included:

- The 1822 fax confirmation to HHSC was not in the file.
- Counselor notes do not match the documents in the file and contains inaccurate information.
- Staff did not open a case in TWIST when the customer attended the EPS and did not open/create a file in Laserfiche.

Out the eleven centers reviewed all but three were at 100% compliance for this process.

SNAP Full Review

A full review of the SNAP program was conducted, and the review consisted of all elements of Case Management:

The scope period was July 2021. Twenty-one files were read. The review consisted of three-hundred twenty-four applicable elements with two-hundred eighty-five of them correct and thirty-nine in error, for an overall score of 87.96%.

- The H1822 forms were not in the file and the forms were not submitted to HHSC within two weeks of SNAP orientation.
- Staff did not enter a Reconsideration in TWIST SNAP History Good Cause tab when the customer reported employment.
- Sanctions were not processed appropriately or timely.
- Case management errors consisted of a lack of review of job search logs for allowable participation hours.
- Data entry in TWIST did not match forms in the file.
- Forms were not in the file for job search and support services.

This review indicates that there continue to be a lack of adherence to the form H1822 and Reconsideration process. There was an increase in the number of errors related to the 3-day grace period and sanction requests. Of the eleven centers review, two had accuracy rates above 95%.

Choices

A Full review of the Choices program was conducted. Eleven files were reviewed for the scope period of April through June 2021. Due to the COVID-19 pandemic, participation is not required but if a customer chooses to participate staff must follow the program requirements. There were two centers that did not have active case files due to the low enrollment.

The review consisted of one-hundred sixty-six applicable elements with one-hundred thirty-four of them correct and thirty-two in error, for an overall score of 80.72%.

The following errors were noted for the Initial and Ongoing Assessment:

- Staff failed to refer customers to the WIOA programs when they expressed an interest in training.

- Staff failed to follow up on requests for childcare and support service requests.

The following errors were noted for the Employment Plan:

- Untimely data entry of Service 68 in TWIST Service tracking after the development of the Family Employment Plan.
- Staff developed employment plans without customer input.

There were significant errors in the allowability and correct calculation of participation hours:

- Case notes, Service Tracking and documents in the file did not match.
- Support service calculations did not match TWIST counselor notes.

There was 100% compliance for notifying HHSC within 24 hours when a change occurred, Equal Opportunity and Confidentiality and verification of employment hours in Service tracking.

NCP Choices

A case management review was conducted of five NCP Choices cases for the scope period of February through July 2021.

The review consisted of ninety-two applicable elements with eighty-eight of them correct and four in error, for an overall score of 95.65%.

Errors were found in the following areas:

- There was a missing verification of participation form (not found in Laserfiche).
- There was a verification of participation form not uploaded timely in Laserfiche.
- 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.

WIOA Adult, Dislocated Worker

Fourteen Adult/Dislocated Worker files were read for case management requirements. The review consisted of 157 applicable elements with 133 of them correct and 24 in error, for an overall score of 84.71%. The errors included:

- Discrepancies in the data entry and file documentation related to assessments and individual employment plans.
- Lack of alignment in support services data between case notes, TWIST service tracking and customer files.
- Cases that did not maintain 30 - day contact, or attempted contact.
- Two cases that exited with negative performance not showing evidence of required contact attempts.

All cases were 100% compliant with eligibility requirements and every file contained an orientation to discrimination complaint form as required.

National Dislocated Worker Grant

Eleven Adult/Dislocated Worker cases were read for compliance with regulation on the current dislocated worker grant related to the winter storm in February 2021. The review consisted of 71 applicable elements with 64 being correct and 7 in error for an overall accuracy rate of 90.14%. Errors include:

- Two cases with case notes belonging to the wrong customer, indicating that the customers did not receive fully individualized needs assessments.
- One case that does not contain a work authorization which calls the customers basic eligibility into question.
- Discrepancies between case notes and Laserfiche files related to employment plans and military service.

All files were found to contain the required orientation to discrimination complaint form.

TAA Waivers

Only 3 new waivers were available during the scope of the review. The review consisted of 14 applicable elements with 13 being correct and one in error with an overall score of 92.86%. One Laserfiche file was missing the waiver form. These cases were also read for confidentiality, limited English proficiency, and orientation to discrimination complaint forms, no exceptions were found in these areas.

RESEA

Fourteen files were read for compliance with activities related to orientation attendance. Of the 83 applicable elements 4 errors were found, all in one case with an overall score of 95.18%. The errors included a lack of documentation entered into WIT, there was no employment plan developed, and the WIT application was not complete. A best practice was observed in several cases, the case note documentation that the customer did not have any specific barriers.

Affirmative Outreach Plan (AOP)

A sample review of twenty outreaches was conducted for the scope period of April 2021 through June 2021. The review consisted of 175 applicable elements with 173 of them correct and 2 in error, which resulted in an overall accuracy rate of 99%.

The following errors were cited:

- An outreach for Element #7 (Demographic group outreached) did not include adequate documentation of the demographic group outreached (e.g., to reach a specific population of the community such as veterans, youth, etc.). Element #7 accumulated the highest number of errors.
- Outreach for Element #2 (Business/organization's information) did not include a contact name.
- Multiple Observations were also indicated for Element #2, due to the name of the person in the organization outreached to was noted, however, their title/position was not.
- Positive note: 7 elements reached 100% accuracy rates (Element #5 indicated N/A in each review).

Process gaps were identified, including a lack of clear documentation of the direct contact name/position of the individual in the organization and about which demographic groups were targeted and why. The purpose of the plan is to ensure reasonable efforts are made to include members of the various groups protected by CFR 38.40. A variety of organizations were included in the outreach pool, which appear to assist a wide range of vulnerable populations. However, based on the review of this Outreach Log, the program that appears to be the predominant target is Youth/WIOA Youth. Improvements were seen in the most recent Affirmative Outreach Log that was developed by Equus, which includes elements indicating supporting documentation. Overall, the log does include elements that effectively capture the nature and outcome of the contact/outreach.

CONCLUSION-GAP ANALYSIS

The accurate and timely data entry of customer information into TWIST and the accurate maintenance of Laserfiche files is a significant aspect of effective case management that requires improvement. The errors found in this review cycle indicate a continued lack of Management oversight and controls needed to accomplish consistent data integrity and continuity of quality case management. The SNAP file reviews indicate that there is continued lack of staff adherence to SNAP and Board policy requirements. For the 1817 Reconsideration and Form 1822 process, the accuracy rates remain below the target accuracy rate. Choices had a slight improvement but remains below the target accuracy rate. There continues to be a gap in program policy adherence relating to customer assessment and data integrity for the Choices and SNAP programs.

Missing WIOA documents, especially those related to eligibility have a negative impact on federal data validation standards and the potential to impact performance measures and create dis-allowed costs. Failure to provide and/or document an individual needs assessment for each customer has the potential to reduce the customer's ability to succeed in the program and achieve a positive exit.

PROGRAM FINDINGS

Finding 1: One-hundred-twenty-nine data integrity and case management errors were identified during the file review of one-thousand-one-hundred-forty-eight 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. Regarding the AOP Log review, process issues to be addressed are to ensure that staff performing the outreach document the Business/direct contact names and the demographics targeted.

Equus Response

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 appropriate technical assistance on all correctable and non- correctable errors.

Equus Leadership has a plan of action which will incorporate the following activities across all programs.

- The Leadership Team will reinforce the following to enhance current oversight and control
 - Remind all staff of the expected results.
 - Ensure staff follow program requirements by reviewing files, meeting individually and in groups to discuss changes, trends, and areas of concern.
 - Provide uninterrupted, protected time to allow TDSs to complete necessary data entry and documentation.
- The Operations Team will conduct a “Back to the Basics” case management training for all programs, by program by November 30, 2021. Items addressed will include:
 - Critical Timelines / deadlines by program
 - Case note documentation
 - Employment Plans
 - How to work your active/inactive list to manage your caseload
 - How to use your program checklists in your daily routine

In addition, more specific actions for each program will include:

SNAP

- The Program Manager Team with input from Equus QA will facilitate a 90-day employment retention training which will be mandatory for all SNAP staff by November 30, 2021.
- The Program Manager Team will continue to review the 1822 report weekly and address issues/concerns immediately with the Center Manager/TDS.

Choices

- The Program Manager Team will provide a refresher training on the utilization and referral to internal resources such as childcare, WIOA services, and support services. The training will include methods to remind and encourage

partner program opportunities to be shared with participants on a consistent basis. Training will be conducted by November 30, 2021.

- The Program Management staff will disseminate information of available internal resources to all TDS staff. This information will include notices of upcoming WIOA orientations and reminders to review the dfwjobs.com site for online orientation registration opportunities for participants.

WIOA

- The Program Manager Team will review with staff and supervisors the expected processes of regular contact with customers as part of the inactive caseload review and will identify trends for specific centers and/or TDSs regarding timeliness of customer contact and case closure.

National Dislocated Worker Grant (NDWG)

- Equus QA WIOA case management reviews include ensuring TWIST Counselor Note documentation applies to the appropriate customer.
- Staff will be reminded to practice appropriate case management to ensure TWIST Counselor Note documentation and Laserfiche information is accurate.

Trade Adjustment Assistance (TAA)

- Equus QA TAA case management reviews include waiver documentation requirements.
- Equus QA Manager will conduct a review of active TAA waivers in reconciliation of the Laserfiche case file to be completed by October 29, 2021.

RESEA

- The Centers are provided a weekly RESEA spreadsheet of the RESEA Orientation attendees for the week, which tracks individual services given and entered in WIT. Each center is required to complete the spreadsheet noting the services for each attendee, ensuring all attendees are accounted for. Centers return the completed spreadsheet to the Program Manager on the Monday following the RESEA Orientation.

Affirmative Outreach Plan (AOP)

- The Operations team will continue to review the AOP log requirements with the Centers to ensure understanding and compliance.

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	April-June 2020/21	22	3/22	19	3	22	86.36%
SNAP	1817 Reconsiderations	April-June 2021	16	13/44	31	13	44	70.45%
SNAP	Full Review	July 2021	21	39/324	285	39	324	87.96%
Choices	Full Review	April - June 2021	11	32/166	134	32	166	80.72%
NCP	Full Review	February-July 2021	5	4	88	4	92	95.65%
WIOA Adult DW	Full Case Management	October 2020 – June 2021	14	24/157	133	24	157	84.71%
NDWG	Case Management/Elig.	June – July 2021	11	7/71	64	7	71	90.14%
TAA	Waivers	Feb – July 2021	3	1/14	13	1	14	92.86%
RESEA	Required Activity	Feb 2021	14	4/83	79	4	83	95.18%
AOP	Outreach Log	January-March 2021	20	2/175	173	2	175	98.86%