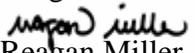


TEXAS WORKFORCE COMMISSION LETTER

ID/No:	WD 06-13
Date:	January 29, 2013
Keyword:	Choices; SNAP E&T; TAA; TWIST; WIA; WorkInTexas.com
Effective:	March 1, 2013

To: Local Workforce Development Board Executive Directors
Commission Executive Offices
Integrated Service Area Managers

From:  Reagan Miller, Director, Workforce Development Division

Subject: **Documenting Services and Participant Contact in The Workforce Information System of Texas** *Counselor Notes*

PURPOSE:

To provide Local Workforce Development Boards (Boards) with information and guidance on:

- contact with participants; and
- comprehensive documentation of services and contact with participants in The Workforce Information System of Texas (TWIST) *Counselor Notes*.

BACKGROUND:

Accurate service and outcome data for Texas workforce system customers is necessary to meet state and federal reporting requirements and to assess the performance of the workforce system. The data is used to generate reports and information that the Texas Workforce Commission (TWC) and Boards use to manage, monitor, and assess performance. TWIST serves as the case file; therefore, it is necessary that all information entered be clear, concise, comprehensive, and accurate.

TWC has identified the following issues:

- After prolonged periods in which there was no contact with a participant, services were entered into TWIST—thereby delaying the participant's exit.
- Participants were placed in a variety of services, such as mentoring, tutoring, and GED, in excess of 90 days and no contact with the participant was documented in TWIST *Counselor Notes* during that time—thereby preventing the participants' exit and causing inaccurate data to be reported.

The accuracy and reliability of data is essential for efficient and responsible public administration and necessary for reporting such information to the U.S.

Department of Labor, the Legislative Budget Board, and others, and for maintaining the integrity of the Texas workforce system.

PROCEDURES:

Contact with Participants

Programs and activities have different contact requirements; therefore, Boards must ensure that Workforce Solutions Office staff is aware of and understands the differences among programs.

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For services that are open longer than one day, Boards must ensure that Workforce Solutions Office staff actively works with participants throughout the entire period of service.

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Boards must ensure that Workforce Solutions Office staff is in direct, two-way contact with participants at least monthly. For this purpose, the following applies:

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- Monthly means approximately 30 days.
- To qualify as a direct contact, a response (e.g., e-mail, text, phone call, fax) must be received from the participant indicating his or her continued engagement with the workforce system through the provided services. Automated responses, such as an outgoing voice mail message or out-of-office notification, do not qualify.
- To verify attendance and progress in training and education, documentation received from the school or training provider, including by e-mail or fax, is acceptable and constitutes a direct contact with the participant.

Documentation in TWIST *Counselor Notes*

Boards must ensure that the combination of services and detailed narrative information entered into TWIST *Counselor Notes* reflect a comprehensive picture of Workforce Solutions Office staff interactions with participants.

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Documenting Services

Boards must ensure that Workforce Solutions Office staff:

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- only documents services in TWIST and WorkInTexas.com when actively working with a participant;
- only documents services provided to a participant;
- accurately records service dates in TWIST and WorkInTexas.com; and
- closes service activities when no longer actively working with a participant. This includes manually closing out open service records with the correct service end dates and completion reasons.

Boards must ensure that Workforce Solutions Office staff documents only those job search activities performed by participants:

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- at a Workforce Solutions Office or in WorkInTexas.com; or
- in accordance with an employment plan developed by Workforce Solutions Office staff and the participant.

Boards also must ensure that Workforce Solutions Office staff documents participants' self-reporting of job search activities as a *Job Search Assistance* service in TWIST or WorkInTexas.com—only if there is evidence that such job search was performed using WorkInTexas.com or Workforce Solutions Offices resources.

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Documenting Contact with Participants

Boards must ensure that Workforce Solutions Office staff documents the following information in TWIST *Counselor Notes*:

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- details of all services provided;
- all contact with participants and other entities concerning the participants; and
- participants' progress, including supporting documentation and status.

Boards must ensure that Workforce Solutions Office staff enters into TWIST *Counselor Notes* a comprehensive, detailed, self-explanatory narrative on participants' cases that enables other staff members to work the cases with minimal background information required from participants.

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Boards must ensure that Workforce Solutions Office staff includes the following types of information in the narrative, *as applicable*: title (a descriptive subject entry accurately reflecting the contents); who (customer's name, employer's name, etc.); what (activity being reported); when (the date the activity was reported); where (customer's work/school location, etc.); why (to verify or document service activities); and how (customer called, case manager called, etc.).

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Attachment 1 provides scenarios of participant cases showing comprehensive and accurate narratives for TWIST *Counselor Notes*.

Boards must ensure that Workforce Solutions Office staff enters comprehensive information into TWIST *Counselor Notes* within one week of the service provision or contact.

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Boards may require their contractors to apply these procedures for child care services.

LF

ATTACHMENTS:

Attachment 1: Sample Comprehensive Narrative Entries for TWIST *Counselor Notes*

INQUIRIES:

Direct inquiries regarding this WD Letter to wfpolicy.clarifications@twc.state.tx.us.

RESCISSIONS:

None

REFERENCE:

Workforce Investment Act, Final Rule, 20 CFR §666.300
U.S. Department of Agriculture, Food and Nutrition Service Rules and Regulations, 7 CFR §273.7(a)
U.S. Department of Health and Human Services, 45 CFR §265.9
U.S. Department of Health and Human Services, Administration for Children and Families, Temporary Assistance for Needy Families Final Rule, 45 CFR, Part 261, et al.
Texas Penal Code §37.10
Texas Workforce Commission Choices Rules: 40 TAC, Chapter 811

FLEXIBILITY RATINGS:

No Local Flexibility (NLF): This rating indicates that Boards must comply with the federal and state laws, rules, policies, and required procedures set forth in this WD Letter and have no local flexibility in determining whether and/or how to comply. All information with an NLF rating is indicated by “must” or “shall.”

Local Flexibility (LF): This rating indicates that Boards have local flexibility in determining whether and/or how to implement guidance or recommended practices set forth in this WD Letter. All information with an LF rating is indicated by “may” or “recommend.”