



North Central Texas Council of Governments

October 28, 2020

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

Dear Ms. Downs:

NCTCOG completed the fourth quarter review for FY2020 related to the Contract # FY20-TWC-02, between ResCare and NCTCOG, for the provision of Workforce Services for Workforce Solutions for North Central Texas.

The attached final report for the fourth quarter, details the scope of the monitoring and includes ResCare's 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.

We appreciate your cooperation in providing us with the necessary data to complete the review. 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 4

For

Equus Workforce Services

Contract FY20-TWC-02

October 28, 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 and Definitions

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
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
FY2020 NCTCOG Workforce Review 4
Equus Workforce Services
North Central Texas Workforce Services Contract-#FY20-TWC-02

BACKGROUND

Following a brief transition period, ResCare (Equus) Workforce Services 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, 2019. 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 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:

- 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:

- Choices Full Review
- SNAP 1817 Reconsideration Review
- SNAP 1822 Work Requirement Verification
- WIOA Adult, DW, and Youth Exit Activity

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 Form 1822 Work Requirement Verification

A slant review of the form 1822 Work Requirement Verification 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 timeframe reviewed was February through March 2020. Three out of ten centers monitored met the compliance requirement. Listed are the findings contributing to the overall noncompliance for this measure:

- a Form 1822 was completed and submitted to HHSC but was not within two weeks of participation,
- a Form 1822 was not completed,
- in TWIST Counselor Notes there is not a statement that Form 1822 was completed and sent to HHSC, including the date the form was sent to HHSC, and
- a copy of Form 1822 and fax confirmation is not in the customer file.

SNAP 1817 Reconsideration Request

A slant review of the 1817 Reconsideration Request of SNAP ABAWD and General Population cases was conducted based on the finding identified by TWC in January 2020. The scope timeframe of review was February through March 2020. Of the eight centers monitored, no centers met the requirement for this element; the overall accuracy rate was zero percent. Listed are the findings that contributed to the results:

- the Form 1817 was not submitted or was submitted untimely,
- the Form 1817 and fax confirmation are not in the file,
- untimely data entry of the reconsideration in the TWIST Good Cause tab,
- lack of or no counselor notes and untimely data entry of case notes to document the reconsideration activity that includes the data entry in the TWIST Good Cause tab and fax submission to HHSC,
- for employed customers, a Service 39 was not entered in TWIST service tracking and the Program Detail was closed inappropriately, and
- customers that reported employment that would begin within thirty days, staff did not notify HHSC within twenty-four hours and staff documented in case notes that the customer was required to continue participation in the SNAP program until employment began thus reporting the employment via Form 1817 to HHSC on the actual start date of employment.

The review indicates an assumption that staff have a lack of SNAP policy knowledge and interpretation. The lack of documentation in TWIST counselor notes, failure to notify HHSC timely, missing documents in the file and the improper case management could impact the benefits for the SNAP ABAWD and General Population customer that meet the SNAP E&T requirements.

Choices Full Review

A full review of sixteen Choices cases was conducted for the scope period of December 2019 through June 2020. Case management, process implementation, data integrity and data validation continue to be areas of concern. The findings identified relate to findings from the slant reviews of Non-Cooperation and Work activities conducted in the Workforce 3 monitoring review, as evidenced by:

- TRAs were not initiated within 24 hours,
- staff did not enter a service 68 in service tracking when a plan was developed or updated and case notes are not consistent with the employment plans in the file,
- lack of case notes to determine if changes were reported timely to HHSC,
- the incorrect methods were used to calculate participation hours,
- the files did not contain all documents and documents were filed inappropriately,
- participation forms in the file did not match TWIST service tracking and case notes,
- possible questionable costs for the untimely discontinuation of childcare services and no documentation in the file for the issuance of transportation support.

The improper assessment and management of participants attributed to the data integrity and data validation errors for this review. Missing documents in the file and untimely and inaccurate data entry in TWIST are also contributing factors to the low accuracy rates. These continuous findings could lead to improper payments for support services and inconsistent services to assist customers to attain self-sufficient goals.

WIOA Adult, Dislocated Worker and Youth

Seventeen adult/dislocated worker and twelve youth cases were reviewed for exit activity including the documentation of measurable skills gains, employment, attained credential data, and the provision of follow up services. Significant gaps were found in the tracking and documenting of customer employment as evidenced by:

- six of eight adult/dislocated worker cases not having appropriate data entered in the TWIST Performance Data tab, or not having supporting documents in the case file for the entry made,
- one dislocated worker case in which employment documented as occurring on the same day as the WIOA application date being entered in TWIST performance data, and
- two youth cases that without documented attempts to verify employment data prior to it being entered into TWIST.

Gaps were found in the provision and documentation of follow up services for youth customers. Significant compliance with the requirements for adult follow up services was observed.

CONCLUSION-GAP ANALYSIS

The SNAP and Choices reviews indicate that there is continued lack of staff knowledge and policy interpretation for all aspects of case management. For all programs, the accurate and timely data entry of customer information into TWIST is a basic aspect of sound case management that has great significance for the correct and accurate reporting of data to State and Federal entities. Significant improvement is needed in these areas.

PROGRAM FINDINGS

Finding 1: One hundred- seventeen data integrity and case management errors were identified during the file review of four hundred-thirteen applicable elements. Specific case errors are detailed in the attachments provided with the draft report.

Citation: ResCare Workforce Services, North Central Texas Workforce System Contract # FY20 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

ResCare 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 Services has reviewed the report and findings in detail and will act to strengthen existing procedures, develop any new procedures, provide additional staff training, and develop a plan to evaluate the efficiency and effectiveness of training once it has been deployed. EWS will continue to implement strategies to assist customers with obtaining employment. Program management staff review each error to ensure appropriate correction is applied when allowable and all actions are documented.

EWS deploys the internal Quality Assurance team to monitor adherence to program policies, procedures, and trainings. Reports and accuracy rates received from the internal and Board QA teams are used to counsel staff and Center Managers while providing a feedback loop to achieve quality case management.

SNAP

All errors have been discussed with the responsible staff, and the errors that were correctable have been corrected. Equus recognizes that accountability to expectations will drive consistency of actions and that repeat findings are not acceptable. Management began steps for correction and re-training in late July 2020. All cases served since 10/1/19 were reviewed to ensure the required actions regarding 1822 and Reconsiderations were documentation was submitted and documented in TWIST. This task was complete on August 31, 2020. Additionally, the Program Manager facilitated SNAP re-training for all staff over two sessions held on August 12th and 19th. The training focused on 1822 and Reconsideration documentation requirements, case management actions, timelines for entry and case action and documenting case management actions in TWIST; timely initiation of penalties and changes to the TRA procedures.

Equus project management is aware of the negative impact that continued lack in following policy and procedure may have upon the contract and the review from outside audit. To mitigate errors the Program Manager will train the Special Projects Coordinator to conduct spot checks for data entry for case actions through the end of

December 2020. It is the expectation of this effort that case work will improve with immediate feedback to TDS and Management.

Additional SNAP training is scheduled for November 18th, 2020. This training will focus on recent changes to the SNAP program regarding TRA and the efforts related to the re-engagement of SNAP ABAWDS following the outreach efforts during October.

Choices

All errors have been discussed with the responsible staff, and the errors that were correctable have been corrected. Equus program management has analyzed the errors to determine issues most in need of attention and will provide Technical Assistance training via a facilitated training to be held on December 18th, 2020. To reinforce the expectations of accuracy of case actions local center management and Choices management will review 1 file each month. This input will allow management to validate staff effort to timeliness, case actions and adherence to policy on an on-going basis and allow direct feedback to staff.

WIOA Adult, Dislocate Worker, and Youth

All errors have been discussed with the responsible staff, and the errors that were correctable have been corrected. Equus program management will discuss the monitoring findings and observations with staff at WIOA quarterly training to be held prior to the end of November 2020. Youth WIOA technical assistance will focus on the application and adherence to case closure and follow up activities. Adult and Dislocated WIOA technical assistance will focus on employment and credential data entry and case closure expectations. Program Management will review a minimum of 5 files each month (project wide) to review for adherence to case closures, data entry and follow up through the end of December 2020. The errors from this review will be used to train staff in application of policy rule.

Conclusion – GAP Analysis

Equus management continues to support and work with staff to achieve complete, accurate, and consistent case management. Ongoing training for new and tenured staff will be provided.

The internal QA team will continue to follow-up on the effectiveness of training and its influences on case management practices by tracking individual accuracy rates. The entire Operations Team continues to partner on providing training across all programs to expose staff to different training styles and to provide more dynamic training.

Staff competency reviews, ongoing observations of TDSs, and the Case File Review Plan allows program management to have a systematic, ongoing way to gauge the effectiveness of training and the skills of staff.

Program Findings

Equus Workforce Services strives to achieve the highest standards in the delivery of quality services to meet all Board, State, and Federal rules. All files were corrected as allowable, and support documentation is included as an attachment to this response. Additionally, we have outlined our plans to address each area of deficiency and will implement those plans as scheduled. Internal monitoring by the Equus Quality Assurance Team will continue to identify gaps in program compliance, trend information to be addressed through training by program management, and opportunities to conduct one-on-one technical assistance for new or tenured staff.

APPENDIX A



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