



North Central Texas Council of Governments

February 5, 2024

Mr. Elven Simmons
Project Director
Equus Workforce Services
624 Six Flags Drive, Suite 245
Arlington, TX 76011

Dear Mr. Simmons:

NCTCOG completed the first review for FY2024 related to the Contract # FY24-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.

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: Cherisa Price-Wells
Lisa Boyd
Mark Douglass
Carlton Tidwell

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



FY2024 NCTCOG WORKFORCE CYCLE 1 FINAL

For

Equus Workforce Services
Contract FY24-TWC-02

January 31, 2024

Prepared by

Workforce Development Compliance and Continuous Improvement

**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
ITA	Individual Training Account
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
FY2024 NCTCOG Workforce Cycle 1

Equus Workforce Services

North Central Texas Workforce Services Contract FY24-TWC-02

BACKGROUND

Following the adoption of a resolution by the North Central Texas Workforce Board of Directors at the May 19, 2020, 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. The contract was renewed again for the period of October 1, 2023, through September 30, 2024.

RISK

The FY2024 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:

- SNAP remains on the NCTCOG Performance Improvement Plan (PIP). Monitoring reviews for FY23 did not meet the required standard of 90%.
- Choices remains on the NCTCOG PIP for the overall case management of the program. Monitoring reviews for FY23 did not meet the required standard of 90%.
- Lack of adequate maintenance of WIOA customer files found in FY2023 reviews.
- High rates of turn-over in Subrecipient staff, impacting all programs
- 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 in 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 Sanctions
- SNAP Good Cause and Reconsiderations
- Choices Work Activities
- Choices Sanctions
- Noncustodial Parent (NCP) Choices
- WIOA Adult and Dislocated Worker PII, Language English Proficiency (LEP), and Orientation to Discrimination Complaint Requirements
- WIOA Youth PII, Language English Proficiency (LEP), and Orientation to Discrimination Complaint Requirements

Desk reviews included a sample of work from the eleven (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 Sanctions

Nineteen (19) files were reviewed for the sanctions process that includes the appropriate and timely initiation of a penalty. The review indicates positive results. The period of review was October 2023.

There were three errors:

- Inappropriate penalty for a compliant participant.
- Inaccurate case note documentation in TWIST.

The accuracy rate for the review is **96.81%**.

SNAP Good Cause and Reconsideration

Twenty (20) files were reviewed for the scope period of October 2023. The purpose of the review is to ensure that the program requirements are followed for the Good Cause and Reconsideration process. The review indicates that Equus is not in compliance with these case management standards.

The significant errors are listed.

- Errors regarding the incorrect or inappropriate actions in the TWIST SNAP Good Cause and Penalty tabs.
- Untimely or no entry of the Reconsideration in the TWIST SNAP Good Cause tab.
- Missing documents in the file such as fax confirmations to HHSC.
- Untimely or no notification to HHSC when participant reported employment.
- Errors regarding untimely or inaccurate case note documentation in TWIST counselor notes.

The accuracy rate for the review is **70.27%**.

CHOICES Work Activities

Twenty-two (22) files were reviewed for compliance with work activities such as unsubsidized employment, subsidized employment, and work experience activities. The scope of review was October 2023. Review of participation hours to ensure they were allowable and calculated accurately. For performance related participation hours, the Daily Time Verification screen was reviewed for verification entry and supporting documents in the file. Based on the results of the review, Equus did not meet the case management standard in this area of review. The errors are listed.

- There were errors regarding the verification of participation hours. The signer on the verification forms did not match the TWIST verification entries.
- There were missing hours in the file to support the data entry in TWIST.
- There was late documentation of receipt of hours or actions that occurred in counselor notes.

The accuracy rate for the review is **87.36%**.

Choices Sanctions

Nine (9) files were reviewed for compliance with the Choices program guidelines for the *Sanctions* process that includes the TRA (Timely & Reasonable Attempts) process. The scope of review was October 2023. The results indicate that Equus did not meet the case management standard in this area of review. The errors are listed.

- Sanctions were not entered within the seven (7) days of the noncompliance or discovery of noncompliance date.
- TRA was not initiated within 24 hours of participation noncompliance.
- Staff did not document in counselor notes the noncompliance date or the discovery of noncompliance date.
- TWIST data was entered untimely and/or untimely and did not match documentation in the file.

The accuracy rate for the review is **76.47%**.

NCP Choices Review

A review of five (5) case files (active and closed) was conducted for the scope period of October 2023-November 2023.

Errors and notes found during this review are listed below:

- In multiple cases, it was found that participation forms (job search logs and/or timesheets) noted in Counselor notes were not found in Laserfiche. An updated Employment Development Plan was not entered in the TWIST Service Tracking tab.
- Timeliness issues were found in some instances.
- A discrepancy was found in the Counselor notes regarding Support Services and what was indicated in Laserfiche.
- One case indicated incomplete fields in the TWIST Characteristics tab.
- In one case, the landlord's W-9 was uploaded to Laserfiche and included that individual's SS# and address. Management was notified and the correction made.
- Once the Customer continuously remains employed/in compliance, only monthly verification is necessary, rather than wkly.

The accuracy rate for the review is **93.94%**.

WIOA Adult, Dislocated Worker OTDC, LEP and PII

Twenty (20) cases were reviewed for compliance with the requirements of the Language English Proficiency (LEP), Orientation to Discrimination Complaint (OTDC), and Personally Identifiable Information (PII) for the scope period of October through November 2023.

There was one (1) file that contained sensitive information in the electronic file. All case files contained an orientation to discrimination complaint form and there was compliance with confidentiality requirements.

The accuracy rate for the review is **97.56%**.

WIOA Youth OTDC, LEP, and PII

Sixteen (16) Youth cases were reviewed for compliance with the requirements of the Language English Proficiency (LEP), Orientation to Discrimination Complaint (OTDC), and Personally Identifiable Information (PII) for the scope period of October through November 2023.

There were two (2) files that contained sensitive information in the electronic file.

All case files contained an orientation to discrimination complaint form and there was compliance with confidentiality requirements.

The accuracy rate for the review is **90.91%**.

CONCLUSION-GAP ANALYSIS

Discrepancies in customer information between systems and within different sections of TWIST are noted across most programs. A lack of consistent data within different areas of TWIST and incomplete customer files is seen across all programs. This indicates a lack of Management oversight and the inability of staff to self-correct their own errors. Failure to document actions timely and accurately reflects improper case management.

The Choices and SNAP programs have not shown a significant improvement from FY22. There continues to be a lack of adherence to and understanding of TWC Choices and SNAP requirements. The PIP for both programs has not demonstrated to be effective in increasing the scores or an improvement in case management.

PROGRAM FINDINGS

Finding 1: Fifty-six (56) data integrity and case management errors were identified during the file review of four hundred and ninety-five (495) 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

WIOA Adult, Dislocated Worker OTDC, LEP, and PII and SNAP Sanctions audits were above 95% accuracy.

Based on monitoring reviews, Equus has identified trends and implemented strategies to address the recurring issue of staff failing to document case management actions in a timely and accurate manner by:

- Operations Team sets the goal – 95% accuracy rate in all case management elements.
- QCI and Operations Team gather evidence – 100% targeted file reviews and 20% full case management file reviews.
- Operations Team interprets findings as a result of the reviews.
- Operations Team decides and acts - Equus will send a team comprised of Quality and Continuous Improvement (QCI) staff and Program Managers (PMs) to at risk centers to provide onsite and in the moment technical assistance (TA), assess the current processes in the center, and provide recommendations to the Deputy Director and Project Director.

At Risk may be defined as centers with repeat low accuracy, vacant positions, new staff, and other criteria.

Equus overall accuracy rate for NCTCOG audits received FY24 Cycle 1 is 89%.

SNAP Good Cause and Reconsideration

We are taking the following steps:

The Operations and QCI Team were assigned to at risk centers (Corsicana, Denton, Granbury/Stephenville, Plano, and Terrell) and participated in daily and weekly meetings to discuss caseloads, timeframes, and other areas of concern. At Risk may be defined as centers with repeat low accuracy, vacant positions, and new staff.

Program Manager provided training on the items listed below to all SNAP TDS and Center Managers on 1/24/24.

- Errors regarding the incorrect or inappropriate actions in the TWIST SNAP Good Cause and Penalty tabs.
- Untimely or no entry of the Reconsideration in the TWIST SNAP Good Cause tab.
- Missing documents in the file such as fax confirmations to HHSC.
- Untimely or no notification to HHSC when participant reported employment.
- Errors regarding untimely or inaccurate case note documentation in TWIST counselor notes.

In addition:

- Program Manager will revise current local written process by 1-31-24 to clarify TWIST good cause and reconsideration data entry steps.
- We have implemented weekly SNAP meetings with SNAP Program Manager and SNAP TDS to address errors, trends, and provide technical assistance.
- We continue with immediate TA to centers or TDS when trends are identified through internal and external reviews.

Choices Work Activities

We are taking the following steps:

The Operations and QCI Team were assigned to at risk centers (Corsicana, Denton, Granbury/Stephenville, Plano, and Terrell) and participated in daily and weekly meetings to discuss caseloads, timeframes, and other areas of concern. At Risk may be defined as centers with repeat low accuracy, vacant positions, and new staff.

Program Manager provided training on the items listed below to all Choices TDS and Center Managers on 11/21/23.

- Errors regarding the verification of participation hours and verification forms and TWIST data entry matching.
- Errors regarding missing hours in the file to support the data entry in TWIST.
- Timeliness of counselor note documentation.

In addition:

- We continue providing individual Choices staff TA during each center's weekly denominator calls to include participation hours verification, missing hours documentation, and counselor notes.
- We continue with immediate TA to centers or TDS when trends are identified through internal and external reviews.

Choices Sanctions

We are taking the following steps:

The Operations and QCI Team were assigned to at risk centers (Corsicana, Denton, Granbury/Stephenville, Plano, and Terrell) and participated in daily and weekly meetings to discuss caseloads, timeframes, and other areas of concern.

The Program Manager provided training on the items listed below to all Choices TDS and Center Managers on 11/21/23 in response to NCTCOG Choices Sanction audit.

- Sanctions were not entered within the seven (7) days of the noncompliance or discovery of noncompliance date.
- TRA was not initiated within 24 hours of participation noncompliance.
- Staff did not document in counselor notes the noncompliance date or the discovery of noncompliance date.
- TWIST data was entered untimely and/or untimely and did not match documentation in the file.

In addition:

- We continue providing individual Choices staff TA during each center's weekly denominator calls to include TRA requirements, counselor notes, and TWIST data entry.
- We continue with immediate TA to centers or TDS when trends are identified through internal and external reviews.

NCP Choices Review

Equus Operations Manager met with NCP TDS and CMs to provide TA on areas below was conducted on 1/23/24.

- Uploading participation forms into Laserfiche (such as job search logs and timesheets) mentioned in Counselor notes.
- Entering Employment Development Plan into TWIST Service Tracking tab.
- Accurate, complete, and timely data entry across systems and case notes.
- Maintaining PII confidentiality requirements.
- NCP program requirements for employed customers.

WIOA Youth OTDC, LEP, and PII

Two (2) Youth files contained sensitive information in the electronic file. The sensitive information was removed from the electronic files. Individual staff were counseled on PII and medical confidentiality requirements.

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	Sanctions	October 2023	19	3/94	91	3	94	96.81%
SNAP	Good Cause/Reconsiderations	October 2023	20	22/74	52	22	74	70.27%
Choices	Sanctions	October 2023	9	8/34	26	8	34	76.47%
Choices	Work Activities	October 2023	22	11/87	76	11	87	87.36%
WIOA Adult DW	OTDC, LEP, PII	Oct-Nov 2023	20	1/41	40	1	41	97.56%
WIOA Youth	OTDC, LEP, PII	Oct-Nov 2023	16	3/33	30	3	33	90.91%
NCP	NCP Choices Review	Oct 2023-Nov 2023	5	8/132	124	8	132	93.94%