



March 15, 2019

Jeanne M. Lambrew, Ph.D.
Commissioner
Maine Department of Health and Human Services
11 State House Station
221 State Street,
Augusta, Maine 04333-0011

RE: Agreement OFI-17-005

Dear Commissioner Lambrew,

Fedcap Breaking the Cycle (BTC) is deeply committed to promoting greater self-sufficiency for Maine's families receiving Transitional Assistance for Needy Families. We understand that successful operation of the program requires accountability, transparency and flexibility to ensure responsiveness to the evolving needs of the individuals we serve. We also recognize that building and sustaining an environment of excellence requires increased accuracy and diligence in our daily work to improve service delivery and performance outcomes.

Fedcap BTC acknowledges the Office of Family Independence (OFI) concerns with some of our performance measures and customer service practices and as such is working closely with Senior leadership to develop innovative solutions to operationalize the requirements of our contractual agreement. Moreover, we acknowledge these areas of concerns cited in the in the letter received on 3/13/2019 and we are aware of the level of improvement that needs to occur and the urgency with which it must be done.

Services and Plan (Family Contract Amendment- FCA) Development are not individualized:

Since its inception Fedcap BTC has focused on compliance and standardization of practices. Staff were provided with initial tools to help develop FCAs which has resulted in the use of a uniform format that was not tailored to individual participant needs. Fedcap BTC acknowledges that these tools require updating, additional staff training is required, and a shift needs to occur so that FCAs reflect the individual needs of every family served.

Poor Customer Service: Sensitivity, Confidentiality and Professionalism:

Fedcap BTC has placed a strong emphasis on accountability and engaging participants to perform their requirements which at times has resulted in errors and misunderstandings. In some offices there has also been too much familiarity among staff and participants who reside in the same communities resulting in lapses of professional boundaries and confidentiality. We recognize that there is need for additional and more in-depth training needed in a variety of areas to ensure that our participants experience greater customer satisfaction.

Responsiveness to Participants:

Fedcap BTC acknowledges that during occasions of staff transitions essential follow up and contact information has not been provided in a timely manner to program participants. We have more work to do around reinforcing and monitoring expectations for responsiveness to participants to ensure that phone calls and emails are returned according to program standards. We are developing additional standard operating procedures to manage the handling of cases during staff transitions and leaves.

Good Cause:

Fedcap BTC has worked to hold participants accountable to their work requirements. The work participation rate is 50% which permits those individuals who are unable to fulfill a work schedule to address their on-going barriers. Staff has received training in Good Cause and we would be open to additional guidance from OFI on how it should be further implemented.

Fedcap BTC Senior Leadership have proactively begun addressing many of the identified concerns and are working to establish a long-term solution to ensure we meet the needs of all our key stakeholders. In recent months, we have taken steps to revamp staff training and provide field guides to include a stronger emphasis on career counseling and individualizing services. On January 24, 2018, we released a comprehensive program guide which includes our expectations and approach for all aspects of service delivery and being responsive to individual need. On 2/25/19, we finalized a more in-depth training on HIPPA, Privacy and Confidentiality practices which is scheduled for all staff training on 3/20/2019. On 3/6/2019 targeted trainings were provided to staff with emphasis on career planning, coaching and the development of client centered FCA based on vocational assessment. Additionally, on 3/14/2019, we finalized and implemented a new staff training log to more efficiency track required trainings by individual staff person.

Our continuous ongoing efforts toward educating, strengthening and advancing our staff's skill sets and capabilities allows us to ensure that key policies and practices are not only implemented, but also sustained and improved over time. Through a multidimensional approach, heightened focused will be placed on Staff Development and Training and coordinated monitoring activities such as observations, case reviews, checklists, and client satisfaction surveys to drive improvement in our service delivery and foster greater program compliance in these identified areas. Additionally, our Quality Improvement (QI) methods will involve the creation of a Quality Improvement workgroup consisting of Regional Directors, Supervisors, direct line staff and Quality Assurance Specialists to discuss program performance, quality issues, staff challenges and perform peer group root cause analyses in hopes of preventing future instances of non-compliance to process standards and procedures.

Fedcap remains committed to serving the communities of Maine and successfully carrying out the requirements of our contractual agreements, and such we must build a strong alliance with our key stakeholders. These areas of concerns are of paramount importance to Fedcap as they allow for the implementation of critical changes in our performance-based practices to strengthen our infrastructural abilities to carry out the deliverables of our contract. We continue to work tirelessly to cultivate a culture of excellence by instilling our mission, vision and values into our daily operations. Fedcap understands that to make this transformation happen, change is needed by all staff at every level of service delivery to drive continuous improvement that meets program compliance and promotes success in every facet of the program.

The attached chart outlines detailed corrective action steps that Fedcap has taken and will be taking to address the performance deficiencies within our Breaking the Cycle program and provides a timeline for when these actions will occur. This plan for correction is designed to provide resolution to areas out of compliance, outlines QA tasks, compliance measures and staff responsible for follow up activities to ensure program outcomes are aligned to the strategic direction of the Fedcap BTC Program and OFI program requirements.

Fedcap is open to receiving ongoing feedback from OFI to address for improvement. These opportunities for targeted feedback will allow Fedcap to formulate better operational changes and quality implementation plans to improve and increase program performance. We thank Maine Department Health and Human Services for their willingness to work with us and we look forward to your feedback on Fedcap's corrective action plan.

We are also interested in obtaining copies of the survey results from January 2019 to help us gain greater insight and perspective of our program participants and their concerns.

We look forward to continuing our partnership with OFI to better serve the families of Maine.

Sincerely,



Grant E. Collins II
President
Fedcap, Inc.

cc: Bethany Hamm, Deputy Commissioner, State of Maine, DHHS
Tony Pelotte, Director Office of Family independence. State of Maine, DHHS
Liz Ray, TANF/ASPIRE Senior Program Manager, State of Maine, DHHS

Fedcap's Breaking the Cycle Corrective Action Plan

Area of Performance Deficiency: Services and Plan (Family Contract Amendment- FCA) Development are not individualized

Step #	List Each Action Taken to Improve Performance	Expected Outcome(s) of Each Step	Compliance Measure(s)	Start Date	End Date	Person/Title(s) Responsible
1)	The Executive Director will revise expectations for case management to place greater emphasis on tailoring services in program guidebook and Standard Operating Procedures (SOPs)	Result in individualized Family Contract Amendments (FCAs) that incorporate assessment results and labor market information	On a weekly basis, Site Supervisors will conduct a random review of 10 FCA's from their active caseload to ensure staff are adhering to expectations for FCA development. Results of QA reviews will be shared with staff to address individual deficiencies and to identify the need for additional training when necessary.	4/1/19	Ongoing	Executive Director
2)	The Director of Training will deliver additional training for all staff delivering case management to focus on thoughtful career planning incorporating assessment results and labor market information	FCAs that support enrollment in opportunities for additional credentials and/or education	On a bi-weekly basis, the Regional Directors will monitor QA review findings and provide feedback to Supervisors to hold individuals accountable for their performance in this area. A report summarizing findings will be sent to Executive Director to determine effectiveness of our current methods and to evaluate whether additional change is needed to achieve full compliance.			Director of Training
3)	The Regional Directors will oversee biweekly calls for those with case management responsibilities to discuss case management approach and practice including development of individualized FCAs, planning for further education and training and resource development.		A Quick Reference Desk guide will be created and made readily available to all staff to refer to during their workday to ensure adherence to process requirement			Site Supervisors Regional Directors Case Managers

Area of Performance Deficiency: Poor Customer Service: Sensitivity, Confidentiality and Professionalism

	List Each Action Taken to Improve Performance	Expected Outcome(s) of Each Step	Compliance Measure(s)	Start Date	End Date	Person/Title(s) Responsible
1)	The Regional Directors and/or Director of Training will conduct in-service/refresher trainings for all new and current staff members on company's Standard Operating Procedures relevant to Confidentiality protocol and our Customer Service Training module to ensure compliance with program expectations.	All relevant staff are trained on company's Standard Operating Procedures (SOPs) related to confidentiality practices and Customer Service best practices.	Attendance sign in sheets will be maintained and will demonstrate compliance with trainings as well as identify staff who missed the in-service /refresher trainings. Make- up sessions will be provided for all new and current staff who missed the original training sessions to ensure 100% compliance with training attendance.	4/1/19	5/3/19 and ongoing as needed.	Regional Directors Director of Training Fedcap QA Specialist Case Managers
2)	Monthly staff meetings to reiterate and provide opportunity for continuous learning; targeting best customer service practices, confidentiality policies, practicing active listening, de-escalating conflicts, demonstrating empathy and using positive language to achieve the high standards expected by OFI and Fedcap.	Improved and increased professionalism and sensitivity in communication with participants.	The Regional Director and/or designated Supervisors on a monthly basis will discuss and reiterate company's practice on Customer Service and processes related to sharing and discussion participant information during individualized supervision coaching session and/or staff meetings, to ensure full compliance with policies and procedures and to assess further training needs	4/1/19	Ongoing	Regional Directors Site Supervisors Case Managers
3)	Creation and implementation of a paper and electronic participant satisfaction survey to measure our participant program experience, examine the quality of our service delivery, identify gaps and	Increase program insights from key stakeholders to drive program improvement initiatives.	To ensure reliability and credibility of results, Fedcap's QA Team and/or designee will collect and properly document participant feedback and create a report that summarizes client responses. Results will be evaluated, analyzed and shared	3/25/19	Ongoing	Program Director Director of Operations Fedcap QA Specialist Administrative Assistant

	<p>areas needing process improvement.</p> <p>Signage for Participant survey will be posted throughout all Opportunity Centers to solicit participant feedback on program services.</p>		<p>with Fedcap Senior Leadership to identify areas requiring improvement and/or the need for specialized consultations.</p>			
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Area of Performance Deficiency: Responsiveness to participants.

	List Each Action Taken to Improve Performance	Expected Outcome(s) of Each Step	Compliance Measure(s)	Start Date	End Date	Person/Title(s) Responsible
1)	<p>Regional Director and/or designed staff will conduct tailored continuous training, instructing case managers on proper phone etiquette and procedures, how to properly set up their desk phones with the proper voicemail greeting, and the 24-hour timeframe required for returning phone calls and emails.</p>	<p>Improved communication among case managers and their participants. Decreased reports of participants feeling their concerns are not heard.</p>	<p>Regional Directors, Fedcap QA Specialists and/or designees will conduct bi-weekly phone and email audits to ensure all staff have the proper voicemail message, email signature and properly respond within the 24 hour required timeframes. Results will be shared with Fedcap Leadership on a monthly basis.</p>	4/1/19	Ongoing	<p>Regional Directors Director of Training Fedcap QA Specialist Case Managers</p>
2)	<p>Designate and train responsible parties for the daily monitoring and maintenance of the Helpline and Email Box for participants who call with general inquiries or to leave messages specific to their cases.</p>	<p>All inquiries made via telephone and email will be sufficiently responded to and response thoroughly documented via Helpline spreadsheet log and FedcapCARES case record within the required timeframe of 24 hours.</p>	<p>BTC Site Supervisors will review Helpline spreadsheet log daily to ensure timely follow up and proper documentation of outcomes. Items found to be out of compliance will be shared with the Regional Director to address concerns immediately to ensure 100% compliance with our internal communication processes</p>	4/1/19	Ongoing	<p>Site Supervisors Regional Directors</p>

3)	<p>Develop and implement a Documentation Receipts Form for all documents received from the participants in person, via fax or email.</p> <p>CM and/or designated staff will provide documentation receipt to each participant who submits documentation to assure compliance with this newly implemented practice for all documents received.</p> <p>Create a “Did You Know” flyer to educate participants on the newly implemented Documentation Receipt form process.</p>	<p>Decreased miscommunication among case managers and participants regarding documents turned in and scanned.</p> <p>Increase compliance with tracking documentation provided to program staff.</p>	<p>Site Supervisors will conduct random weekly case reviews to verify if the participant brought in any documents during their visit, whether a documentation receipt was provided for all instance where documents were received to ensure 100% compliance with our scanning processes.</p> <p>Fedcap QA Team will conduct random monthly case reviews to ensure all relevant documents are scanned into FedcapCARES with the accompanying documentation receipt form to evaluate the effectiveness of this new process.</p>	3/25/19	Ongoing	<p>Director of Training</p> <p>Fedcap QA Specialist</p> <p>Site Supervisors</p>
4)	<p>The Site Supervisor and/or designee will conduct continuous in-service trainings to remind staff of the proper steps to take when scanning documents. This training will demonstrate how to scan documents, complete a documentation receipt and how to check that the document has been properly uploaded.</p>	<p>Proper completion and imaging of Documentation Receipts for all documents received.</p>	<p>Fedcap QA Team will conduct monthly case reviews to ensure documents are scanned and attached properly to the corresponding case. Results will be measured and analyzed in order to identify areas that require further refresher trainings or specialized consultations.</p>	3/25/19	Ongoing	<p>Site Supervisors</p> <p>Director of Training</p> <p>Fedcap QA Specialist</p>

5)	Regional Director will ensure all staff have an automated outgoing message for when they are out of the office for an extended period, due to vacation or other absence and provide the expected return date and who may be contacted in the meantime. Staff will be required to forward their calls to the Regional Directors line and/or designee for follow up with participant concerns to ensure full compliance and timely responsiveness.	Timely responsiveness to participant calls.	<p>The Regional Director and/or designee will monitor voice mail systems to ensure phones are always readily available to accept messages.</p> <p>Fedcap QA Specialist will conduct monthly random reviews of Case Managers voice mails to determine accessibility to reach case managers and the timely response to voicemail left within 24 hours.</p>			<p>Regional Directors</p> <p>Fedcap QA Specialist</p> <p>Case Managers</p>
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Area of Performance Deficiency: Good Cause						
	List Each Action Taken to Improve Performance	Expected Outcome(s) of Each Step	Compliance Measure(s)	Start Date	End Date	Person/Title(s) Responsible
1)	Regional Director and/or Director of Training will provide in-service training for Case Managers on Standard Operating Procedures and OFI policies related to the provision of "Good Cause" to ensure adherence to procedures.	The provision of "Good Cause" to all applicable cases.	Sign-in sheets will be maintained for all training sessions to ensure all staff are trained and knowledgeable on processes related to granting "Good Cause" when applicable. The Regional Director will conduct a quarterly Training check review to ensure that all current Case Management staff have received training.	4/1/19	5/3/19 and ongoing as needed	<p>Regional Directors</p> <p>Director of Training</p> <p>Case Managers</p>

2)	Implementation of weekly reviews to be completed by Supervisor to ensure adherence to Good Cause policies and to ensure participants are properly serviced.	Full compliance to all program requirements	<p>On a weekly basis, Supervisors will conduct a random review of 10 cases to ensure staff are adhering to Standard Operating Procedures and OFI policies related to the provision of “Good Cause” to ensure standards are adhered to and full compliance is achieved.</p> <p>On a bi-weekly basis, the Regional Directors will monitor QA reviews findings and provide feedback to Supervisors in order to hold individuals accountable for their performance in this area. A report summarizing findings will be sent to the Executive Director to determine effectiveness of current processes and to evaluate whether any other change may be needed to ensure full compliance. Director of Operations will generate a quarterly report on utilizing Good Cause to be distributed to BTC Leadership.</p>	4/1/19	Ongoing	Regional Directors Director of Training Case Managers BTC Executive Director
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