



**STATE OF MAINE
DEPARTMENT OF HEALTH
AND HUMAN SERVICES**

**FINAL ASSESSMENT REPORT
OFI ASPIRE-TANF THIRD PARTY ASSESSMENT**

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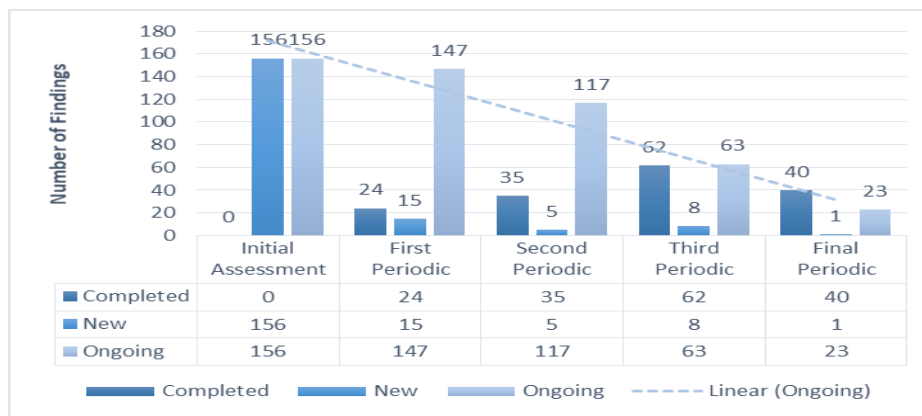
1. EXECUTIVE SUMMARY

CSG Government Solutions, Inc. (CSG) began conducting a Third Party Assessment of Fedcap Rehabilitation Services, Inc. (Fedcap) in May 2019, on behalf of the State of Maine Department of Health and Human Services (DHHS). This assessment evaluated services and plan development, customer service, responsiveness to participants, and application of the Good Cause provision.

Progress Summary

The Third Party Assessment identified 185 total findings across Fedcap’s 16 site locations, referred to as “Opportunity Centers”, and its Maine Headquarters, referred to as “HQ”. Of the 185 findings identified, Fedcap has taken steps to successfully address and close 161 findings (87%). **Table 1** below illustrates the total count of findings by assessment period.

Table 1: Total Findings by Assessment Period



The following summarizes progress Fedcap made over the course of this Third Party Assessment to address the opportunities, as well as areas for continued improvement. It is expected that Fedcap will work with the Office for Family Independence (OFI) to fully implement remaining recommendations provided as part of this assessment, to address and remediate findings that remain open.

Services and Plan Development Are Not Individualized (FCAs)

Fedcap took steps to improve the quality of Family Contract Amendments (FCAs) and has progressed from non-specific FCAs containing standard program expectations to creating more detailed agreements aligned with the specific goals, abilities, and barriers of the participant. Fedcap developed and delivered extensive staff education and training. Standard Operating Procedures (SOPs) and the Program Guide were updated to reflect expectations that FCAs be tailored to the individual participant. FCA reviews of 10 per week per site were implemented and additional training provided to address deficiencies. A bi-weekly call was established to provide a forum for managers and staff to share FCA best practices. Some Fedcap sites have begun to include labor market information when developing FCAs with participants.

For continued improvement in this area, Fedcap will continue to monitor implementation of labor market research across all Opportunity Centers, as noted in the Third Party Assessment recommendations. Fedcap is also continuing to work on improving the timeliness for completing vocational assessments to further support FCAs that are personalized to each participant’s needs and skills.



Customer Service

Fedcap pursued several initiatives to address customer service concerns. Staff training and development was a key focus – customer service, professionalism, and confidentiality trainings were developed or updated, and new hire training and on-boarding processes modified to improve delivery. The Director of Training position was made full-time to provide more support. Performance management SOPs and supervision forms were updated and quality reviews conducted to ensure employees receive feedback to support customer service expectations. Fedcap implemented a Customer Service Observation program in which site management will be more engaged with staff as they serve participants, providing coaching that enhances employee knowledge and professionalism. Participant surveys were implemented and results reviewed by leadership to identify areas for improvement.

Fedcap is expected to continue improving its new hire training and on-boarding procedures to reduce the extensive manual effort required to track training completion. Fedcap is currently implementing an additional QA review of the new hire training process, to ensure all required trainings are completed within the first 30 days of employment. Fedcap is expected to continue to monitor and refine its service observation program, to support stronger participant service levels going forward.

Fedcap took steps to improve the privacy and confidentiality of participant conversations by installing additional white noise machines, relocating some workspaces, and setting expectations for case managers to utilize vacant offices to avoid conducting multiple participant meetings in the same work area simultaneously. Fedcap is working with OFI leadership to consider opportunities for additional reconfiguration or build out of offices to further improve privacy and confidentiality.

Responsiveness to Participants

Fedcap leadership implemented new processes and enhanced existing ones to improve participant responsiveness. These activities enabled Fedcap to better track and assure participants are provided with timely and accurate follow up. Fedcap established an expectation that all participant inquiries will be returned within 24 hours. SOPs and program materials were updated, and FCA, Case, and Call Log Reviews are now utilized to confirm timely follow up occurred. Document receipts are provided to address concerns with participants being asked for the same documents multiple times. This process is audited weekly and monthly for compliance. Management of the participant helpline was centralized for more timely resolution of inquiries. Fedcap has also implemented tracking that assures newly hired ICM staff receive all required case management training timely, prior to providing services.

To continue improving its responsiveness, Fedcap is expected to continue tracking the timeliness of participant follow up, providing feedback where incidents of non-compliance are identified.

Application of Good Cause Provision

An additional area identified for improvement was Fedcap's handling of potential Good Cause situations. To address this, staff training is now provided on an ongoing basis and in new hire orientation. Fedcap sites have also partnered with OFI staff to provide training on applicable OFI policies. Good Cause is a frequent agenda topic in staff meetings, and quality reviews were implemented to assure Good Cause decisions and documentation align with OFI policies and procedures.

For further improvement, Fedcap will continue to partner with OFI to provide additional clarification and understanding of situations that can and should be handled as Good Cause. Site management is expected to continue conducting Good Cause reviews weekly, providing staff with feedback for improvement.



2. OVERVIEW

The State of Maine Department of Health & Human Services (DHHS) entered into a contract with Fedcap Rehabilitation Services, Inc. (“Fedcap”) on October 1, 2016. The purpose of this agreement is for the management and provision of services under the Additional Support for People in Retraining and Employment - Temporary Assistance for Needy Families (ASPIRE-TANF) Program. Fedcap began administering this program, also referred to as “Breaking the Cycle (BTC)”, in January 2017.

Independent assessment and monitoring services were procured by the State of Maine DHHS in April 2019 for CSG Government Solutions, Inc. (CSG) to conduct a Third Party Assessment of the ASPIRE-TANF program and the activities taken, or being taken, by Fedcap to address and correct contractual performance concerns identified in late 2018.

2.1 Scope

As part of the Third Party Assessment, it was established that CSG would conduct an Initial Assessment, followed by three Periodic Assessments and one Final Assessment. The CSG Assessment team developed assessment criteria and assessment interview questions and checklists specific to this Third Party Assessment. The criteria were organized into the following three categories.

- **Security and Privacy:** Interview questions and checklists were developed to assess Fedcap efforts in maintaining appropriate security and privacy controls in line with National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 Rev 4 / Volume III: Catalog of Minimum Acceptable Risk Security and Privacy Controls for Exchanges (MARS-E v2.0) standards and Health Insurance Portability and Accountability Act of 1996 (HIPAA) privacy standards
- **Contract Requirements:** Interview questions and checklist items were developed to assess Fedcap compliance with requirements specified in the ASPIRE-TANF contract originally executed in October 2016, including staff, training, and facility requirements, and key performance indicators
- **Service Delivery:** Interview questions and checklist items were developed to assess Fedcap efforts in delivering on its commitments specified in the CAP, implemented in March 2019, and to assure services provided to ASPIRE-TANF BTC participants are being fulfilled to support their ability to obtain employment and self-sufficiency

During this Third Party Assessment, CSG:

- Conducted 40 site visits to Fedcap Opportunity Centers and to Fedcap Maine’s HQ
- Conducted 84 stakeholder interviews (OFI and Fedcap)
- Completed 171 Family Contract Amendment (FCA) reviews
- Conducted 164 case reviews
- Conducted 140 staff file reviews
- Completed 38 quality reviews
- Conducted 36 security and privacy walk throughs and desk audits
- Examined more than 500 documents



Based upon the results of the Initial Assessment, conducted in June, 2019, and the subsequent Periodic Assessments conducted in July, August, and September, 2019, the Final Periodic Assessment encompassed site visits to the following six Fedcap locations:

- Augusta
- Bangor
- Biddeford
- Fort Kent
- Skowhegan
- South Portland

The six Opportunity Centers visited as part of this Final Periodic Assessment were determined based on the number of “Ongoing” (Open) findings at these sites at the end of the Third Periodic Assessment. These six Fedcap sites had the highest number of open findings among the 16 Fedcap centers. In the case where one site, Caribou, had an equal number of findings as another site, the decision regarding which six sites to visit was also determined based on the number of new findings identified at those sites over the course of the Third Party Assessment.

The Global and Fedcap HQ findings continued to be tracked and addressed in parallel with the Opportunity Center site visits.

The Site Summary Roll Up below summarizes total “Ongoing” findings by Fedcap site, including HQ, as of the end of the Third Periodic Assessment. The bolded sites are those six sites whose findings were tracked and progress monitored, through the completion of site visits, during this Final Periodic Assessment. Of the 63 “Ongoing” findings from the Third Assessment (which represents 16 unique findings), the six Opportunity Centers selected for site visits for this Final Periodic Assessment accounted for 33 (52%) of the total open findings.

During this period, the CSG Assessment team continued to monitor Fedcap’s efforts to remediate findings at the additional sites through discussions and meetings with Fedcap leadership, and monitoring of documentation to demonstrate and validate actions taken to address the deficiencies. All results were maintained in the Plan of Action and Milestones (POA&M).

Site Summary Roll Up

Table 2: Global Fedcap Maine HQ Findings provides a count of all the Global findings that remained in a status of “Ongoing” following the Third Periodic Assessment. Global findings impacted many or potentially all 16 Opportunity Centers, and were more systemic in nature. They required direction, support, and oversight of senior Fedcap leadership to be fully addressed and remediated. While Global findings may have been first identified in Opportunity Centers, they were not included in the Opportunity Center total count of findings.

Table 2: Global Fedcap Maine HQ Findings

Site	Security and Privacy	Contract Requirements	Service Delivery	Total Findings
Fedcap Maine HQ- Global Findings	0	4	1	5



Site findings were those that were more specific to certain sites, though full remediation of those findings may have required guidance, direction, and/or resources from Fedcap senior leadership. Fedcap Maine HQ was included in several site finding recommendations, and was therefore included in **Table 3: Site Summary Roll-Up**, which summarizes “Ongoing” site findings following the Third Periodic Assessment.

Table 3: Site Summary Roll-Up

Site	Security and Privacy	Contract Requirements	Service Delivery	Total Findings
South Portland	1	1	7	9
Biddeford	1	1	4	6
Fort Kent	0	0	5	5
Skowhegan	0	1	4	5
Augusta	1	0	3	4
Bangor	1	1	2	4
Caribou	0	1	3	4
Ellsworth	0	0	3	3
Farmington	0	0	3	3
Fedcap Maine HQ	1	0	2	3
Sanford	0	0	3	3
South Paris	0	1	2	3
Calais	0	0	2	2
Lewiston	0	0	2	2
Rockland	0	0	2	2
Houlton	0	0	0	0
Machias	0	0	0	0

2.2 Approach

CSG’s Final Periodic Assessment approach follows a similar approach as was described in the Initial Assessment and prior Periodic Assessment Reports, with the intent to monitor and track Fedcap progress in implementing recommendations to remediate prior findings, and to document any new findings that result from the Final Periodic Assessment site visits. For this assessment, a review of new and/or updated documents and artifacts was conducted, in addition to interviews, a series of assessments including staff file, quality, case, and FCA reviews, and a total of six site visits. Walk Through and Desk Audit reviews were conducted at those sites that had Security and Privacy findings during the Initial Assessment.

New findings and recommendations for the six Fedcap sites were compiled from the document examinations, interviews, Opportunity Center walk throughs, and reviews conducted. The findings and



recommendations have been added to **Section 4: Detailed Findings and Recommendations**. These new findings are given a status of “New”. Findings from the Initial Assessment and prior Periodic Assessments are given a status of either “Ongoing” (Open) or “Completed” (Closed).

The full list of documents reviewed, interviews conducted, and reviews completed are provided in **Appendix A: Catalog of Review**.

The interview questions developed in preparation for the Initial Assessment site visit to Fedcap Maine HQ are included in **Appendix D: HQ Interview Questions Document**. Certain questions were revisited as necessary during the subsequent Periodic Assessments, to gauge and report on Fedcap progress in remediating prior findings. The interview questions and checklist items prepared and used for Initial and Periodic Assessment site visits to the Opportunity Centers are included in **Appendix E: Opportunity Center Interview Questions and Checklist Items**.

In addition, during the First Periodic Assessment, a survey was developed and distributed via e-mail to solicit feedback from ASPIRE-TANF participants, across all 16 of the Fedcap Opportunity Centers. This initial survey was to establish a benchmark to measure customer satisfaction throughout the assessment period over time as Fedcap implements assessment recommendations and makes changes. The survey was sent to 1,316 current and/or former program participants to receive feedback directly from participants on their experience working with Fedcap, and on their level of satisfaction with Fedcap services. The survey was available to participants for a two week period, beginning July 8, 2019. A summary of the survey results, the full participant survey, and the results by question are included in **Appendix G: Participant Survey**.



3. REMEDIATION OF EXISTING FINDINGS AND SUMMARY OF NEW FINDINGS

The Final Periodic Assessment began with the site visit to the Fort Kent Opportunity Center on September 27, 2019. This visit was followed by site visits to the Bangor, Augusta, Skowhegan, Biddeford, and South Portland Opportunity Centers between September 30, 2019 and October 4, 2019, respectively.

As shown in **Table 4: Summary- All Sites - Total Number of Findings**, the Initial Assessment, and three subsequent Periodic Assessments, resulted in 46 unique findings that required Fedcap action. Of the 46 findings, Fedcap has satisfactorily addressed 38 of these findings (status of “Completed”), including eight that were remediated during the Final Periodic Assessment. A total of eight unique findings remain in process of resolution (status of “Ongoing”). CSG’s Final Periodic Assessment resulted in no new unique findings.

All updates and progress made on existing findings, and all new site specific findings, are tracked in the POA&M, maintained by the CSG Assessment team and Fedcap senior leadership. The details and status of all new and existing findings are provided in **Section 4: Detailed Findings and Recommendations**.

Summary of Findings by Status

Table 4: Summary- All Sites - Total Number of Findings

New	Completed	Existing	
		Ongoing	Delayed
0	38	8	0

Following the First Periodic Assessment, the unique findings accounted for 147 total findings when tracked by site location and including all global findings. Following the Second Periodic Assessment, 35 total findings had been updated to the status of “Completed” and five new findings identified. During the Third Periodic Assessment, 62 total findings were remediated and updated to a status of “Completed”. A total of eight new findings were identified. As a result of the Final Periodic Assessment, 40 findings were remediated and moved to “Completed”. A total of one new site finding was identified.

The current count of “New” and “Ongoing” findings now stands at 24, a net decrease of 132 findings from the Initial Assessment total findings count of 156, and a net decrease of 161 (87%) findings from the overall cumulative total of 185 findings identified over the course of the Third Party Assessment period.

Remediation of Key Findings

The Final Periodic Assessment included a review of Fedcap’s efforts to address and remediate prior findings, as detailed in the POA&M. A summary of Fedcap’s progress to remediate key initial findings is provided in **Table 5** below, with findings grouped by assessment category. All progress updates are documented in the POA&M, including the status of each finding. Findings that require additional effort to fully address the underlying performance concerns, and/or require additional validation, are stated as “Ongoing”; those findings considered fully remediated and addressed are stated as “Completed”.



Table 5: Site Summary Dashboard

Site Summary Dashboard of Findings					
Security and Privacy		Contract Requirements		Service Delivery	
Total Number of Unique Findings: 1		Total Number of Unique Findings: 2		Total Number of Unique Findings: 5	
New: 0	Existing: 1	New: 0	Existing: 2	New: 0	Existing: 5
<ul style="list-style-type: none"> ➤ Five sites had critical/sensitive security and/or privacy areas (e.g., transmission medium, power equipment, and cabling) that were not secured in locked closets <ul style="list-style-type: none"> ✓ Locking cabinets were purchased and installed; the finding is stasured as “Completed” ➤ Five sites had opportunities to reconfigure office space to assure participant confidentiality <ul style="list-style-type: none"> ✓ Fedcap installed additional white noise machines, relocated and/or reconfigured some workspaces, installed new partitions (Lewiston site), and directed staff to utilize designated offices to avoid conducting multiple participant meetings in the same work area simultaneously ✓ Additional discussions are ongoing at this time with Fedcap and OFI regarding whether additional reconfiguration of office space will occur; the finding is stasured as “Ongoing” 		<ul style="list-style-type: none"> ➤ New hire training and job shadowing initiatives had opportunities identified <ul style="list-style-type: none"> ✓ Orientation and on-boarding processes and forms were modified to improve delivery ✓ Customer service, professionalism, and confidentiality trainings were developed and presented ➤ Centralized tracking and exception reporting to the Executive Director has been implemented <ul style="list-style-type: none"> ✓ The finding is stasured as “Ongoing” as the new processes become routine ➤ Employee coaching/supervision and performance evaluations were identified as areas for improvement to support staffing and customer service <ul style="list-style-type: none"> ✓ Managers were trained, procedures updated, forms standardized, and new expectations implemented ✓ The remediation activities have been completed and the finding stasured as “Completed” ➤ Monitoring and reporting on employer outreach requires stronger tracking and reporting <ul style="list-style-type: none"> ✓ Manual tracking has been implemented for all sites ✓ A system enhancement is pending deployment in November 2019, and the finding stasured as “Ongoing” 		<ul style="list-style-type: none"> ➤ Opportunities included Good Cause training and implementation of monitoring to assure adherence to policy <ul style="list-style-type: none"> ✓ In-service trainings were completed ✓ Monitoring tools and review processes were implemented and validated ✓ The finding status was updated to “Completed” ➤ Development of individualized participant FCAs, based on intake information and labor market information, required improvement <ul style="list-style-type: none"> ✓ Fedcap conducted extensive staff training and implemented enhanced quality review procedures ✓ Efforts continue with including labor market information into the FCA and the finding stasured as “Ongoing” ➤ Recommendations were made to address deficiencies in case management services, including tax credit (EITC) estimates, Work Experience Program (WEP) feedback, mock interviews, and job retention sessions <ul style="list-style-type: none"> ✓ WEP, mock interviews, and job retention sessions are now being completed ✓ EITC continues to be an area of focus; the finding is stasured as “Ongoing” as this becomes more routine 	



4. DETAILED FINDINGS AND RECOMMENDATIONS

Following is the detail and current status of all existing findings and recommendations from the Initial, First, Second, and Third Periodic Assessments, and all new findings from the Final Periodic Assessment, by assessment category and by site. Those sites bolded in the “Site” column below are those that have “Ongoing” (Open) findings for the specific finding being referenced.

Security and Privacy

Table 6: Detailed Security and Privacy Findings and Recommendations

Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
<ul style="list-style-type: none"> ➤ Fedcap Maine HQ ➤ Augusta ➤ Bangor ➤ Biddeford ➤ Lewiston ➤ South Portland 	I_2019_001	Checklist Items <ul style="list-style-type: none"> ➤ OC-SP-WT-CL-003 ➤ OC-SP-WT-CL-020 ➤ OC-SP-WT-CL-021 	Ongoing	There was limited confidential office space to support confidential discussions. Some case managers and/or employment specialists in several Fedcap offices share office space. Attempts have been made to provide for participant confidentiality (e.g., use of cubicle wall (less than six feet), white noise machines, and positioning of participant seating). Additional updates to the some office spaces are needed to improve participant confidentiality. The lack of confidentiality may impede participant communications with case managers, thus reducing participant engagement.	<ul style="list-style-type: none"> ➤ Fedcap Maine HQ provide final approval for building plans and/or re-configurations to address privacy concerns ➤ For the Augusta site: Fedcap implement its plans for a build-out of this site due to the lack of confidential work areas within the suite ➤ For the Bangor site: Fedcap complete a reconfiguration of the space to relocate two employment specialist workspaces that are located along a hallway, and install higher quality cubicle walls/partitions to improve confidentiality of the remaining two employment specialist workspaces ➤ For the remaining sites, all of the following are recommended: <ul style="list-style-type: none"> ✓ Replacement of the five foot (approximate height) cubicle panels with taller, higher quality cubicle walls/partitions that would provide improved sound-proofing, and protect participants from casual observation



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
					<ul style="list-style-type: none"> ✓ Add additional white noise machines, placing them strategically in shared spaces to mask participant and case manager conversations ✓ Arrange staff desks and participant chairs to reduce or eliminate potential of overhearing conversations from other staff or participants ✓ Do not conduct dual participant interviews in the same proximity; this will reduce the potential of eavesdropping on participant and case manager conversations
<ul style="list-style-type: none"> ➤ Fedcap Maine HQ ➤ Bangor ➤ Biddeford ➤ Ellsworth ➤ Rockland ➤ Skowhegan 	I_2019_002	Checklist Items <ul style="list-style-type: none"> ➤ OC-SP-WT-CL-037 	Completed	Critical / sensitive areas (e.g., transmission medium, power equipment, and cabling) are not secured (e.g., locked rooms without windows, securely anchored to cabinets / walls). Unprotected cables, routers/switches are susceptible to man-in-the-middle attacks (MITM - is an attack where the attacker secretly relays and possibly alters the communications between two parties who believe they are directly communicating with each other), which place participant and employee transmitted information in jeopardy. Improperly secured routers/switches can be stolen or the cables damaged. This would result in the inability of an Opportunity Center to provide prompt services to participants.	<ul style="list-style-type: none"> ➤ Fedcap Maine HQ: Identify and develop solutions to protect the critical / sensitive areas (e.g., transmission medium, power equipment and cabling), for example: <ul style="list-style-type: none"> ✓ Protected by locked rooms without windows ✓ Securely anchored to cabinets / walls ➤ Regional directors and site managers implement the solutions specified by Fedcap Maine HQ



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
<ul style="list-style-type: none"> ➤ Lewiston ➤ Skowhegan ➤ South Paris 	I_2019_003	<ul style="list-style-type: none"> ➤ Checklist Items ➤ OC-SP-WT-CL-041 	Completed	There is no or limited clear view of waiting area from front desk. Participants, children, etc. may require the assistance of Fedcap staff (e.g., becoming ill, safety from other participants) or may engage in non-approved activities.	Placement of mirrors or other devices that will allow the administrative staff a clear view into the entire waiting area.
<ul style="list-style-type: none"> ➤ Fort Kent 	I_2019_004	<ul style="list-style-type: none"> ➤ Checklist Items ➤ OC-SP-WT-CL-043 	Completed	The office did not employ and maintain automatic emergency lighting that activates in the event of a power outage or disruption and covers emergency exits and evacuation routes within the facility. Lack of emergency lighting could result in injury to participants and staff during an evacuation.	Installation of emergency lighting in the office.

Contract Requirements

Table 7: Detailed Contract Requirements Findings and Recommendations

Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
Global Findings					
Global	I_2019_005	<ul style="list-style-type: none"> ➤ Interview Questions ✓ A-CR-SQTC-Q-001 ✓ A-CR-SQTC-Q-004 ➤ Checklist Items ✓ OC-CR-SQTC-CL-002 	Ongoing	<p>Fedcap’s current processes for tracking compliance with training modules has resulted in an inability to demonstrate that all staff:</p> <ul style="list-style-type: none"> ➤ Attended and completed all required new hire training modules (see Rider A, IV.3.a) ➤ Participated in a job-shadow experience with an experienced Fedcap employee for at least one week upon completion 	<p>Fedcap Maine HQ:</p> <ul style="list-style-type: none"> ➤ Update the New Hire Completer form implemented in late 2018 to capture specific details of the new hire training provided, including the job shadowing dates and personnel involved ➤ Implement Fedcap Maine HQ plans to acquire a Learning Management System (LMS) to manage, document, and report on training completion. The LMS would be



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
		<ul style="list-style-type: none"> ✓ OC-CR-SQTC-CL-003 ✓ OC-CR-SQTC-CL-014 ✓ OC-CR-SQTC-CL-015 		<p>of all required training, and for an additional one week period while performing their assigned duties (see Rider A, IV.3.c)</p> <ul style="list-style-type: none"> ➤ Received and attested to required new hire and annual security and privacy trainings <p>The current process using SharePoint is limited in functionality and difficult for management to locate and track completed and outstanding training. Missed training and job shadowing may impede Fedcap staff from providing services to participants.</p>	<p>used to define which training (curriculum / training modules) is required for each role, schedule training, record job shadowing (as a training activity), track completion dates, manage training quizzes, and track attestations.</p>
Global	I_2019_006	<p>Interview Questions</p> <ul style="list-style-type: none"> ➤ A-CR-SQTC-Q-002 	Completed	<p>Training on the following six modules (see Rider A, IV.B.3.b) has not been consistently provided to the Direct/clinical staff prior to performing any direct client services:</p> <ul style="list-style-type: none"> ➤ Working with populations with serious mental health conditions ➤ Overview of the top-ten, most-prevalent, medical diagnoses ➤ Linking participants receiving Intensive Care Management to community-based organizations ➤ Monitoring the clinical progress of participants receiving Intensive Care Management ➤ Disability services overview ➤ Core components of Cognitive Behavioral Therapy (CBT) 	<p>Fedcap Maine HQ:</p> <ul style="list-style-type: none"> ➤ Follow the current schedule to complete the direct/clinical staff training that was started with the first module on April 4, 2019, with the remaining modules to be completed between June and September 2019 ➤ Ensure attendance tracking is maintained to demonstrate 100% staff attendance ➤ Include these required Direct/clinical staff trainings as part of future new hire training for intensive case managers and document 100% attendance



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
				Lack of the intensive care management training may impede a case manager's ability to provide services to participants.	
Global	I_2019_007	Interview Questions ➤ A-SD-STBP-Q-003 ➤ A-SD-STBP-Q-005 ➤ OC-SD-STBP-Q-004	Ongoing	<p>Fedcap provides Employer Outreach and Research activities in support of the ASPIRE-TANF program (see Rider A, IV.D.5). These activities include but are not limited to:</p> <ul style="list-style-type: none"> ➤ Make cold calls to Maine employers ➤ Attend and accompany participants to local and regional job fairs and hiring events ➤ Research and identify new and existing Maine labor market opportunities and job postings ➤ Contact and network with community-based organizations, commerce associations, faith-based institutions, and job recruiters <p>Interviews and document examination indicate that FedcapCARES or manual processes currently lack the capability for full employer management. This impedes the engagement and tracking of employers, which could impede the hiring of participants.</p>	<ul style="list-style-type: none"> ➤ Fedcap Maine HQ: <ul style="list-style-type: none"> ✓ Continue to work with Fedcap Corporate to implement an employer management enhancement to FedcapCARES (referred to as "Rolodex") to capture employer outreach efforts ✓ Conduct ongoing training on employer management activities for site managers/supervisors, and job developers, to include a process for tracking employer outreach and research efforts, with or without the system enhancement ➤ Fedcap Quality Assurance (QA) conduct monitoring and report to Fedcap Maine HQ on the status of ongoing training for employer management for job developers
Global	I_2019_008	<ul style="list-style-type: none"> ➤ Interview Questions ✓ A-SD-STBP-Q-010 	Completed	<p>It could not be demonstrated that Job Retention Sessions (see Rider A, IV.13.d and e) are occurring, nor is it included in the Standard Operating Procedures (SOP) for Job Retention. These services are</p>	<p>Fedcap Maine HQ:</p> <ul style="list-style-type: none"> ➤ Develop and implement processes and expectations for job retention sessions



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
		<ul style="list-style-type: none"> ➤ Checklist Items ✓ OC-SD-STBP-CL-025 		necessary to provide ongoing support to participants in maintaining employment. Lack of these participant services could facilitate a participant leaving employment.	<ul style="list-style-type: none"> ➤ Create and implement a report to track job retention sessions by Opportunity Center
Global	I_2019_009	Checklist Items <ul style="list-style-type: none"> ➤ OC-CR-SQTC-CL-018 ➤ OC-CR-SQTC-CL-019 ➤ OC-CR-SQTC-CL-020 ➤ OC-CR-SQTC-CL-021 ➤ OC-CR-SQTC-CL-022 ➤ OC-CR-SQTC-CL-023 	Completed	The current 90 Day Introductory Period Evaluation process does not provide employees with the documented goals and progress, additional training and job shadowing, and employee responses to required questions, as specified in Fedcap's SOPs and Breaking the Cycle Program Guide. The lack of documented performance feedback and evaluations may impede Fedcap staff in providing services to participants.	<ul style="list-style-type: none"> ➤ Fedcap Maine HQ deliver training to site managers and supervisors on processes for conducting and completing structured 90 Day performance evaluations ➤ Fedcap QA conduct monitoring and report to Fedcap Maine HQ on the status of site managers/supervisors scheduling and conducting 90 Day performance evaluations for staff, to include documented feedback and identified training needs
Site Findings					
<ul style="list-style-type: none"> ➤ Biddeford ➤ Farmington ➤ Sanford ➤ Skowhegan ➤ South Paris 	I_2019_010	Checklist Items <ul style="list-style-type: none"> ➤ OC-CR-SQTC-CL-011 ➤ OC-CR-SQTC-CL-012 ➤ OC-CR-SQTC-CL-013 	Completed	Documentation could not be provided to consistently demonstrate that staff: <ul style="list-style-type: none"> ➤ Attended the required FCA-related career planning training specified by Fedcap in their Corrective Action Plan (CAP) (FCA item 2) ➤ Attended tailored continuous training on proper phone etiquette and procedures, phone set up, and 24-hour timeframe for returning calls and e-mails, as specified by Fedcap in their 	Fedcap regional directors and site managers/supervisors: <ul style="list-style-type: none"> ✓ Provide and document the FCA-related career planning training ✓ Provide and document tailored continuous training on proper phone etiquette and procedures, phone set up, and 24-hour timeframe for returning calls and e-mails ✓ Provide and document in-service training to remind staff of the proper



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
				<p>CAP (Responsiveness to Participants item 1)</p> <ul style="list-style-type: none"> ➤ Attended the latest in-service training to remind staff of the proper steps to take when scanning documents, as specified by Fedcap in their CAP (Responsiveness to Participants item 4) <p>The Fedcap CAP training is intended to improve staff's ability to serve the participants. Participant services may be impacted if CAP training activities are not provided to the Fedcap staff.</p>	<p>steps to take when scanning documents</p>
<ul style="list-style-type: none"> ➤ Fedcap Maine HQ ➤ Bangor ➤ Biddeford ➤ Caribou ➤ Ellsworth ➤ Farmington ➤ Fort Kent ➤ Houlton ➤ Lewiston ➤ Rockland ➤ Sanford ➤ Skowhegan ➤ South Paris ➤ South Portland 	I_2019_011	<p>Checklist Items</p> <ul style="list-style-type: none"> ➤ OC-CR-SQTC-CL-016 ➤ OC-CR-SQTC-CL-017 	Completed	<p>Site managers/supervisors are not conducting, and/or not documenting employee weekly / bi-weekly supervision as specified in Fedcap's SOPs and Breaking the Cycle Program Guide. A lack of documented coaching and feedback to employees impedes development of the skill sets to serve participants.</p>	<ul style="list-style-type: none"> ➤ Fedcap Maine HQ: <ul style="list-style-type: none"> ✓ Confirm and update SOPs for conducting employee supervision and conduct training for structured employee weekly / bi-weekly supervisions for site managers/supervisors ✓ Develop and implement a standard weekly / bi-weekly supervision form to be used to document feedback provided ➤ Site managers/supervisors schedule, conduct, and document weekly / bi-weekly supervisions, provide feedback, identify training needs, and schedule training ➤ Fedcap QA conduct monitoring and report to Fedcap Maine HQ on the status of site managers/supervisors conducting weekly



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
					/ bi-weekly supervisions, with feedback and additional training provided
<ul style="list-style-type: none"> ➤ Fedcap Maine HQ ➤ Augusta ➤ Bangor ➤ Biddeford ➤ Ellsworth ➤ Farmington ➤ Rockland ➤ Sanford ➤ Skowhegan 	I_2019_012	Checklist Items <ul style="list-style-type: none"> ➤ OC-CR-SQTC-CL-024 ➤ OC-CR-SQTC-CL-025 ➤ OC-CR-SQTC-CL-026 ➤ OC-CR-SQTC-CL-027 	Completed	Site managers/supervisors are not consistently developing and delivering One Year Evaluations, as specified in Fedcap’s SOPs and Breaking the Cycle Program Guide. A lack of documented performance feedback to employees impedes development of the skill sets to serve participants.	<ul style="list-style-type: none"> ➤ Fedcap Maine HQ: <ul style="list-style-type: none"> ✓ Schedule and deliver manager training on writing performance reviews ✓ Clarify and confirm with all leadership staff the expectation to complete One Year Evaluations annually for all staff regardless of a change in staff position ➤ Site managers/supervisors conduct and document the annual evaluations to staff ➤ Fedcap QA work with HR to implement a monthly personnel file audit to include confirming performance evaluations are being completed as required
<ul style="list-style-type: none"> ➤ Lewiston ➤ South Portland 	P1_2019_001	Checklist Items <ul style="list-style-type: none"> ➤ OC-CR-SQTC-CL-024 ➤ OC-CR-SQTC-CL-025 ➤ OC-CR-SQTC-CL-026 ➤ OC-CR-SQTC-CL-027 	Completed	Site managers/supervisors are not consistently developing and delivering One Year Evaluations, as specified in Fedcap’s SOPs and Breaking the Cycle Program Guide. A lack of documented performance feedback to employees impedes development of the skill sets to serve participants.	<ul style="list-style-type: none"> ➤ Fedcap Maine HQ: <ul style="list-style-type: none"> ✓ Schedule and deliver manager training on writing performance reviews ✓ Clarify and confirm with all leadership staff the expectation to complete One Year Evaluations annually for all staff regardless of a change in staff position ➤ Site managers/supervisors conduct and document the annual evaluations to staff ➤ Fedcap QA work with HR to implement a monthly personnel file audit to include confirming performance evaluations are being completed as required



Service Delivery

Table 8: Detailed Service Delivery Findings and Recommendations

Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
Global					
Global	I_2019_013	Interview Questions ➤ A-SD-QUAL-Q-002	Completed	The Quick Reference Guide specified in the CAP (FCA, compliance measurement item #3), to address FCA deficiencies, has not been implemented. Without this guide, avoidable errors may continue to be made in developing individualized FCAs.	Fedcap Maine HQ finalize, implement, and distribute the Quick Reference Guide (QRG) to staff to support adherence to FCA process requirements.
Global	I_2019_014	Interview Questions ➤ A-SD-QUAL-Q-004 ➤ A-SD-QUAL-Q-005 ➤ A-SD-QUAL-Q-006 ➤ OC-SD-QUAL-Q-001	Ongoing	<p>Opportunities for improvement were noted in how Fedcap tracks and achieves the following CAP initiatives:</p> <ul style="list-style-type: none"> ➤ Measuring customer service communications (e.g., in person, over the telephone, or through e-mail) to assure: <ul style="list-style-type: none"> ✓ Appropriate level of empathy ✓ Sensitivity and professional tone ➤ Quality Assurance and management oversight in measuring customer service <p>Communications between Fedcap staff and participants are essential in developing relationships of trust. These relationships of trust allow Fedcap and its partners (e.g., OFI, employers, professionals) to guide participants through the services defined in the FCA, and as a goal, eventually leading to employment. The lack of professional communication and customer service will</p>	<ul style="list-style-type: none"> ➤ Fedcap Maine HQ: <ul style="list-style-type: none"> ✓ Continue its development and implementation of more formal and structured customer service observation procedures, leveraging best practices already in place in its corporate office and establishing specific and measurable expectations for each site’s leadership team ✓ Publish and train site manager/supervisors and case managers on what defines customer service communication and how to observe said customer service, to include case scenarios ✓ Continue efforts to enhance FedcapCARES with e-mail and potentially texting capability, to standardize communications with participants ➤ Fedcap QA:



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
				impede the development of trust, and subsequently may delay participant engagement and employment.	<ul style="list-style-type: none"> ✓ Continue to work with Fedcap Maine HQ in implementing customer service observation procedures ✓ Define and implement an audit process to assure compliance
Global	I_2019_015	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-ELIG-CL-006 	Completed	It could not be demonstrated that the three job positions of interest included estimates of the Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) for each of the identified job positions (see Rider A, IV.C.3.c). This information allows participants to understand what potential tax benefits are available for their three job positions of interest, to encourage participants to seek and retain employment.	<ul style="list-style-type: none"> ➤ Fedcap Maine HQ provide training to case management staff to share the respective tax credits for the three positions of interest with participants to provide motivation and encourage job retention; track 100% attendance completion ➤ Fedcap QA conduct monitoring and report to Fedcap Maine HQ on the status of case management staff incorporating estimates of the EITC and CTC for each of the three positions of interest
Global	I_2019_016	<ul style="list-style-type: none"> ➤ Interview Questions <ul style="list-style-type: none"> ✓ OC-SD-QUAL-Q-005 ➤ Checklist Items <ul style="list-style-type: none"> ✓ OC-CR-SQTC-CL-004 ✓ OC-SD-QUAL-CL-008 ✓ OC-SD-QUAL-CL-009 	Completed	Fedcap has not fully implemented its CAP initiatives related to Good Cause, including: <ul style="list-style-type: none"> ➤ Implementation of required in-service training for case managers on SOPs and OFI policies related to Good Cause (CAP, Good Cause item #1) ➤ Regional directors conduct quarterly training review to ensure all current case management staff have received Good Cause training (CAP, Good Cause item #1, compliance measures) ➤ Implementation of site supervisors' weekly random review of 10 cases to ensure staff are adhering to SOPs and OFI policies related to the provision of 	Fedcap Maine HQ: <ul style="list-style-type: none"> ➤ Finalize the development of the in-service training for Good Cause, and deliver to case managers on June 18, 2019 ➤ Update current weekly QA audits to include monitoring for Good Cause and work with Fedcap QA to implement the new audits ➤ Establish and document expectations for regional directors to conduct quarterly Good Cause training reviews for case managers



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
				<p>Good Cause (CAP, Good Cause item #2, compliance measures)</p> <p>Participants may not receive the appropriate Good Cause determinations if Fedcap staff are unaware or unclear on the policies and requirements.</p>	
Site Findings					
<ul style="list-style-type: none"> ➤ Fedcap Maine HQ ➤ Augusta ➤ Bangor ➤ Biddeford ➤ Calais ➤ Caribou ➤ Ellsworth ➤ Farmington ➤ Lewiston ➤ Rockland ➤ Sanford ➤ Skowhegan ➤ South Portland 	I_2019_017	<p>Checklist Items</p> <ul style="list-style-type: none"> ➤ OC-SD-FCA-CL-001 ➤ OC-SD-FCA-CL-014 	Ongoing	<p>FCAs are not consistently individualized to the participant utilizing career planning based on intake and assessment process information and labor market information, as specified in Fedcap’s CAP initiatives (FCA item #2). The lack of individualized FCAs limits participant expectations and potentially their engagement.</p>	<ul style="list-style-type: none"> ➤ Case managers incorporate intake and assessment process information into Specific, Measurable, Attainable, Relevant, and Timely (SMART) FCA short and long term goals ➤ Site managers/supervisors audit FCAs to ensure that intake and assessment process information was used to develop both short and long term SMART FCA goals ➤ Fedcap QA conduct monitoring and report to Fedcap Maine HQ on the status of individualized FCAs using career planning based on assessment results and labor market information, as well as the use of SMART goals
<ul style="list-style-type: none"> ➤ Biddeford ➤ Lewiston ➤ Sanford 	I_2019_018	<p>Checklist Items</p> <ul style="list-style-type: none"> ➤ OC-SD-ELIG-CL-004 	Completed	<p>The case reviews of FedcapCARES could not demonstrate that the intake and assessment always included the following aptitude and career development tools (see Rider A, IV.C.3.a):</p> <ul style="list-style-type: none"> ➤ Test of Adult Basic Education (TABE) 	<p>Site managers/supervisors:</p> <ul style="list-style-type: none"> ➤ Conduct audits to validate that intake and assessment include TABE and CareerScope ➤ Provide feedback and training to case managers where there is non-compliance



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
				<ul style="list-style-type: none"> ➤ CareerScope <p>Participants may not receive the most appropriate services if the TABE or CareerScope are not completed.</p>	
<ul style="list-style-type: none"> ➤ Augusta ➤ Biddeford ➤ Caribou ➤ Farmington ➤ Lewiston ➤ Sanford ➤ Skowhegan ➤ South Paris 	I_2019_019	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-ELIG-CL-005 	Completed	<p>Case management documentation in FedcapCARES could not demonstrate that assessment information was collected and documented for each participant at initial assessment and at the time of change in any of the following required categories:</p> <ul style="list-style-type: none"> ➤ Family structure ➤ Work history ➤ Education grade completed ➤ Financial status ➤ Physical and mental health status ➤ Personal and employment related goals and interests ➤ ASPIRE services necessary to obtain sustainable, paid private and public employment ➤ Barriers to employment <p>The intake assessment information supports the development of individualized FCAs. Participants may not receive services without the proper intake information.</p>	<ul style="list-style-type: none"> ➤ Case managers provide and document that assessment information was collected for each participant at initial assessment and at the time of change in any of the required eight categories (e.g., family structure, work history, etc.) ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Conduct audits to validate that assessment information was collected for each participant at initial assessment and at the time of change in any of the required eight categories (e.g., family structure, work history, etc.) ✓ Provide feedback and training to case manager for non-compliance
<ul style="list-style-type: none"> ➤ Augusta ➤ Bangor ➤ Calais ➤ Farmington 	I_2019_020	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-002 	Completed	<p>Case management documentation in FedcapCARES could not demonstrate that participants were notified when there was a change in case managers, providing a point of contact to the participant (see Rider A,</p>	<p>Site managers/supervisors provide additional case management training to include timely written notification to participants when a change in case manager occurs.</p>



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
<ul style="list-style-type: none"> ➤ Lewiston ➤ Sanford ➤ Skowhegan ➤ South Paris 				IV.D.1). Changes in case managers without notification to participants may lead to: <ul style="list-style-type: none"> ➤ Trust issues between participants and Fedcap case managers ➤ Participant questions not being addressed ➤ Participants not following through on scheduled events 	
<ul style="list-style-type: none"> ➤ Bangor ➤ Ellsworth ➤ Lewiston 	I_2019_021	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-003 ➤ OC-SD-STBP-CL-004 	Completed	Case management documentation in FedcapCARES could not demonstrate that case management services were conducted monthly, to include participant’s progress, circumstances, and needs (see Rider A, IV.D.1.b). Lack of regular contact with participants based on their specific circumstances may lead to: <ul style="list-style-type: none"> ➤ Trust issues between participants and Fedcap case managers ➤ Participant questions not being addressed ➤ Participants not following through on scheduled events 	Site managers/supervisors provide additional training and coaching to case management staff regarding the expectation to maintain, at minimum, monthly contact (in person meetings, telephone calls, and e-mail correspondence) with participants, to include participant’s progress, circumstances, and needs.
<ul style="list-style-type: none"> ➤ Calais ➤ Ellsworth ➤ Sanford 	I_2019_022	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-005 	Completed	Case management documentation in FedcapCARES confirmed adjustments were not made to the participant’s FCA based upon monthly case management communications (see Rider A, IV.D.1.c). Not updating the FCA based upon changing family structure, work history, financial status, barriers, etc. could lead to:	Site managers/supervisors provide additional training to case management staff regarding the expectation to update FCAs based upon monthly case management communication (in person meetings, telephone calls, and e-mail correspondence).



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
				<ul style="list-style-type: none"> ➤ Non-individualized FCAs ➤ Frustrated participants 	
<ul style="list-style-type: none"> ➤ Ellsworth ➤ Lewiston ➤ Sanford 	I_2019_023	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-006 ➤ OC-SD-FCA-CL-015 	Completed	Case management documentation in FedcapCARES could not demonstrate that phone calls and e-mails were returned within 24 business hours. Lack of response to participant communications may lead to: <ul style="list-style-type: none"> ➤ Trust issues between participants and Fedcap case managers ➤ Participant questions not being addressed ➤ Participants not following through on scheduled events 	<ul style="list-style-type: none"> ➤ Case managers provide and document that phone calls and e-mails were returned within 24 business hours ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Conduct audits to validate that phone calls and e-mails were returned within 24 business hours ✓ Provide feedback and training to case manager for non-compliance
<ul style="list-style-type: none"> ➤ Biddeford ➤ Calais ➤ Lewiston ➤ Rockland ➤ Sanford ➤ South Paris 	I_2019_024	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-007 	Completed	Case management in FedcapCARES could not demonstrate that participants were notified of potential job opportunities (see Rider A, IV.D.1.b.ii). Participants may lose employment opportunities without the case manager providing job opportunity notifications.	<ul style="list-style-type: none"> ➤ Case managers provide and document that participants were notified of potential job opportunities ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Conduct audits to validate that participants were notified of potential job opportunities ✓ Provide feedback and training to case manager for non-compliance
<ul style="list-style-type: none"> ➤ Ellsworth 	I_2019_025	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-008 ➤ OC-SD-STBP-CL-018 	Completed	Case management in FedcapCARES could not demonstrate that participant's transportation, child care or other support services were reviewed and arranged (see Rider A, IV.D.8). Improper management of support services may lead to a participant's: <ul style="list-style-type: none"> ➤ Inability to attend scheduled events 	Site managers/supervisors provide additional training and coaching to case management staff regarding the expectation to review and arrange for support services as necessary.



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
				➤ Inability to maintain employment	
<ul style="list-style-type: none"> ➤ Bangor ➤ Biddeford ➤ Lewiston ➤ Sanford 	I_2019_026	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-010 ➤ OC-SD-FCA-CL-013 	Completed	Case management in FedcapCARES could not demonstrate that participant’s Renewal FCA was developed and executed prior to the expiration of current FCA, ensuring that no gap in engagement occurred (see Rider A, IVD.14.b). Breaks in FCA coverage dates may impact the participant scheduled activities.	<ul style="list-style-type: none"> ➤ Case managers provide and document that the renewal FCA was developed and executed prior to the expiration of current FCA ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Conduct audits to validate that the renewal FCA was developed and executed prior to the expiration of current FCA ✓ Provide feedback and training to case manager for non-compliance
<ul style="list-style-type: none"> ➤ Augusta ➤ Bangor ➤ Biddeford ➤ Farmington ➤ Rockland ➤ Sanford 	I_2019_027	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-013 	Completed	Case management in FedcapCARES could not demonstrate participant was engaged in mock interviews and provided feedback as part of the job readiness self-assessment (see Rider A, IV.D.3.c.ii). Without mock interviews, participants may continue to make the same interview mistakes and not be considered for employment.	Site managers/supervisors provide additional training and coaching to case management staff regarding the expectation to engage participants in mock interviews and provide feedback as part of job readiness (Power of Possible).
<ul style="list-style-type: none"> ➤ Biddeford ➤ Calais ➤ Farmington ➤ Sanford 	I_2019_028	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-015 	Completed	Case management in FedcapCARES could not demonstrate that participants were accompanied to local and regional job fairs and hiring events (see Rider A, IV.D.5.a.ii). Participants may lack confidence to attend these hiring events by themselves. Fedcap staff accompanying participants may lead to employment opportunities.	Site managers/supervisors assure staff accompany participants to local and regional job fairs and hiring events and the activities tracked.
<ul style="list-style-type: none"> ➤ Sanford 	I_2019_029	Checklist Items	Completed	Case management in FedcapCARES could not demonstrate education and training	<ul style="list-style-type: none"> ➤ Case managers: identify and assign education and training activities



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
		<ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-019 		activities were provided (see Rider A, IV.D.9.a). These education and training activities are based upon the participant’s intake and assessment results, FCA development or renewal, aspirations, or other social determinants. Participants may not qualify for specific jobs without receiving education and training needed.	<ul style="list-style-type: none"> ➤ Site managers/supervisors schedule and conduct audits to identify and assign education and training activities, with provided feedback and scheduled training for staff non-compliance
<ul style="list-style-type: none"> ➤ Augusta ➤ Calais ➤ Ellsworth ➤ Farmington ➤ Fort Kent ➤ Sanford ➤ Skowhegan 	I_2019_030	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-021 	Completed	Case management in FedcapCARES could not demonstrate that feedback was used to engage the participant in semi-monthly meetings for volunteer work and community service, helping them develop sufficient/appropriate work skills and habits, to become prepared for paid employment (see Rider A, IV.D.10.f). Participants may not gain the experience and skills outlined in the FCA without the appropriate volunteer work and community service monitoring.	<ul style="list-style-type: none"> ➤ Job developers ensure WEP forms are completed by the volunteer / community service organization ➤ Case managers provide and document that feedback was used to engage the participant in semi-monthly meetings, helping them develop sufficient/appropriate work skills and habits, to become prepared for paid employment ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Conduct audits to validate that feedback was used to engage the participant in semi-monthly meetings, helping them develop sufficient / appropriate work skills and habits, to become prepared for paid employment ✓ Provide feedback and training to the case manager where there is non-compliance
<ul style="list-style-type: none"> ➤ Sanford 	I_2019_031	Checklist Items	Completed	Case management in FedcapCARES could not demonstrate weekly check-ins with the participant and employer for subsidized on-	<ul style="list-style-type: none"> ➤ Case managers provide and document that the weekly check-ins with the participant and employer for subsidized



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
		<ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-022 		<p>the-job training (OJT) occurred every week for first 30 days and then monthly (Rider A, IV.D.11.b). Lack of OJT management may negatively impact the participant’s ability to maintain OJT, and may impede relationships between Fedcap and/or the participant with the employer.</p>	<p>OJT occurred every week for first 30 days and then monthly</p> <ul style="list-style-type: none"> ➤ Site managers/supervisors schedule and conduct audits on the weekly check-ins with the participant and employer for subsidized OJT occurred every week for first 30 days and then monthly, with provided feedback and scheduled training for staff non-compliance
<ul style="list-style-type: none"> ➤ Fedcap Maine HQ ➤ Ellsworth ➤ Fort Kent ➤ Lewiston ➤ Rockland 	I_2019_032	<p>Checklist Items</p> <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-023 	Completed	<p>Case management in FedcapCARES could not demonstrate that, upon notification to Fedcap of the new employment status, the participant was notified verbally and in writing of the Department’s (DHHS) transitional services and Fedcap’s job retention services (Rider A, IV.D.12.g). Participants may not understand the additional potential services available without notification from Fedcap.</p>	<ul style="list-style-type: none"> ➤ Fedcap Maine HQ: <ul style="list-style-type: none"> ✓ Develop processes and training to provide and document the Department’s transitional services and Fedcap’s job retention services available to participants ✓ Conduct ongoing training to provide and document the Department’s transitional services and Fedcap’s job retention services available to participants, to staff ➤ Case managers provide and document the Department’s transitional services and Fedcap’s job retention services available to participants ➤ Site managers/supervisors schedule and conduct audits on the notification of the Department’s transitional services, and Fedcap’s job retention services for site managers, with provided feedback and scheduled training for staff non-compliance



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
					<ul style="list-style-type: none"> ➤ Fedcap QA conduct and report to Fedcap Maine HQ on the status of ongoing training on the Department’s transitional services, and Fedcap’s job retention services for site managers
<ul style="list-style-type: none"> ➤ Farmington ➤ Sanford 	I_2019_033	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-026 	Completed	Case management in FedcapCARES could not demonstrate participant’s progress was monitored for off-site job search activities like job fairs and visiting career centers, preparing job applications, and completing job applications (see Rider A, IV.D.14.d). Participants may lose potential employment opportunities without the case manager monitoring job search activities.	<ul style="list-style-type: none"> ➤ Case managers provide and document that the participant’s progress was monitored for off-site job search activities such as job fairs and visiting career centers, preparing job applications, and completing job applications ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Schedule and conduct audits on that the participant’s progress was monitored for off-site job search activities such as job fairs and visiting career centers, preparing job applications, and completing job applications, with provided feedback and scheduled training for staff non-compliance
<ul style="list-style-type: none"> ➤ Augusta ➤ Bangor 	I_2019_034	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-030 	Completed	A third contact attempt (home visit) to a non-compliant participant, to be conducted within 24 hours of the second contact attempt, was not conducted timely (see Rider A, IV.D.15.b). Without this effort, participants may not reengage in the ASPIRE-TANF program or obtain meaningful employment.	Site managers/supervisors: <ul style="list-style-type: none"> ➤ Scheduled and conducted audits on the status of all three non-compliant communication attempts ➤ Provided feedback and scheduled training for staff non-compliance
<ul style="list-style-type: none"> ➤ Fedcap Maine HQ 	I_2019_035	Checklist Items	Completed	Some recent participants were not provided with document receipts, as specified in Fedcap’s CAP (Response to	<ul style="list-style-type: none"> ➤ Fedcap Maine HQ develops and implements process to include review of



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
<ul style="list-style-type: none"> ➤ Bangor ➤ Calais ➤ Fort Kent ➤ Machias ➤ Sanford 		<ul style="list-style-type: none"> ➤ OC-SD-QUAL-CL-005 ➤ OC-SD-FCA-CL-008 ➤ OC-SD-STBP-CL-032 		<p>Participants, item #3). Furthermore, weekly random case reviews for participant documentation receipts have not been implemented, as specified in the CAP (Response to Participant, Compliance Measures item #3).</p> <p>Participants may be required to provide the same documentation multiple times, when Fedcap staff do not provide document receipts. Providing the same documents can lead to frustration (as noted in the OFI participant surveys) and may lead to participant disengagement.</p>	<ul style="list-style-type: none"> documentation receipts into weekly QA reviews ➤ Site managers/supervisors conduct and document a weekly random case review for participant documentation receipts, and document non-compliance ➤ Regional directors include results of documentation reviews in bi-weekly QA review summary to executive director
<ul style="list-style-type: none"> ➤ Augusta ➤ Bangor ➤ Caribou ➤ Ellsworth ➤ Farmington ➤ Fort Kent ➤ Lewiston ➤ Rockland ➤ Sanford ➤ Skowhegan ➤ South Paris ➤ South Portland 	I_2019_036	<p>Checklist Items</p> <ul style="list-style-type: none"> ➤ OC-SD-FCA-CL-011 	Completed	<p>Case management in FedcapCARES could not demonstrate that the participant received a copy of the FCA as specified by Chapter 607 (see section 7, II.C). Participants will have difficulty remembering all of their and all of Fedcap’s activities and responsibilities, and remaining compliant with the activities, without a copy of the FCA.</p>	<ul style="list-style-type: none"> ➤ Case managers provide and document that the participant received a copy of the FCA ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Conduct audits to validate that participant received a copy of the FCA ✓ Provide feedback and training to case manager for non-compliance
<ul style="list-style-type: none"> ➤ Fort Kent ➤ Lewiston ➤ Machias 	I_2019_037	<p>Checklist Items</p> <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-009 	Completed	<p>Case management in FedcapCARES could not demonstrate that the participant was scheduled to begin engaging in the required activities listed within their</p>	<ul style="list-style-type: none"> ➤ Case managers provide and document that the participant was scheduled to begin engaging in the required activities listed within their respective FCAs within



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
<ul style="list-style-type: none"> ➤ Rockland ➤ South Portland 		<ul style="list-style-type: none"> ➤ OC-SD-FCA-CL-012 		<p>respective FCAs within three business days of execution of the FCA. Delays in schedule may cause participants to disengage in employment preparedness activities.</p>	<p>three business days of execution of the FCA</p> <ul style="list-style-type: none"> ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Conduct audits to validate that the participant was scheduled to begin engaging in the required activities listed within their respective FCAs within three business days of execution of the FCA ✓ Provide feedback and training to case manager for non-compliance
<ul style="list-style-type: none"> ➤ Lewiston ➤ Sanford ➤ South Portland 	P1_2019_002	<p>Checklist Items</p> <ul style="list-style-type: none"> ➤ OC-SD-FCA-CL-005 	Completed	<p>Case management in FedcapCARES could not demonstrate that the FCA contains required activities (Services to be Provided) appropriate for obtaining and retaining employment. Not including appropriate activities may result in participants not being successful in obtaining employment.</p>	<ul style="list-style-type: none"> ➤ Case managers provide and document the FCA with activities appropriate to support the participant in obtaining and retaining employment ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Conduct audits to validate that the FCA contained activities appropriate to support the participant in obtaining and retaining employment ✓ Provide feedback and training to case manager for non-compliance
<ul style="list-style-type: none"> ➤ South Portland 	P1_2019_003	<p>Checklist Items</p> <ul style="list-style-type: none"> ➤ OC-SD-FCA-CL-007 	Completed	<p>Case management in FedcapCARES could not demonstrate that the FCA reflects each individual participant’s preferences and abilities to the extent that they conform to the goal of the program to help participants gain employment and to the extent that those preferences conform to any other applicable program rules. Not individualizing the FCA to reflect participant</p>	<ul style="list-style-type: none"> ➤ Case managers work with participants to develop FCAs that reflect each participant’s preferences and abilities to the extent that they conform to the goal of the program ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Conduct audits to validate that the FCA reflects participant preferences



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
				preferences and abilities may lead to participant disinterest and/or disengagement.	<ul style="list-style-type: none"> and abilities to the extent that they conform to the goal of the program ✓ Provide feedback and training to case manager for non-compliance
➤ Biddeford	P1_2019_004	Checklist Items ➤ OC-SD-FCA-CL-010	Completed	Case management in FedcapCARES could not demonstrate that the FCA was signed by the Fedcap staff and by the participant. Ensuring participants sign a copy of the FCA provides an opportunity to confirm their understanding of, and agreement with, the expectations outlined in the FCA.	Site managers/supervisors provide additional training and coaching to case management staff regarding the expectation that all FCAs will be signed by the participant.
➤ Sanford	P1_2019_005	Checklist Items ➤ OC-SD-ELIG-CL-001	Completed	Case management in FedcapCARES could not demonstrate that the participant was notified via their preferred method of communication of their scheduled orientation, intake and assessment appointment 24-48 hours before appointment. Not reminding participants of scheduled appointments may result in missed appointments and a lack of success in obtaining and retaining employment.	Regional Director ensure appointment reminders are generated consistently in a timely manner and distributed to ensure participants are informed of scheduled appointments.
➤ South Portland	P1_2019_006	Checklist Items ➤ OC-SD-ELIG-CL-002	Completed	Case management in FedcapCARES could not demonstrate that the participant was timely engaged in an appropriate activity after completing orientation. Not engaging participants in activities in a timely manner may result in participants becoming disengaged.	<ul style="list-style-type: none"> ➤ Case managers schedule participants to begin engaging timely in appropriate activities after completing orientation ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Conduct audits to validate that participants are engaged timely in appropriate activities after completing orientation ✓ Provide feedback and training to case manager for non-compliance



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
➤ South Portland	P1_2019_007	Checklist Items ➤ OC-SD-ELIG-CL-003	Completed	Case management in FedcapCARES could not demonstrate that a Work Agreement was executed for the participant. Not having an executed Work Agreement may result in participants not understanding program expectations.	Site managers/supervisors implement a process change to execute Work Agreements at the time the FCA is delivered, rather than during Power of Possible training
➤ South Portland	P1_2019_008	Checklist Items ➤ OC-SD-ELIG-CL-004	Completed	The case reviews of FedcapCARES could not demonstrate that the intake and assessment always included the following tools (see Rider A, IV.C.3.a): <ul style="list-style-type: none"> ➤ Test of Adult Basic Education (TABE) ➤ CareerScope Participants may not receive the most appropriate services if the TABE or CareerScope are not completed.	Site managers/supervisors: <ul style="list-style-type: none"> ➤ Conduct audits to validate that intake and assessment include TABE and CareerScope ➤ Provide feedback and training to case managers where there is non-compliance
➤ South Portland	P1_2019_009	Checklist Items ➤ OC-SD-STBP-CL-003	Completed	Case management documentation in FedcapCARES could not demonstrate that case management services were conducted monthly, via in person meetings, telephone calls, and/or e-mail correspondence (see Rider A, IV.D.1.b). Lack of regular contact with participants based on their specific circumstances may lead to: <ul style="list-style-type: none"> ➤ Trust issues between participants and Fedcap case managers ➤ Participant questions not being addressed ➤ Participants not following through on scheduled events 	Site managers/supervisors provide additional training and coaching to case management staff regarding the expectation to maintain, at minimum, monthly contact (in person meetings, telephone calls, and e-mail correspondence) with participants, to include participant's progress, circumstances, and needs.



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
➤ South Portland	P1_2019_010	Checklist Items ➤ OC-SD-STBP-CL-019	Completed	Case management in FedcapCARES could not demonstrate education and training activities were provided (see Rider A, IV.D.9.a). These education and training activities are based upon the participant's intake and assessment results, FCA development or renewal, aspirations, or other social determinants. Participants may not qualify for specific jobs without receiving education and training needed.	<ul style="list-style-type: none"> ➤ Case managers: identify and assign education and training activities ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Schedule and conduct audits to identify and assign education and training activities ✓ Provide feedback and schedule training for staff non-compliance
➤ Sanford	P1_2019_011	Checklist Items ➤ OC-SD-STBP-CL-028	Completed	Case management in FedcapCARES could not demonstrate that timely first contact attempts were made to reengage the participant by telephone within 24 hours of non-compliance. Not attempting to reengage participants timely may increase the likelihood participants will permanently disengage from the program.	<p>Site managers/supervisors:</p> <ul style="list-style-type: none"> ➤ Schedule and conduct audits on the status of all three non-compliant communication attempts ➤ Provide feedback and schedule training for staff non-compliance
➤ Sanford	P1_2019_012	Checklist Items ➤ OC-SD-STBP-CL-033	Completed	Case management in FedcapCARES could not demonstrate that the participant's request for Good Cause was handled according to established policy and procedures. Participants may not receive the appropriate Good Cause determinations if Fedcap staff are unaware or unclear on the policies and requirements.	<p>Site managers/supervisors:</p> <ul style="list-style-type: none"> ➤ Implement weekly Good Cause audits to ensure appropriate Good Cause determinations are made according to established policy and procedure ➤ Provide feedback and training to case managers where there is non-compliance related to Good Cause determinations
➤ Skowhegan	P2_2019_001	Checklist Items ➤ OC-SD-ELIG-CL-004	Completed	The case reviews of FedcapCARES could not demonstrate that the intake and assessment always included the following aptitude and career development tools (see Rider A, IV.C.3.a):	<p>Site managers/supervisors:</p> <ul style="list-style-type: none"> ➤ Conduct audits to validate that intake and assessment include TABE and CareerScope



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
				<ul style="list-style-type: none"> ➤ Test of Adult Basic Education (TABE) ➤ CareerScope Participants may not receive the most appropriate services if the TABE or CareerScope are not completed.	<ul style="list-style-type: none"> ➤ Provide feedback and training to case managers where there is non-compliance
➤ Skowhegan	P2_2019_002	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-029 	Completed	A second contact attempt (mailed letter) to a non-compliant participant, to be conducted within 24 hours of the first contact attempt, was not conducted timely (see Rider A, IV.D.15.b). Without this effort, participants may not reengage in the ASPIRE-TANF program or obtain meaningful employment.	Site managers/supervisors: <ul style="list-style-type: none"> ➤ Scheduled and conducted audits on the status of all three non-compliant communication attempts ➤ Provided feedback and scheduled training for staff non-compliance
<ul style="list-style-type: none"> ➤ Farmington ➤ Skowhegan 	P2_2019_003	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-FCA-CL-008 ➤ OC-SD-STBP-CL-032 	Completed	Some recent participants were not provided with document receipts, as specified in Fedcap’s CAP (Response to Participants, item #3). Participants may be required to provide the same documentation multiple times, when Fedcap staff do not provide document receipts. Providing the same documents can lead to frustration (as noted in the OFI participant surveys) and may lead to participant disengagement.	<ul style="list-style-type: none"> ➤ Fedcap Maine HQ develops and implements process to include review of documentation receipts into weekly QA reviews ➤ Site managers/supervisors conduct and document a weekly random case review for participant documentation receipts, and document non-compliance ➤ Regional directors include results of documentation reviews in bi-weekly QA review summary to executive director
➤ Farmington	P2_2019_004	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-022 	Completed	Case management in FedcapCARES could not demonstrate weekly check-ins with the participant and employer for subsidized on-the-job training (OJT) occurred every week for first 30 days and then monthly (Rider A, IV.D.11.b). Lack of OJT management may negatively impact the participant’s ability	<ul style="list-style-type: none"> ➤ Case managers provide and document that the weekly check-ins with the participant and employer for subsidized OJT occurred every week for first 30 days and then monthly ➤ Site managers/supervisors schedule and conduct audits on the weekly check-ins



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
				to maintain OJT, and may impede relationships between Fedcap and/or the participant with the employer.	with the participant and employer for subsidized OJT occurred every week for first 30 days and then monthly, with provided feedback and scheduled training for staff non-compliance
<ul style="list-style-type: none"> ➤ Biddeford ➤ Lewiston ➤ Sanford ➤ Skowhegan ➤ South Portland 	P3_2019_001	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-ELIG-CL-006 	Ongoing	It could not be demonstrated that the three job positions of interest included estimates of the Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) for each of the identified job positions (see Rider A, IV.C.3.c). This information allows participants to understand what potential tax benefits are available for their three job positions of interest, to encourage participants to seek and retain employment.	Site managers/supervisors: <ul style="list-style-type: none"> ➤ Conduct audits to validate that the three job positions of interest included estimates of the Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) for each of the identified job positions ➤ Provide feedback and training to case managers where there is non-compliance
<ul style="list-style-type: none"> ➤ South Portland 	P3_2019_002	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-FCA-CL-008 ➤ OC-SD-STBP-CL-032 	Completed	Some recent participants were not provided with document receipts, as specified in Fedcap’s CAP (Response to Participants, item #3). Participants may be required to provide the same documentation multiple times, when Fedcap staff do not provide document receipts. Providing the same documents can lead to frustration (as noted in the OFI participant surveys) and may lead to participant disengagement.	<ul style="list-style-type: none"> ➤ Site managers/supervisors conduct and document a weekly random case review for participant documentation receipts, and document non-compliance ➤ Regional directors include results of documentation reviews in bi-weekly QA review summary to executive director
<ul style="list-style-type: none"> ➤ South Portland 	P3_2019_003	Checklist Items <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-002 	Completed	Case management documentation in FedcapCARES could not demonstrate that participants were notified when there was a change in case managers, providing a point of contact to the participant (see	Site managers/supervisors provide additional case management training to include timely written notification to participants when a change in case manager occurs.



Site	Finding ID #	Interview Questions & Checklist Item #	Status	Finding	Recommendation
				<p>Rider A, IV.D.1). Changes in case managers without notification to participants may lead to:</p> <ul style="list-style-type: none"> ➤ Trust issues between participants and Fedcap case managers ➤ Participant questions not being addressed ➤ Participants not following through on scheduled events 	
➤ South Portland	P3_2019_004	<p>Checklist Items</p> <ul style="list-style-type: none"> ➤ OC-SD-STBP-CL-028 	Ongoing	<p>Case management in FedcapCARES could not demonstrate that timely first contact attempts were made to reengage the participant by telephone within 24 hours of non-compliance. Not attempting to reengage participants timely may increase the likelihood participants will permanently disengage from the program.</p>	<p>Site managers/supervisors:</p> <ul style="list-style-type: none"> ➤ Schedule and conduct audits on the status of all three non-compliant communication attempts ➤ Provide feedback and schedule training for staff non-compliance
➤ South Portland	F_2019_001	<p>Checklist Items</p> <ul style="list-style-type: none"> ➤ OC-SD-FCA-CL-005 	New	<p>Case management in FedcapCARES could not demonstrate that the FCA contains required activities (Services to be Provided) appropriate for obtaining and retaining employment. Not including appropriate activities may result in participants not being successful in obtaining employment.</p>	<ul style="list-style-type: none"> ➤ Case managers provide and document the FCA with activities appropriate to support the participant in obtaining and retaining employment ➤ Site managers/supervisors: <ul style="list-style-type: none"> ✓ Conduct audits to validate that the FCA contained activities appropriate to support the participant in obtaining and retaining employment ➤ Provide feedback and training to case manager for non-compliance



5. CLOSING RECOMMENDATIONS

Fedcap has implemented a number of additional processes and procedures over the course of the Third Party Assessment to realize improvement in the areas of opportunity identified by DHHS. It will be important that the progress achieved is maintained going forward, and that focus remain on continuing to identify and implement improvements that will further strengthen the ASPIRE-TANF BTC program and the level of service being provided to participants.

In support of this effort, the CSG Assessment team makes the following recommendations to OFI for continued vendor performance monitoring. Given that Fedcap has introduced new procedures and additional controls to the BTC program, it is suggested that OFI leverage those improvements and changes as part of their ongoing oversight efforts, to support continuous improvement. The recommendations are aligned with the four areas of opportunity identified in the CAP initiated by DHHS in April 2019, key findings identified within those areas of opportunity in the course of conducting the Third Party Assessment, and changes implemented by Fedcap to address those findings.

Services and Plan Development Are Not Individualized (FCAs)

The following FCA-related opportunities were noted during the Third Party Assessment:

- FCAs tailored to individual participants' specific interests and abilities, to include specific short and long term goals, intake and vocational assessment information, labor market data, and earned income tax credit (EITC) and Child Tax Credit (CTC) estimates

Recommendations:

- Receive and review quarterly the following Fedcap documents:
 - ✓ A summary of results from Fedcap QA's monthly FCA Reviews that track compliance with each of these expectations
 - ✓ Reports from FedcapCARES that track Opportunity Centers' timely completion of FCA renewals and vocational assessments, to include TABE and CareerScope

Customer Service

The following opportunities were noted during the Third Party Assessment:

- Measuring customer service communications to assure an appropriate level of empathy, sensitivity, and professional tone
- Tracking timely completion of all required new hire and ICM training and job shadowing, employee performance reviews, including 90-Day and Annual Evaluations, and completion of weekly/bi-weekly employee supervision, necessary for employees to successfully provide services to participants

Recommendations:

- Receive and review quarterly the following Fedcap documents:
 - ✓ A summary of results from Fedcap QA's monthly Customer Service Observation assessments



- ✓ A sample of site reports to Fedcap senior leadership summarizing customer service observation findings and corrective action plans, where appropriate
- ✓ Fedcap QA monthly reviews used to track and assure timely completion of:
 - Required new hire and ICM training classes, and
 - Employee 90-Day and annual evaluations, and weekly/bi-weekly supervision
- ✓ A sample of site Placement Trackers that track employer outreach and development activities including cold calls and hiring events, and reports from FedcapCARES' employer module once implemented in 4th Quarter 2019

Responsiveness to Participants

The following opportunities were noted during the Third Party Assessment:

- Demonstrate that participant phone calls and e-mails are consistently returned within 24 business hours
- Consistently provide document receipts to participants who submit documentation directly to Fedcap BTC staff
- Demonstrate timely completion of required participant services, including delivery of bi-weekly WEP feedback, completion of mock interviews, and weekly check-ins with newly employed participants

Recommendations:

- Receive and review quarterly the following Fedcap documents:
 - ✓ A summary of results from Fedcap QA's monthly reviews that track timeliness of Fedcap staff returning voicemails and e-mails
 - ✓ Summary results of site call log audits
 - ✓ Fedcap QA monthly reviews that track progress of staff providing participants with document receipts
 - ✓ Site Placement Trackers that record completion of participant mock interviews at the end of Power of Possible workshops
- Consider including additional checklist items (for full inventory of CSG Assessment checklist items, refer to **Appendix E: Opportunity Center Interview Questions and Checklist Items**) to existing OFI monthly and/or annual audits, if not already included, that assess responsiveness to participants, to include:
 - ✓ Participant calls and e-mails returned within 24 hours
 - ✓ WEP feedback provided to participants bi-weekly
 - ✓ Check-ins with newly employed participants completed weekly
 - ✓ Participants notified verbally and in writing of changes in case manager
 - ✓ Support services reviewed and arranged timely, as appropriate



Application of Good Cause Provision

The following opportunities were noted during the Third Party Assessment:

- Demonstrate consistent and accurate application of the Good Cause provision, in accordance with OFI policies and procedures

Recommendations:

- Receive and review quarterly the following Fedcap documents:
 - ✓ A sample of Fedcap sites' weekly Good Cause reviews
 - ✓ Summary of Good Cause training sessions conducted

Plan of Action & Milestones

The CSG Assessment team has tracked all findings, including status and progress, in the POA&M. As of this Final Assessment Report, Fedcap continues to work on fully addressing and remediating 24 of the 185 total findings (13%) that have been identified. As a final recommendation, OFI is encouraged to consider maintaining this tracking with Fedcap leadership for a period of time going forward, to further assure appropriate actions continue to be taken that support remediation of these remaining open findings.



6. APPENDIX A: CATALOG OF REVIEW

This section provides a list of the interviews conducted, staff files, quality, FCA, and case reviews completed, documents reviewed, and walk throughs and desk audits completed by the CSG Assessment team during this Final Periodic Assessment.

Stakeholders Interviewed

Table 9: Stakeholders Interviewed provides a listing of all personnel interviewed for the Final Periodic Assessment.

Table 9: Stakeholders Interviewed

Stakeholders Interviewed	Project Role	Organization	Date(s)
Liz Ray	Associate Director, Policies & Programs	Office for Family Independence	09/10/2019
Julian Baer	Sr. Program Manager – TANF/ASPIRE	Office for Family Independence	09/10/2019
Heather Chobar	Regional Director – Northern Region	Fedcap	09/27/2019 10/01/2019
Jorge Alvarado	Site Manager – Houlton	Fedcap	09/27/2019
Jonathan Judkins	Site Manager – Caribou / Fort Kent	Fedcap	09/27/2019
Patricia Bourgoin	Site Supervisor – Caribou / Fort Kent	Fedcap	09/27/2019
Carla Smith	Director of Operations	Fedcap	09/30/2019 10/01/2019 10/02/2019 10/03/2019 10/04/2019
Ashaki Roberts	Director of Quality	Fedcap	09/30/2019 10/01/2019 10/02/2019 10/03/2019 10/04/2019



Stakeholders Interviewed	Project Role	Organization	Date(s)
Serena Powell	Executive Director	Fedcap	09/30/2019 10/01/2019 10/02/2019 10/03/2019 10/04/2019
Shannon Emery	Regional Director – Downeast Region	Fedcap	09/30/2019
Tyler Oversmith	Site Manager – Bangor	Fedcap	09/30/2019
Amanda Ricci	Site Manager – Augusta	Fedcap	10/01/2019
Joshua Smith	Site Supervisor – Augusta	Fedcap	10/01/2019
Lisa Crothers	Regional Director – Southern Region	Fedcap	10/02/2019 10/03/2019 10/04/2019
Kathie Marcoux	Site Manager – Skowhegan and Farmington	Fedcap	10/02/2019
Sianeh Omeze	Site Manager – Biddeford	Fedcap	10/03/2019
Tim Sturtevant	Site Supervisor – South Portland	Fedcap	10/04/2019

Walk Throughs and Desk Audits Completed

Table 10 provides a listing of all walk throughs and desk audits conducted at Fedcap Opportunity Centers for the Final Periodic Assessment.

Table 10: Walk Throughs and Desk Audits Completed

Audits Completed	Date
Walk Through and Desk Audit – Fort Kent	09/27/2019
Walk Through and Desk Audit – Bangor	09/30/2019
Walk Through and Desk Audit – Augusta	10/01/2019
Walk Through and Desk Audit – Skowhegan	10/02/2019
Walk Through and Desk Audit – Biddeford	10/03/2019
Walk Through and Desk Audit – South Portland	10/04/2019



Quality Reviews Completed

Table 11 provides a listing of all quality (CAP) reviews conducted at Fedcap Opportunity Centers for the Final Periodic Assessment.

Table 11: Quality Reviews Completed

Site	Facilitator(s)	Date
Fort Kent	Jorge Alvarado/Jonathan Judkins/Heather Chobar	09/27/2019
Bangor	Tyler Oversmith/Shannon Emery	09/30/2019
Augusta	Amanda Ricci/Heather Chobar	10/01/2019
Skowhegan	Kathie Marcoux/Lisa Crothers	10/02/2019
Biddeford	Sianeh Omeze/Lisa Crothers	10/03/2019
South Portland	Tim Sturtevant/Lisa Crothers	10/04/2019

Family Contract Amendment and Cases Reviewed

Table 12 provides a count of all FCA and end-to-end participant case reviews conducted at the Opportunity Centers for the Final Periodic Assessment.

Table 12: Family Contract Amendment and Cases Reviewed

Site	# Reviewed	Facilitator(s)	Date
Fort Kent	FCA Review: 4 Case Review: 4	Jorge Alvarado/Jonathan Judkins/ Heather Chobar	09/27/2019
Bangor	FCA Review: 5 Case Review: 5	Tyler Oversmith/Shannon Emery	09/30/2019
Augusta	FCA Review: 5 Case Review: 5	Amanda Ricci/Heather Chobar	10/01/2019
Skowhegan	FCA Review: 5 Case Review: 5	Kathie Marcoux/Lisa Crothers	10/02/2019
Biddeford	FCA Review: 5 Case Review: 5	Sianeh Omeze/Lisa Crothers	10/03/2019
South Portland	FCA Review: 5 Case Review: 5	Tim Sturtevant/Lisa Crothers	10/04/2019



Staff Files Reviewed

Table 13 provides a count of the number of random employee file reviews conducted at the Opportunity Centers for the Final Periodic Assessment.

Table 13: Staff Files Reviewed

Site	# Files Reviewed	Facilitator(s)	Date
Fort Kent	3	Jorge Alvarado/Jonathan Judkins/ Heather Chobar	09/27/2019
Bangor	4	Tyler Oversmith/Shannon Emery	09/30/2019
Augusta	4	Amanda Ricci/Heather Chobar	10/01/2019
Skowhegan	4	Kathie Marcoux/Lisa Crothers	10/02/2019
Biddeford	4	Sianeh Omeze/Lisa Crothers	10/03/2019
South Portland	4	Tim Sturtevant/Lisa Crothers	10/04/2019

Documents Reviewed

Table 14 provides the list and description of the documents reviewed in support of the Final Periodic Assessment.

Table 14: Documents Reviewed

Documents Reviewed	Description
#1 Fedcap BTC – Intake Appointment Observation Review Checklist Developed 5.31.2019.pdf	Checklist tool created to facilitate customer service observations of BTC intake processes
#2 Fedcap BTC – Vocational Assessment Process Observation Review Checklist Tool Revised 9.6.2019.pdf	Checklist tool created to facilitate customer service observations of BTC vocational assessment processes
#3 Fedcap BTC – Workshop Observation Review Checklist Tool Revised 8.30.2019.pdf	Checklist tool created to facilitate customer service observations of BTC workshop processes
#4 Fedcap BTC – Outreach Observation Review Checklist Tool Revised 8.30.2019.pdf	Checklist tool created to facilitate customer service observations of BTC outreach processes
#5 Fedcap BTC – Job Readiness Observation Review Checklist Tool Developed 9.16.2019.pdf	Checklist tool created to facilitate customer service observations of BTC job readiness processes
Augusta – Participant Satisfaction Survey August Results Final Report.pdf Bangor – Participant Satisfaction Survey August Results Final Report.pdf	Results of participant surveys for August 2019 by Fedcap location



Documents Reviewed	Description
<p>Biddeford – Participant Satisfaction Survey August Results Final Report.pdf</p> <p>Calais – Participant Satisfaction Survey August Results Final Report.pdf</p> <p>Caribou – Participant Satisfaction Survey August Results Final Report.pdf</p> <p>Ellsworth – Participant Satisfaction Survey August Results Final Report.pdf</p> <p>Farmington – Participant Satisfaction Survey August Results Final Report.pdf</p> <p>Fort Kent – Participant Satisfaction Survey August Results Final Report.pdf</p> <p>Houlton – Participant Satisfaction Survey August Results Final Report.pdf</p> <p>Lewiston – Participant Satisfaction Survey August Results Final Report.pdf</p> <p>Machais – Participant Satisfaction Survey August Results Final Report.pdf</p> <p>Rockland – Participant Satisfaction Survey August Results Final Report.pdf</p> <p>Sanford – Participant Satisfaction Survey August Results Final Report.pdf</p> <p>Skowhegan – Participant Satisfaction Survey August Results Final Report.pdf</p>	
<p>Document Folders-Types 9.25.19.jpg</p>	<p>Screen shot of FedcapCARES enhancement to include new Career Planning folder to store tax credit and labor market documentation</p>
<p>EITC CTC Enhancement and Communication 2019_09_25.jpg</p>	<p>Communication to Fedcap staff regarding updated procedures to be followed in providing tax credit information to participants based on positions of interest</p>
<p>EITC_CTC_Local Labor Market_Training_Minutes 9.28.19.pdf</p>	<p>Minutes summarizing the topics and materials covered during the August 28, 2019 labor market training to Fedcap case management staff</p>
<p>Email communication re. Fedcap BTC Customer Service Observation Review Process 9.20.19.pdf</p>	<p>Communication to Fedcap managers that details how they are to implement the new Customer Service Observation program</p>



Documents Reviewed	Description
FCA.pdf FCA – Labor Market Example 1 of 4.jpg FCA – Labor Market Example 2 of 4.jpg FCA – Labor Market Example 3 of 4.jpg FCA – Labor Market Example 4 of 4.jpg	Example of completed FCA that includes labor market information based on participant’s positions of interest
Fedcap and OFI Response to Outstanding CAP Items 10.4.2019.pdf	Email communications between Fedcap and OFI regarding remediation of findings regarding transitional services and privacy
Fedcap Breaking the Cycle Quality Assurance FCA August 2019 Final Report dev 9.16.19.pdf	Fedcap QA’s monthly FCA Review results for August 2019
Fedcap BTC – Customer Service Observation Review Process rev. 9.30.19.pdf	Document outlines processes to be followed in completing monthly Customer Service Observation Reviews
Fedcap BTC EITC_CTC Updated Process 9.3.2019.pdf	Training to Fedcap staff regarding procedures for documenting EITC/CTC discussions with participants effective 9/3/2019
Fedcap BTC Executive Summary August 2019.pdf	Executive Summary report for August 2019
Fedcap BTC FedcapCARES Document Types Guide 9.30.19.xlsx	Fedcap staff guide showing which documents are to be archived to specific folders within the FedcapCARES case management system
Fedcap BTC ICM Required Training Checklist Form 9.5.2019.pdf	Checklist to track completion of required ICM training modules
Fedcap BTC Monthly Report August 2019.pdf	Monthly report of results for August 2019
Fedcap BTC New Hire Employee Required Trainings QA Audit Tool 9.27.2019.xlsx	Fedcap review tool to be used monthly by QA to audit timely completion of mandatory new hire and ICM training modules
Fedcap BTC New Hire (Instructor Led) 5 Day Required Training Checklist – Revised 9.24.2019.pdf	Checklist that tracks completion of required, instructor-led new hire training modules
Fedcap BTC New Hire Required Training Checklist Form-Revised 9.6.2019.pdf	Revised new hire checklist to track completion of all required training modules
Fedcap BTC New Hire Required Training (Self Directed E-Learning Training) Checklist 9.24.19.pdf	Checklist that tracks completion of required, self-directed new hire training modules
Fedcap BTC NHT Training Tracking Process.pdf	Document of instructions to follow in tracking completion of all new hire training modules, including exception reporting



Documents Reviewed	Description
Fedcap BTC Quality Assurance Customer Service Observation Audit Review Tool.xlsx	QA's tool to track Opportunity Center compliance with expectations for completing monthly customer service observations.
Fedcap BTC Transitional Services Talking Point (Informational Flyer)...10.11.19.pdf	Draft flyer for use in informing newly employed participants of possible transitional services available to them
FortKentOpenCaseload_VocAssessmentList_10-02-19.xlsx	Fedcap Fort Kent report that tracks completion of outstanding participant vocational assessments
I_2019_017-D.pdf	Communication to Fedcap management confirming expectations regarding utilization of labor market tools and survey information during participant intake, dated October 9, 2019; included CWRI Tool Quick Reference Guide
ICM Required Training Schedule and Outcome Report.xlsx	Fedcap tracking and completion of required ICM training modules
Labor Market Example.docx	Screen shots from FedcapCARES of labor market information shared with participant based on position of interest
QA P-6 Initiating QA Reviews Draft SOP Rev. 9.24.19.pdf	Fedcap draft SOP updated to include new customer service observation procedures
Quality Assurance Communication re. WEP-CS Monthly Follow Up Expectation 9.4.2019.pdf	Communication to all Fedcap staff clarifying expectations for WEP feedback to be provided to participants
Scheduled Retention Events 8.1.2019 – 9.30.2019.xlsx	Report of scheduled participant job retention events by Fedcap Opportunity Center
Staff Tracker 09.25.2019 CSG.xlsx	Fedcap staffing roster updated as of September 25, 2019
Transitional Services Final.pptx	OFI slide deck of possible transitional services available to participants who become employed



7. APPENDIX B: SITE REVIEW SUMMARIES

Site Review Summary- Fedcap Maine HQ

Fedcap began administering Maine's ASPIRE-TANF program in January 2017, and is responsible for providing ASPIRE-TANF participants with the training and case management services necessary to obtain and maintain employment. Fedcap Maine's senior leadership has established its headquarters in Portland, Maine, referred to as "HQ". The Third Party Assessment's Initial phase began with a site visit to Fedcap HQ on May 20, 2019.

A total of 16 findings were identified during the Initial Assessment site visit, and the subsequent Periodic Assessment site visits. A total of 12 findings have been statused as "Completed" since the Initial Assessment was conducted, and four findings remain statused as "Ongoing". The status of the 16 findings are summarized here, and represent a combination of both Global and Site findings.

Global findings are findings that impacted many or potentially all 16 Opportunity Centers, and were more systemic in nature. They require direction, support, and oversight of senior Fedcap leadership to fully address and remediate. Site findings were findings that were more specific to certain sites, though full remediation of the findings may require guidance and input from Fedcap senior leadership.

All global and site findings are documented in detail in **Section 4: Detailed Findings and Recommendations** of this report, and in the Plan of Action and Milestones (POA&M).

Site Summary of Remediation Efforts for Existing Findings

The following summarizes findings assigned to Fedcap HQ that resulted from site visits to the HQ office and/or to the 16 Opportunity Centers. During the HQ Initial Assessment site visit, the CSG Assessment team conducted interviews and reviewed documentation with several members of the senior leadership team. During the site visits to the Opportunity Centers, the CSG Assessment team conducted interviews and reviewed documentation, conducted security walk throughs and desk audits, and completed random reviews of staff files, FCAs, and cases. A review of quality initiatives related to the CAP was also performed.

Security and Privacy

The CSG Assessment team developed a set of security and privacy questions based upon NIST SP 800-53 Rev 4 and MARS-E v2.0. These controls addressed the HIPAA security and privacy rules.

The security controls, reviewed through document examination and interviews, included:

- Rules of Behavior
- Access Controls: Enforcement; Unsuccessful Logon Attempts; Session Lock; and Session Termination
- Awareness and Training: Role-based Security Training; and Security Training Records
- Audit and Accountability: Audit Events; and Audit Review, Analysis, and Reporting
- Identification and Authorization Management
- Incident Response: Incident Response Training; and Incident Reporting
- Media Protection: Media Access; Media Storage; Media Transport; and Media Sanitation



- Physical and Environmental (primarily addressed during the 16 Opportunity Center walk throughs)
- System and Communications: Encryption in transit; Protect at rest; and Electronic Mail

The Privacy controls, reviewed through document examination and interviews, included:

- Governance and Privacy Program
- Privacy Monitoring and Auditing
- Privacy Awareness and Training
- Accounting of Disclosures
- Consent
- Individual Access
- Complaint Management
- Privacy Incident Response
- Privacy Notice
- Dissemination of Privacy Program Information

The CSG Assessment team examined documents, conducted security and privacy interviews at Fedcap HQ, and completed walk throughs at each of the 16 Opportunity Centers. Remediation of the Security and Privacy findings identified during the Initial Periodic Assessment were led by Fedcap HQ leadership. To address the finding related to sensitive equipment not being secured, Fedcap purchased and installed locking cabinets in the five Opportunity Centers where this was an issue.

To address the second finding related to inadequate work areas to support participant confidentiality, Fedcap purchased 45 additional white noise machines and installed them in sites where there were opportunities identified to improve privacy and confidentiality. Additional workstation partitions were installed and reconfiguration of participant and staff seating completed in some Opportunity Centers. In addition, Fedcap has provided information to OFI to conduct an assessment of additional updates and configuration changes that could be made to Fedcap offices that may further enhance participant privacy and confidentiality. Fedcap and OFI are currently discussing this option.

The status of the specific findings for Fedcap Maine HQ is as follows:

- Five Opportunity Centers had sensitive equipment, specifically routers, switches, and cabling that were not secured in a locked closet or cabinet
 - ✓ Status: Completed
- Five Opportunity Centers were identified as having inadequate work areas to support participant confidentiality; several recommendations were made to address each of the sites' opportunities
 - ✓ Status: Ongoing

Contract Requirements

The following seven findings were noted and assigned to HQ for remediation as a result of the interviews conducted and assessments completed at the Fedcap HQ and/or Opportunity Centers. Two of these



findings remain in an "Ongoing" status, as Fedcap demonstrates that the changes implemented to track new hire training and employer outreach and development activities provide sustained improvement in these areas going forward.

The status of the specific findings for Fedcap Maine HQ is as follows:

- Fedcap's manual processes for tracking and reporting attendance at training sessions has resulted in an inability to demonstrate that staff completed all required new hire training modules and/or job shadowing, prior to the delivery of services
 - ✓ Status: Ongoing
- Training on six Intensive Case Management (ICM) modules, required of all ICM staff, was not consistently provided as new staff were on-boarded
 - ✓ Status: Completed
- There are several employer outreach and research activities to be performed; however, Fedcap's case management system, FedcapCARES, is lacking in its current configuration to provide robust tracking and management of employer engagement
 - ✓ Status: Ongoing
- Fedcap was unable to demonstrate that Job Retention Sessions were occurring, nor were they included in the Standard Operating Procedures (SOPs)
 - ✓ Status: Completed
- Fedcap policies and procedures pertaining to staff supervision and performance management, intended to support employee development and accountability in their achievement of goals and level of service to participants, were not consistently followed by Fedcap's management team. Three specific findings were identified, and the status of each is as follows:
 - ✓ Weekly or bi-weekly employee supervision, to include documented feedback
 - Status: Completed
 - ✓ Timely completion of 90-Day Introductory Period Evaluations, to include documented feedback
 - Status: Completed
 - ✓ One Year Evaluations completed and/or delivered timely
 - Status: Completed

Service Delivery

The following seven findings, assigned to HQ for remediation, were noted as part of the CSG Assessment team's review of services being provided and quality improvement efforts implemented as a result of the CAP. One of the findings remains in an "Ongoing" status, as Fedcap demonstrates that the Customer Service Observation processes it has implemented can be sustained going forward, to achieve improved participant service levels.

The status of the specific findings for Fedcap Maine HQ is as follows:



- A Quick Reference Guide specified in the CAP to support staff in addressing FCA deficiencies, had not been implemented
 - ✓ Status: Completed
- Opportunities were noted in Fedcap’s tracking and measurement of the level of customer service being provided, to assure an appropriate level of empathy, sensitivity, and professionalism when engaging participants
 - ✓ Status: Ongoing
- Estimates of the Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) for each position of interest was not consistently provided as part of the intake and assessment process
 - ✓ Status: Completed
- Some Good Cause initiatives included in the CAP had not been fully implemented, including in-service training to case managers and implementation of weekly Good Cause reviews
 - ✓ Status: Completed
- FCAs were not consistently developed and individualized to the specific participant utilizing career planning based on intake and assessment process information and labor market information
 - ✓ Status: Completed
- Participants were not consistently notified verbally and in writing of DHHS transitional services and Fedcap’s job retention services
 - ✓ Status: Completed
- Participants were not consistently provided with document receipts, as specified in the CAP
 - ✓ Status: Completed

Site Summary of Findings

Table 15 provides the count of total findings assigned to Fedcap HQ, by finding category and current status. Details of all open and completed findings are provided in the POA&M.

Table 15: Site Summary Findings – Fedcap Maine HQ

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Fedcap Maine HQ/Global Findings Combined				
Security and Privacy	0	1	1	0
Contract Requirements	0	5	2	0
Service Delivery	0	6	1	0



Site Review Summary- Augusta

A total of nine findings were identified since the Initial Assessment site visit to the Augusta Opportunity Center on May 31, 2019. Periodic Assessment site visits were conducted on August 7, 2019, and on October 1, 2019, to assess progress in addressing the site's open findings. A total of eight findings have been statused as "Completed" since the Initial Assessment was conducted, and one finding remain statused as "Ongoing". There were no new findings identified during this Final Periodic Assessment and site visit.

A summary of the Augusta Opportunity Center's progress in remediating prior findings is provided below. Details and status of all findings and recommendations are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Augusta site visits, CSG conducted follow up interviews with members of the site and regional leadership team. CSG and Fedcap reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm plan of action updates. Staff file, quality, case, and FCA reviews, as well as security walk throughs, were completed and additional recommendations provided to help address "Ongoing" findings. The status of Fedcap's remediation efforts and progress as of the Final Periodic Assessment follows.

Security and Privacy

Remediation of the Security and Privacy findings identified during the Initial Periodic Assessment were led by Fedcap HQ leadership. Fedcap purchased 45 additional white noise machines and installed them in sites where there were opportunities identified to improve privacy and confidentiality. Reconfiguration of participant and staff seating was recently completed within the Opportunity Center. In addition, Fedcap has provided information to OFI to conduct an assessment of additional updates and configuration changes that could be made to Fedcap offices that may further enhance participant privacy and confidentiality. Fedcap and OFI are currently discussing this option.

The status of the specific finding for the Augusta site is as follows:

- There was one finding noted from the site walk through regarding the configuration of the office space to safeguard participant privacy and confidentiality, specifically as it relates to the location of case manager and employment specialist workstations to support participant confidentiality and privacy
 - ✓ Status: Ongoing

Contract Requirements

Fedcap leadership and managers worked to remediate findings related to contract requirements. For the Augusta Opportunity Center, these findings included timely completion and documentation of annual performance evaluations. Fedcap addressed these findings through management re-training, revised employee development and feedback forms, and updated standard operating procedures and quality assurance audits.

The status of the specific finding is as follows:



- Completion and/or timely delivery of One Year Performance Evaluations could not be consistently demonstrated
 - ✓ Status: Completed

Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

All seven service delivery findings identified during the Initial and Periodic Assessment site visits to the Augusta Opportunity Center have been remediated and the finding status updated to “Completed”, as noted below. These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.

The status of the specific findings is as follows:

- Develop FCAs that are individualized to the specific participant, especially in the area of establishing SMART short and long term goals, as well as considering, including, and documenting labor market information
 - ✓ Status: Completed
- Ensure assessment information is collected and documented at the time of change in required categories, e.g. family structure, work history, financial status, or barriers
 - ✓ Status: Completed
- Notify participant who to contact when Fedcap staff leave the Opportunity Center
 - ✓ Status: Completed
- Complete and document Job Readiness Self-Assessments with mock interviews conducted and feedback provided
 - ✓ Status: Completed
- Obtain feedback from the WEP supervisor and use it to engage the participant in semi-monthly meetings that help develop work skills and habits to become prepared for paid employment
 - ✓ Status: Completed
- Ensure reengagement activities are completed within required timeframes; specifically, conduct home visits (third contact attempts) within 24 hours / next business day following the second contact attempt
 - ✓ Status: Completed
- Document in the case notes that participants were provided with a copy of their FCA
 - ✓ Status: Completed



New Site Findings

There were no new findings during the Augusta Opportunity Center Final Periodic Assessment site visit.

Site Summary of Findings

Table 16 contains the count of findings noted during the Initial and Periodic site visits to the Augusta Opportunity Center. Details of all open and completed findings are provided in the POA&M.

Table 16: Site Summary of Findings - Augusta

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Augusta				
Security and Privacy	0	0	1	0
Contract Requirements	0	1	0	0
Service Delivery	0	7	0	0

Site Review Summary- Bangor

A total of 12 findings were identified since the Initial Assessment site visit to the Bangor Opportunity Center on June 3, 2019. Periodic Assessment site visits were conducted on July 11, 2019, and September 30, 2019, to assess progress in addressing the site’s open findings. Eleven of the 12 findings have been stasued as “Completed” since the Initial Assessment was conducted, and one finding remains stasued as “Ongoing”. There were no new findings identified during this Final Periodic Assessment and site visit.

A summary of the Bangor Opportunity Center’s progress in remediating prior findings is provided below. Details and status of all findings and recommendations are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Bangor site visits, CSG conducted follow up interviews with members of the site and regional leadership team. CSG and Fedcap reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm plan of action updates. Staff file, quality, case, and FCA reviews, as well as security walk throughs, were completed and additional recommendations provided to help address “Ongoing” findings. The status of Fedcap’s remediation efforts and progress as of the Final Periodic Assessment follows.

Security and Privacy

Remediation of the Security and Privacy findings identified during the Initial Periodic Assessment were led by Fedcap HQ leadership. Fedcap purchased 45 additional white noise machines and installed them in sites where there were opportunities identified to improve privacy and confidentiality. Some reconfiguration of participant and staff seating was completed within the Opportunity Center. In addition, Fedcap has provided information to OFI to conduct an assessment of additional updates and configuration



changes that could be made to Fedcap offices that may further enhance participant privacy and confidentiality. Fedcap and OFI are currently discussing this option.

To address a finding related to sensitive equipment not being secured, Fedcap purchased and installed locking cabinets in the five Opportunity Centers where this was an issue. The Bangor location had the new cabinet installed on August 20, 2019.

The status of the specific findings is as follows:

- The Bangor Opportunity Center had sensitive equipment, specifically routers, switches, and cabling, that were not secured in a locked closet or cabinet
 - ✓ Status: Completed
- Concerns related to the configuration of office workspaces were discussed, specifically as they relate to the location of employment specialist workstations to support participant confidentiality and privacy
 - ✓ Status: Ongoing

Contract Requirements

Fedcap leadership and managers worked to remediate findings related to contract requirements. For the Bangor Opportunity Center, these findings included timely completion and documentation of employee supervision and annual performance evaluations. Fedcap addressed these findings through management re-training, revised employee development and feedback forms, and updated standard operating procedures and quality assurance audits. The status of the specific findings are as follows:

- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated, though it was noted that the feedback provided was specific and detailed
 - ✓ Status: Completed
- Completion and/or timely delivery of One Year Performance Evaluations could not be consistently demonstrated
 - ✓ Status: Completed

Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

All eight of the service delivery findings identified during the Initial and Periodic Assessment site visits to the Bangor Opportunity Center have been remediated and the finding status updated to “Completed”, as noted below. These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.

The status of the specific findings is as follows:



- Develop FCAs that are individualized to the specific participant, especially in the area of establishing SMART short and long term goals, as well as considering, including, and documenting labor market information
 - ✓ Status: Completed
- Document in the case notes that participants were provided with a copy of their FCA
 - ✓ Status: Completed
- Notify participant who to contact when Fedcap staff leave the Opportunity Center
 - ✓ Status: Completed
- Ensure monthly case management is documented, to include case notes pertaining to participant’s progress, circumstances, and needs
 - ✓ Status: Completed
- Develop and execute Renewal FCA prior to the expiration of the current FCA
 - ✓ Status: Completed
- Complete and document Job Readiness Self-Assessments with mock interviews conducted and feedback provided
 - ✓ Status: Completed
- Ensure reengagement activities are completed within required timeframes; specifically, conduct home visits (third contact attempts) within 24 hours / next business day following the second contact attempt
 - ✓ Status: Completed
- Weekly site case reviews to check for participant documentation receipts, as specified in the CAP, have not been implemented; and ensure participants are provided with documentation receipts for all documents and records submitted
 - ✓ Status: Completed

New Site Findings

There were no new findings during the Bangor Opportunity Center Final Periodic Assessment site visit.

Site Summary of Findings

Table 17 provides the count of total findings noted during the Initial and Periodic site visits to the Bangor Opportunity Center. Details of all open and completed findings are provided in the POA&M.

Table 17: Site Summary of Findings - Bangor

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Bangor				



Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Security and Privacy	0	1	1	0
Contract Requirements	0	2	0	0
Service Delivery	0	8	0	0

Site Review Summary- Biddeford

A total of 14 findings were identified since the Initial Assessment site visit to the Biddeford Opportunity Center on May 29, 2019. Periodic Assessment site visits were conducted on July 15, August 29, and October 3, 2019, to assess progress in addressing the site's open findings. A total of 11 findings have been statused as "Completed" since the Initial Assessment was conducted, and three findings remain statused as "Ongoing".

A summary of the Biddeford Opportunity Center's progress in remediating findings is provided below. Details and status of all findings and recommendations are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Biddeford site visits, CSG conducted follow up interviews with members of the site and regional leadership team. CSG and Fedcap reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm plan of action updates. Staff file, quality, case, and FCA reviews, as well as security walk throughs were completed, and additional recommendations provided to help address "Ongoing" findings. The status of Fedcap's remediation efforts and progress as of the Final Periodic Assessment follows.

Security and Privacy

Remediation of the Security and Privacy findings identified during the Initial Periodic Assessment were led by Fedcap HQ leadership. This included remediation of sensitive equipment that was not secured at the time of the Initial Assessment. Fedcap purchased and installed locking cabinets to secure the equipment at the five sites impacted by this finding. The Biddeford location had the new cabinet installed on August 6, 2019.

Fedcap also purchased 45 additional white noise machines and installed them in sites where there were opportunities identified to improve privacy and confidentiality of employee workspaces. In addition, Fedcap has provided information to OFI to conduct an assessment of additional updates and configuration changes that could be made to Fedcap offices that may further enhance participant privacy and confidentiality. Fedcap and OFI are currently discussing this option.

The status of the specific findings is as follows:

- The Biddeford Opportunity Center had sensitive equipment, specifically routers, switches, and cabling, that were not secured in a locked closet or cabinet
 - ✓ Status: Completed



- Concerns related to office workspaces were discussed, specifically as they relate to the location of the job developer's workstation, and the co-location of the Intensive Case Manager (ICM) and employment specialist, to support participant confidentiality and privacy
 - ✓ Status: Ongoing

Contract Requirements

Fedcap leadership and managers worked to remediate findings related to contract requirements. For the Biddeford Opportunity Center, these findings included timely completion and documentation of employee supervision. Fedcap addressed these findings through management re-training, revised employee development and feedback forms, additional reporting, and updated standard operating procedures and quality assurance audits.

One finding related to a lack of documentation to demonstrate all staff received required training on scanning participant documents into the case management system was remediated with the re-training of all site staff. The status of the finding was updated to "Completed". A second finding, regarding timely completion and delivery of annual reviews, was also remediated and updated to "Completed". The third finding, pertaining to completion and documentation of employee supervision, was successfully addressed and updated to a status of "Completed" during the Final Periodic Assessment site visit.

The status of the specific findings is as follows:

- Documentation could not be provided to consistently demonstrate that staff attended the latest in-service training on scanning documents, as specified in the CAP
 - ✓ Status: Completed
- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated
 - ✓ Status: Completed
- Completion and/or timely delivery of One Year Performance Evaluations could not be consistently demonstrated
 - ✓ Status: Completed

Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

Seven service delivery findings identified during the Initial and Periodic Assessment site visits to the Biddeford Opportunity Center have been remediated and their statuses updated to "Completed". These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.



Two service delivery findings remain in a status of “Ongoing” as the Opportunity Center works to consistently incorporate labor market and tax credit information into participant FCA and intake processes.

The status of the specific findings is as follows:

- Develop FCAs that are individualized to the specific participant, especially in the area of establishing SMART short and long term goals, as well as considering, including, and documenting labor market information
 - ✓ Status: Ongoing
- Consistently complete required intake and assessment activities, including use of the CareerScope tool
 - ✓ Status: Completed
- Ensure assessment information is collected and documented at the time of change in required categories, e.g. family structure, work history, financial status, or barriers
 - ✓ Status: Completed
- Ensure participants are notified of potential job opportunities
 - ✓ Status: Completed
- Develop and execute Renewal FCA prior to the expiration of the current FCA
 - ✓ Status: Completed
- Complete and document Job Readiness Self-Assessments with mock interviews conducted and feedback provided
 - ✓ Status: Completed
- Accompany participants to job fairs and other external hiring events and document in the case management system
 - ✓ Status: Completed
- Ensure FCA is signed by the Fedcap staff and by the participant
 - ✓ Status: Completed
- Demonstrate that the three job positions of interest include estimates of the Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) for each of the identified job positions
 - ✓ Status: Ongoing

New Site Findings

There were no new findings during the Biddeford Opportunity Center Final Periodic Assessment site visit.

Site Summary of Findings

Table 18 provides the count of total findings noted during the Initial and Periodic site visits to the Biddeford Opportunity Center. Details of all open and completed findings are provided in the POA&M.



Table 18: Site Summary of Findings - Biddeford

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Biddeford				
Security and Privacy	0	1	1	0
Contract Requirements	0	3	0	0
Service Delivery	0	7	2	0

Site Review Summary-Calais

A total of seven findings were identified since the Initial Assessment site visit to the Calais Opportunity Center on May 31, 2019. Monitoring and reporting on Calais’ efforts and progress in remediating the deficiencies has been ongoing since the Initial Assessment, and tracked in the POA&M. A total of six findings have been stuated as “Completed”, and one finding remains stuated as “Ongoing”.

A summary of the Calais Opportunity Center’s progress in remediating findings is provided below. Details and status of all findings and recommendations are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Calais site visit, CSG conducted interviews with members of the site and regional leadership team. Staff file, quality, case, and FCA reviews, as well as security walk throughs were completed. As part of the Periodic Assessments, CSG and Fedcap have reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm Calais’ plan of action updates. Additional recommendations were provided to help address “Ongoing” findings. The status of Fedcap’s remediation efforts and progress as of the Final Periodic Assessment follows.

Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

Six service delivery findings identified during the Initial site visit to the Calais Opportunity Center have been remediated and their statuses updated to “Completed”. These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.

One service delivery finding remains in a status of “Ongoing” as the Opportunity Center works to consistently incorporate labor market information into participant FCA and intake processes.



The status of the specific findings is as follows:

- Develop FCAs that are individualized to the specific participant, especially in the area of establishing SMART short and long term goals, as well as considering, including, and documenting labor market information
 - ✓ Status: Ongoing
- Notify participant who to contact when Fedcap staff leave the Opportunity Center
 - ✓ Status: Completed
- Updates to FCA based on participant’s changing circumstances, results, and goals
 - ✓ Status: Completed
- Ensure participants are notified of potential job opportunities
 - ✓ Status: Completed
- Accompany participants to job fairs and other external hiring events and document in the case management system
 - ✓ Status: Completed
- Obtain feedback from the WEP supervisor and use it to engage the participant in semi-monthly meetings that help develop work skills and habits to become prepared for paid employment
 - ✓ Status: Completed
- Weekly site case reviews to check for participant documentation receipts, as specified in the CAP, have not been implemented; and ensure participants are provided with documentation receipts for all documents and records submitted
 - ✓ Status: Completed

Site Summary of Findings

Table 19 provides the count of findings noted during the site visit to the Calais Opportunity Center. Details of all open and completed findings are provided in the POA&M.

Table 19: Site Summary of Findings - Calais

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Calais				
Security and Privacy	0	0	0	0
Contract Requirements	0	0	0	0
Service Delivery	0	6	1	0



Site Review Summary- Caribou

A total of four findings were identified since the Initial Assessment site visit to the Caribou Opportunity Center on May 29, 2019. Monitoring and reporting on Caribou's efforts and progress in remediating the deficiencies has been ongoing since the Initial Assessment, and tracked in the POA&M. All four of the findings have been statused as "Completed", following the Final Periodic Assessment.

A summary of the Caribou Opportunity Center's progress in remediating findings is provided below. Details and status of all findings and recommendations are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Caribou site visit, CSG conducted interviews with members of the site and regional leadership team. Staff file, quality, case, and FCA reviews, as well as security walk throughs were completed. As part of the Periodic Assessments, CSG and Fedcap have reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm Caribou's plan of action updates. Additional recommendations were provided to help address "Ongoing" findings. The status of Fedcap's remediation efforts and progress as of the Final Periodic Assessment follows.

Contract Requirements

Fedcap leadership and managers worked to remediate findings related to contract requirements. For the Caribou Opportunity Center, these findings were specific to the timely completion and documentation of employee supervision. Fedcap and the site addressed this finding through management re-training, revised employee development and feedback forms, and updated standard operating procedures and quality assurance audits.

The status of the specific finding is as follows:

- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated
- ✓ Status: Completed

Service Delivery

Service delivery-related findings have been and continue to be addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

All three of the service delivery findings identified during the Initial site visit to the Caribou Opportunity Center have been remediated and their statuses updated to "Completed". These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.

The status of the specific findings are as follows:



- Develop FCAs that are individualized to the specific participant, especially in the area of establishing SMART short and long term goals, as well as considering, including, and documenting labor market information
 - ✓ Status: Completed
- Ensure assessment information is collected and documented at the time of change in required categories, e.g. family structure, work history, financial status, or barriers
 - ✓ Status: Completed
- Document in the case notes that participants were provided with a copy of their FCA
 - ✓ Status: Completed

Site Summary of Findings

Table 20 provides the count of findings noted during the site visit to the Caribou Opportunity Center. Details of all open and completed findings are provided in the POA&M.

Table 20: Site Summary of Findings - Caribou

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Caribou				
Security and Privacy	0	0	0	0
Contract Requirements	0	1	0	0
Service Delivery	0	3	0	0

Site Review Summary- Ellsworth

A total of 11 findings were identified since the Initial Assessment site visit to the Ellsworth Opportunity Center on May 24, 2019. A Periodic Assessment site visit was conducted on August 2, 2019, in addition to continued monitoring of findings tracked in the POA&M, to assess progress in addressing the site’s open findings. A total of 10 findings have been stautused as “Completed” since the Initial Assessment was conducted, and one finding remains stautused as “Ongoing”.

A summary of the Ellsworth Opportunity Center’s progress in remediating findings is provided below. Details and status of all findings and recommendations are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Ellsworth site visits, CSG conducted follow up interviews with members of the site and regional leadership team. CSG and Fedcap reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm plan of action updates. Staff file, quality, case, and FCA reviews, as well as security walk throughs were completed and additional recommendations provided to help address “Ongoing” findings. The status of Fedcap’s remediation efforts and progress as of the Final Periodic Assessment follows.



Security and Privacy

Remediation of the Security and Privacy findings identified during the Initial Periodic Assessment were led by Fedcap HQ leadership. This included remediation of sensitive equipment that was not secured at the time of the Initial Assessment. Fedcap purchased and installed locking cabinets to secure the equipment at the five sites impacted by this finding. The Ellsworth location had the new cabinet installed on August 8, 2019.

The status of the specific finding for the Ellsworth site has been updated as follows:

- The Ellsworth Opportunity Center had sensitive equipment, specifically routers, switches, and cabling, that were not secured in a locked closet or cabinet
 - ✓ Status: Completed

Contract Requirements

Fedcap leadership and managers worked to remediate findings related to contract requirements. For the Ellsworth Opportunity Center, these findings included timely completion and documentation of employee supervisions and annual performance evaluations. Fedcap addressed these findings through management re-training, revised employee development and feedback forms, and updated standard operating procedures and quality assurance audits.

The status of the specific findings is as follows:

- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated, though it was noted that the feedback provided was specific and detailed
 - ✓ Status: Completed
- Completion and/or timely delivery of One Year Performance Evaluations could not be consistently demonstrated
 - ✓ Status: Completed

Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

Seven service delivery findings identified during the Initial and Periodic Assessment site visits to the Ellsworth Opportunity Center have been remediated and their statuses updated to “Completed”. These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.

One service delivery finding remains in a status of “Ongoing” as the Opportunity Center works to consistently incorporate labor market information into participant FCA and intake processes.

The status of the specific findings is as follows:



- Develop FCAs that are individualized to the specific participant, especially in the area of establishing SMART short and long term goals, as well as considering, including, and documenting labor market information
 - ✓ Status: Ongoing
- Ensure monthly case management is documented, to include case notes pertaining to participant’s progress, circumstances, and needs
 - ✓ Status: Completed
- Provide updates to the FCA based on participant’s changing circumstances, results, and goals
 - ✓ Status: Completed
- Ensure participant inquiries are followed up on within 24 hours, and documented
 - ✓ Status: Completed
- Review and arrange participant’s transportation, child care or other support services as necessary
 - ✓ Status: Completed
- Obtain feedback from the WEP supervisor and use it to engage the participant in semi-monthly meetings that help develop work skills and habits to become prepared for paid employment
 - ✓ Status: Completed
- Inform participants verbally and in writing as required, regarding transitional and job retention services available to them when they become employed
 - ✓ Status: Completed
- Document in the case notes that participants were provided with a copy of their FCA
 - ✓ Status: Completed

Site Summary of Findings

Table 21 provides the count of findings noted during the Initial and Periodic site visits to the Ellsworth Opportunity Center. Details of all open and completed findings are provided in the POA&M.

Table 21: Site Summary of Findings - Ellsworth

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Ellsworth				
Security and Privacy	0	1	0	0
Contract Requirements	0	2	0	0
Service Delivery	0	7	1	0



Site Review Summary- Farmington

A total of 13 findings were identified since the Initial Assessment site visit to the Farmington Opportunity Center on May 30, 2019. Follow up Periodic Assessment site visits were conducted on August 6, 2019, and on August 26, 2019, to assess progress in addressing the site's open findings. A total of 12 findings have been statused as "Completed" since the Initial Assessment was conducted, and one finding remains statused as "Ongoing".

A summary of the Farmington Opportunity Center's progress in remediating findings is provided below. Details and status of all findings and recommendations are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Farmington site visits, CSG conducted follow up interviews with members of the site and regional leadership team. CSG and Fedcap reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm plan of action updates. Staff file, quality, case, and FCA reviews, as well as security walk throughs were completed and additional recommendations provided to help address "Ongoing" findings. The status of Fedcap's remediation efforts and progress as of the Final Periodic Assessment follows.

Contract Requirements

Fedcap leadership and managers worked to remediate findings related to contract requirements. For the Farmington Opportunity Center, these findings included timely completion and documentation of employee supervisions and annual performance evaluations. Fedcap addressed these findings through management re-training, revised employee development and feedback forms, additional reporting, and updated standard operating procedures and quality assurance audits.

The status of the specific findings is as follows:

- Documentation could not be provided to consistently demonstrate that staff attended in-service trainings on career planning and scanning documents, as specified in the CAP
 - ✓ Status: Completed
- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated, though it was noted that the feedback provided was specific and detailed
 - ✓ Status: Completed
- Completion and/or timely delivery of One Year Performance Evaluations could not be consistently demonstrated
 - ✓ Status: Completed

Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees,



and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

Nine service delivery findings identified during the Initial and Periodic Assessment site visits to the Farmington Opportunity Center have been remediated and their statuses updated to “Completed”. These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements. One service delivery finding remains in a status of “Ongoing”, as the Opportunity Center works to consistently incorporate labor market information into participant FCAs.

One service delivery finding remains in a status of “Ongoing” as the Opportunity Center works to consistently incorporate labor information into participant FCA and intake processes.

The status of the specific findings is as follows:

- Develop FCAs that are individualized to the specific participant, especially in the area of establishing SMART short and long term goals, as well as considering, including, and documenting labor market information
 - ✓ Status: Ongoing
- Ensure assessment information is collected and documented at the time of change in required categories, e.g. family structure, work history, financial status, or barriers
 - ✓ Status: Completed
- Notify participant who to contact when Fedcap staff leave the Opportunity Center
 - ✓ Status: Completed
- Complete and document Job Readiness Self-Assessments with mock interviews conducted and feedback provided
 - ✓ Status: Completed
- Accompany participants to job fairs and other external hiring events and document in the case management system
 - ✓ Status: Completed
- Obtain feedback from the WEP supervisor and use it to engage the participant in semi-monthly meetings that help develop work skills and habits to become prepared for paid employment
 - ✓ Status: Completed
- Consistently monitor participant progress, to include off-site job search activities including job fairs and visiting career centers, and preparing and completing job applications
 - ✓ Status: Completed
- Document in the case notes that participants were provided with a copy of their FCA
 - ✓ Status: Completed
- Conduct weekly check-ins with the participant and employer every week for first 30 days and then monthly



- ✓ Status: Completed
- Ensure participants consistently receive receipts for documents submitted
- ✓ Status: Completed

Site Summary of Findings

Table 22 provides the count of findings noted during the initial and periodic site visits to the Farmington Opportunity Center. Details of all open and completed findings are provided in the POA&M.

Table 22: Site Summary of Findings - Farmington

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Farmington				
Security and Privacy	0	0	0	0
Contract Requirements	0	3	0	0
Service Delivery	0	9	1	0

Site Review Summary - Fort Kent

A total of seven findings were identified since the Initial Assessment site visit to the Fort Kent Opportunity Center on May 28, 2019. Monitoring and reporting on Fort Kent’s efforts and progress in remediating the deficiencies has been ongoing since the Initial Assessment, and tracked in the POA&M. All seven findings have been stasured as “Completed” following the Final Periodic Assessment site visit.

A summary of the Fort Kent Opportunity Center’s progress in remediating findings is provided below. Details and status of all findings and recommendations are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Fort Kent site visit, CSG conducted interviews with members of the site and regional leadership team. Staff file, quality, case, and FCA reviews, as well as security walk throughs were completed. As part of the Periodic Assessments, CSG and Fedcap have reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm Fort Kent’s plan of action updates. Additional recommendations were provided to help address “Ongoing” findings. The status of Fedcap’s remediation efforts and progress as of the Final Periodic Assessment follows.

Security and Privacy

Remediation of the Security and Privacy findings identified during the Initial Periodic Assessment were led by Fedcap HQ leadership. For Fort Kent, these findings specifically included the need to maintain emergency lighting within the Opportunity Center. The finding has been updated to a status of “Completed” as of September 3, 2019, with the installation of automatic emergency lighting and exit signs.

The status of the specific finding is as follows:



- The Fort Kent Opportunity Center did not employ and maintain automatic emergency lighting that activates in the event of a power outage
 - ✓ Status: Completed

Contract Requirements

Fedcap leadership and managers worked to remediate findings related to contract requirements. For the Fort Kent Opportunity Center, these findings included timely completion and documentation of employee supervision. Fedcap addressed these findings through management re-training, revised employee development and feedback forms, additional reporting, and updated standard operating procedures and quality assurance audits.

The status of the specific finding is as follows:

- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated
 - ✓ Status: Completed

Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

All five of the service delivery findings identified during the Initial and Periodic Assessment site visits to the Fort Kent Opportunity Center have been remediated and their statuses updated to “Completed”. These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.

The status of the specific findings is as follows:

- Obtain feedback from the WEP supervisor and use it to engage the participant in semi-monthly meetings that help develop work skills and habits to become prepared for paid employment
 - ✓ Status: Completed
- Inform participants verbally and in writing as required, regarding transitional and job retention services available to them when they become employed
 - ✓ Status: Completed
- Weekly site case reviews to check for participant documentation receipts, as specified in the CAP, have not been implemented; and ensure participants are provided with documentation receipts for all documents and records submitted
 - ✓ Status: Completed
- Document in the case notes that participants were provided with a copy of their FCA



- ✓ Status: Completed
- Ensure participants are scheduled to begin engaging in FCA activities within three business days of execution of the FCA
- ✓ Status: Completed

New Site Findings

There were no new findings during the Fort Kent Opportunity Center Final Periodic Assessment site visit.

Site Summary of Findings

Table 23 provides the count of findings noted during the site visit to the Fort Kent Opportunity Center. Details of all open and completed findings are provided in the POA&M.

Table 23: Site Summary of Findings - Fort Kent

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Fort Kent				
Security and Privacy	0	1	0	0
Contract Requirements	0	1	0	0
Service Delivery	0	5	0	0

Site Review Summary- Houlton

One finding was identified during the Initial Assessment site visit to the Houlton Opportunity Center on May 30, 2019. Monitoring and reporting on Houlton’s efforts and progress in remediating the deficiency continued since the Initial Assessment, and tracked in the POA&M. The finding has been remediated and the status updated to “Completed”.

A summary of the Opportunity Center’s progress in remediating the finding is provided below. Details and status of all findings and recommendations are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Houlton site visit, CSG conducted interviews with members of the site and regional leadership team. Staff file, quality, case, and FCA reviews, as well as security walk throughs were completed. As part of the Periodic Assessments, CSG and Fedcap have reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm Houlton’s plan of action updates. Additional recommendations were provided to help address the finding. The status of Fedcap’s remediation efforts and progress as of the Final Periodic Assessment follows.



Contract Requirements

Fedcap leadership and managers worked to remediate findings related to contract requirements. For the Houlton Opportunity Center, these findings included the timely completion and documentation of employee supervision. Fedcap and the Opportunity Center addressed this finding through management re-training, revised employee development and feedback forms, and updated standard operating procedures and quality assurance audits.

The status of the specific finding is as follows:

- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated
- ✓ Status: Completed

Site Summary of Findings

Table 24 provides the count of findings noted during the site visit to the Houlton Opportunity Center. Additional details for all findings are provided in the POA&M.

Table 24: Site Summary of Findings - Houlton

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Houlton				
Security and Privacy	0	0	0	0
Contract Requirements	0	1	0	0
Service Delivery	0	0	0	0

Site Review Summary- Lewiston

A total of 17 findings were identified since the Initial Assessment site visit to the Lewiston Opportunity Center on May 22, 2019. Periodic Assessment site visits were conducted on July 10, 2019 and August 27, 2019 to assess progress in addressing the site’s open findings. A total of 15 findings have been stautused as “Completed” since the Initial Assessment was conducted, and two findings remain stautused as “Ongoing”.

A summary of the Lewiston Opportunity Center’s progress in remediating findings is provided below. Details and status of all findings and recommendations are documented in Section 4: Detailed Findings and Recommendations, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Lewiston site visits, CSG conducted follow up interviews with members of the site and regional leadership team. CSG and Fedcap reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm plan of action updates. Staff file, quality, case, and FCA reviews, as well as security walk throughs were completed and additional recommendations provided to help address “Ongoing”



findings. The status of Fedcap's remediation efforts and progress as of the Final Periodic Assessment follows.

Security and Privacy

Remediation of the Security and Privacy findings identified during the Initial Periodic Assessment were led by Fedcap HQ leadership. Fedcap purchased 45 additional white noise machines and installed them in sites where there were opportunities identified to improve privacy and confidentiality. This finding for the Lewiston Opportunity Center was remediated with the purchase and installation of additional workstation partitions and reconfiguration of some participant and staff seating. In addition, Fedcap has provided information to OFI to conduct an assessment of additional updates and configuration changes that could be made to Fedcap offices that may further enhance participant privacy and confidentiality. Fedcap and OFI are currently discussing this option.

The finding regarding visibility of the waiting area from the front desk was remediated during a previous assessment, and the status updated to "Completed", with the installation of mirrors at the site.

The status of the specific findings is as follows:

- Concerns regarding workspaces were discussed, specifically the location and configuration of job developer and employment specialist workstations, and recommendations provided, to support participant confidentiality and privacy
 - ✓ Status: Completed
- There is limited clear view of the waiting area from the front desk. Participants, children, etc. may require the assistance of Fedcap staff (e.g., becoming ill, safety from other participants) or may engage in non-approved activities
 - ✓ Status: Completed

Contract Requirements

Fedcap and the Lewiston Opportunity Center leadership team worked to address two findings pertaining to timely completion and documentation of employee supervision, as well as annual employee evaluations. These findings were remediated through management re-training, revised employee development and feedback forms, additional reporting, and updated standard operating procedures and quality assurance audits. The status of the specific findings are as follows:

- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated
 - ✓ Status: Completed
- Completion and/or timely delivery of One Year Performance Evaluations could not be consistently demonstrated
 - ✓ Status: Completed

Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant



FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

Eleven service delivery findings identified during the Initial and Periodic Assessment site visits to the Lewiston Opportunity Center have been remediated and their statuses updated to “Completed”. These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.

Two service delivery findings remain in a status of “Ongoing” as the Opportunity Center works to consistently incorporate labor market and tax credit information into participant FCA and intake processes.

The status of the specific findings are as follows:

- Develop FCAs that are individualized to the specific participant, especially in the area of establishing SMART short and long term goals, as well as considering, including, and documenting labor market information
 - ✓ Status: Ongoing
- Document in the case notes that participants were provided with a copy of their FCA
 - ✓ Status: Completed
- Complete and/or document that intake and assessment consistently includes use of the Test of Adult Basic Education (TABE) and CareerScope tools
 - ✓ Status: Completed
- Ensure assessment information is collected and documented at the time of change in required categories, e.g. family structure, work history, financial status, or barriers
 - ✓ Status: Completed
- Notify participant who to contact when Fedcap staff leave the Opportunity Center
 - ✓ Status: Completed
- Ensure monthly case management is documented, to include case notes pertaining to participant’s progress, circumstances, and needs
 - ✓ Status: Completed
- Ensure participant inquiries are followed up on within 24 hours, and documented
 - ✓ Status: Completed
- Ensure participants are notified of potential job opportunities
 - ✓ Status: Completed
- Develop and execute Renewal FCA prior to the expiration of the current FCA
 - ✓ Status: Completed



- Inform participants verbally and in writing as required, regarding transitional and job retention services available to them when they become employed
 - ✓ Status: Completed
- Ensure participants are scheduled to begin engaging in required activities listed within their FCA within 3 business days of execution of the FCA
 - ✓ Status: Completed
- FCA contains required activities (Services to be Provided) appropriate for obtaining and retaining employment
 - ✓ Status: Completed
- Demonstrate that the three job positions of interest include estimates of the Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) for each of the identified job positions
 - ✓ Status: Ongoing

Site Summary of Findings

Table 25 provides the count of total findings noted during the Initial and Periodic site visits to the Lewiston Opportunity Center. Details of all open and completed findings are provided in the POA&M.

Table 25: Site Summary of Findings - Lewiston

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Lewiston				
Security and Privacy	0	2	0	0
Contract Requirements	0	2	0	0
Service Delivery	0	11	2	0

Site Review Summary- Machias

A total of two findings were identified since the Initial Assessment site visit to the Machias Opportunity Center on May 31, 2019. Monitoring and reporting on Machias’ efforts and progress in remediating the deficiencies has been ongoing since the Initial Assessment, and tracked in the POA&M. Both findings have been remediated and the statuses updated to “Completed”.

A summary of the Opportunity Center’s progress in remediating the findings is provided below. Details and status of all findings and recommendations are documented in Section 4: Detailed Findings and Recommendations, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Machias site visit, CSG conducted interviews with members of the site and regional leadership team. Staff file, quality, case, and FCA reviews, as well as security walk throughs were completed. As part of the Periodic Assessments, CSG and Fedcap have reviewed the POA&M, and reviewed documentation



and procedures as applicable to confirm Machias’ plan of action updates. Additional recommendations were provided to help address and resolve the findings. The status of Fedcap’s remediation efforts and progress as of the Final Periodic Assessment follows.

Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

The two Machias Opportunity Center findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.

The status of the specific findings is as follows:

- Weekly site case reviews to check for participant documentation receipts, as specified in the CAP, have not been implemented; and ensure participants are provided with documentation receipts for all documents and records submitted
 - ✓ Status: Completed
- Ensure participants are scheduled to begin engaging in required activities listed within their FCA within 3 business days of execution of the FCA
 - ✓ Status: Completed

Site Summary of Findings

Table 26 provides the count of findings noted during the site visit to the Machias Opportunity Center. Details of all findings are provided in the POA&M.

Table 26: Site Summary of Findings - Machias

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Machias				
Security and Privacy	0	0	0	0
Contract Requirements	0	0	0	0
Service Delivery	0	2	0	0

Site Review Summary- Rockland

A total of nine findings were identified since the Initial Assessment site visit to the Rockland Opportunity Center on May 23, 2019. A Periodic Assessment site visit was conducted on August 8, 2019, to assess



progress in addressing the site's open findings. A total of eight findings have been statused as "Completed" since the Initial Assessment was conducted, and one finding remains statused as "Ongoing".

A summary of the Rockland Opportunity Center's progress in remediating prior findings is provided below. Details and status of all findings and recommendations are documented in **Section 4: Detailed Findings and Recommendations**, and in the Plan of Action and Milestones (POA&M) report.

Site Summary of Remediation Efforts for Existing Findings

During the Rockland site visits, CSG conducted follow up interviews with members of the site and regional leadership team. CSG and Fedcap reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm plan of action updates. Staff file, quality, case, and FCA reviews, as well as security walk throughs were completed and additional recommendations provided to help address "Ongoing" findings. The status of Fedcap's remediation efforts and progress as of the Final Periodic Assessment follows.

Security and Privacy

Remediation of the Security and Privacy findings identified during the Initial Periodic Assessment were led by Fedcap HQ leadership. This includes remediation of sensitive equipment that was not secured at the time of the Initial Assessment. Fedcap purchased and installed locking cabinets to secure the equipment for the five sites impacted by this finding. The Rockland location had the new cabinet installed on August 13, 2019.

The status of the specific finding for the Rockland site is as follows:

- The Rockland Opportunity Center had sensitive equipment, specifically routers, switches, and cabling, that were not secured in a locked closet or cabinet
 - ✓ Status: Completed

Contract Requirements

Fedcap leadership and managers worked to remediate findings related to contract requirements. For the Rockland Opportunity Center, these findings included timely completion and documentation of employee supervisions and annual performance evaluations. Fedcap addressed these findings through management re-training, revised employee development and feedback forms, and updated standard operating procedures and quality assurance audits.

The status of the specific findings is as follows:

- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated, though it was noted that the feedback provided was specific and detailed
 - ✓ Status: Completed
- Completion and/or timely delivery of One Year Performance Evaluations could not be consistently demonstrated
 - ✓ Status: Completed



Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

Five service delivery findings identified during the Initial and Periodic Assessment site visits to the Rockland Opportunity Center have been remediated and their statuses updated to “Completed”. These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.

One service delivery findings remain in a status of “Ongoing” as the Opportunity Center works to consistently incorporate labor market information into participant FCA and intake processes.

The status of the specific findings is as follows:

- Develop FCAs that are individualized to the specific participant, especially in the area of establishing SMART short and long term goals, as well as considering, including, and documenting labor market information
 - ✓ Status: Ongoing
- Ensure participants are notified of potential job opportunities
 - ✓ Status: Completed
- Complete and document Job Readiness Self-Assessments with mock interviews conducted and feedback provided
 - ✓ Status: Completed
- Inform participants verbally and in writing as required, regarding transitional and job retention services available to them when they become employed
 - ✓ Status: Completed
- Document in the case notes that participants were provided with a copy of their FCA
 - ✓ Status: Completed
- Ensure participants are scheduled to begin engaging in required activities listed within their FCA within 3 business days of execution of the FCA
 - ✓ Status: Completed

Site Summary of Findings

Table 27 provides the count of findings noted during the Initial and Periodic site visits to the Rockland Opportunity Center. Details of all open and completed findings are provided in the POA&M.



Table 27: Site Summary of Findings - Rockland

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Rockland				
Security and Privacy	0	1	0	0
Contract Requirements	0	2	0	0
Service Delivery	0	5	1	0

Site Review Summary- Sanford

A total of 24 findings were identified since the Initial Assessment site visit to the Sanford Opportunity Center on May 28, 2019. Follow up Periodic Assessment site visits were conducted on July 12, 2019 and August 28, 2019 to assess progress in addressing the site’s open findings. A total of 22 findings have been statused as “Completed” since the Initial Assessment was conducted, and two findings remain statused as “Ongoing”.

A summary of the Sanford Opportunity Center’s progress in remediating findings is provided below. Details and status of all existing and new findings, including recommendations, are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Sanford site visits, CSG conducted follow up interviews with members of the site and regional leadership team. CSG and Fedcap reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm plan of action updates. Staff file, quality, case, and FCA reviews, as well as security walk throughs were completed and additional recommendations provided to help address “Ongoing” findings. The status of Fedcap’s remediation efforts and progress as of the Final Periodic Assessment follows.

Contract Requirements

Fedcap leadership and managers worked to remediate findings related to contract requirements. For the Sanford Opportunity Center, these findings include timely completion and documentation of employee supervision and annual performance evaluations. These two findings were remediated through management re-training, revised employee development and feedback forms, additional reporting, and updated standard operating procedures and quality assurance audits.

One finding related to a lack of documentation to demonstrate all staff received required training on scanning participant documents into the case management system was remediated with the re-training of all site staff during the prior Periodic Assessment in July. All three Contract Requirement findings reflect a status of “Completed” as noted below.

The status of the specific findings is as follows:

- Documentation could not be provided to consistently demonstrate that staff attended the latest in-service training on scanning documents, as specified in the CAP



- ✓ Status: Completed
- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated
- ✓ Status: Completed
- Completion and/or timely delivery of One Year Performance Evaluations could not be consistently demonstrated
- ✓ Status: Completed

Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

A total of 19 service delivery findings identified during the Initial and Periodic Assessment site visits to the Sanford Opportunity Center have been remediated and their statuses updated to “Completed”. These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.

Two service delivery findings remain in a status of “Ongoing” as the Opportunity Center works to consistently incorporate labor market and tax credit information into participant FCA and intake processes.

The status of the specific findings is as follows:

- Develop FCAs that are individualized to the specific participant, especially in the area of establishing SMART short and long term goals, as well as considering, including, and documenting labor market information
- ✓ Status: Ongoing
- Document in the case notes that participants were provided with a copy of their FCA
- ✓ Status: Completed
- Complete and/or document that intake and assessment consistently includes use of the TABE and/or CareerScope tools
- ✓ Status: Completed
- Ensure assessment information is collected and documented at the time of change in required categories, e.g. family structure, work history, financial status, or barriers
- ✓ Status: Completed
- Notify participant who to contact when Fedcap staff leave the Opportunity Center
- ✓ Status: Completed



- Updates to FCA based on participant's changing circumstances, results, and goals
 - ✓ Status: Completed
- Ensure participant inquiries are followed up on within 24 hours, and documented
 - ✓ Status: Completed
- Ensure participants are notified of potential job opportunities
 - ✓ Status: Completed
- Develop and execute Renewal FCA prior to the expiration of the current FCA
 - ✓ Status: Completed
- Complete and document Job Readiness Self-Assessments with mock interviews conducted and feedback provided
 - ✓ Status: Completed
- Accompany participants to job fairs and other external hiring events and document in the case management system
 - ✓ Status: Completed
- Consistently ensure the education and training activities provided are based on the participant's aspirations, intake and assessment results, and FCA
 - ✓ Status: Completed
- Obtain feedback from the WEP supervisor and use it to engage the participant in semi-monthly meetings that help develop work skills and habits to become prepared for paid employment
 - ✓ Status: Completed
- Complete and document weekly check-ins with the participant and employer for Subsidized/On-the-job Training occurred for first 30 days then monthly
 - ✓ Status: Completed
- Consistently monitor participant progress, to include off-site job search activities including job fairs and visiting career centers, and preparing and completing job applications
 - ✓ Status: Completed
- Weekly site case reviews to check for participant documentation receipts, as specified in the CAP, have not been implemented; and ensure participants are provided with documentation receipts for all documents and records submitted
 - ✓ Status: Completed
- FCA contains required activities (Services to be Provided) appropriate for obtaining and retaining employment
 - ✓ Status: Completed
- Inform participants via their preferred method of communication of their scheduled orientation, intake and assessment appointment 24-48 hours before appointment



- ✓ Status: Completed
- Reengage participants by telephone within 24 hours of non-compliance, to fulfill the first contact attempt
- ✓ Status: Completed
- Ensure participant requests for Good Cause are handled according to established policy and procedures
- ✓ Status: Completed
- Demonstrate that the three job positions of interest include estimates of the Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) for each of the identified job positions
- ✓ Status: Ongoing

Site Summary of Findings

Table 28 provides the count of total findings noted during the Initial and Periodic site visits to the Sanford Opportunity Center. Details of all open and completed findings are provided in the POA&M.

Table 28: Site Summary of Findings - Sanford

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Sanford				
Security and Privacy	0	0	0	0
Contract Requirements	0	3	0	0
Service Delivery	0	19	2	0

Site Review Summary- Skowhegan

A total of 14 findings were identified since the Initial Assessment site visit to the Skowhegan Opportunity Center on May 24, 2019. Periodic Assessments were conducted on August 5, August 26, and October 2, 2019 to assess progress in addressing the site’s open findings. A total of 12 findings have been stautused as “Completed” since the Initial Assessment was conducted, and two findings remain stautused as “Ongoing”.

A summary of the Skowhegan Opportunity Center’s progress in remediating findings is provided below. Details and status of all findings and recommendations are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the Skowhegan site visits, including the Final Periodic Assessment, CSG conducted follow up interviews with members of the site and regional leadership team. CSG and Fedcap reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm plan of action updates. Staff file, quality, case, and FCA reviews, as well as security walk throughs were completed and additional



recommendations provided to help address “Ongoing” findings. The status of Fedcap’s remediation efforts and progress as of the Final Periodic Assessment follows.

Security and Privacy

Remediation of the Security and Privacy findings identified during the Initial Periodic Assessment were led by Fedcap HQ leadership. This included remediation of sensitive equipment that was not secured at the time of the Initial Assessment. Fedcap purchased and installed locking cabinets to secure the equipment at the five sites impacted by this finding. The Skowhegan location had the new cabinet installed on August 21, 2019. The finding regarding visibility of the waiting area from the front desk was remediated in July and the status updated to “Completed”, with the installation of mirrors at the site.

The status of the specific findings is as follows:

- The Skowhegan Opportunity Center had sensitive equipment, specifically routers, switches, and cabling, that were not secured in a locked closet or cabinet
 - ✓ Status: Completed
- There was limited clear view of the waiting area from the front desk. Participants, children, etc. may require the assistance of Fedcap staff (e.g., becoming ill, safety from other participants) or may engage in non-approved activities
 - ✓ Status: Completed

Contract Requirements

Fedcap leadership and managers worked to remediate findings related to contract requirements. For the Skowhegan Opportunity Center, these findings included timely completion and documentation of employee supervisions and annual performance evaluations. Fedcap addressed these findings through management re-training, revised employee development and feedback forms, additional reporting, and updated standard operating procedures and quality assurance audits. The Skowhegan Site Manager has completed and administered all outstanding annual performance evaluations and that finding was updated to a status of “Completed” following the Third Periodic Assessment site visit.

One finding related to a lack of documentation to demonstrate that all staff received required training on scanning participant documents into the case management system was remediated with the re-training of all site staff during the prior Periodic Assessment conducted in July.

The status of the specific findings is as follows:

- Documentation could not be provided to consistently demonstrate that staff attended the latest in-service training on scanning documents, as specified in the CAP
 - ✓ Status: Completed
- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated, though it was noted that the feedback provided was specific and detailed
 - ✓ Status: Completed
- Completion and/or timely delivery of One Year Performance Evaluations could not be consistently demonstrated
 - ✓ Status: Completed



Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

Seven service delivery findings identified during the Initial and Periodic Assessment site visits to the Skowhegan Opportunity Center have been remediated and their statuses updated to “Completed”. These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.

Two service delivery findings remain in a status of “Ongoing” as the Opportunity Center works to consistently incorporate labor market and tax credit information into participant FCA and intake processes.

The status of the specific findings is as follows:

- Develop FCAs that are individualized to the specific participant, especially in the area of establishing SMART short and long term goals, as well as considering, including, and documenting labor market information
 - ✓ Status: Ongoing
- Ensure assessment information is collected and documented at the time of change in required categories, e.g. family structure, work history, financial status, or barriers
 - ✓ Status: Completed
- Notify participant who to contact when Fedcap staff leave the Opportunity Center
 - ✓ Status: Completed
- Obtain feedback from the WEP supervisor and use it to engage the participant in semi-monthly meetings that help develop work skills and habits to become prepared for paid employment
 - ✓ Status: Completed
- Document in the case notes that participants were provided with a copy of their FCA
 - ✓ Status: Completed
- The intake and assessment did not include completion of the TABE and CareerScope tools
 - ✓ Status: Completed
- Reengage participants via mailed letter within 24 hours of non-compliance, to fulfill the second contact attempt
 - ✓ Status: Completed
- Ensure participants consistently receive receipts for documents submitted
 - ✓ Status: Completed



- Demonstrate that the three job positions of interest include estimates of the Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) for each of the identified job positions
 - ✓ Status: Ongoing

New Site Findings

There were no new findings during the Skowhegan Opportunity Center Final Periodic Assessment site visit.

Site Summary of Findings

Table 29 provides the count of findings noted during the Initial and Periodic site visits to the Skowhegan Opportunity Center, and their current status. Details of all open and completed findings are provided in the POA&M.

Table 29: Site Summary of Findings - Skowhegan

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Skowhegan				
Security and Privacy	0	2	0	0
Contract Requirements	0	3	0	0
Service Delivery	0	7	2	0

Site Review Summary- South Paris

A total of seven findings were identified since the Initial Assessment site visit to the South Paris Opportunity Center on May 23, 2019. Monitoring and reporting on South Paris’ efforts and progress in remediating the deficiencies has been ongoing since the Initial Assessment, and tracked in the POA&M. All seven findings have been stasured as “Completed” following the final periodic assessment.

A summary of the South Paris Opportunity Center’s progress in remediating findings is provided below. Details and status of all findings and recommendations are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the South Paris site visit, CSG conducted interviews with members of the site and regional leadership team. Staff file, quality, case, and FCA reviews, as well as a security walk through was completed. As part of the Periodic Assessments, CSG and Fedcap have reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm South Paris’ plan of action updates. Additional recommendations were provided to help address “Ongoing” findings. The status of Fedcap’s remediation efforts and progress as of the Final Periodic Assessment follows.



Security and Privacy

Remediation of the Security and Privacy findings identified during the Initial Periodic Assessment were led by Fedcap HQ leadership. For South Paris, these specifically included a finding regarding the lack of visibility of the waiting area from the front desk. This finding was remediated in August and the status updated to “Completed”, with the installation of mirrors at the site.

The status of the specific finding is as follows:

- There is limited clear view of the waiting area from the front desk. Participants, children, etc. may require the assistance of Fedcap staff (e.g., becoming ill, safety from other participants) or may engage in non-approved activities
 - ✓ Status: Completed

Contract Requirements

Fedcap leadership and managers worked to remediate findings related to contract requirements. For the South Paris Opportunity Center, these findings included timely completion and documentation of employee supervision. Fedcap addressed these findings through management re-training, revised employee development and feedback forms, additional reporting, and updated standard operating procedures and quality assurance audits.

One finding related to a lack of documentation to demonstrate all staff received required training on scanning participant documents into the case management system was remediated with the re-training of all site staff. The status of the finding was updated to “Completed”.

The status of the specific findings is as follows:

- Documentation could not be provided to consistently demonstrate that staff attended the latest in-service training on scanning documents, as specified in the CAP
 - ✓ Status: Completed
- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated
 - ✓ Status: Completed

Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

Four service delivery findings identified during the Initial site visit to the South Paris Opportunity Center have been remediated and their statuses updated to “Completed”. These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.



The status of the specific findings are as follows:

- Ensure assessment information is collected and documented at the time of change in required categories, e.g. family structure, work history, financial status, or barriers
 - ✓ Status: Completed
- Notify participant who to contact when Fedcap staff leave the Opportunity Center
 - ✓ Status: Completed
- Ensure participants are notified of potential job opportunities
 - ✓ Status: Completed
- Document in the case notes that participants were provided with a copy of their FCA
 - ✓ Status: Completed

Site Summary of Findings

Table 30 provides the count of findings noted during the site visit to the South Paris Opportunity Center. Details of all open and completed findings are provided in the POA&M.

Table 30: Site Summary of Findings - South Paris

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
South Paris				
Security and Privacy	0	1	0	0
Contract Requirements	0	2	0	0
Service Delivery	0	4	0	0

Site Review Summary- South Portland

A total of 18 findings were identified since the Initial Assessment site visit to the South Portland Opportunity Center on May 21, 2019, including one new finding identified during this most recent assessment. Periodic Assessments were conducted on July 9, August 30, and October 4, 2019, to assess progress in addressing the site’s open findings. Thirteen findings have been moved to a status of “Completed” since the Initial Assessment was conducted, and five findings remain stautused as “Ongoing”.

A summary of the South Portland Opportunity Center’s progress and results in remediating findings is provided below. Details and status of all existing and new findings, including recommendations, are documented in **Section 4: Detailed Findings and Recommendations**, and in the POA&M.

Site Summary of Remediation Efforts for Existing Findings

During the South Portland site visits, CSG conducted follow up interviews with members of the site and regional leadership team. CSG and Fedcap reviewed the POA&M, and reviewed documentation and procedures as applicable to confirm plan of action updates. Staff file, quality, case, and FCA reviews, as



well as security walkthroughs were completed and additional recommendations provided to help address “Ongoing” findings. The status of Fedcap’s remediation efforts and progress as of the Final Periodic Assessment follows.

Security and Privacy

Remediation of the Security and Privacy findings identified during the Initial Periodic Assessment were led by Fedcap HQ leadership. Fedcap purchased 45 additional white noise machines and installed them in sites where there were opportunities identified to improve privacy and confidentiality. Some reconfiguration of participant and staff seating was completed within the Opportunity Center. In addition, Fedcap has provided information to OFI to conduct an assessment of additional updates and configuration changes that could be made to Fedcap offices that may further enhance participant privacy and confidentiality. Fedcap and OFI are currently discussing this option.

The status of the specific Security and Privacy finding for the South Portland site is as follows:

- Concerns related to the configuration of office workspaces were discussed, specifically as they relate to the configuration and proximity of some case management staff to support participant confidentiality and privacy
 - ✓ Status: Ongoing

Contract Requirements

Fedcap leadership and managers have worked to remediate findings related to contract requirements. For the South Portland Opportunity Center, these findings included timely completion and documentation of employee supervisions and annual performance evaluations. Fedcap has addressed these findings through management re-training, revised employee development and feedback forms, additional reporting, and updated standard operating procedures and quality assurance audits. The South Portland Site Manager and Site Supervisor completed and administered all outstanding annual performance evaluations and that finding was updated to a status of “Completed” following the Third Periodic Assessment site visit.

A second finding, pertaining to completion and documentation of employee supervision, was successfully addressed and updated to a status of “Completed” during the Final Periodic Assessment site visit.

The status of the specific findings is as follows:

- Completion and documentation of weekly or bi-weekly supervision could not be consistently demonstrated
 - ✓ Status: Completed
- Completion and/or timely delivery of One Year Performance Evaluations could not be consistently demonstrated
 - ✓ Status: Completed

Service Delivery

Service delivery-related findings have been addressed as Fedcap works to implement the recommendations made during the Initial and subsequent Periodic Assessments. These findings impact how and when services are delivered to participants, and the development and execution of participant



FCAs. To address these opportunities, Fedcap has provided additional training and tools to its employees, and implemented additional oversight and monitoring procedures. Fedcap leadership implemented a system enhancement to support staff in delivering more individualized participant FCAs.

A total of 11 service delivery findings identified during the Initial and Periodic site visits to the South Portland Opportunity Center have been remediated and their statuses updated to “Completed”. These findings were remediated through employee re-training, clarification and communication to staff regarding expectations, and implementation of additional reporting, process controls, quality assurance reviews, and system enhancements.

A total of four service delivery findings remain in a status of “Ongoing” as the Opportunity Center works to consistently incorporate labor market and tax credit information into participant FCA and intake processes, consistently complete participant reengagement outreaches timely, and assure required activities appropriate for supporting the participant in obtaining and retaining employment are included in the FCA.

The status of the specific findings are as follows:

- Develop FCAs that are individualized to the specific participant, especially in the area of establishing SMART short and long term goals, as well as considering, including, and documenting labor market information
 - ✓ Status: Ongoing
- Document in the case notes that participants were provided with a copy of their FCA
 - ✓ Status: Completed
- Ensure participants are scheduled to begin engaging in FCA activities within three business days of execution of the FCA
 - ✓ Status: Completed
- FCA contains required activities (Services to be Provided) appropriate for obtaining and retaining employment
 - ✓ Status: Completed
- FCA reflects each individual participant’s preferences and abilities to the extent that they conform to the goal of the program to help participants gain employment and to the extent that those preferences conform to any other applicable program rules.
 - ✓ Status: Completed
- Participant was timely engaged in an appropriate activity after completing orientation
 - ✓ Status: Completed
- A Work Agreement was executed for the participant
 - ✓ Status: Completed
- The intake and assessment did not include completion of the TABE and CareerScope tools
 - ✓ Status: Completed



- Conduct and document monthly case management services, via in person meetings, telephone calls, and/or e-mail correspondence
 - ✓ Status: Completed
- Ensure an appropriate set of education and training activities are provided, based upon the participant’s intake and assessment results, FCA development or renewal, aspirations, or other social determinants
 - ✓ Status: Completed
- Ensure participants are provided with documentation receipts for all documents and records submitted
 - ✓ Status: Completed
- Demonstrate that the three job positions of interest include estimates of the Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) for each of the identified job positions
 - ✓ Status: Ongoing
- Notify participant who to contact when Fedcap staff leave the Opportunity Center
 - ✓ Status: Completed
- Reengage participants by telephone within 24 hours of non-compliance, to fulfill the first contact attempt
 - ✓ Status: Ongoing

New Site Findings

- **FCA and Case Reviews**
 - ✓ Ensure FCA contains required activities (Services to be Provided) appropriate for obtaining and retaining employment

Site Summary of Findings

Table 31 provides the count of total findings noted during the Initial and Periodic site visits to the South Portland Opportunity Center. Details of all open and completed findings are provided in the POA&M.

Table 31: Site Summary of Findings - South Portland

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
South Portland				
Security and Privacy	0	0	1	0
Contract Requirements	0	2	0	0
Service Delivery	1	11	3	0



8. APPENDIX C: PLAN OF ACTION AND MILESTONES SUMMARY

This section contains a summary of the Initial and Periodic Assessment findings by status. An electronic copy of the POA&M has been provided separately.

Plan of Action and Milestones Site Summary

Table 32: Plan of Action and Milestones Site Summary provides the count and the status of findings by Fedcap site and by assessment category, identified during the Initial, First, Second, Third, and Final Periodic Assessments. A total of 40 global and site findings were moved to a status of “Completed” during the Final Periodic Assessment period. Of the 40 closed findings, 22 were for sites visited during this Periodic Assessment. An additional 18 findings were stasured as “Completed” based on validation completed through discussion with Fedcap leadership and review of documentation provided. A total of one “New” finding was identified while conducting site visits during the Final Assessment.

Table 32: Plan of Action and Milestones Site Summary

Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Fedcap Maine HQ/Global Findings Combined				
Security and Privacy	0	1	1	0
Contract Requirements	0	5	2	0
Service Delivery	0	6	1	0
Augusta				
Security and Privacy	0	0	1	0
Contract Requirements	0	1	0	0
Service Delivery	0	7	0	0
Bangor				
Security and Privacy	0	1	1	0
Contract Requirements	0	2	0	0
Service Delivery	0	8	0	0
Biddeford				
Security and Privacy	0	1	1	0
Contract Requirements	0	3	0	0
Service Delivery	0	7	2	0



Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Calais				
Security and Privacy	0	0	0	0
Contract Requirements	0	0	0	0
Service Delivery	0	6	1	0
Caribou				
Security and Privacy	0	0	0	0
Contract Requirements	0	1	0	0
Service Delivery	0	3	0	0
Ellsworth				
Security and Privacy	0	1	0	0
Contract Requirements	0	2	0	0
Service Delivery	0	7	1	0
Farmington				
Security and Privacy	0	0	0	0
Contract Requirements	0	3	0	0
Service Delivery	0	9	1	0
Fort Kent				
Security and Privacy	0	1	0	0
Contract Requirements	0	1	0	0
Service Delivery	0	5	0	0
Houlton				
Security and Privacy	0	0	0	0
Contract Requirements	0	1	0	0
Service Delivery	0	0	0	0
Lewiston				
Security and Privacy	0	2	0	0
Contract Requirements	0	2	0	0
Service Delivery	0	11	2	0
Machias				



Category	New Findings	Completed Findings	Existing Findings	
			Ongoing	Delayed
Security and Privacy	0	0	0	0
Contract Requirements	0	0	0	0
Service Delivery	0	2	0	0
Rockland				
Security and Privacy	0	1	0	0
Contract Requirements	0	2	0	0
Service Delivery	0	5	1	0
Sanford				
Security and Privacy	0	0	0	0
Contract Requirements	0	3	0	0
Service Delivery	0	19	2	0
Skowhegan				
Security and Privacy	0	2	0	0
Contract Requirements	0	3	0	0
Service Delivery	0	7	2	0
South Paris				
Security and Privacy	0	1	0	0
Contract Requirements	0	2	0	0
Service Delivery	0	4	0	0
South Portland				
Security and Privacy	0	0	1	0
Contract Requirements	0	2	0	0
Service Delivery	1	11	3	0



9. APPENDIX D: HQ INTERVIEW QUESTIONS DOCUMENT

Fedcap Maine HQ - Interview Questions

This document contains interview questions for the ASPIRE-TANF Third Party Assessment. There are proposed demonstrations or tests that may be conducted as evidence, and a list of possible respondents for the question. The questions are broken into three categories, sub-categories, and then the individual questions.

Contractual Requirements

Staffing, Training, and Continuous Improvement

Table 33: Staffing, Training, and Continuous Improvement

Item #	Interview Questions	Demonstrations / Tests
Staff Training		
A-CR-SQTC-Q-001 ➤ Director of Training	<ul style="list-style-type: none"> ➤ What is the process to identify training gaps and provide the necessary follow up training to address those gaps? How are the following used in the process? <ul style="list-style-type: none"> ✓ Training Evaluation Form ✓ Quarterly Training Report ✓ CQI Training Intervention Form 	Demonstrate the mechanism(s) used to identify and fill identified training gaps.
A-CR-SQTC-Q-002 ➤ Director of Training	<p>Describe how the Direct Care / Clinical Staff additionally complete the Fedcap administered training and does the training include the following:</p> <ul style="list-style-type: none"> ➤ Working with populations with serious mental health conditions ➤ Overview of the top-ten, most-prevalent, medical diagnoses ➤ Linking participants receiving Intensive Care Management to community-based organizations ➤ Monitoring the clinical progress of participants receiving Intensive Care Management ➤ Disability services overview ➤ Core components of Cognitive Behavioral Therapy (CBT) 	Demonstrate how the training and required attendance are tracked and managed.
A-CR-SQTC-Q-003 ➤ Director of Training	<ul style="list-style-type: none"> ➤ What is the status of the following additional or ongoing quality training? (CAP) <ul style="list-style-type: none"> ✓ Training to case management staff on thoughtful career planning incorporating assessment results 	<ul style="list-style-type: none"> ➤ Demonstrate how the quality trainings are managed. ➤ Provide tracking of who has not yet attended required



Item #	Interview Questions	Demonstrations / Tests
	<p>and labor market information to assure FCAs are individualized</p> <ul style="list-style-type: none"> ✓ In-service/refresher trainings for all new and current staff members on Fedcap’s Standard Operating Procedures (SOPs) relevant to Confidentiality protocol and Customer Service Training module ✓ In-service training for Case Managers on SOPs and OFI policies related to Good Cause ✓ Tailored continuous training to case managers on phone etiquette, set up of desk phones and 24-hour timeframe for follow up <ul style="list-style-type: none"> ➤ What is the plan for ongoing monitoring to ensure compliance? 	<p>trainings and plan to achieve 100%.</p> <ul style="list-style-type: none"> ➤ Provide a copy of the FCA training to case management staff.
A-CR-SQTC-Q-004 ➤ Director of Training	How is training effectiveness measured and what metrics are used?	Demonstrate how training effectiveness is measured.
Staff Continuous Improvement		
A-CR-SQTC-Q-005 ➤ Executive Director ➤ Director of Operations	<ul style="list-style-type: none"> ➤ How are expectations established and documented to measure individual performance? <ul style="list-style-type: none"> ✓ What is measured? ✓ Does it include customer service? ➤ How do you provide staff ongoing and timely feedback regarding their performance and opportunities for improvement? 	<ul style="list-style-type: none"> ➤ Provide samples of measurements used. ➤ Review applicable policies and procedures.

Key Performance Indicators

Table 34: Key Performance Indicators

Item #	Interview Questions	Demonstrations / Tests
A-CR-KPI-Q-001 ➤ Executive Director ➤ Director of Operations	<p>Describe the administrative corrective actions taken when the following KPIs are not met for the following:</p> <ul style="list-style-type: none"> ➤ 50% of all participants will achieve their mandatory work requirements (% of families meeting Work Participation Rate (WPR) ➤ 90% of new referrals are engaged within the time frames set out in Section (IV)(C)(1)(c) ➤ 30% of applicants and participants are employed 	Demonstrate the mechanism(s) used to implement corrective actions.



Item #	Interview Questions	Demonstrations / Tests
A-CR-KPI-Q-002 ➤ Executive Director ➤ Director of Operations	<p>Explain the process for reporting and tracking the performance of each Opportunity Center in achieving the contractual KPIs.</p> <ul style="list-style-type: none"> ➤ What corrective action steps are taken when an Opportunity Center is not achieving the KPIs? 	Provide management reporting that tracks Opportunity Center and overall Fedcap results against each of the KPIs.

Reports – Interview Questions

Table 35: Reports – Interview Questions

Item #	Interview Questions	Demonstrations / Tests
A-CR-RPT-Q-001 ➤ Director of Operations	<p>Are the mandatory reports, including the following, generated according to the required due dates and frequency?</p> <ul style="list-style-type: none"> ➤ Monthly Activity Report <ul style="list-style-type: none"> ✓ Due fifteen (15) days following the last day of each Agreement calendar month ➤ Monthly Participation Report <ul style="list-style-type: none"> ✓ Due fifteen (15) days following the last day of each Agreement calendar month ➤ Quarterly Performance Report <ul style="list-style-type: none"> ✓ Due thirty (30) days following the last day of each quarter ➤ Quarterly Report of Revenue <ul style="list-style-type: none"> ✓ Due thirty (30) days following the last day of each quarter (except for the final quarterly report which is due sixty (60) days following the close of the Agreement period) ➤ Agreement Closeout Report <ul style="list-style-type: none"> ✓ Due sixty (60) days following the close of the Agreement period 	Review the mechanism used to track and ensure reports are produced and delivered timely as required by the contract.
A-CR-RPT-Q-002 ➤ Director of Operations	<p>Are there alerts to note delays in report delivery to the Department?</p>	Demonstrate applicable alerts.



Service Delivery

Eligibility Determination Interview Questions

Table 36: Eligibility Determination Interview Questions

Item #	Interview Questions	Demonstrations / Tests
A-SD-ELIG-Q-001 ➤ Director of Operations	Are orientation materials approved by the Department in writing prior to their use by Fedcap staff and prior to dissemination or publication?	Review a copy of the Department’s written approval of orientation materials.

Services to Be Provided Interview Questions

Table 37: Services to Be Provided Interview Questions

Item #	Interview Questions	Demonstrations / Tests
SNAP to Work Accelerated Transition (SWAT)		
A-SD-STBP-Q-001 ➤ Director of Employment Services	Describe the status and activities of the SNAP to Work Accelerated Transition (SWAT) proof of concept pilot.	Demonstrate SWAT program participants are being included and served.
Job Readiness Course		
A-SD-STBP-Q-002 ➤ Director of Employment Services	Describe how participants are granted access to 240 hours of varying online job preparedness modules and skills training that is accessible from remote locations such as the participant’s home.	Demonstrate access to the modules and skills training.
Employer Outreach and Research		
A-SD-STBP-Q-003 ➤ Director of Employment Services	Describe the process used to develop relationships with Maine employers individually, and as part of employer stakeholder groups. Activities may include but are not limited to the following: <ul style="list-style-type: none"> ➤ Make cold calls to Maine employers ➤ Attend and accompany participants local and regional job fairs and hiring events ➤ Research and identify new and existing Maine labor market opportunities and job postings ➤ Contact and network with community-based organizations, commerce associations, faith-based institutions, and job recruiters 	Demonstrate the mechanism(s) used to track efforts, including initiatives pursued and results.



Item #	Interview Questions	Demonstrations / Tests
A-SD-STBP-Q-004 ➤ Director of Employment Services	Describe the reasonable efforts to engage with businesses that will hire science, technology, engineering, and math-trained participants.	Demonstrate the mechanism(s) used to track this effort and provide examples from the past 60 days.
A-SD-STBP-Q-005 ➤ Director of Employment Services	<ul style="list-style-type: none"> ➤ Describe how Fedcap analyzes Maine’s labor market trends and job market information. ➤ Trends and information shall include but are not limited to the following: <ul style="list-style-type: none"> ✓ Hiring trends ✓ Application and interview process information ✓ Employer needs ✓ Occupations in demand ✓ Education required for occupations ✓ Expected job growth ✓ Employment opportunities 	Demonstrate the mechanism(s) used to analyze labor market trends and job market information, and how it is applied to support individual participant’s job search.
A-SD-STBP-Q-006 ➤ Director of Employment Services	Are open positions posted to the Fedcap website?	Demonstrate the Fedcap website’s open positions.
Education and Training		
A-SD-STBP-Q-007 ➤ Director of Employment Services	Do participants have access to at least 3,000 course modules across a variety of industry sectors?	Demonstrate access to the courses
A-SD-STBP-Q-008 ➤ Director of Employment Services	Describe the short-term occupation training for high-demand occupations.	Demonstrate the mechanism(s) used to track the participant’s occupational training (up to 112 hours) for high-demand occupations.
Volunteer Work and Community Service		
A-SD-STBP-Q-009 ➤ Director of Employment Services	<ul style="list-style-type: none"> ➤ Describe the process to execute agreements with each of the partnering agencies that are developed as volunteer work and community service sites for participants. ➤ Do the partnering agencies: <ul style="list-style-type: none"> ✓ Complete monthly performance reviews to assess participants’ progress? 	<ul style="list-style-type: none"> ➤ Demonstrate mechanism(s) used to develop and track agreements. ➤ Review examples of the monthly performance reviews.



Item #	Interview Questions	Demonstrations / Tests
	<ul style="list-style-type: none"> ✓ Provide feedback to Fedcap and participants regarding the process and activities performed? ✓ Is the feedback used to engage participant participants in semi-monthly meetings? ➤ What is the status of conducting these activities off-site versus on-site at Fedcap? 	<ul style="list-style-type: none"> ➤ Demonstrate the mechanism(s) used to track feedback to Fedcap and participants on the activities performed.
Job Retention Services		
A-SD-STBP-Q-010 ➤ Director of Employment Services	Describe the process to coordinate, host, and facilitate participant peer-to-peer and job retention sessions on weekends and outside traditional work hours for participants receiving TANF benefits and after TANF closure.	Provide examples of sessions completed on weekends in the past 60 days by Opportunity Center.

Quality

Table 38: Quality

Item #	Interview Questions	Demonstrations / Tests
Services and Plan (Family Contract Amendment-FCA) Development are not Individualized		
A-SD-QUAL-Q-001 ➤ Executive Director	What is the status of the Executive Director revising expectations for case management to place greater emphasis on tailoring services in program guidebook and SOPs?	Provide the revised SOPs.
A-SD-QUAL-Q-002 ➤ Director of Operations	What is the status of creating a Quick Reference Guide and making it available to all staff?	Provide a copy of the Quick Reference Guide.
A-SD-QUAL-Q-003 ➤ Executive Director	What is the status of the Regional Directors monitoring QA review findings on a bi-weekly basis and providing feedback to Supervisors? <ul style="list-style-type: none"> ➤ Is the report summarizing findings being received by the Executive Director? ➤ What if any changes in policy, procedures, or training have resulted in the reports? 	Provide summary audit results; confirm staff feedback delivered.
Customer Service: Sensitivity, Confidentiality, and Professionalism		
A-SD-QUAL-Q-004 ➤ Executive Director	<ul style="list-style-type: none"> ➤ How is customer service measured? ✓ What are your key performance metrics? ➤ What Quality Assurance monitoring or oversight is in place to assure appropriate and professional 	Demonstrate how this expectation is measured and provide policies and procedures that support Quality Assurance.



Item #	Interview Questions	Demonstrations / Tests
<ul style="list-style-type: none"> ➤ Director of Operations 	<p>communications and customer service are consistently provided?</p> <ul style="list-style-type: none"> ✓ What elements are regularly monitored? 	
<p>A-SD-QUAL-Q-005</p> <ul style="list-style-type: none"> ➤ Executive Director ➤ Director of Operations 	<ul style="list-style-type: none"> ➤ Have customer service policies and procedures been documented that include clear service standards and metrics? ✓ What Quality Assurance monitoring or oversight is in place to assure appropriate and professional communications and customer service are consistently provided? 	<p>Demonstrate how this expectation is measured.</p>
<p>A-SD-QUAL-Q-006</p> <ul style="list-style-type: none"> ➤ Director of Operations 	<p>How is the “appropriate level of empathy, sensitivity and professional tone” measured when providing service to participants in person, over the phone, and/or through e-mail communications?</p>	<p>Provide documentation of how this is measured.</p>
<p>A-SD-QUAL-Q-007</p> <ul style="list-style-type: none"> ➤ Director of Operations 	<ul style="list-style-type: none"> ➤ What is the status of the paper and electronic participant satisfaction survey? ✓ How do you get these surveys to participants and how often? ✓ How are the survey results tracked and used to improve quality of service? ➤ What gaps and areas needing process improvement have been identified as a result of the surveys? 	<p>Review copies of participant survey summaries and demonstrate how the feedback was used to drive service improvement.</p>
<p>A-SD-QUAL-Q-008</p> <ul style="list-style-type: none"> ➤ Executive Director ➤ Director of Operations 	<ul style="list-style-type: none"> ➤ What is the status of implementing a Quality Improvement workgroup? ✓ What improvement opportunities have been identified? 	<p>Share meeting minutes and key initiatives identified.</p>
<p>Responsiveness to Participants</p>		
<p>A-SD-QUAL-Q-009</p> <ul style="list-style-type: none"> ➤ Executive Director ➤ Director of Operations 	<ul style="list-style-type: none"> ➤ What is the status of the following quality initiatives to improve responsiveness to participants? ✓ Bi-weekly phone and e-mail audits to ensure all staff have proper voicemail and e-mail messaging and respond within 24 hours ✓ Implementation of Documentation Receipt Form process ✓ Creation and dissemination of a “Did You Know” flyer to participants 	<ul style="list-style-type: none"> ➤ Provide results of bi-weekly phone and e-mail audits that are shared with Fedcap leadership on a monthly basis ✓ Provide a copy of the flyer
<p>Good Cause</p>		



Item #	Interview Questions	Demonstrations / Tests
A-SD-QUAL-Q-010 ➤ Executive Director	<p>What is the status of the bi-weekly QA “Good Cause” review summary report produced by the Regional Directors and sent to the Executive Director?</p> <ul style="list-style-type: none"> ➤ What if any changes in policy, procedures, or training have resulted from the reports and new procedures? ➤ How is improvement in this area being measured? 	Review the bi-weekly summary report and the Director of Operations’ quarterly report on utilization of Good Cause being distributed to leadership.

Security and Privacy

Security Questions

These security controls are derived from Volume III: Catalog of Minimum Acceptable Risk Security and Privacy Controls of the MARS-E v2.0 document suite, other security requirements cited in the APSIRE-TANF contract between OFI and Fedcap, and other federal and State of Maine regulations.

The MARS-E controls are built upon the NIST SP 800-53r4 control suite.

The questions address the security controls families, although a few specific controls are referenced to provide clarity. These security controls address federal regulations (e.g., HIPAA).

The purpose of the security controls is to protect the confidentiality of the participant informational assets and other sensitive information. In addition, security controls protect the integrity of the data collection and the availability of the informational assets.

Table 39: Security Questions

Item #	Interview Questions	Demonstrations / Tests
A-SP-SEC-Q-001 ➤ Director of Operations ➤ Human Resource Manager ➤ Director of Systems, Data, and IT	<p>Rules of Behavior –</p> <p>Describe how the following are addressed:</p> <ul style="list-style-type: none"> ➤ Establishes and makes readily available to individuals requiring access to the information system the rules that describe their responsibilities and expected behavior (e.g., social media usage, non-disclosure clause, no sharing of computer ids/passwords, computer ids/passwords are kept secured, no sharing logged in computers) with regard to information and information system usage ➤ Receives an acknowledgment (paper or electronic) from such individuals, indicating that they have read, understand, and agree to abide by the rules of behavior before authorizing access to information and the information system 	Review with assessors a copy of the Rules of Behavior
A-SP-SEC-Q-002 Director of Operations	<p>Access Controls</p> <ul style="list-style-type: none"> ➤ Account Management <ul style="list-style-type: none"> ✓ Describe how access and use of PII and PHI is based on employee roles ➤ Access Enforcement 	



Item #	Interview Questions	Demonstrations / Tests
<ul style="list-style-type: none"> ➤ Director of Systems, Data, and IT 	<ul style="list-style-type: none"> ✓ Do computers and information system(s) with access to PII and PHI enforce approved authorizations for logical access (e.g., user id/password) to information and system resources in accordance with applicable access control policies ➤ Unsuccessful Logon Attempts <ul style="list-style-type: none"> ✓ Do computers and information system(s) with access to PII and PHI log unsuccessful logon attempts? ➤ Session Lock <ul style="list-style-type: none"> ✓ Do information system(s) with access to PII and PHI prevents further access to the system by initiating a session lock after fifteen (15) minutes of inactivity or upon receiving a request from a user? ➤ Session Termination <ul style="list-style-type: none"> ✓ Do computers and information system(s) with access to PII and PHI automatically terminates a user session after fifteen (15) minutes of inactivity? 	
<p>A-SP-SEC-Q-003 Director of Operations</p> <ul style="list-style-type: none"> ➤ Director of Systems, Data, and IT ➤ Director of Training 	<p>Awareness and Training</p> <ul style="list-style-type: none"> ➤ Security Awareness Training <ul style="list-style-type: none"> ✓ Describe the security awareness training plan. ✓ When is security training required and how often? ➤ Role-Based Security Training <ul style="list-style-type: none"> ✓ Describe the security training provided based upon a user’s role(s). ➤ Security Training Records <ul style="list-style-type: none"> ✓ Describe how training records are managed, and that each workforce member satisfactorily completed periodic training. 	
<p>A-SP-SEC-Q-004 Director of Operations</p> <ul style="list-style-type: none"> ➤ Director of Systems, Data, and IT 	<p>Audit and Accountability</p> <ul style="list-style-type: none"> ➤ Audit Events <ul style="list-style-type: none"> ✓ What type of audit events logged (e.g., login attempts, data exfiltration, elevated privileges)? ➤ Audit Review, Analysis, and Reporting) <ul style="list-style-type: none"> ✓ What mechanism(s) are used to manage audit reviews, analysis, and reporting? 	
<p>A-SP-SEC-Q-005 Director of Operations</p> <ul style="list-style-type: none"> ➤ Director of Systems, Data, and IT 	<p>Identification and Authentication</p> <ul style="list-style-type: none"> ➤ Identification and Authentication (Organizational Users) <ul style="list-style-type: none"> ✓ Are the use of system and/or network authenticators and unique user identifiers required? ➤ Identifier Management <ul style="list-style-type: none"> ✓ Describe the mechanism(s) used to for identity management. ➤ Authenticator Management 	



Item #	Interview Questions	Demonstrations / Tests
	<ul style="list-style-type: none"> ✓ Describe the mechanism(s) used to for authenticator management. 	
<p>A-SP-SEC-Q-004</p> <ul style="list-style-type: none"> ➤ Director of Operations ➤ Director of Systems, Data, and IT ➤ Director of Training 	<ul style="list-style-type: none"> ➤ Incident Response Training <ul style="list-style-type: none"> ✓ Is incident response training consistent with assigned roles and responsibilities to information system users? ✓ Describe how training records are managed, and that each workforce member satisfactorily completed periodic training. ➤ Incident Reporting <ul style="list-style-type: none"> ✓ Are personnel required to report suspected incidents to the organizational incident response designee within a specific timeframe? <ul style="list-style-type: none"> • What is the timeframe? ✓ Reports incidents to OFI within 24 hours after the business associate is aware of the suspected incident or breach 	
<p>A-SP-SEC-Q-006</p> <ul style="list-style-type: none"> ➤ Director of Operations ➤ Director of Systems, Data, and IT 	<ul style="list-style-type: none"> ➤ Media Access - How is media protected against unauthorized access? ➤ Media Storage - Describe how media containing PII and PHI is appropriately secured when not in use. ➤ Media Transport - Describe how media containing PII and PHI is transported securely. ➤ Media Sanitization - Describe how media containing PII and PHI is sanitization. 	
<p>A-SP-SEC-Q-007</p> <ul style="list-style-type: none"> ➤ Director of Operations ➤ Director of Systems, Data, and IT 	<p>System and Communications</p> <ul style="list-style-type: none"> ➤ Transmission Confidentiality and Integrity <ul style="list-style-type: none"> ✓ <u>Contract requirement</u>: Processes all information exchanges and fees, including retrieving/sending daily Department file feeds, with secure mechanisms (FTPS or HTTPS, encrypted to at least TLS 1.0) ✓ Describe the mechanism(s) used to maintain the confidentiality and integrity of information during preparation for transmission and during reception of PII and PHI (e.g., application to server, server to server, server to database). ➤ Protection of Information at Rest <ul style="list-style-type: none"> ✓ Describe how PII and PHI are protected at rest (e.g., files, databases) ➤ Electronic Mail <ul style="list-style-type: none"> ✓ Is PII and PHI allowed to be sent via e-mail? If so, <ul style="list-style-type: none"> • Is the procedure to place all sensitive information in an encrypted attachment, prior to sending an e-mail? 	



Privacy Questions

These privacy controls are derived from Volume III: Catalog of Minimum Acceptable Risk Security and Privacy Controls of the MARS-E document suite, other security requirements cited in the APSIRE-TANF contract between OFI and Fedcap, and other federal and State of Maine regulations.

The MARS-E controls are built upon the NIST SP 800-53r4 control suite.

Table 40: Privacy Questions

Item #	Interview Checklist Items	Demonstrations / Tests
A-SP-PRIV-Q-001 ➤ Director of Operations ➤ Privacy Officer	Governance and Privacy Program – Describe how the following are addressed: ➤ Appoints a designated privacy official accountable for developing, implementing, and maintaining a governance and privacy program to ensure compliance with all applicable laws and regulations regarding the collection, use, maintenance, sharing, and disposal of PII and PHI by programs and information systems ➤ Monitors federal (and state as applicable) privacy laws and policy for changes that affect the privacy program ➤ Develops, disseminates, and implements operational privacy policies and procedures that govern the appropriate privacy and security controls for programs, information systems, or technologies involving PII and PHI ➤ Updates the privacy plan, policies, and procedures, as required to address changing requirements, at least biannually	➤ Review with assessors the documentation specifying the assignment of the designated privacy official ➤ Demonstrate the mechanism(s) used to develop, track, and disseminate privacy related plans, controls, policies, procedures, etc.
A-SP-PRIV-Q-002 ➤ Director of Operations ➤ Privacy Officer	Privacy Monitoring and Auditing Describe how the following are addressed: ➤ Monitors and audits privacy controls and internal privacy policy as required to ensure effective implementation ➤ Complies with HHS and State of Maine privacy oversight monitoring and auditing policies and procedures	
A-SP-PRIV-Q-003 ➤ Director of Operations ➤ Privacy Officer ➤ Director of Training	Privacy Awareness and Training Describe how the following are addressed: ➤ Develops, implements, and updates a comprehensive privacy training and awareness strategy aimed at ensuring personnel understand privacy responsibilities and procedures ➤ Administer basic privacy training at least annually, and targeted, role-based privacy training for personnel	➤ Demonstrate the mechanism(s) used to track basic and role-based privacy training scheduled and conducted ➤ Review with assessors the basic and role-based privacy training materials



Item #	Interview Checklist Items	Demonstrations / Tests
	<p>having responsibility for PII and PHI or for activities that involve PII and PHI at least annually</p> <ul style="list-style-type: none"> ➤ Training records are managed, and that each workforce member satisfactorily completed periodic training ➤ Ensure that personnel certify (manually or electronically) acceptance of responsibilities for privacy requirements at least annually 	
<p>A-SP-PRIV-Q-004</p> <ul style="list-style-type: none"> ➤ Director of Operations ➤ Privacy Officer 	<p>Accounting of Disclosures</p> <p>Describe how the following are addressed:</p> <ul style="list-style-type: none"> ➤ Describe how an accurate accounting of disclosures of information is kept held in each system of records (this includes information released not in an information system) under its control, including: <ul style="list-style-type: none"> ✓ Date, nature, and purpose of each disclosure of a record ✓ Name and address of the person or agency to which the disclosure was made ➤ Retains the accounting of disclosures for the life of the record or five years after the disclosure is made, whichever is longer ➤ Makes the accounting of disclosures available to the person named in the record upon request 	<p>Demonstrate the mechanism(s) used to track disclosures of information</p>
<p>A-SP-PRIV-Q-005</p> <ul style="list-style-type: none"> ➤ Director of Operations ➤ Privacy Officer 	<p>Consent</p> <p>Describe how the following are addressed:</p> <ul style="list-style-type: none"> ➤ Are means provided, where feasible and appropriate, for individuals to authorize the collection, use, maintenance, and sharing of PII and PHI before its collection ➤ Are appropriate means provided for individuals to understand the consequences of decisions to approve or decline the authorization of the collection, use, dissemination, or retention of PII and PHI ➤ Is consent obtained, where feasible and appropriate, from individuals before any new uses or disclosures of previously collected PII and PHI ➤ Describe how individuals are made aware of and, where feasible, consent to all uses of PII and PHI not initially described in the public notice that was in effect at the time the organization collected the PII and PHI 	<ul style="list-style-type: none"> ➤ Review with assessors document examples (e.g., templates, guides) used to describe and acknowledge consent to use PII and PHI ➤ Review with assessors documentation of participant consent
<p>A-SP-PRIV-Q-006</p> <ul style="list-style-type: none"> ➤ Director of Operations 	<p>Individual Access</p> <p>Describe how the following are addressed:</p>	<p>Review with assessors the policy and procedures that govern a Participant's ability to access to their PII and PHI</p>



Item #	Interview Checklist Items	Demonstrations / Tests
<ul style="list-style-type: none"> ➤ Privacy Officer 	<ul style="list-style-type: none"> ➤ Describe the process that provides individuals the ability to have access to their PII and PHI maintained in its system(s) of records. ➤ Is information deemed confidential by ASPIRE-TANF is removed, de-identified or deleted prior to the participant viewing the record? ➤ Is the Department notified within 5 business days of the request (BAA specified)? ➤ Are policies and/or regulations published that govern how individuals may request access to records maintained in the system of records? ➤ Are access procedures published? ➤ Describe why the access procedures adhere to applicable federal and State privacy regulations and policies. 	
<p>A-SP-PRIV-Q-007</p> <ul style="list-style-type: none"> ➤ Director of Operations ➤ Privacy Officer 	<p>Complaint Management</p> <ul style="list-style-type: none"> ➤ Has a process been implemented for receiving and responding to complaints, concerns, or questions from individuals about the organizational privacy practice? ➤ Does the process comply with the privacy notice? 	<p>Demonstrate the mechanism(s) used to track privacy complaints</p>
<p>A-SP-PRIV-Q-008</p> <ul style="list-style-type: none"> ➤ Director of Operations ➤ Privacy Officer 	<p>Privacy Incident Response</p> <p>Describe how the following are addressed:</p> <ul style="list-style-type: none"> ➤ Has a Privacy Incident Response Plan been developed and implemented? ➤ Is there an organized and effective response to privacy incidents in accordance with the organizational Privacy Incident Response Plan? <ul style="list-style-type: none"> ✓ Reports incidents to OFI within 24 hours after the business associate is aware of the suspected incident or breach 	<ul style="list-style-type: none"> ➤ Review with assessors the Privacy Incident Response Plan or similar plan ➤ Demonstrate the mechanism(s) used to track privacy incidents <p>✓</p>
<p>A-SP-PRIV-Q-009</p> <ul style="list-style-type: none"> ➤ Director of Operations ➤ Privacy Officer 	<p>Privacy Notice</p> <p>Describe how the following are addressed:</p> <ul style="list-style-type: none"> ➤ Provides effective notice to the public and to individuals regarding: <ul style="list-style-type: none"> ✓ Its activities that impact privacy, including its collection, use, sharing, safeguarding, maintenance, and disposal of PI and PHI ✓ Authority for collecting PII and PHI ✓ The choices, if any, individuals may have regarding how the organization uses PII and PHI, and the consequences of exercising or not exercising those choices 	<p>Review with assessors a copy of the posted privacy notice</p>



Item #	Interview Checklist Items	Demonstrations / Tests
	<ul style="list-style-type: none"> ✓ The ability to access and have PII and PHI amended or corrected if necessary ✓ Posted in Opportunity Center public access areas ➤ Describes: <ul style="list-style-type: none"> ✓ The PII and PHI that Fedcap collects and the purpose(s) for which it collects that information ✓ How Fedcap uses PII and PHI internally ✓ Whether Fedcap shares PII and PHI with external entities, the categories of those entities, and the purposes for such sharing ✓ Whether individuals have the ability to consent to specific uses or sharing of PII and PHI, and how to exercise any such consent ✓ How individuals may obtain access to PII and PHI ✓ How the PII and PHI will be protected ➤ Revises its public notices to reflect changes in practice or policy that affect PII and PHI, or changes in its activities that impact privacy, before, or as soon as practicable after the change 	
<p>A-SP-PRIV-Q-010</p> <ul style="list-style-type: none"> ➤ Director of Operations ➤ Privacy Officer 	<p>Dissemination of Privacy Program Information</p> <p>Describe how the following are addressed:</p> <ul style="list-style-type: none"> ➤ Ensures the public has access to information about its privacy activities and is able to communicate with its designated privacy official ➤ Ensures its privacy practices are publicly available through Fedcap’s websites or otherwise 	<p>Demonstrate that Fedcap’s privacy practices are publicly available through websites or otherwise</p>



10. APPENDIX E: OPPORTUNITY CENTER INTERVIEW QUESTIONS AND CHECKLIST ITEMS

Opportunity Center Contract Requirements - Interview Questions and Checklist Items

This document contains interview questions and checklist items (to support case reviews, staff file reviews, and walk through) for the ASPIRE-TANF Third Party Assessment. There are proposed demonstrations or tests that may be conducted as evidence, and a list of possible respondents for the question. The questions and checklist items are broken into three categories, sub-categories, and then the individual questions.

Staffing, Training, and Continuous Improvement

This section contains the staffing training and continuous improvement related items.

Staffing, Training, and Continuous Improvement Interview Questions

Table 41: Staffing, Training, and Continuous Improvement Interview Questions

Item # / Respondent	Interview Questions	Demonstrations / Tests
Staff Training		
OC-CR-SQTC-Q-001 ➤ Regional Director ➤ Site Manager	Describe how monthly staff meetings provide opportunity for continuous learning (CAP start date 4/1/19): ➤ Targeting best customer service practices ➤ Confidentiality policies ➤ Practicing active listening ➤ Deescalating conflicts ➤ Demonstrating empathy ➤ Using positive language	Review minutes of the April / May monthly staff meeting.
OC-CR-SQTC-Q-002 ➤ Regional Director	What is the status of the Regional Director and/or designated staff conducting tailored continuous training to case managers, instructing them on (CAP start date 4/1/19): ➤ Proper phone etiquette and procedures ➤ How to properly set up their desk phones with the proper voice-mail greeting ➤ 24-hour timeframe for returning phone calls and e-mails	Review training curriculum and completion documentation.
OC-CR-SQTC-Q-003	What is the status of the Regional Director and/or Director of Training provided in-service training for Case Managers on SOPs and OFI policies related to the provision of Good Cause? (CAP start date 4/1/19)	Review in-service training curriculum and completion documentation.



Item # / Respondent	Interview Questions	Demonstrations / Tests
➤ Regional Director	➤ What is the plan for ongoing compliance and monitoring?	
OC-CR-SQTC-Q-004 ➤ Site Manager	What is the status to designate and train responsible parties for the daily monitoring and maintenance of the Helpline and E-mail Box for participants who call with general inquiries or to leave messages specific to their cases? (CAP start date 4/1/19) This was deemed to be N/A for Site Reviews after the start of the Initial Assessment	Review designee list and training completion documentation.
OC-CR-SQTC-Q-005 ➤ Site Manager	What is the status of the Site Supervisor and/or designee conduct continuous in-service trainings to remind staff of the proper steps to take when scanning documents? (CAP start date 3/25/19) ➤ Does the training include content describing the process on how to: <ul style="list-style-type: none"> ✓ Scan documents ✓ Complete a documentation receipt ✓ Check that the document was properly uploaded 	Review in-service training curriculum and completion documentation.
Staff Continuous Improvement		
OC-CR-SQTC-Q-006 ➤ Site Manager	What is the process to identify training gaps and provide the necessary follow up training to address those gaps?	Demonstrate the mechanism(s) used to identify training gaps and assure they are addressed.

Staffing, Training, Continuous Improvement, and Related Checklist Items for Staff File Review

To complete these checklist activities, the assessor will have identified up to four staff member files from the Opportunity Center to be reviewed. Copies of the staff’s job description, training records, coaching documentation and performance evaluations will be requested to complete the review.

Table 42: Staffing, Training, Continuous Improvement, and Related Checklist Items

Item #	Checklist Items	Demonstrations / Tests		
Staff Training				
OC-CR-SQTC-CL-001	Staff completed the Fedcap ten (10) day training (24 modules defined by the contract) and prior to providing services.	Y	N	N/A
OC-CR-SQTC-CL-002	Staff participated in a job-shadow experience with an experienced Fedcap employee for at least one week upon completion of all required training.	Y	N	N/A



Item #	Checklist Items	Demonstrations / Tests		
OC-CR-SQTC-CL-003	Staff shadowed for an additional one week period while doing their assigned duties.	Y	N	N/A
OC-CR-SQTC-CL-004	Case Managers attended the required in-service training on SOPs and OFI policies related to Good Cause.	Y	N	N/A
	The Direct Care / Clinical Staff additionally completed the Fedcap administered training and prior to performing any direct client services			
OC-CR-SQTC-CL-005	Working with populations with serious mental health conditions	Y	N	N/A
OC-CR-SQTC-CL-006	Overview of the top-ten, most-prevalent, medical diagnoses	Y	N	N/A
OC-CR-SQTC-CL-007	Linking participants receiving Intensive Care Management to community-based organizations	Y	N	N/A
OC-CR-SQTC-CL-008	Monitoring the clinical progress of participants receiving Intensive Care Management	Y	N	N/A
OC-CR-SQTC-CL-009	Disability services overview	Y	N	N/A
OC-CR-SQTC-CL-010	Core components of Cognitive Behavioral Therapy (CBT)	Y	N	N/A
	Quality Improvement Training			
OC-CR-SQTC-CL-011	Attended case management training on thoughtful career planning incorporating assessment results and labor market information.	Y	N	N/A
OC-CR-SQTC-CL-012	Attended tailored continuous training to case managers on proper phone etiquette and procedures, phone set up, and 24-hour timeframe for returning calls and e-mails. (CAP started 4/1/19)	Y	N	N/A
OC-CR-SQTC-CL-013	Attended latest in-service training to remind staff of the proper steps to take when scanning documents. (CAP started 3/25/19)	Y	N	N/A
	Security and Privacy Training			
OC-CR-SQTC-CL-014	Attended, completed, and signed an attestation for security training.	Y	N	N/A
OC-CR-SQTC-CL-015	Attended, completed, and signed an attestation for privacy training.	Y	N	N/A
	Staff Continuous Improvement			
	Employee Weekly / Bi-Weekly Supervision			



Item #	Checklist Items	Demonstrations / Tests		
OC-CR-SQTC-CL-016	Employee received timely (weekly or bi-weekly) one-on-one supervision and the supervision is documented to include issues discussed and goals set.	Y	N	N/A
OC-CR-SQTC-CL-017	Feedback provided includes where employee could use improvement and/or additional training.	Y	N	N/A
90 Day Introductory Period				
OC-CR-SQTC-CL-018	Employee received timely performance evaluation during 90 Day introductory period.	Y	N	N/A
OC-CR-SQTC-CL-019	Weekly meeting to assess progress.	Y	N	N/A
OC-CR-SQTC-CL-020	Arranged for more training/shadowing.	Y	N	N/A
OC-CR-SQTC-CL-021	Goals established and progress reviewed. This was deemed to be N/A for Site Reviews after the start of the Initial Assessment	Y	N	N/A
OC-CR-SQTC-CL-022	Employee responses to required questions documented.	Y	N	N/A
OC-CR-SQTC-CL-023	90 Day evaluation delivered or approved extension on file.	Y	N	N/A
One Year Evaluation				
OC-CR-SQTC-CL-024	Employee received timely One Year evaluation.	Y	N	N/A
OC-CR-SQTC-CL-025	Specific goals established (minimum 3).	Y	N	N/A
OC-CR-SQTC-CL-026	Employee responses to required questions documented.	Y	N	N/A
OC-CR-SQTC-CL-027	One Year evaluation delivered and approved.	Y	N	N/A



Key Performance Indicators

This section contains the KPI Interview questions and related checklist items.

KPI Interview Questions

Table 43: KPI Interview Questions

Item # / Respondent	Interview Questions	Demonstrations / Tests
OC-CR-KPI-Q-001 ➤ Regional Director	<p>Explain the process for reporting and tracking the performance of each office in achieving the contractual KPIs.</p> <p>➤ What corrective action steps are taken when an Opportunity Center is not achieving the KPIs?</p>	Provide management reporting that tracks Opportunity Center results against each of the KPIs.

Opportunity Center Service Delivery - Interview Questions and Case Review Checklist Items

This document contains interview questions and checklist items (to support case reviews, staff file reviews, and walk through) for the ASPIRE-TANF Third Party Assessment. There are proposed demonstrations or tests that may be conducted as evidence, and a list of possible respondents for the question. The questions and checklist items are broken into three categories, sub-categories, and then the individual questions.

Eligibility Determination and Related Case Review Checklist Items for Case Review

To complete these checklist activities, the assessor will have identified five participant case numbers to be reviewed. Assessor will review the cases, accompanied by a designated member of the Fedcap staff.

Table 44: Eligibility Determination and Related Case Review Checklist Items for Case Review

Item #	Checklist Items	Result		
Referral				
OC-SD-ELIG-CL-001	Participants notified via their preferred method of communication of their scheduled orientation, intake and assessment appointment 24-48 hours before appointment.	Y	N	N/A
Orientation				
OC-SD-ELIG-CL-002	Participant was timely engaged in an appropriate activity after completing orientation.	Y	N	N/A
OC-SD-ELIG-CL-003	A Work Agreement was executed for the participant.	Y	N	N/A
Intake and Assessment				
OC-SD-ELIG-CL-004	<p>The intake and assessment included the following tools:</p> <p>➤ Test of adult basic education (TABE)</p>	Y	N	N/A



Item #	Checklist Items	Result		
	<ul style="list-style-type: none"> ➤ Career occupational preference system (COPS) and career ability placement survey (CAPS) and/or CareerScope ➤ Initial screening assessment ➤ Domestic violence screening 			
OC-SD-ELIG-CL-005	<p>Assessment information was collected and documented for each participant at initial assessment and at the time of change in any of the following required categories:</p> <ul style="list-style-type: none"> ➤ Family structure ➤ Work history ➤ Education grade completed ➤ Financial status ➤ Physical and mental health status ➤ Personal and employment related goals and interests ➤ ASPIRE services necessary to obtain sustainable, paid private and public employment ➤ Barriers to employment 	Y	N	N/A
OC-SD-ELIG-CL-006	<p>Three (3) job positions of interest recorded, with estimate of the Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) for each of the identified job positions.</p>	Y	N	N/A

Services to Be Provided

This section contains the Services to Be Provided interview questions and case review checklist items.

Services to Be Provided Interview Questions

Table 45: Services to Be Provided Interview Questions

Item # / Respondent	Interview Questions	Demonstrations / Tests
Job Readiness Course		
OC-SD-STBP-Q-001 <ul style="list-style-type: none"> ➤ Regional Director ➤ Site Manager 	<p>Describe the process used to organize, convene, and facilitate employer panels which include employers from agencies or companies outside of Fedcap, at the end of each job readiness course.</p>	<p>Provide details of employer panel from past two job readiness courses.</p>
Job Search		



Item # / Respondent	Interview Questions	Demonstrations / Tests
OC-SD-STBP-Q-002 ➤ Site Manager	Describe how the job search assistance includes but is not limited to the following: ➤ Organize, convene, and facilitate monthly hiring events at each of the Opportunity Centers or OFI District Offices	Provide information on the past two monthly hiring events.
OC-SD-STBP-Q-003 ➤ Site Manager	Are open job postings actually current, and include the county of that particular office and neighboring counties?	Demonstrate the job postings.
Employer Outreach and Research		
OC-SD-STBP-Q-004 ➤ Regional Director Site Manager	Describe the process (within the Opportunity Center) used to develop relationships with Maine employers individually, and as part of employer stakeholder groups. Activities may include: ➤ Make cold calls to Maine employers ➤ Attend and accompany participants to local and regional job fairs and hiring events ➤ Research and identify new and existing Maine labor market opportunities and job postings ➤ Contact and network with community-based organizations, commerce associations, faith-based institutions, and job recruiters	Provide examples of new employer relationships developed in past 2 months and fairs/events attended with participants in past 2 months.

Services to Be Provided and Related Checklist Items for Case Review

To complete these checklist activities, the assessor will have identified five participant cases to be reviewed. Assessor will review the cases, accompanied by a designated member of the Fedcap staff.

Table 46: Services to Be Provided and Related Checklist Items for Case Review

Item #	Checklist Items	Result		
Case Management				
OC-SD-STBP-CL-001	Participant was assigned a Case Manager.	Y	N	N/A
OC-SD-STBP-CL-002	Participant notified in writing when Provider staff leave the associated agency Opportunity Center, notifying the participant who to contact in their place.	Y	N	N/A
OC-SD-STBP-CL-003	Monthly case management services: Conduct in person meetings, telephone calls, and/or e-mail correspondence.	Y	N	N/A
OC-SD-STBP-CL-004	Monthly case management services: Communications include participant’s progress, circumstances, and needs.	Y	N	N/A



Item #	Checklist Items	Result		
OC-SD-STBP-CL-005	Monthly case management services: Adjustments made to the participant's FCA based upon the communications.	Y	N	N/A
OC-SD-STBP-CL-006	Phone calls and e-mails returned within 24 business hours.	Y	N	N/A
OC-SD-STBP-CL-007	Participant notified of potential job opportunities.	Y	N	N/A
OC-SD-STBP-CL-008	Participant's transportation, child care or other support services reviewed and arranged as necessary.	Y	N	N/A
OC-SD-STBP-CL-009	Participant began engaging in the required activities listed within their respective FCAs within three business days of execution of the FCA.	Y	N	N/A
OC-SD-STBP-CL-010	Renewal FCA was developed and executed prior to the expiration of current FCA, ensuring that no gap in engagement occurred.	Y	N	N/A
Job Readiness Course				
OC-SD-STBP-CL-011	The job readiness course was sixty (60) hours in length.	Y	N	N/A
OC-SD-STBP-CL-012	Training via Fedcap job readiness course was scheduled, facilitated, and provided to the FCA-assigned participant.	Y	N	N/A
OC-SD-STBP-CL-013	Engaged in mock interviews and provided feedback for the participant's job readiness self-assessment.	Y	N	N/A
Job Search				
OC-SD-STBP-CL-014	For FCA-assigned participant that is unemployed or working less than 40 hours per week, provided and tracked 60 hours of supervised, structured, job search assistance.	Y	N	N/A
Employer Outreach and Research				
OC-SD-STBP-CL-015	Staff accompanied participant to local and regional job fairs and hiring events.	Y	N	N/A
Independent, Comprehensive, Medical, Psychological Evaluation				
OC-SD-STBP-CL-016	Psychosocial portion of the ICMPE meeting occurred within three business days of the intake.	Y	N	N/A
OC-SD-STBP-CL-017	Participant was notified of the scheduled medical evaluation appointment verbally and in writing.	Y	N	N/A
Benefits				
OC-SD-STBP-CL-018	Every effort was made to request supports in a timely manner.	Y	N	N/A
Education and Training				



Item #	Checklist Items	Result		
OC-SD-STBP-CL-019	An appropriate set of education and training activities were provided, based upon the participant’s intake and assessment results, FCA development or renewal, aspirations, or other social determinants.	Y	N	N/A
Volunteer Work and Community Service				
OC-SD-STBP-CL-020	Participant was not placed in the same volunteer work and community service site for more than 26 weeks while performing the same tasks.	Y	N	N/A
OC-SD-STBP-CL-021	Feedback was documented and used to engage the participant in semi-monthly meetings, helping them develop sufficient/appropriate work skills and habits, and become prepared for paid employment.	Y	N	N/A
Subsidized / On-the-job Training (OJT)				
OC-SD-STBP-CL-022	Weekly check-ins with the participant and employer occurred every week for first 30 days and then monthly.	Y	N	N/A
Employment Supports				
OC-SD-STBP-CL-023	Upon notification to Fedcap of the new employment status, the participant was notified verbally and in writing of the Department’s transitional services and Fedcap’s job retention services.	Y	N	N/A
Job Retention Services				
OC-SD-STBP-CL-024	Monthly check-ins with employed participant conducted in-person at the participant’s Opportunity Center, via phone calls, or e-mail for 180 days past the participant’s TANF closure.	Y	N	N/A
OC-SD-STBP-CL-025	For participant receiving TANF benefits and after TANF closure, Fedcap staff coordinated and facilitated peer-to-peer and job retention sessions on weekends and outside traditional work hours.	Y	N	N/A
Monitor Participation				
OC-SD-STBP-CL-026	Participant’s progress was monitored for off-site job search activities like job fairs and visiting career centers, preparing job applications, and completing job applications.	Y	N	N/A
Reengagement and Sanctions				
OC-SD-STBP-CL-027	There was a Good Cause determination when invoked by the participant prior to requesting a sanction to the Department.	Y	N	N/A
Participant Fails to Perform a Required Activity – Contact Attempts				
OC-SD-STBP-CL-028	First contact attempt: reengage the participant by telephone within 24 hours of non-compliance.	Y	N	N/A



Item #	Checklist Items	Result		
OC-SD-STBP-CL-029	Second contact attempt: reengage the participant through a home visit no sooner than the business day following the first contact attempt. Note: Confirmed with OFI as of 5/23/2019 the process was modified and a mailed letter served as second attempt; home visit served as third attempt	Y	N	N/A
OC-SD-STBP-CL-030	Third contact attempt: reengage the participant by mailed letter no sooner than the business day following the second contact attempt, and notify the participant that a TANF sanction request has been sent to the Department. Note: Confirmed with OFI as of 5/23/2019 the process was modified and a mailed letter served as second attempt; home visit served as third attempt	Y	N	N/A
Follow Up and Adherence to Good Cause Policy				
OC-SD-STBP-CL-032	Staff provided a documentation receipt (for participant documents provided after 3/25/2019).	Y	N	N/A
OC-SD-STBP-CL-033	Participant requests for Good Cause were handled according to established policy and procedures.	Y	N	N/A

Family Contract Amendments (FCAs)

This section contains the FCA Interview questions and related case review checklist items.

FCA Interview Questions

Table 47: FCA Interview Questions

Item #	Interview Questions	Demonstrations / Tests
OC-SD-FCA-Q-001 ➤ Site Manager	What steps have been taken to tailor services in the FCA so they are more individualized and incorporate assessment results and labor market information? (CAP start date 4/01/2019)	Review minutes of the bi-weekly calls with Regional Directors and those with case management responsibilities to discuss development of individualized FCAs.
OC-SD-FCA-Q-002 ➤ Site Manager	What is the status of Site Supervisors conducting a random review of 10 FCAs to ensure staff are adhering to expectations for FCA development? ➤ Are results being shared with staff to address deficiencies and identify additional training? ➤ What additional training(s) has been identified and what is the plan to provide the training?	Provide summary audit results; validate staff feedback delivered.



Item # /Respondent	Interview Questions	Demonstrations / Tests
OC-SD-FCA-Q-003 ➤ Regional Director	What is the status of the Regional Directors monitoring QA review findings on a bi-weekly basis and providing feedback to Supervisors? ➤ Is the report summarizing findings being sent to the Executive Director?	Provide summary audit results; confirm staff feedback delivered; confirm summary report generated.

FCA and Related Case Review Checklist Items for FCA Case Review

To complete these checklist activities, the assessor will have identified five participant case numbers to be reviewed. Assessor will review the cases, accompanied by a designated member of the Fedcap staff.



Table 48: FCAs and Related Case Review Checklist Items for FCA Case Review

Item #	Checklist Items	Result		
OC-SD-FCA-CL-001	The FCA is based upon the results of the intake and assessment process and the FLSA calculation.	Y	N	N/A
OC-SD-FCA-CL-002	Executed in person or an exception is documented and based on Good Cause.	Y	N	N/A
OC-SD-FCA-CL-003	Covers a period of one to six months.	Y	N	N/A
OC-SD-FCA-CL-004	Includes contract requirements between the participant and Fedcap staff.	Y	N	N/A
OC-SD-FCA-CL-005	Contains required activities (Services to be Provided) appropriate for obtaining and retaining employment.	Y	N	N/A
OC-SD-FCA-CL-006	Contains mutually agreed upon support service benefits necessary to facilitate employment.	Y	N	N/A
OC-SD-FCA-CL-007	Reflects each individual participant’s preferences and abilities to the extent that they conform to the goal of the program to help participants gain employment and to the extent that those preferences conform to any other applicable program rules.	Y	N	N/A
OC-SD-FCA-CL-008	Staff provided a documentation receipt to participant who submits documentation.	Y	N	N/A
OC-SD-FCA-CL-009	Contains the participant’s Rights and Responsibilities.	Y	N	N/A
OC-SD-FCA-CL-010	Signed by the Fedcap staff and by the participant.	Y	N	N/A
OC-SD-FCA-CL-011	Participant received a copy of the FCA.	Y	N	N/A
OC-SD-FCA-CL-012	Participant began engaging in the required activities listed within their respective FCAs within three business days of execution of the FCA.	Y	N	N/A
OC-SD-FCA-CL-013	Renewal FCAs were developed and executed prior to the expiration of current FCAs, ensuring that no gap in engagement occurred.	Y	N	N/A
OC-SD-FCA-CL-014	FCA incorporated “more thoughtful career planning” based on assessment results and labor market information. (CAP start date 4/01/19)	Y	N	N/A
OC-SD-FCA-CL-015	Follow up was provided within 24 hours (for inquiries after 4/01/2019).	Y	N	N/A
OC-SD-FCA-CL-016	Participant requests for Good Cause were handled according to established policy and procedures.	Y	N	N/A



Quality

This section contains the quality interview questions and related checklist items.

Quality Interview Questions

Table 49: Quality Interview Questions

Item # / Respondent	Interview Questions	Demonstrations / Tests
Customer Service: Sensitivity, Confidentiality, and Professionalism		
OC-SD-QUAL-Q-001 ➤ Regional Director ➤ Site Manager	How is the appropriate level of empathy, sensitivity and professional tone measured when providing service to participants in person, over the phone, and/or through e-mail communications? (CAP start date 4/01/2019) ➤ What Quality Assurance monitoring or oversight is in place to assure appropriate and professional communications and customer service are consistently provided?	Demonstrate how this expectation is measured and how professional communications and customer service are consistently provided.
OC-SD-QUAL-Q-002 ➤ Site Manager	How are escalated participant issues tracked and processed to achieve satisfactory and timely resolution?	Demonstrate the mechanism(s) used to track escalated issues to closure.
Responsiveness to Participants		
OC-SD-QUAL-Q-003 ➤ Regional Director ➤ Site Manager	How is the quality, accuracy, and timeliness of the information and responses to participants tracked and monitored? ➤ How are you measuring quality and accuracy, and tracking to ensure compliance with the 24-hour turnaround time?	Demonstrate the mechanism(s) used to monitor and measure communications with participants.
OC-SD-QUAL-Q-004 ➤ Regional Director	How is the Regional Director and/or designee monitoring voice mail systems to ensure phones are always readily available to accept messages? ➤ How often is this monitoring done?	Demonstrate the mechanism(s) used to manage phone and voice mail.
Good Cause		
OC-SD-QUAL-Q-005 ➤ Regional Director ➤ Site Manager	Have the new initiatives for Good Cause been implemented as planned on 4/01/2019? ➤ Site Supervisors' weekly review of policies ➤ Site Supervisors' weekly review of 10 cases ➤ Regional Director quarterly training check reviews for case management staff training	Review and confirm implementation of new initiatives for Good Cause.



Quality and Related Checklist Items for Quality Review

To complete these checklist activities, Fedcap is to provide the necessary artifacts, including but not limited to items such as coaching session notes, staff meeting minutes, and audit results, that demonstrate these activities were completed and/or are occurring. The assessor will provide Fedcap random time periods, where applicable. Assessor will review the artifacts and complete the checklist, accompanied by a designated member of the Fedcap staff.

Table 50: Quality and Related Checklist Items for Quality Review

Item #	Checklist Items	Result		
Customer Service: Sensitivity, Confidentiality, and Professionalism				
OC-SD-QUAL-CL-001	Regional Director or designated supervisors discussed and reiterated on a monthly basis Fedcap’s practice on Customer Service and processes related to sharing and discussing participant information, during coaching session or staff meetings.	Y	N	N/A
Responsiveness to Participants				
OC-SD-QUAL-CL-002	QA Specialist conducted monthly random reviews of Case Managers’ voice mails to determine accessibility and timely response to voice-mail left within 24 hours. This was deemed to be N/A for Site Reviews after the start of the Initial Assessment	Y	N	N/A
OC-SD-QUAL-CL-003	A daily review of the Helpline spreadsheet log was completed to ensure timely follow up, response fully documented, and non-compliance documented. This was deemed to be N/A for Site Reviews after the start of the Initial Assessment	Y	N	N/A
OC-SD-QUAL-CL-004	Incidents of non-compliance from the Helpline spreadsheet log were shared with the Regional Director to address concerns immediately. This was deemed to be N/A for Site Reviews after the start of the Initial Assessment	Y	N	N/A
OC-SD-QUAL-CL-005	Site Supervisors completed a random weekly case review for participant documentation receipts, and non-compliance documented.	Y	N	N/A
OC-SD-QUAL-CL-006	Fedcap QA completed a monthly case review for proper document scanning and attachment to the case was completed, and non-compliance documented. This was deemed to be N/A for Site Reviews after the start of the Initial Assessment	Y	N	N/A
Good Cause				



Item #	Checklist Items	Result		
OC-SD-QUAL-CL-008	The Regional Director conducted a quarterly Training check review to ensure all current Case Management staff have received Good Cause training.	Y	N	N/A
OC-SD-QUAL-CL-009	Site Supervisor(s) conducted weekly random review of 10 cases to ensure staff are adhering to SOPs and OFI policies related to the provision of Good Cause.	Y	N	N/A

Office Security and Privacy – Interview Questions and Checklist Items

This section contains the quality interview questions and related checklist items.

Walk Through Interview Questions

Table 51: Walk Through Interview Questions

Item # / Respondent	Interview Questions	Demonstrations / Tests
OC-SP-WT-Q-001 ➤ Regional Director ➤ Site Manager	What modifications, if any, have been made to the office to ensure confidential spaces are available?	Confirm during walk through.
OC-SP-WT-Q-002 ➤ Regional Director ➤ Site Manager	Describe the procedure for a participant to request a foreign language interpreter. This was deemed to be N/A for Site Reviews after the start of the Initial Assessment	Demonstrate the mechanism(s) used to manage foreign language interpreters.
OC-SP-WT-Q-003 ➤ Regional Director ➤ Site Manager	Are there provisions for persons skilled in communicating with vision or hearing impaired persons? This was deemed to be N/A for Site Reviews after the start of the Initial Assessment	Demonstrate the mechanism(s) used to manage communicate with vision or hearing impaired persons.
OC-SP-WT-Q-004 ➤ Regional Director ➤ Site Manager	Is PII and PHI allowed to be sent via e-mail? ➤ Is there a procedure to place all sensitive information in an encrypted attachment, prior to sending an e-mail? ➤ Is there another solution? This was deemed to be N/A for Site Reviews after the start of the Initial Assessment	Review the e-mail procedure to protect PII and PHI, and review and e-mail with protected PII or PHI.
OC-SP-WT-Q-005 ➤ Regional Director ➤ Site Manager	Is PII and PHI allowed to be faxed? ➤ What specific precautions are followed when performing fax transmission of PII and PHI? ➤ Transmit PII and PHI only to authorized recipients	Review fax procedure to protect PII and PHI, and review the fax logs.



Walk Through Checklist Items

To complete these checklist activities, the assessor will walk through the office accompanied by a designated member of the Fedcap staff.

Table 52: Walk Through Checklist Items

Item #	Checklist Items	Result		
OC-SP-WT-CL-001	Office operates from 8am to 5pm, Monday through Friday.	Y	N	N/A
OC-SP-WT-CL-002	Office appears to have adequate space (e.g., waiting room, classroom) to facilitate participant activities.	Y	N	N/A
OC-SP-WT-CL-003	Confidential office space provided supports confidential discussions.	Y	N	N/A
OC-SP-WT-CL-004	Access to computers, telephones, photocopies, printers, and the internet to allow participants to engage in the activities listed within their respective Family Contract Amendment (FCA).	Y	N	N/A
OC-SP-WT-CL-005	Equipment in Network Centers fully operational.	Y	N	N/A
OC-SP-WT-CL-006	Computer labs contain visual representations of Career Ladders within several high-demand employment sectors, specific to the region where the Office is located.	Y	N	N/A
OC-SP-WT-CL-007	Job placement board created and maintained where it can be viewed by participants.	Y	N	N/A
OC-SP-WT-CL-008	Job placement board includes a “winner’s wall” for participants obtaining employment.	Y	N	N/A
OC-SP-WT-CL-009	Documented “winner’s wall” participant approvals.	Y	N	N/A
OC-SP-WT-CL-010	Appropriate Signage: Privacy Notice	Y	N	N/A
OC-SP-WT-CL-011	Appropriate Signage: ADA	Y	N	N/A
OC-SP-WT-CL-012	Appropriate Signage: Translation Services	Y	N	N/A
OC-SP-WT-CL-013	Appropriate Signage: Fair hearings	Y	N	N/A
OC-SP-WT-CL-014	Appropriate Signage: Complaints	Y	N	N/A
OC-SP-WT-CL-015	Appropriate Signage: Participant Survey	Y	N	N/A



Item #	Checklist Items	Result		
OC-SP-WT-CL-016	Employees observed protecting PHI by speaking in a low tone of voice and, as appropriate, in non-public areas	Y	N	N/A
OC-SP-WT-CL-017	Rooms well maintained	Y	N	N/A
OC-SP-WT-CL-018	Ambient temperature comfortable	Y	N	N/A
OC-SP-WT-CL-019	Open positions are posted	Y	N	N/A
Desk Audit				
OC-SP-WT-CL-020	Staff have adequate space to perform work required, to include maintaining confidentiality	Y	N	N/A
OC-SP-WT-CL-021	Individual work areas where services are provided allow for confidentiality	Y	N	N/A
OC-SP-WT-CL-022	When not in use, computers are locked or have password-enabled screen savers	Y	N	N/A
OC-SP-WT-CL-023	Documents containing PHI are handled appropriately and are face down or concealed from public view when employees leave their workstations	Y	N	N/A
OC-SP-WT-CL-024	Account Management: User IDs and passwords kept secured	Y	N	N/A
OC-SP-WT-CL-025	Workspace appears professional and uncluttered	Y	N	N/A
No sensitive documents left unprotected throughout facility				
OC-SP-WT-CL-026	Mailroom	Y	N	N/A
OC-SP-WT-CL-027	Break areas	Y	N	N/A
OC-SP-WT-CL-028	Printers - in or near	Y	N	N/A
Media containing PII and PHI appropriately secured when not in use				
OC-SP-WT-CL-029	Locking file rooms	Y	N	N/A
OC-SP-WT-CL-030	Secure filing cabinets	Y	N	N/A
OC-SP-WT-CL-031	Safes	Y	N	N/A
OC-SP-WT-CL-032	Removable storage devices	Y	N	N/A



Item #	Checklist Items	Result		
OC-SP-WT-CL-033	Secure shred bins	Y	N	N/A
Physical Access Authorizations and Access Control				
OC-SP-WT-CL-034	Access granted to the facility, restricted areas, and equipment based upon roles	Y	N	N/A
OC-SP-WT-CL-035	Protocols in place for managing assignment of badges and keys	Y	N	N/A
OC-SP-WT-CL-036	Protocols in place for identification of referred individuals presenting without Photo ID card	Y	N	N/A
OC-SP-WT-CL-037	Locking file rooms and other critical / sensitive areas (e.g., transmission medium, power equipment and cabling)	Y	N	N/A
OC-SP-WT-CL-038	Badges are worn - Visitors	Y	N	N/A
OC-SP-WT-CL-039	Badges are worn - Staff badges have legible names and include titles	Y	N	N/A
Physical and Environmental Controls				
OC-SP-WT-CL-040	Physical access to output devices (e.g., printers) is controlled to prevent unauthorized individuals from obtaining the output	Y	N	N/A
OC-SP-WT-CL-041	There is a clear view of waiting area from front desk.	Y	N	N/A
OC-SP-WT-CL-042	Provides a short-term uninterruptible power supply to facilitate an orderly shutdown of the information system in the event of a primary power source loss.	Y	N	N/A
OC-SP-WT-CL-043	Employs and maintains automatic emergency lighting for the work activities that activates in the event of a power outage or disruption and covers emergency exits and evacuation routes within the facility.	Y	N	N/A
OC-SP-WT-CL-044	Employs and maintains fire suppression and detection devices/systems supported by an independent energy source.	Y	N	N/A
OC-SP-WT-CL-045	Fire extinguishers present, have no visible or missing parts and have current inspection.	Y	N	N/A
OC-SP-WT-CL-046	Authorizes, monitors, and controls the flow of sensitive equipment and components entering and exiting the facility and maintains records of those items.	Y	N	N/A
OC-SP-WT-CL-047	Positions equipment and components within the facility to minimize potential damage from physical and environmental hazards, and to minimize the opportunity for unauthorized access or view.	Y	N	N/A



Item #	Checklist Items	Result		
OC-SP-WT-CL-048	Portable equipment such as laptops and PDAs are physically secured.	Y	N	N/A

Security and Privacy Interview Question

Table 53: Security and Privacy Interview Question

Item #	Interview Questions	Demonstrations / Tests
OC-SP-Q-001 ➤ Site Manager	Incident Response – Potential security and privacy incidents are reported immediately to the Site Supervisor or Site Manager.	



11. APPENDIX F: ACRONYMS

Table 54: Acronyms

Acronym	Definition
ADA	Americans with Disabilities Act
ASPIRE-TANF	Additional Support for People in Retraining and Employment - Temporary Assistance for Needy Families
BTC	Breaking the Cycle
CAP	Fedcap’s Corrective Action Plan dated March 15, 2019, in response to the DHHS concerns and issues letter dated March 13, 2019
CBT	Cognitive Behavioral Therapy
CSG	CSG Government Solutions, Inc.
CTC	Child Tax Credit
DHHS	State of Maine Department of Health & Human Services
EITC	Earned Income Tax Credit
FCA	Family Contract Amendment
FTE	Full-Time Equivalent
HHS	Health and Human Services
HIPAA	Health Insurance Portability and Accountability Act of 1996
HQ	Refers to Fedcap Maine’s Headquarters
ICM	Integrated Case Management
ICMPE	Independent, Comprehensive, Medical, Psychological Evaluation
KPI	Key Performance Indicator
LMS	Learning Management System
MITM	Man-in-the-Middle Attacks
MARS-E	Volume III: Catalog of Minimum Acceptable Risk Security and Privacy Controls for Exchanges
NIST SP 800-53R4	National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 Rev 4
OFI	Office for Family Independence



Acronym	Definition
OJT	On-the-job Training
PDA	Personal Digital Assistant
PII	Personally Identifiable Information
POA&M	Plan of Action and Milestones
PHI	Protected Health Information
QA	Quality Assurance
QRG	Quick Reference Guide
SMART	Specific, Measurable, Attainable, Relevant, and Timely
SOP	Standard Operating Procedures
SWAT	SNAP to Work Accelerated Transition
TABE	Test of Adult Basic Education
WEP	Work Experience Program
WPR	Work Participation Rate



12. APPENDIX G: PARTICIPANT SURVEY SUMMARY

As part of the Maine ASPIRE-TANF Independent Third Party Assessment, CSG conducted a survey of ASPIRE-TANF participants. This initial survey was to establish a benchmark to measure customer satisfaction throughout the assessment period over time as Fedcap implements assessment recommendations and makes changes.

The survey was produced using Survey Monkey, and was sent to 1,316 participants via email, which included a link to the survey. The email was sent from ASPIRE-survey@csgdelivers.com. The initial survey was sent to participants on July 8, 2019 and was open for completion by participants over a two week period of time. Two email reminders were sent to participants during the two week period, to encourage participation. A total of 302 participants completed the survey, for a response rate of 23%.

The survey included 10 close-ended and two open-ended questions, using a five point scale, from “Strongly Agree” to “Strongly Disagree”. Two questions could also be answered with a response of “Not Applicable”. Nine of the questions required a response, while the question regarding the participant’s Fedcap office location, and the two open-ended questions, were optional. The Fedcap office location and two open ended questions were made optional in the event participants were not comfortable disclosing the location of the Fedcap office they utilize, and/or preferred not to provide comments.

Summary of Observations

Based on a review of the data from the 302 surveys completed, the following observations were noted.

- Across the full survey, respondents answered “Strongly Agree or Agree” 54% of the time on average, compared to 27% “Strongly Disagree/Disagree” and 19% “Neutral”- so on the whole, participants were twice as likely to answer with Strongly Agree/Agree versus Strongly Disagree/Disagree
- In looking at Questions 5 and 9, regarding satisfaction with the level of service being provided at the sites and Fedcap overall, responses were consistent, with 50% responding with “Strongly Agree/Agree” vs. between 30-32% responding with “Strongly Disagree/Disagree”
- It was also notable that there were two questions that achieved less than 50% “Strongly Agree/Agree” responses, indicating these areas in particular provide opportunity for improvement
 - ✓ Question 3- Staff organized and knowledgeable- 46% answered “Strongly Agree/Agree” and 34% answered “Strongly Disagree/Disagree”
 - ✓ Question 7- Calls are returned within 24 hours- Just 45% answered “Strongly Agree/Agree” while 40% said they “Strongly Disagree/Disagree”
- There were 2 questions that achieved more than a 60% “Strongly Agree/Agree” response
 - ✓ Question 1- Employees treat participants with respect- 64% responded “Strongly Agree/Agree”
 - ✓ Question 4- Trust Fedcap staff to keep information confidential- 66% answered with “Strongly Agree/Agree”



- There were 3 questions that were Optional, meaning the respondent could choose to skip that question and not provide a response:
 - ✓ Question 10 asked respondents to provide the Fedcap office location where they receive services; 98% of respondents chose to answer this question
 - ✓ Question 11 asked respondents to provide comments regarding what has gone well working with Fedcap; 44% of respondents chose to provide feedback for this question
 - ✓ Question 12 asked respondents to provide comments regarding how their experience can be improved; 40% of survey participants provided responses to this question

Both the survey and survey results by question are provided on the following pages.



Figure 1: Participant Survey

Survey of Fedcap Services

Please take a moment to provide your feedback related to Fedcap services. It will take you approximately five minutes to take the survey. Your feedback and comments are very important in helping to improve the program. Your answers will be anonymous and confidential. Please complete the survey by Monday, July 22. Thank you!

* 1. I feel that Fedcap employees treat me with respect.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree

* 2. Fedcap provides tools and resources to support my success.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree

* 3. The Fedcap staff are organized and knowledgeable.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree

* 4. I trust that personal information I share with Fedcap staff is treated confidentially.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree



* 5. I am satisfied with the level of customer service at the Fedcap Opportunity Center.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree

* 6. My service plan (Family Contract Amendment) addresses my individual needs and goals.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree

* 7. My calls and/or emails to Fedcap staff are returned within 24 hours.

- Not Applicable
- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree

* 8. I am satisfied with the support services (for example, transportation and child care) that were provided.

- Not Applicable
- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree

* 9. Overall, I am satisfied with Fedcap and the services they provide.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree



10. To help us use the feedback received to make improvements in the program, would you please provide us with the location of the Fedcap Opportunity Center you participate in? (This question is optional.)

- Augusta
- Biddeford
- Brewer
- Calais
- Caribou
- Ellsworth
- Farmington
- Fort Kent
- Houlton
- Lewiston
- Machias
- Oxford
- Rockland
- Sanford
- Skowhegan
- South Portland

11. Please provide any additional comments regarding what has gone well with your experience working with Fedcap. (This question is optional.)

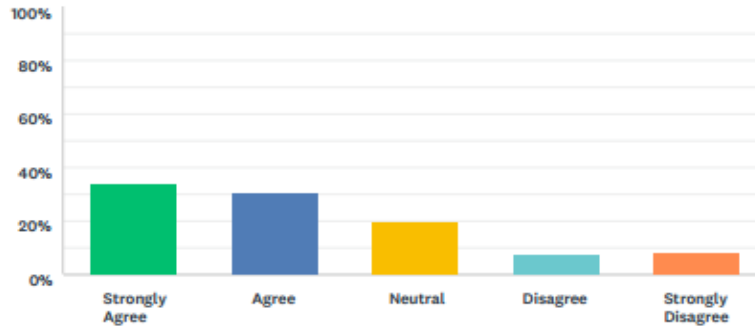
12. Please provide any additional comments regarding how we can improve your experience. (This question is optional.)



Figure 2: Participant Survey Results by Question

Q1 I feel that Fedcap employees treat me with respect.

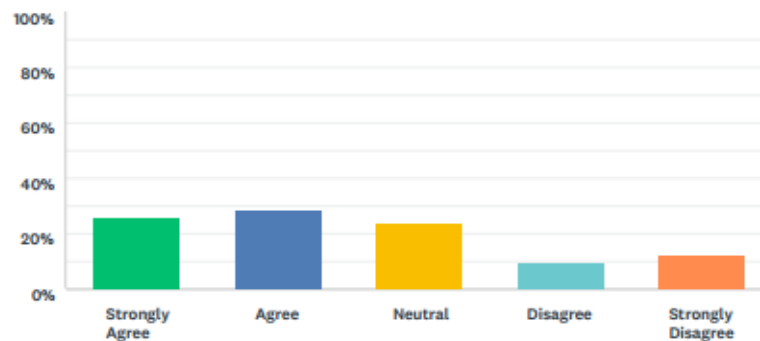
Answered: 302 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly Agree	33.77%	102
Agree	30.46%	92
Neutral	19.54%	59
Disagree	7.62%	23
Strongly Disagree	8.61%	26
TOTAL		302

Q2 Fedcap provides tools and resources to support my success.

Answered: 302 Skipped: 0

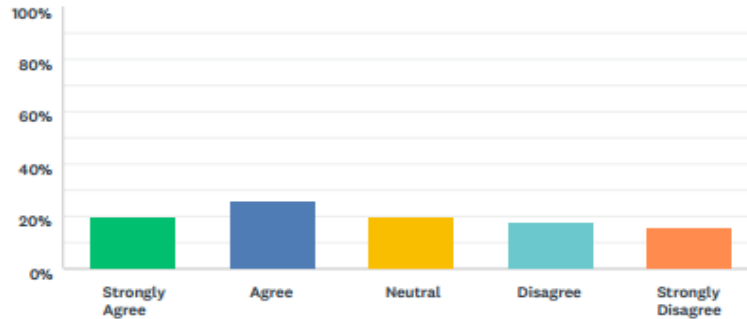


ANSWER CHOICES	RESPONSES	
Strongly Agree	26.16%	79
Agree	28.48%	86
Neutral	23.51%	71
Disagree	9.60%	29
Strongly Disagree	12.25%	37
TOTAL		302



Q3 The Fedcap staff are organized and knowledgeable.

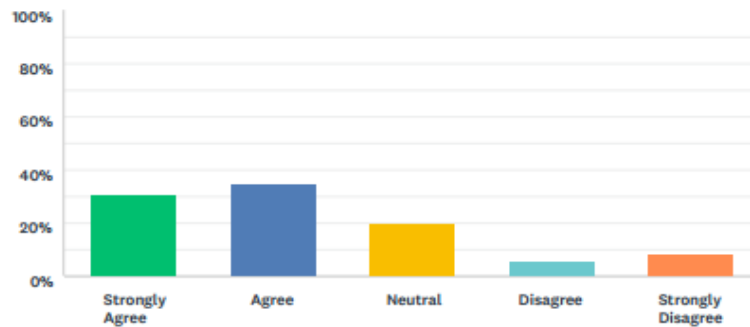
Answered: 302 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly Agree	20.20%	61
Agree	25.83%	78
Neutral	20.20%	61
Disagree	18.21%	55
Strongly Disagree	15.56%	47
TOTAL		302

Q4 I trust that personal information I share with Fedcap staff is treated confidentially.

Answered: 302 Skipped: 0

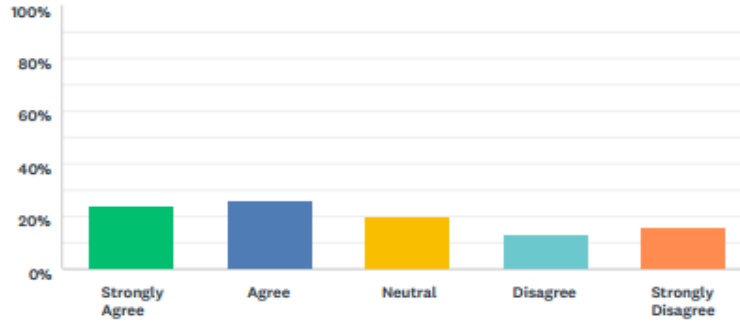


ANSWER CHOICES	RESPONSES	
Strongly Agree	31.13%	94
Agree	34.77%	105
Neutral	19.87%	60
Disagree	5.96%	18
Strongly Disagree	8.28%	25
TOTAL		302



Q5 I am satisfied with the level of customer service at the Fedcap Opportunity Center.

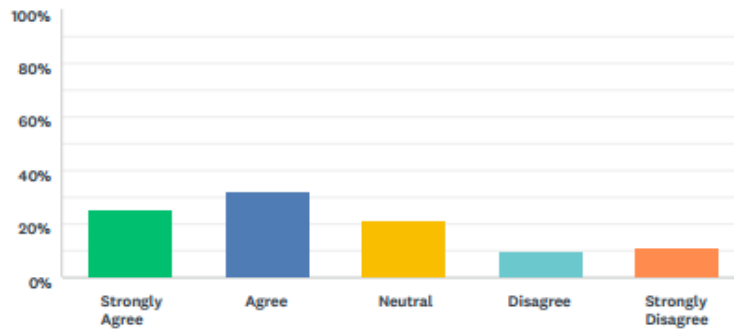
Answered: 302 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly Agree	23.84%	72
Agree	26.16%	79
Neutral	20.20%	61
Disagree	13.58%	41
Strongly Disagree	16.23%	49
TOTAL		302

Q6 My service plan (Family Contract Amendment) addresses my individual needs and goals.

Answered: 302 Skipped: 0

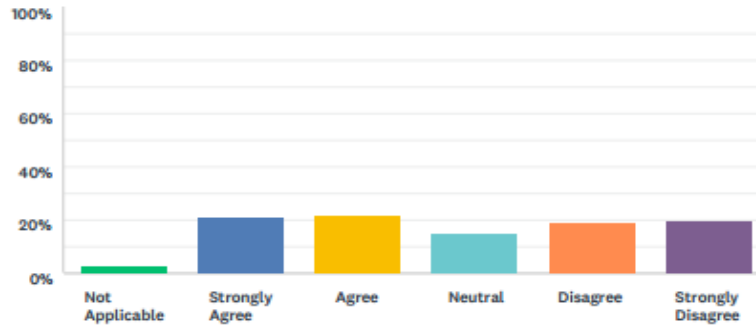


ANSWER CHOICES	RESPONSES	
Strongly Agree	25.50%	77
Agree	31.79%	96
Neutral	21.52%	65
Disagree	9.93%	30
Strongly Disagree	11.26%	34
TOTAL		302



Q7 My calls and/or emails to Fedcap staff are returned within 24 hours.

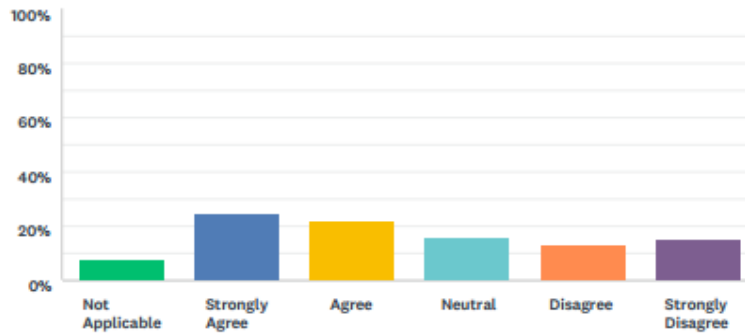
Answered: 302 Skipped: 0



ANSWER CHOICES	RESPONSES	
Not Applicable	2.65%	8
Strongly Agree	21.19%	64
Agree	22.19%	67
Neutral	14.90%	45
Disagree	18.87%	57
Strongly Disagree	20.20%	61
TOTAL		302

Q8 I am satisfied with the support services (for example, transportation and child care) that were provided.

Answered: 302 Skipped: 0

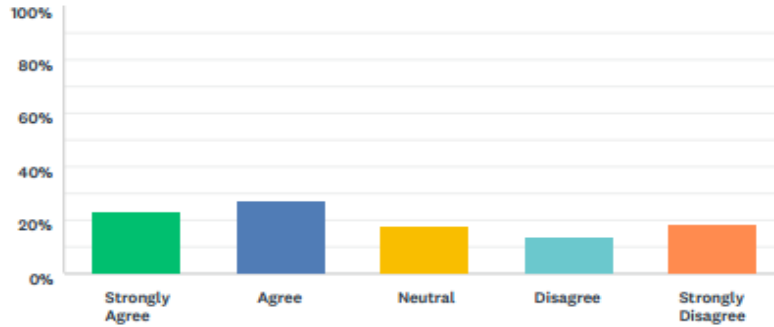


ANSWER CHOICES	RESPONSES	
Not Applicable	7.95%	24
Strongly Agree	25.17%	76
Agree	22.19%	67
Neutral	15.89%	48
Disagree	13.58%	41
Strongly Disagree	15.23%	46
TOTAL		302



Q9 Overall, I am satisfied with Fedcap and the services they provide.

Answered: 302 Skipped: 0

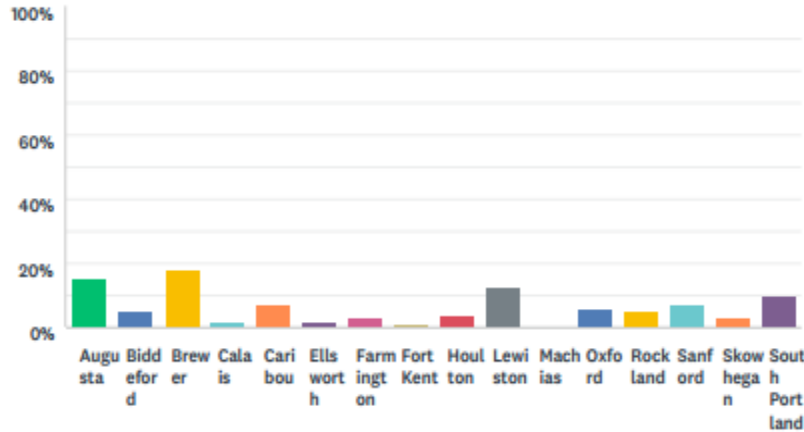


ANSWER CHOICES	RESPONSES	
Strongly Agree	22.85%	69
Agree	27.48%	83
Neutral	17.55%	53
Disagree	13.58%	41
Strongly Disagree	18.54%	56
TOTAL		302



Q10 To help us use the feedback received to make improvements in the program, would you please provide us with the location of the Fedcap Opportunity Center you participate in? (This question is optional.)

Answered: 296 Skipped: 6



ANSWER CHOICES	RESPONSES	
Augusta	15.20%	45
Biddeford	5.07%	15
Brewer	17.91%	53
Calais	1.35%	4
Caribou	6.76%	20
Ellsworth	2.03%	6
Farmington	3.04%	9
Fort Kent	1.01%	3
Houlton	3.38%	10
Lewiston	12.50%	37
Machias	0.34%	1
Oxford	6.08%	18
Rockland	5.07%	15
Sanford	7.09%	21
Skowhegan	3.04%	9
South Portland	10.14%	30
TOTAL		296



13. DELIVERABLE SIGNOFF AND APPROVAL

The signatures following indicate that this Project Deliverable, Maine OFI ASPIRE-TANF Final Third Party Assessment Report, has been reviewed by the OFI and all the necessary project stakeholders, and that the authorized signers accept and approve the content herein.

IN WITNESS WHEREOF, the parties hereto have caused this agreement to be executed by their duly authorized representatives.

CSG Project Manager

Director, Office for Family Independence

Norman C. Curtis

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

Norman C. Curtis

NAME

NAME

Project Manager

TITLE

TITLE

October 25, 2019

DATE

DATE