

North Central Texas Council of Governments

October 10, 2022

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

Dear Ms. Budd:

NCTCOG completed the fourth review for FY2022 related to the Contract # FY22-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: Moneisa Downs
Lisa Boyd
Mark Douglass
Carlton Tidwell

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FY2022 NCTCOG WORKFORCE 4

For

Equus Workforce Services

Contract FY22-TWC-02

October 10, 2022


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

FY2022 NCTCOG Workforce Review 4

Equus Workforce Services

North Central Texas Workforce Services Contract FY22-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 for the period of October 1, 2021, through September 30, 2022.

RISK

The FY2022 Risk Assessment determined that Data Integrity and Customer Service continue to be the primary areas of risk for all Workforce programs. There was a resumption of pre-COVID-19 participation requirements for Choices and SNAP programs. Significant consideration was given to the following:

- SNAP continues to be high risk in the overall case management including the requirements for the form H1822, Good Cause, and Reconsideration actions to HHSC.
- For Choices, TWC recently added additional allowable activities for performance measures and are required to be verified in TWIST effective October 1, 2021.
- The potential for continued gaps in the accuracy and integrity of WIOA data in TWIST and Laserfiche, as revealed in FY2021 monitoring.
- 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:

- SNAP Form H1822 and Sanctions
- SNAP Noncooperation
- SNAP Slant Review
- Choices Work Activities
- WIOA Adult and Dislocated Worker Exits and Performance
- WIOA Youth Exits and Performance
- TAA Exits and Performance
- TAA Benchmarks and Thirty Day Contacts
- 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 Form H1822 and Sanctions

Twenty-seven files were reviewed for the period of May through June 2022. This review consisted of the form H1822 form submission to HHSC and the Sanction request process. These elements were identified as findings during the TWC Monitoring Review in March 2022. Compliance was reviewed and it was determined based on the files selected that Equus is not meeting the standards. The results are listed.

- The 1822 form was not sent to HHSC within two weeks of the customer's attendance of the Employment Planning Session or there was no documentation of the actions that occurred.
- The correct actions were not taken in the Penalty tab or were not documented in case notes.
- Penalties were not entered timely on the fourth day of failure to participate or failure to respond to outreach.

- Staff penalized the customer during the three-day grace period. Due to gaps in services, a determination could not be made regarding the three-day grace period for the penalty entry.

The accuracy rate is **65.71%**.

SNAP Non-Cooperation

Twenty-six files were reviewed for the noncooperation process that includes the appropriate and timely initiation of a penalty. The samples selected indicate that Equus is not meeting the standards based on the results. The period of review was May through July 2022. Penalties were not initiated appropriately and there were penalties that were not entered timely in TWIST.

- Customers that attended EPS and in compliance with program requirements were penalized. Customers that reported employment and met the 20/30-hour requirement were required to continue participation in the program until the start date of the employment; they were penalized if they failed to do so. For ABAWDS, SNAP guidance indicates that ABAWDS who gain employment for 20 hours per week can continue to participate voluntarily in the SNAP program to gain employment of 30 hours per week; it is not a requirement and must not be penalized.
- For untimely entry of the penalties, the number of days late from the 4th day of entry ranges from one day to twenty-nine days.

Gaps in case notes contributed to the inappropriate and untimely penalties. Review of the SNAP guide and Board policies and procedures is recommended to ensure sound case management. The accuracy rate is **78.85%**.

SNAP Slant Review

Eleven files were reviewed for the period of April through June 2022. For the Slant review the following elements were reviewed: Initial and monthly eligibility verification, initial and subsequent Employment Plan development, entry of the Service 68 in TWIST Service Tracking, the form H1822 process, registration in Work in Texas, intake documents in the file, and the Workfare process. The form 1822 process was identified as a finding during the TWC Monitoring Review in March 2022. The compliance review indicates that Equus is not meeting the case management standards. All elements were below the 95% accuracy rate, the results are listed.

- The H1822 form was not sent to HHSC within two weeks of the customer's attendance of the SNAP Employment Planning Session.
- The Service 68 was not entered in TWIST Service Tracking the day of the plan development.
- SNAP eligibility was not verified on the date the customer attended the SNAP EPS virtually or in person. The eligibility documents were not in the file.

- There were gaps in case notes that resulted in untimely case note documentation for actions or activities that had already occurred.
- Due to the lack of case notes or case management, there were three instances that resulted in a customer being penalized incorrectly.

The accuracy rate is **66.28%**.

CHOICES Work Activities

Fifteen files were selected for compliance with work activities and case management. The scope was May through July 2022. The review consisted of ensuring that Employment Plans were developed appropriately, accurately and with timely data entry in TWIST Service Tracking. Participation hours were reviewed to validate that they were allowable and calculated accurately. TWIST was reviewed to ensure that there was an entry made for those activities with the appropriate verification action. Based on the results, there is not compliance in meeting the Choices program standards. The errors are listed.

- Missing monthly Eligibility verification.
- Family Employment Plans were not developed or updated.
- The Service 68 was not entered timely in TWIST Service tracking.
- Participation hours were either not allowable or not calculated correctly.
- Participation hours in the file did not match TWIST Service Tracking or counselor notes.
- Missing participation documents in the file.
- Performance related hours were not verified appropriately.
- HHSC was not notified timely when customer reported a change.

Gaps in counselor notes and untimely case management actions are contributors to the errors identified. The accuracy rate is **55.24%**.

WIOA Adult, Dislocated Worker Exits and Performance

Fifteen cases were reviewed for compliance with regulations related to exit and performance. Measurable skills gains were entered into TWIST and supported as required. All cases maintained confidentiality and the customer files all contained signed and dated Orientation to Discrimination Complaint (OTDC) forms. Errors were found in case exits and related activity including:

- Follow up codes not being entered into TWIST service tracking.
- Customers who were not entered into follow up or for which follow up attempts were not made monthly.
- Customers not receiving personal contacts after exiting without meeting

performance.

The accuracy rate for the review is **84.93%**.

WIOA Youth Exits and Performance

Thirteen Youth files were reviewed for compliance with regulations related to exit and performance. All cases were compliant with confidentiality and the customer files contained signed and dated OTDC forms. Gaps were found in the provision of follow up services and closure of the TWIST program detail tab including:

- Customers who were not entered into follow up.
- Cases in which follow up attempts were not made monthly.
- Cases that were allowed to soft close or that did not document the closure in case notes.

The accuracy rate for the review is **89.23%**.

TAA Exits and Performance

Six cases were reviewed for compliance with regulations related to exit and performance. Gaps were found in the documentation of training completion records. Four of the six cases contained conflicting information on the end of training dates. All cases were found to be compliant with requirements for documenting and supporting measurable skills gains.

The accuracy rate for the review is **75%**.

TAA Benchmarks and Thirty Day Contacts

Twelve cases were reviewed for compliance with regulation on conducting and documenting benchmark reviews of training progress and thirty-day contacts. Two cases did not document benchmark reviews within the required sixty-day time frame and one case did not contain adequate vendor documentation. Five cases did not make a contact for one of the months in the scope or made contact in intervals greater than 30 days.

The accuracy rate for the review is **89.61%**.

Affirmative Outreach Plan (AOP) Log Review

A sample review of fourteen outreach activities was conducted for the scope period of April 2022 through June 2022. The purpose of the review was to ensure that reasonable efforts were made to engage with the various groups in the community who are protected by CFR (Code of Federal Regulations) 38.40.

The following errors were cited:

- In multiple outreach activities, staff did not include adequate documentation of the groups outreached to. It was unclear which specific groups identified in CFR 38.40 were being outreached. (e.g., In one outreach activity, "Adult and Youth" was noted as the group outreached to rather than a targeted or specific group underserved within the community).
- In other instances, the outreach activity lacked documentation to specify what services or programs were offered by WSNCT. (e.g., in one outreach activity, the "Services offered" is noted only as "Job Seeker").
- One outreach activity did not include adequate documentation of the Contact name.

The primary gaps identified included a lack of clear documentation about the services offered and about which specific groups were targeted. It was noted that multiple organizations that were outreached in this review appear to reach a wide variety of vulnerable populations, such as, Erath Co. Community Bridges and Emily's Place.

The overall accuracy rate for the review is **93.81%**.

CONCLUSION-GAP ANALYSIS

A lack of consistent data within different areas of TWST 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. For the Choices and SNAP programs there continues to be a lack of adherence to TWC Choices and SNAP policy.

Process gaps still exist in the AOP outreach activities. The primary areas of concern are a lack of clear documentation about the vast services and programs offered by the North Central Texas Workforce Board, and which specific protected groups were targeted in the outreach activity.

PROGRAM FINDINGS

Finding 1: One hundred and forty-nine data integrity and case management errors were identified during the file review of six hundred sixty-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 # 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

Equus Workforce Solutions Management has reviewed the report and its findings and have worked with Center Managers and Talent Development Specialists (TDS) to correct errors where possible. Program Managers reviewed each error to ensure appropriate corrections were applied. All errors have been discussed with the responsible TDS with technical assistance provided to ensure staff understood the errors. As requested, training specific to each program of Choices and SNAP will be documented on the PIP going forward.

The Operations Team continues to operate under the continuous improvement model – Identify, Plan, Execute, and Review. The team continues to meet regularly with Center Managers and Talent Development Specialists to discuss quality, provide updates, share best practices, and set expectations.

The Leadership Team, including the Operations Team, met with Center Managers in July. Best practice shared at that meeting was the daily checklist, accountability, and tracking used by one of the Center Managers which has proved to be successful.

Equus will add two significant resources to assist with staff training and quality in FY23: Staff trainer and Quality Control. The staff trainer will focus on foundational workforce training for systems, equipment, and customer/participant services. This process will provide support to all employees to be well prepared to assume their program training and responsibilities with focused support from the program managers. Quality control will provide support to case management actions to validate appropriate case actions are entered, documented, and stored as required

SNAP Form H1822 and Sanctions

All errors were discussed with the Center Manager and with the Talent Development Specialists. We will continue to provide and enhance the following:

- Senior Program Analyst SNAP/Choices has assumed the duties of the weekly 1822 reviews, July 2022. This was previously conducted by a Talent Engagement Specialist.
- QA will continue with monthly 1822/Reconsideration reviews
- To more heavily review case actions affecting eligibility QA management and PD evaluated the data collected for further action:
 - Scope period FY22 quarter 1 NCTCOG penalty review accuracy rate was 60%. Scope period FY22 quarter 3 Equus penalty review accuracy rate was 82%. A marked increase, however, the results of the reviews were below the 95% accuracy standard.
 - In response, QA initiated monthly Penalty reviews in August 2022 (scope period July) to review all penalties initiated during the month. While penalties are part of the weekly review this targeted effort focuses on

using the latest TWC tool for evaluation. Results indicated penalty errors were due to staff misapplication of penalties within various case situations, however systemic issues were not determined.

- A mandatory training will be held no later than 10/21/22 to review all penalty actions to meet timely and accurate application, documentation, and entry. Analysis of penalty errors discovered will be specifically covered in this technical assistance.
- Weekly analysis of PIP file reviews is conducted.
 - Accuracy rates are tracked by staff, center, and project and are provided to Equus leadership in a “heat map” report.
 - Staff training/technical assistance needs are identified for staff.
 - Overall, we have seen improvement in quality. Accountability measures are put in place following Equus progressive disciplinary processes for staff who do not achieve sustained improvement.
- Trainings/Technical Assistance conducted to address these issues were conducted:
 - SNAP New Hire Training – 9/19/2022 – 9/20/22
 - SNAP New Hire TA after Training was conducted with:
 - Terrell – 9/28/22
 - McKinney – 9/27/22
 - Rockwall – 9/26/22
 - SNAP Quarterly Training – 9/14/2022
 - Non-Compliance Chart shared weekly with TDS/CM – started on 7/13/22 – present
 - SNAP TA provided to:
 - Rockwall – 9/26/22
 - McKinney – 9/27/22
 - Terrell – 9/28/22

SNAP Non-Cooperation

All errors were discussed with the Center Manager and with the Talent Development Specialists. We will continue to provide and enhance the following:

- PIP reviews continue weekly with corrections expected within three days.
- Weekly analysis of PIP file reviews is conducted.
 - Accuracy rates are tracked by staff, center, and project and are provided to Equus leadership in a “heat map” report.
 - We have identified and address training needs and staff accountability.
 - Overall, we have seen improvement in quality. However, there are some areas that have not shown sustained improvement. We are implementing progressive disciplinary action.

- Senior Program Analyst SNAP/Choices and Choices/SNAP/NCP Program Manager send daily e-mail reminders on the non-cooperation process.
- Program Manager will conduct mandatory training by 10/21/22 on how to enter penalties timely and accurately; and how to document appropriately. This will be required for Center Managers, PIP Reviewers, and TDSs.
- Trainings/Technical Assistance conducted to address these issues were conducted:
 - SNAP New Hire Training – 9/19/2022 – 9/20/22
 - SNAP New Hire TA after Training was conducted with:
 - Terrell – 9/28/22
 - McKinney – 9/27/22
 - Rockwall – 9/26/22
 - SNAP Quarterly Training – 9/14/2022
 - Non-Compliance Chart shared weekly with TDS/CM – started on 7/13/22 – present
 - SNAP TA provided to:
 - Rockwall – 9/26/22
 - McKinney – 9/27/22
 - Terrell – 9/28/22

SNAP Slant Review

All errors were discussed with the Center Manager and with the Talent Development Specialists. We will continue to provide and enhance the following:

- Senior Program Analyst SNAP/Choices has assumed the duties of the weekly 1822 reviews previous conducted by a Talent Engagement Specialist.
- QA started targeted monthly Penalty reviews in August 2022, in addition to the weekly PIP file reviews as documented in the previous section.
- PIP reviews continue weekly with corrections expected within three days.
- An analysis of results of PIP reviews will be conducted regularly to address training needs and staff accountability.
- Program Manager will conduct mandatory training by 10/21/22 on how to enter penalties timely and accurately; and how to document appropriately. This will be required for Center Managers, PIP Reviewers, and TDSs.
- Senior Program Analyst SNAP/Choices and Choices/SNAP/NCP Program Manager will send reminder to enter Service 68 on EPS dates.
- Trainings/Technical Assistance conducted to address these issues were conducted:
 - SNAP New Hire Training – 9/19/2022 – 9/20/22
 - SNAP New Hire TA after Training was conducted with:
 - Terrell – 9/28/22
 - McKinney – 9/27/22

- Rockwall – 9/26/22
- SNAP Quarterly Training – 9/14/2022
- Non-Compliance Chart shared weekly with TDS/CM – started on 7/13/22 – present
- SNAP TA provided to:
 - Rockwall – 9/26/22
 - McKinney – 9/27/22
 - Terrell – 9/28/22

CHOICES Work Activities

All errors were discussed with the Center Manager and with the Talent Development Specialists. We will continue to provide and enhance the following:

- PIP reviews continue weekly with corrections expected within three days.
- Weekly analysis of PIP file reviews is conducted.
 - Accuracy rates are tracked by staff, center, and project and are provided to Equus leadership in a “heat map” report.
 - We have identified and address training needs and staff accountability.
 - Overall quality has improved and individual performers who do not show sustained accuracy are being addressed with accountability measures.
 - An analysis of results of PIP reviews will be conducted regularly to address training needs and staff accountability.
- Senior Program Analyst SNAP/Choices and Choices/SNAP/NCP Program Manager send reminders to enter Service 68 on EPS dates.
- As a result of this review and Equus internal PIP analysis, Senior Program Analyst SNAP/Choices and Choices/SNAP/NCP Program Manager will conduct Family Employment Plan training by 10/31/22 to ensure FEPs are developed appropriately, accurately and with timely data entry in TWIST Service Tracking.
- Program Manager continues with weekly denominator calls.
- Choices new hire training is scheduled for 10/11/22 – 10/12/22.
- Trainings/Technical Assistance conducted to address these issues were conducted:
 - Choices Quarterly Training – 9/16/22
 - TRA Chart shared weekly with TDS/CM – started on 7/13/22 – present
 - Additional Choices TA provided during weekly denominator calls to:
 - Greenville
 - Terrell
 - Plano

WIOA Adult, Dislocated Worker Exits and Performance

All errors were discussed with the Center Manager and with the Talent Development Specialists. We will continue to provide and enhance the following:

- Program Managers and Center Managers will review exited cases to ensure staff is entering follow-up service tracking, monthly follow-up or follow-up attempts were made, and personal contacts are up to date.
- WIOA Adult, Dislocated Worker, Youth, and TAA staff quarterly training was held 9-30-22 and included a review of recent monitoring findings and a group activity to monitor a file together.

WIOA Youth Exits and Performance

All errors were discussed with the Center Manager and with the Talent Development Specialists. We will continue to provide and enhance the following:

- Program Managers and Center Managers will review exited cases to ensure staff is entering follow-up service tracking, monthly follow-up or follow-up attempts were made, and personal contacts are up to date.
- Program Manager will continue to run active/inactive lists weekly and will highlight those at risk of soft closure.
- WIOA Adult, Dislocated Worker, Youth, and TAA staff quarterly training was held 9-30-22 and included a review of recent monitoring findings and a group activity to monitor a file together.

TAA Exits and Performance

All errors were discussed with the Center Manager and with the Talent Development Specialists. We will continue to provide and enhance the following:

- TAA Training was conducted in June 2022.
- Program manager will review TAA files focusing on exits, benchmarks, 30 day contact, and accurate documentation.
- WIOA Adult, Dislocated Worker, Youth, and TAA staff quarterly training was held 9-30-22 and included a review of recent monitoring findings and a group activity to monitor a file together.

TAA Benchmarks and Thirty Day Contacts

All errors were discussed with the Center Manager and with the Talent Development Specialists. We will continue to provide and enhance the following:

- TAA Training was conducted in June 2022.
- Program manager will review TAA files focusing on exits, benchmarks, 30 day contact, and accurate documentation.
- WIOA Adult, Dislocated Worker, Youth, and TAA staff quarterly training was held 9-30-22 and included a review of recent monitoring findings and a group activity to monitor a file together.

Affirmative Outreach Plan (AOP) Log Review

The overall accuracy rate for the review is 93.81% for scope period of April 2022 through June 2022. All errors have been discussed with the responsible staff, and the errors that were correctable have been corrected. Equus leadership will offer Affirmative Outreach training quarterly beginning in October 2022 to ensure that new staff are trained timely and existing staff have opportunities for refresher training. This training will include guidance on how to correctly document Affirmative Outreach efforts, including the required details of services offered and which specific demographic groups were targeted.

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	Form H1822 & Sanctions	May 2022 – June 2022	27	24/70	46	24	70	65.71%
SNAP	Non-Cooperation	May 2022 – July 2022	26	11/52	41	11	52	78.85%
SNAP	Slant Review	April 2022 – June 2022	11	29/86	57	29	86	66.28%
Choices	Work Activities	May 2022 – July 2022	15	47/105	58	47	105	55.24%
WIOA Adult DW	Exit and Performance	May 2022 – June 2022	15	11/73	62	11	73	84.93%
WIOA Youth	Exit and Performance	Jan. 2022 – March 2022	13	7/65	58	7	65	89.23%
TAA	Exit and Performance	March 2021- June 2022	6	5/20	15	5	20	75.0%
TAA	Benchmarks and 30-Day Contact	Feb 2022 – May 2022	12	8/77	69	8	77	89.61%
AOP	Outreach Log	April 2022- June 2022	14	7/113	106	7	113	93.81%