



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, Chief Executive Officer

Presented by: Dr. Ricardo Ramirez, Director of Quality Assurance

Date: August 15, 2025

Subject: TWC Annual Monitoring Update

SUMMARY: Quality Assurance briefing on TWC’s Annual Monitoring. The item does not require Board action.

BACKGROUND: Boards are subject to TWC audits, reviews, and comprehensive monitoring activities to ensure that programs achieve their intended results while maintaining fiscal accountability and compliance with applicable laws, rules, and regulations in adherence to uniform administrative requirements for grants and agreements.

TWC Audit Resolution

TWC’s annual monitoring required WSA to implement continuous quality improvement for one item. This involved outstanding checks associated with bank reconciliations, for which staff updated procedures, developed and provided staff training, and incorporated internal reviews.

On June 12, 2025, TWC issued an “*Audit Resolution Report*” to WSA. In it, TWC reports that WSA’s corrective actions adequately resolved the finding, reflecting that the Board has adequate controls to ensure the accountability of public funds, and that all outstanding checks are reconciled according to federal, state, and local requirements and guidelines.

With this, the TWC Monitoring Report 25.20.0001 is now closed.

TWC Annual Monitoring

TWC’s Annual Monitoring for this year is underway. WSA received an Engagement letter confirming that the on-site review will occur from October 14, 2025, to October 24, 2025.

Num	Process	Est. Date
1	Engagement Letter	7/15/2025
2	Document Request Package (DRP)	8/19/2025
3	Sample Request	10/08/2025

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 San Antonio, Texas 78207
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4	Entrance Conference	10/14/2025
5	On-Site Review	10/14/2025
6	Exit Conference & Exit Report	10/24/2025
7	TWC Monitoring Report	04/03/2026

STAFF RECOMMENDATIONS:

- Hold meetings with Board and Contractor staff in preparation for the monitoring.
- Set up the technical aspects for the review (e.g., TEAMS channels, TWC Auditors’ VPN access).
- Coordinate each phase with WSA departments and Contractors, including staff assignments, deadlines, and document submission, ensuring responsiveness and promptly addressing each item that may arise.

FINANCIAL IMPACT: None.

STRATEGIC OBJECTIVE: To help ensure that local employment and training activities, including one-stop delivery systems and workforce development services, appropriately use, manage, and invest funds as required and in ways that maximize performance outcomes (WIOA Sec. 107(d)(8); WIOA Sec. 134(2)(B)(iv); WIOA Sec. 183; WIOA Sec. 185(c)(3); WIOA Sec. 121(3); WIOA Sec. 129(b)(1)(e); TWC’s Board Oversight Capacity evaluation, Texas Labor Code §302.048, TWC Rule §Title 40, Part 20, Chapter 802, Integrity of the Texas Workforce System, particularly §802.61; WD 29-15, Chg. 1; TWC Agency-Board Agreements and Grant Contracts).

ATTACHMENTS:

1. TWC Audit Resolution Report
2. TWC Engagement Letter

Texas Workforce Commission

A Member of Texas Workforce Solutions

Bryan Daniel, Chairman
Commissioner Representing
the Public

Alberto Treviño, III
Commissioner Representing
Labor

Joe Esparza
Commissioner Representing
Employers

Edward Serna
Executive Director

June 12, 2025

Mr. Adrian Lopez, Chief Executive Officer
Workforce Solutions Alamo
100 North Santa Rosa Street, Ste. 120
San Antonio, Texas 78207

Audit Resolution Report

Dear Mr. Lopez:

Workforce Solutions Alamo (Board) administers the Child Care Services, Choices (employment services for Temporary Assistance for Needy Families), Employment Services, Trade Adjustment Assistance, and Workforce Innovation and Opportunity Act programs. In Fiscal Year 2025 TWC conducted a monitoring review of these programs and had one finding, as documented in Monitoring Report #25.20.0001. This letter is about the audit resolution of the finding, as outlined below:

Finding: Strengthen Controls Over Bank Reconciliations

The Board does not have adequate controls over bank reconciliations. Monitors found 25 checks that were outstanding over 90 days from issuance, totaling \$28,310.05. Monitors noted that some checks were issued in 2018.

Without effective internal controls over cash management, the Board cannot maintain accountability and safeguard public funds.

Corrective Action Taken:

The Board has adequate controls in place to ensure accountability of public funds, and that all outstanding checks are reconciled according to federal, state and local requirements and guidelines. The Board provided a copy of its updated policies and procedures for bank reconciliations along with the corrective actions taken to address the outstanding checks identified in the finding. In addition, the Board provided recent bank reconciliations with no outstanding checks over 90 days from issuance. Lastly, the Board provided agenda and sign-in sheet for training conducted by its fiscal leadership to staff responsible for preparing the monthly bank reconciliations.

Because the corrective actions taken adequately resolves the finding, TWC Monitoring Report #25.20.0001 is closed. We encourage the Board to continue its efforts in following and adhering to federal, state and local requirements and guidelines, as the area noted above will be tested during subsequent monitoring reviews.

Mr. Lopez
Page 2
June 12, 2025

Thank you for your assistance on this matter. If you have any further questions, please contact Judy Ohn at (737)-802-9398 or judy.ohn@twc.texas.gov.

Sincerely,



Jason Stalinsky, Esq.
Interim Division Director
Division of Fraud Deterrence and Compliance Monitoring

cc: Leslie Cantu, Chair, Workforce Solutions Alamo

United States Department of Health and Human Services

Gwendolyn Jones, Regional Program Manager
Deborah Daniels, Program Specialist
Alisa Matthews, Program Specialist

United States Department of Labor

M. Frank Stluka, Acting Regional Administrator, Employment and Training Administration
and Administrative Services Region IV - Dallas, USDOL/Employment and Training
Administration

Texas Workforce Commission

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Bryan Daniel, Chairman
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Joe Esparza
Commissioner Representing
Employers

Edward Serna
Executive Director

July 22, 2025

Mr. Adrian Lopez, Chief Executive Officer
Workforce Solutions Alamo
100 N. Santa Rosa St., Ste. 120
San Antonio, Texas 78207

Dear Mr. Lopez:

We plan to conduct a review of your grant agreements during the weeks of **October 14, 2025, and October 20, 2025**. The monitoring team will review fiscal and programmatic operating systems to ensure that administrative, organizational, and managerial elements exist to support effective program management.

Concerns or issues will be discussed with management throughout the review. A report will be issued containing any findings or areas of concern resulting from the review.

Indicate your concurrence with the date of the review and return the signed document electronically to **Ernesto Cantú**, Project Manager, at Ernesto.Cantu@twc.texas.gov. You may also reach him at (737) 710-4488, if you have any questions or need additional information.

Please list a contact person for your organization and his or her telephone number and e-mail address. We will contact this person before the review to request information that will assist us in our review preparation. We would appreciate receiving your confirmation by **July 29, 2025**.

Sincerely,



Mary B. Millan, Deputy Division Director
Subrecipient Monitoring
Division of Fraud Deterrence and Compliance Monitoring

Attachment

cc: Leslie Cantu, Chair, Workforce Solutions Alamo



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, Chief Executive Officer

Presented by: Dr. Ricardo Ramirez, Director of Quality Assurance

Date: August 15, 2025

Subject: Quality Assurance Update

SUMMARY: Quality Assurance briefing on WSA monitoring activities. The item does not require Board action.

WSA External Program Monitoring (Ms. Christine Nguyen, CPA)

- *WIOA Adult - C2 GPS:* 100% complete with an overall 93.81% accuracy rate. The testing included: Eligibility, Support Services, Performance Management, Case Management, with four (4) attributes for continuous improvement:
 - Documenting the availability of other resources before issuing support services (89.66%).
 - Performance Credential Outcomes data entry accuracy (88.89%).
 - Employment verification at program entry and documenting unemployment status for 27 or more consecutive weeks (83.33%).
 - Monthly contact documentation, including two attempts per month (63.33%).
- *WIOA Dislocated Worker - C2 GPS:* 100% complete with an overall 91.62% accuracy rate. The testing included: Eligibility, Support Services, Performance Management, Case Management, with five (5) attributes for continuous improvement:
 - Documenting the availability of other resources before issuing support services (76.19%).
 - Support services case notes and WIT Activities ribbon (80.95%).
 - Performance Measurable Skills Gains Outcomes data entry accuracy (85.71%).
 - Service activity codes, and open and closed service dates (87.50%).
 - Monthly contact documentation, including two attempts per month (50.00%).
- *Non-Custodial Parent Choices (NCP) – C2 GPS:* 100% complete. Currently working on the Final Report.
- *WIOA Youth – SERCO:* 49% complete.

WSA Internal QA Program Monitoring

- *Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) – C2 GPS:* 100% complete.

- The testing resulted in a “Phase I” report with eight (8) attributes needing continuous improvement efforts.
- Phase I reviews provide the contractor with the opportunity to address the issues and demonstrate improvement within a two to three-month period. This includes intensified internal controls/monitoring, staff training, and procedural reviews.
- The results will then be reported with a Phase II review.
- *Contractor QA Review (C2GPS, SERCO, and COSA) 58% complete.*
 - QA is reviewing the contractors’ internal monitoring, which includes several elements that we’ll use for feedback and strengthening of the systems, including:
 - Comparing the attributes they test with ours and TWC’s.
 - Comparing the score results from their testing with ours and TWC’s.
 - Reviewing potential causes for any variation in outcomes (e.g., staffing, methods, frequency, etc.).

Other Activities:

- Some of the additional activities performed by QA include, but are not limited to, the following: initiating WSA Staff Training; Developing 2025-2026 performance targets for Adults and Youth; Assisting with the agency’s Risk Assessment; Reviewing and providing guidance on varied policy-related items.

STAFF RECOMMENDATIONS:

- To track the progress of actions, QA continues performing informal testing of attributes with accuracy rates below the 90% threshold.
- Staff focus on the most critical items, such as repeat findings or those impacting performance and funding.
- The continuous improvement system features a feedback mechanism that enables collaboration among Operations, our contractor partners, and QA to drive progress.

FINANCIAL IMPACT: WSA’s External Program Monitoring contract with Ms. Christine Nguyen, CPA: \$225,000.

STRATEGIC OBJECTIVE: To help ensure that local employment and training activities, including one-stop delivery systems and workforce development services, appropriately use, manage, and invest funds as required and in ways that maximize performance outcomes (WIOA Sec. 107(d)(8); WIOA Sec. 134(2)(B)(iv); WIOA Sec. 183; WIOA Sec. 185(c)(3); WIOA Sec. 121(3); WIOA Sec. 129(b)(1)(e); TWC’s Board Oversight Capacity evaluation, Texas Labor Code §302.048, TWC Rule §Title 40, Part 20, Chapter 802, Integrity of the Texas Workforce System, particularly §802.61; WD 29-15, Chg. 1; TWC Agency-Board Agreements and Grant Contracts).

ATTACHMENTS:

QA Timelines.



Estimated Timeline – External Program Monitoring Activities 2024-2025

Initial Estimated Timeline				Actual Timeline						
<i>External Program Monitoring</i>	<i>Duration</i> ⁺⁺	<i>Start</i>	<i>Finish</i>	<i>Duration</i> ⁺⁺	<i>Effort</i>	<i>Variance</i>	<i>Start</i>	<i>Finish</i>	<i>% Complete</i>	<i>Comments</i>
Estimated Timeline: 2024-2025	241	12/2/2024	11/3/2025	166	249	<i>Duration</i>	12/2/2024		92%	
COSA - Child Care Services	46	12/2/2024	2/3/2025	81	80	35	12/2/2024	3/24/2025	100%	Completion delayed due to TWIST access issues.
COSA - CC QIA	40	1/27/2025	3/21/2025	40	40	0	2/11/2025	4/7/2025	100%	Start delayed due to TWIST access issues.
C2GPS - WIOA Adult	46	3/26/2025	5/28/2025	46	46	0	3/26/2025	5/28/2025	100%	
C2GPS - WIOA Dislocated Worker	46	3/26/2025	5/28/2025	46	46	0	3/26/2025	5/28/2025	100%	
C2GPS - SNAP										Moved SNAP to be completed internally by WSA QA
C2GPS - NCP	39	6/4/2025	7/28/2025	38	37	-1	5/29/2025	7/21/2025	100%	Working on the Final Report
SERCO - WIOA Youth	41	7/7/2025	9/1/2025				7/7/2025		49%	
C2GPS - TANF/Choices	40	9/3/2025	10/28/2025							
CONSORTIUM - Ready to Work	21	10/6/2025	11/3/2025							
Avg Duration or Effort (days) →	40			50	50	10				
Multi-tasking (% days overlapping projects) →	24.5%			-33.9%						

Duration : total days from start to finish to complete project (includes some holidays); *Effort (or Work)* : actual number of days spent on each project.

Modification Notes

⁺⁺ The Duration is not equal to the time that the contractors are actively involved in the project - it includes additional internal QA work (e.g., desk and policy review, tool development, etc.).



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, Chief Executive Officer

Presented by: Dr. Ricardo Ramirez, Director of Quality Assurance

Date: August 15, 2025

Subject: Rules Regarding Citizenship Status

SUMMARY: Briefing on citizenship status and work authorization verification requirements associated with WSA grants and services.

Please note that WSA has always verified work authorization status for WIOA and related grants for participant-level services, as per the Texas Workforce Commission’s (TWC’s) requirements.

PURPOSE: This briefing has the following purposes:

- A. To reaffirm WSA’s commitment to meeting employer labor demands through the effective use of public funds in compliance with federal and state work authorization requirements for individuals.
 - Ensure employer confidence that partnering with WSA will help them identify and hire workers who are both equipped with the skills to succeed on the job and legally authorized to work in the U.S.
- B. To highlight a new federal directive requiring verification of temporary work authorizations in three-month intervals.
- C. To brief the Board about citizenship and work authorization requirements for participants.

BACKGROUND:

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193)(PRWORA)¹ prohibits unauthorized individuals within the Nation’s borders from depending on public resources to meet their needs.

WIOA Section 188(a)(5) states that “participation in programs and activities... shall be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens,

¹ Executive Order: Ending Taxpayer Subsidization of Open Borders, The White House, February 19, 2025.

refugees, asylees, and parolees, and other immigrants authorized by the Attorney General to work in the United States.”

To that purpose, the Department of Labor issued a Training and Employment Guidance Letter (TEGL) No. 10-23, Change 2, “*Work Authorization Verification in Grant Programs Administered by the Employment and Training Administration.*”

The directives maintain existing guidance requiring Boards to verify work authorization for all participants served by the Workforce Innovation and Opportunity Act (WIOA) and related programs before delivering ‘*participant-level*’ services and added a new requirement for continued verification of temporary work authorizations.

WIOA and Related Grants

The WIOA and related grants include:

- WIOA Title I Adult, Dislocated Worker, Youth, and statewide employment and training services funded by the Governor’s reserve,
- WIOA National Dislocated Worker Grants (DWGs),
- Wagner-Peyser Act (W-P) Employment Service, and
- Other partner programs not operated by WSA Contractors (authorized under Section 169 of WIOA):
 - Re-entry Employment Opportunities (REO),
 - YouthBuild,
 - Section 167 Migrant and Seasonal Farmworker Program, commonly referred to as the National Farmworker Jobs Program (NFJP), and
 - Senior Community Service Employment Program (SCSEP).

Participant-Level Services (federal public benefits)

While WIOA and related grants provide a range of services to job seekers, the overall goal is to move participants into gainful employment. Attachment 2, “*TEGL 19-16, Attachment II, Participation Level Services Chart,*” lists the applicable services requiring work authorization validation. Grant-specific guidance may also include additional services that must be followed.

REQUIRED ACTIONS

The TEGL ratifies existing work authorization requirements.

Verification of Work Authorization

- Verify and document work authorization before delivering participant-level services to eligible participants.
- The work authorization documentation must include a unique identifier, along with acceptable documents listed in the *WIOA Citizenship/Eligible Non-Citizenship Status Authorization to Work* form (attached).

Non-Qualified Nonimmigrants

Individuals in specific employment-based nonimmigrant categories, such as H-2A, H-2B, and CW-1 workers, are ineligible to receive participant-level services in WIOA and related programs. These individuals are not included in WIOA Section 188’s category of “other immigrants authorized to work in the United States” or PRWORA’s definition of “qualified alien.”

The Foreign Labor Certification for Employers, H-2A (agricultural) and H-2B (non-agricultural), allows employers to hire temporary workers from other countries to fill jobs when they cannot find enough American workers. The CW-1 is for the Northern Mariana Islands.

Grants for Which WSA Does Not Validate Work Authorization Status

Work authorization is not verified for participants in the following grants. The referring agency is responsible for the work authorization or citizenship status verification.

- TANF/Choices and SNAP E&T: HHSC.
- Non-Custodial Parent (NCP): The Office of the Attorney General (OAG).
- Trade Adjustment Assistance (TAA): TWC's TAA Unit.
- SEAL: TWC's Vocational Rehabilitation.

Temporary Work Authorizations

New Requirement: For individuals whose work authorization is temporary, their work authorization must be reviewed at a reasonable interval determined by when their temporary authorization is expected to expire, but no less than every three months. If at any time, a participant's employment authorization expires or is revoked outside of the 3-month check, then the participant must be exited and services discontinued.

STAFF RECOMMENDATIONS:

- Ensure policies and procedures accurately reflect requirements.
- Develop and provide staff training and as needed, technical assistance.
- Maintain internal controls to validate authorization to work requirements for WIOA and related grant participants.

FINANCIAL IMPACT:

- As approved by the Board, WSA covers costs associated with the work status verification using budget allocations for the Contractors (e.g., as part of Operations).
- Cabinet, the electronic document repository of participant records, is already in place, and the expense is already allocated (WSA began digitizing all participant records in August 2023).
- Services provided to non-authorized individuals may incur disallowed costs.

STRATEGIC OBJECTIVE: To help ensure that local employment and training activities, including one-stop delivery systems and workforce development services, appropriately use, manage, and invest funds as required and in ways that maximize performance outcomes (WIOA Sec. 107(d)(8); WIOA Sec. 134(2)(B)(iv); WIOA Sec. 183; WIOA Sec. 185(c)(3); WIOA Sec. 121(3); WIOA Sec. 129(b)(1)(e); TWC's Board Oversight Capacity evaluation, Texas Labor Code §302.048, TWC Rule §Title 40, Part 20, Chapter 802, Integrity of the Texas Workforce System, particularly §802.61; WD 29-15, Chg. 1; TWC Agency-Board Agreements and Grant Contracts).

ATTACHMENTS:

- TEGL 10-23, Change 2, Work Authorization Verification in Grant Programs Administered by the Employment and Training Administration
- TEGL 19-16, Attachment II, Participation Level Services Chart
- WIOA Citizenship/Eligible Non-Citizenship Status Authorization to Work

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION WIOA
	CORRESPONDENCE SYMBOL OWI
	DATE July 10, 2025

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 10-23, Change 2

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE ADMINISTRATORS
STATE WORKFORCE LIAISONS
STATE AND LOCAL WORKFORCE BOARD CHAIRS AND DIRECTORS
AMERICAN JOB CENTER DIRECTOR
STATE LABOR COMMISSIONERS
WORKFORCE INNOVATION AND OPPORTUNITY ACT SECTION 167
MIGRANT AND SEASONAL FARMWORKER PROGRAM GRANTEES
WORKFORCE INNOVATION AND OPPORTUNITY ACT SECTION 169
REENTRY EMPLOYMENT OPPORTUNITIES GRANTEES AND OTHER
DEMONSTRATION PROGRAMS
WORKFORCE INNOVATION AND OPPORTUNITY ACT SECTION 171
YOUTHBUILD GRANTEES
WORKFORCE INNOVATION AND OPPORTUNITY ACT NATIONAL
DISLOCATED WORKER GRANT PROGRAM GRANTEES
SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM
GRANTEES

FROM: LORI FRAZIER BEARDEN 
Acting Assistant Secretary

SUBJECT: Work Authorization Verification in Grant Programs Administered by the Employment and Training Administration

- Purpose.** This guidance provides direction regarding work authorization verification for grant programs administered by the Employment and Training Administration (ETA).
- Action Requested.** Entities receiving grants under the following programs must review and revise policies, documentation requirements, and procedures to align with this guidance: Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, Youth programs (including statewide employment and training services funded by the Governor reserve); WIOA National Dislocated Worker Grants (DWGs); Wagner-Peyser Act (W-P) Employment Service; Reentry Employment Opportunities (REO) and other programs authorized under Section 169 of WIOA; YouthBuild; Section 167 Migrant and Seasonal Farmworker Program, also commonly referred to as the National Farmworker Jobs Program (NFJP); and the Senior Community Service Employment Program (SCSEP).

RESCISSIONS None	EXPIRATION DATE Continuing
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3. Summary and Background.

- a. Summary – This Training and Employment Guidance Letter (TEGL) directs the public workforce development system to update all policies and procedures to ensure that all participants served by the programs identified in the guidance are legally authorized to work in the United States. The overall goal of WIOA is to prepare job seekers and workers to succeed in the labor market while helping employers hire the skilled workers they need to compete in the global economy. Accordingly, participants served through WIOA and the related programs above must have valid work authorization. This will focus ETA-administered federal resources on the workers who can ultimately accomplish the congressionally directed goal of employment. Additionally, it will ensure employers have confidence that partnering with the workforce system will help them identify and hire workers who are both equipped with the skills to succeed on the job and legally authorized to work in the United States.
- b. Background – In February 2024, ETA issued TEGL 10-23, which explained that some ETA-administered program services did not constitute “federal public benefits” under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) and therefore could be provided to job seekers and workers without verifying work authorization. This guidance attempted to differentiate among services that all help participants attain employment, which created confusion among grantees about which services were and were not allowable before verifying work authorization. Additionally, the guidance had acknowledged that individuals’ work authorization could change, but made no provisions for continued validation of work authorization. The guidance also did not require maintaining the kind of documentation that is routinely required for other participant characteristics. That TEGL was rescinded on March 27, 2025.

With this new TEGL, ETA is changing its prior guidance to clarify and establish that all participant-level services are considered “federal public benefits” under PRWORA. Therefore, grantees must verify work authorization for all participants served by WIOA and related programs named above prior to delivering participant-level services.¹

This change aligns with PRWORA and WIOA. This guidance uses the more commonly understood and better-defined category of participant-level services², and clearly states that all participant-level services are “federal public benefits” under PRWORA, because

¹ Programs such as YouthBuild, REO Youth, and NFJP youth services generally include assisting young people in obtaining their high school equivalency or other secondary-level education services. These youth programs provide these secondary-level education services along with other participant-level services that constitute federal public benefits. Because at least some services provided to youth participants are federal public benefits, recipients must verify participants’ work authorization. This policy is consistent with the overall goal of these youth programs to prepare participants for employment, as discussed in this guidance.

² Participant level services are defined in Attachment II in TEGL 19-16, *Guidance on Services through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules.*

they are the same or similar as benefits listed in PRWORA at 8 USC 1611(c).³ While WIOA programs provide a range of services to jobseekers, the overall goal is to move participants into gainful employment. The same is true for programs under the Wagner-Peyser Act and title V of the Older Americans Act. Therefore, grantees are directed to provide participant-level services only to individuals with work authorization. This will focus ETA-administered federal resources on the main purpose of these programs.

4. Verification of Work Authorization Status. For the grant programs covered by this guidance, grantees may only deliver participant-level services to individuals authorized to work in the United States. The legal considerations for limiting services to these individuals include the following:

- **WIOA** - Section 188(a)(5) of WIOA states, “Participation in programs and activities or receiving funds under [Title I of WIOA] shall be available to citizens and nationals^[4] of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized by the Attorney General^[5] to work in the United States.”
- **PRWORA** - Title IV of the PRWORA restricts the eligibility of aliens (non-U.S. citizens and non-U.S. nationals) to receive what the law defines as “federal public benefits,” 8 U.S.C. § 1611, limiting eligibility for such benefits to certain “qualified aliens,” defined at 8 U.S.C. § 1641.
 - **Qualified Alien** - At 8 U.S.C. 1611(a), PRWORA states, “an alien who is not a qualified alien (as defined in section 1641 of this title) is not eligible for any Federal public benefit.” The law then defines “qualified aliens” to include, among others, lawful permanent residents and individuals who have been granted asylum or refugee status.⁶
 - **Federal Public Benefit** - PRWORA defines “federal public benefit” to include “any retirement, welfare, health, disability, public or assisted housing, postsecondary education, food assistance, unemployment benefit, or any other similar benefit for which payments or assistance are provided to an individual,

³ The term “federal public benefit” includes “any retirement, welfare, health, disability, public or assisted housing, postsecondary education, food assistance, unemployment benefit, or any other similar benefit for which payments or assistance are provided to an individual, household, or family eligibility unit by an agency of the United States or by appropriated funds of the United States.”

⁴ A U.S. national is defined as a citizen of the United States or a person who, though not a citizen of the United States, owes permanent allegiance to the United States. 8 U.S.C. 1101(a)(22). For more information on non-citizen nationals, see <https://travel.state.gov/content/travel/en/legal/travel-legal-considerations/us-citizenship/Certificates-Non-Citizen-Nationality.html>.

⁵ As explained in the preamble to the WIOA Final Rule, after the Homeland Security Act of 2002, Pub. L. 107–296, transferred this work authorization authority to the Department of Homeland Security, reference in Federal law to any transferred function shall refer to the official to whom that function is transferred. Therefore, instead of the Attorney General, 20 CFR 683.285(a)(5) clarifies that this provision is referring to the Secretary of Homeland Security or their designee.

⁶ Note that the list above includes those “qualified aliens” that are most likely to interact with ETA grant programs. For the complete list of “qualified aliens” under PRWORA, see 8 U.S.C. 1641. For questions regarding whether an individual is a “qualified alien” under 8 U.S.C. 1641, contact ETA as noted in the Inquiries section.

household, or family eligibility unit by an agency of the United States or by appropriated funds of the United States.”

- **Note on Certain Nonimmigrants** - Aliens in certain employment-based nonimmigrant categories, such as H-2A, H-2B, and CW-1 workers, are ineligible to receive participant-level services in WIOA and related programs as they are not included in WIOA Section 188’s category of “other immigrants authorized to work in the United States” or in PRWORA’s definition of “qualified alien.” See 29 U.S.C. § 3248; 8 U.S.C. § 1641.

All grantees must verify work authorization for individuals who otherwise meet participant eligibility requirements prior to delivering participant-level services.⁷ (If an individual does not meet participant eligibility requirements, the grantee will not deliver services and does not need to verify work authorization for that individual.) Work authorization must be verified by submission of documentation with a unique identifier (also called a “verifiable enumerator”). Some examples of acceptable documents for Form I-9, Employment Eligibility Verification, purposes include an unrestricted Social Security card; a Form I-551, Permanent Resident Card, (informally called green card); Form I-765, Employment Authorization Document (EAD); a U.S. birth certificate; and a U.S. passport. Several other documents might be specifically held by refugees, asylees, parolees, and other immigrants with work authorization.⁸ Grantees should give individuals the Lists of Acceptable Documents included on the Form I-9, so that individuals know which documents they can use to establish their work authorization.⁹ Individuals can choose from the acceptable types of documents which documentation they will show to establish their work authorization. This does not require individuals or grantees to complete an I-9 form; these requirements refer to the documents described in the I-9 that can demonstrate work authorization.

If an individual certifies that they are a non-citizen or if an individual’s documentation indicates they are a non-citizen, valid work authorization and immigration status can be verified through the U.S. Citizenship and Immigration Services’ Systematic Alien Verification for Entitlements (SAVE). SAVE is an online service for registered federal, state, territorial, tribal, and local government agencies to verify U.S. citizenship and immigration status of applicants seeking benefits. In most instances, SAVE can also verify work authorization.¹⁰ ETA strongly recommends that grantees who are registered for SAVE (state, territorial, tribal, and local government agencies) use SAVE to verify immigration status in

⁷ In the rare instance that an individual does not have work authorization but is in one of the categories of “qualified alien” in PRWORA, 8 U.S.C. § 1641, contact ETA for further guidance.

⁸ For guidelines on which documents on Form I-9 are issued to which categories of individuals, see USCIS I-9 Central at <https://www.uscis.gov/i-9-central/form-i-9-acceptable-documents/who-is-issued-this-document>. For specific guidance on evidence of employment authorization for refugees and asylees, see the USCIS Handbook for Employers at <https://www.uscis.gov/i-9-central/form-i-9-resources/handbook-for-employers-m-274/70-evidence-of-employment-authorization-for-certain-categories/73-refugees-and-asylees>.

⁹ Page 2 of the Form I-9 includes the Lists of Acceptable Documents. The Form I-9 is available at: <https://www.uscis.gov/sites/default/files/document/forms/i-9.pdf>.

¹⁰ In some situations, the initial automated SAVE response may not reflect an individual’s employment authorization incident to status or may otherwise provide an unexpected response. In these situations, or when the benefit applicant requests it, the agency that initiated the automated request to SAVE may need to request manual SAVE verification and provide an electronic copy of the individual’s immigration document.

relation to work authorization. State workforce agencies that are not registered for SAVE can apply with USCIS for SAVE access in order to use SAVE. As [announced](#) in April 2025, SAVE is now free to use for state, local, tribal, and territorial government agencies.¹¹

As grantees conduct verification of work authorization, they must ensure they comply with the nondiscrimination provisions at Section 188 of WIOA and its implementing regulations at 29 C.F.R. part 38. To ensure equal treatment, all participants must provide, and grantees must keep copies in case files, proof of authorization to work in the United States. Grantees must update all policies and procedures to conform to these requirements. For individuals whose work authorization is temporary, grantees must verify their continued work authorization at a reasonable interval determined by when their temporary authorization is expected to expire, but no less than once every three months. If, at any time, a grantee becomes aware that a participant’s employment authorization has expired or been revoked outside that 3-month check, then the grantee should exit the participant. Grantees who are registered to use SAVE can use the SAVE system for this continuous verification procedure. Grantees that cannot access SAVE should review documents listed as acceptable on the I-9 as described above.

The above requirements reference verifying work authorization prior to delivering participant-level services. In the WIOA title I Adult and Dislocated Worker programs, to become a participant, an individual must meet all applicable program requirements to receive services aside from self-service or information-only services or activities. A chart that details which services go beyond self-service or information-only service and therefore trigger participation is included as Attachment II in TEGL 19-16. For other WIOA programs, refer to program-specific guidance regarding what services trigger determination of “participant” status. For the W-P Employment Service program, which provides access to all job seekers, an individual must receive a service other than self-service and information-only services or activities to be considered a participant. Additionally, filing complaints via the W-P Employment Service and Employment-Related Law Complaint System is not a participant-level service, see 20 C.F.R. part 658, subpart E. For SCSEP, a participant is defined as an individual who is determined to be eligible, is given a community service assignment, and is receiving any service funded by the program as described in 20 C.F.R. part 641, subpart E.

WIOA Section 166 Indian and Native American Program (INAP) grantees are not subject to the requirements of this TEGL.

5. **Inquiries.** Please direct inquiries to the appropriate Regional Office or your ETA Federal Project Officer.
6. **References.**
 - Workforce Innovation and Opportunity Act (WIOA), Pub. L. 113-128, 29 U.S.C. 3101 et seq.;
 - Wagner-Peyser Act (W-P Act), 29 U.S.C. 49 et seq.;
 - Older Americans Act, Title V, 42 U.S.C. 3056 et seq.;

¹¹ See USCIS, About SAVE, Transaction Charges, <https://www.uscis.gov/save/about-save/transaction-charges>

- Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), Title IV, Pub. L. 104-193, 8 U.S.C. 1601 et seq.;
- The Nondiscrimination and Equal Opportunity Provisions (Section 188) of WIOA available at: <https://www.ecfr.gov/current/title-29/subtitle-A/part-38>;
- Training and Employment Guidance Letter (TEGL) No. 02-14, *Eligibility of Deferred Action for Childhood Arrivals Participants for Workforce Investment Act and Wagner-Peyser Act Programs* available at: <https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-02-14>;
- TEGL No. 19-16, *Guidance on Services through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules* available at: <https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-19-16>;
- TEGL 10-23 change 1, *Rescission of TEGL No. 10-23: Reducing Admin Barriers to Improve Customer Experience in Grant Programs Administered by ETA*; and
- Executive Order 14218, [*Ending Taxpayer Subsidization of Open Borders*](#).

7. **Attachment**. Not Applicable.

Attachment II
Participation Level Services Chart
WIOA Title I Adult, Title I Dislocated Worker, and
Title III Employment Service Programs¹

Attachment II			
Adult/DW/ES Service Type (WIOA Sec. 134 (c))	Does this service trigger inclusion in participation?	Category of Service (i.e. Basic, Individualized, Training)	Applicable PIRL Data Element Number(s)
Eligibility Determination	No	Basic Career Service	N/A
Outreach, Intake, Orientation	No	Basic Career Service	N/A
Initial assessment of skill levels & supportive service needs	Yes	Basic Career Service	1003, 1004, 1102
Job search assistance (Self-directed)	No	Basic Career Service	N/A
Job search assistance (Staff-assisted)	Yes	Basic Career Service	1003, 1004, 1104
Placement assistance (includes "Referred to Employment") (Staff-assisted)	Yes	Basic Career Service	1003, 1004, 1105, 1106, 1107, 1108, 1109, 1110, 1111
Career Counseling (includes "Staff-assisted career guidance")	Yes	Basic Career Service	1003, 1004, 1102
Providing info on in-demand sectors, occupations, or nontraditional employment	No	Basic Career Service	1100, 1101
Provision of referrals and associated coordination of activities with other programs and services	No	Basic Career Service	1100, 1101, 1113, 1115
Provision of workforce and labor market employment statistics information	No	Basic Career Service	1100, 1101, 1103

¹ Note this this chart does not include all available services that may be provided, but rather those services specifically authorized under WIOA sec. 134(c)(2). Additionally, these services do not indicate whether or not an individual is a participant, but rather which services trigger an individual to become a participant.

Attachment II			
Adult/DW/ES Service Type (WIOA Sec. 134 (c))	Does this service trigger inclusion in participation?	Category of Service (i.e. Basic, Individualized, Training)	Applicable PIRL Data Element Number(s)
Provision of info on job vacancies	No	Basic Career Service	1100, 1101, 1103
Provision of info on job skills necessary to fill vacancies	No	Basic Career Service	1100, 1101, 1103
Provision of info on local demand occupations, with earnings, skill requirements, and opportunities for advancement for those jobs	No	Basic Career Service	1100, 1101, 1103
Provision of performance and program cost info for providers of education and training	No	Basic Career Service	1100, 1101
Provision of info on local performance	No	Basic Career Service	1100, 1101
Provision of info on availability of supportive services or assistance	No	Basic Career Service	1100, 1101
Referral to supportive services	No	Basic Career Service	1113
Provision of information and meaningful assistance filing for UI	Yes	Basic Career Service	1003,1004, 1112
Assistance establishing eligibility for financial aid	Yes	Basic Career Service	1003,1004, 1116
Comprehensive and specialized assessments	Yes	Individualized Career Service	1004, 1200, 1201
Development of IEP	Yes	Individualized Career Service	1004, 1200, 1201, 1202
Group Counseling	Yes	Individualized Career Service	1004, 1200, 1201
Individual Counseling	Yes	Individualized Career Service	1004, 1200, 1201
Career Planning	Yes	Individualized Career Service	1004, 1200, 1201

Attachment II			
Adult/DW/ES Service Type (WIOA Sec. 134 (c))	Does this service trigger inclusion in participation?	Category of Service (i.e. Basic, Individualized, Training)	Applicable PIRL Data Element Number(s)
Short-term prevocational services	Yes	Individualized Career Service	1004, 1200, 1201, 1210
Internships and work experiences (including transitional jobs)	Yes	Individualized Career Service	1004, 1200, 1201, 1203, 1205, 1211
Workforce preparation activities	Yes	Individualized Career Service	1004, 1200, 1201
Financial literacy services	Yes	Individualized Career Service	1004, 1200, 1201, 1206
Out-of-area job search assistance and relocation assistance	Yes	Individualized Career Service	1004, 1200, 1201
English-language acquisition and integrated education and training programs	Yes	Individualized Career Service	1004, 1200, 1201, 1207
Follow up services	n/a (must be a participant first to receive)	Follow up Service	1503
Training services under Sec. 134(c)(3)(D) with exception of Sec. 134(c)(3)(D)(iii) (incumbent worker training)	Yes	Training	1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319
Incumbent Worker Training	No ²	Training	907

*Note: Receipt of any of the three types of services (Basic, Individualized, or Training) makes an individual a “Reportable Individual” while it only takes the receipt of one service that triggers participation to be considered a participant.

² While Incumbent Worker Training is not a self-service or information-only service, individuals are not required to meet eligibility requirements for the Adult or Dislocated Worker programs to receive Incumbent Worker Training.

WORKFORCE INNOVATION AND OPPORTUNITY ACT CITIZENSHIP/ELIGIBLE NONCITIZEN STATUS AUTHORIZATION TO WORK

For individuals to receive individualized career or training services under Workforce Innovation and Opportunity Act programs, they must be authorized to work in the United States. Please complete the following form, choosing one item from **List A**, or one item from **List B** and one item from **List C**.

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Print Name: Last First MI Birth/Maiden Name

Date of Birth (month/day/year)

Social Security Number (if voluntarily provided)

All documents must be unexpired

LIST A	LIST B	LIST C
Documents That Establish Both Identity and Employment Eligibility	Documents That Establish Identity	Documents That Establish Employment Eligibility
OR		
<input type="checkbox"/> US Passport or US Passport Card <input type="checkbox"/> Permanent Resident Card or Alien Registration Receipt Card (Form I-551) <input type="checkbox"/> Foreign Passport that contains a temporary I-551 stamp or temporary I-551 printed notation on a machine-readable immigration visa <input type="checkbox"/> Employment Authorization Document that contains a photograph (Form I-766) <input type="checkbox"/> For an individual temporarily authorized to work for a specific employer because of his or her status or parole: a. Foreign passport; and b. Form I-94 or Form I-94A that has the following: (1) The same name as the passport; and (2) An endorsement of the individual's status or parole as long as that period of endorsement has not yet expired and the proposed employment is not in conflict with any restrictions or limitations identified on the form <input type="checkbox"/> Passport from the Federated States of Micronesia (FSM) or the Republic of the Marshall Islands (RMI) with Form I-94 or Form I-94A indicating nonimmigrant admission under the Compact of Free Association Between the United States and the FSM or RMI	<input type="checkbox"/> Driver's License or ID Card issued by a state or outlying possession of the United States, provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address <input type="checkbox"/> ID Card issued by federal, state, or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, gender, height, eye color and address <input type="checkbox"/> School ID Card with a photograph <input type="checkbox"/> Voter Registration Card <input type="checkbox"/> US Military Card or Draft Record <input type="checkbox"/> Military Dependent's ID Card <input type="checkbox"/> US Coast Guard Merchant Mariner Card <input type="checkbox"/> Native American Tribal Document <input type="checkbox"/> Driver's License issued by a Canadian government authority <p style="text-align: center;">For persons under age 18 who are unable to present a document listed above:</p> <input type="checkbox"/> School record or report card <input type="checkbox"/> Clinic, doctor, or hospital record <input type="checkbox"/> Day care or nursery school record	<input type="checkbox"/> Social Security Account Number card other than one that specifies on the face that the issuance of the card does not authorize employment in the United States <input type="checkbox"/> Certification of Report of Birth issued by the Department of Homeland Security (Form DS-1350, FS-545 or FS-240) <input type="checkbox"/> Original or certified copy of a birth certificate issued by a state, county, municipal authority, or territory of the United States bearing an official seal <input type="checkbox"/> Native American Tribal Document <input type="checkbox"/> US Citizen ID Card (INS Form I-197) <input type="checkbox"/> Identification Card for use of Resident Citizen in the United States (Form I-179) <input type="checkbox"/> Employment authorization document issued by the Department of Homeland Security (except I-766, which is a List A document) <input type="checkbox"/> Screenprint of UI screen Current Claim Status <input type="checkbox"/> UI award letter <input type="checkbox"/> Expedited Eligibility through TAA <input type="checkbox"/> Expedited Eligibility through RESEA
AND		

CERTIFICATION

I certify that the information stated above is true and accurate, and understand that the above information, if misrepresented or incomplete, may be grounds for immediate termination or penalties as specified by law.

Individual Signature	Print Name	Date
Workforce Solutions Office Staff Signature	Print Name	Date
Manager/Reviewer Signature	Print Name	Date



MEMORANDUM

To: Oversight Committee
From: Eric Vryn, Chief Process Officer
Date: August 15, 2025
Subject: **Update: Enterprise Risk Management (ERM) Tool**

Purpose:

This memo updates the Oversight Committee on WSA's Enterprise Risk Management (ERM) tool development progress, describes our revised implementation approach based on TWC requirements and organizational feedback, and informs the committee of our strategy as we complete tool development and begin initial deployment within the agency.

Summary:

This memo updates our November 2024 communication on the comprehensive risk assessment framework. Two factors have influenced our strategic approach: the TWC IT assessment recommending a formal risk registry and WSA leadership's identification of the need for risk assessment beyond annual TWC monitoring to provide a secondary mechanism to minimize risk and exposure to the agency. We have developed a revised strategy for enterprise-wide risk management using existing resources where possible.

Overview:

Our initial framework concept emphasized adaptable principles, risk matrix analysis, and technology integration. Subsequent investigation revealed three critical implementation challenges that required strategic adjustment:

- **Challenge 1: Operational Complexity**
Risks vary significantly across departments (Programs, IT, Procurement, Facilities, Fiscal), requiring more tailored assessment methodologies than initially anticipated.
- **Challenge 2: Regulatory Requirements**
The TWC IT assessment specifically mandates a formal risk registry with documentation protocols that exceed our current capabilities.
- **Challenge 3: Organizational Learning**
Stakeholder feedback indicated strong preference for an investigative approach that allows for learning and adaptation throughout implementation.

These findings necessitated refinement of our approach while maintaining commitment to data-informed decisions, transparent accountability, and organizational scalability.

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Risk Analysis Framework:

Our framework is built upon established risk management principles with organizational-specific adaptations across four core areas:

1. Adaptable Principles

We emphasize data-informed decision-making and transparent accountability, incorporating department-specific risk criteria that reflect unique operational contexts. WSA maintains a zero-risk appetite approach, consistent with our responsibility for public resources and regulatory compliance.

2. Robust Methodologies

We employ a comprehensive weighted scoring framework adapted from RICE methodology. The assessment tool evaluates risks across thirteen categories with weighted scoring that prioritizes mission-critical factors, regulatory compliance, and financial considerations while incorporating operational, stakeholder, and implementation factors. This weighted scoring system enables precise risk quantification while addressing three core organizational areas: Programmatic Operations, Fiscal & Procurement Management, and Strategic Organizational Initiatives, following TWC guidance and incorporating research from peer Texas Workforce Boards.

3. Technology Integration

We will deploy the assessment tool using Cognito Forms, an existing platform within WSA's current technology infrastructure, eliminating the need for additional resources at this time. This approach enables revisions as organizational circumstances evolve while prioritizing integration with current business processes rather than creating additional administrative burden.

4. Governance Structure

Our Quality Assurance Director will partner with the CPO office to lead implementation, ensuring alignment with existing quality systems and regulatory compliance requirements. As the tool continues to be modified and revised in the future, a more robust governance structure will be developed to support ongoing risk management maturation.

Implementation Approach:

Our strategy emphasizes systematic investigation and adaptive implementation through three phases:

Phase 1: Foundation Building

Consultation with TWC regarding specific risk registry expectations and analysis of approaches from comparable workforce boards to identify proven, adaptable methodologies.

Phase 2: Framework Development

Development of core risk assessment frameworks applicable across all functional areas, with initial focus on programs and administrative functions. IT risk considerations will be integrated while maintaining specialized technical requirements.

Phase 3: Phased Deployment

Implementation following a measured approach that prioritizes areas for early success while building organizational understanding of effective risk assessment practices.

This approach recognizes that effective risk management requires careful organizational adaptation rather than implementation of rigid solutions.



Timeline and Deliverables:

Our November 2024 timeline anticipated more rapid framework implementation. Based on investigation findings and TWC assessment requirements, we have adjusted our approach with the following implementation schedule:

June 2025: (Completed)

- Completed consultation of TWC guidelines regarding specific risk management requirements
- Completed analysis of peer workforce board risk management practices
- Developed initial assessment criteria and rating scales for core organizational functions

July 2025: (Completed)

- Completed draft risk assessment templates and documentation protocols
- Finalized framework, governance structure and review processes
- Completed technology platform evaluation and selected Cognito Forms

August 2025: (In Progress)

- Develop implementation plan incorporating three separate ERM tools tailored to specific agency operational areas. The three tools maintain the same functionality and format, with variations in the questions used for each of the three operational areas. This approach enables more precise risk calculations based on staff feedback and TWC guidelines, rather than employing a single broad tool that may not address unique requirements of each operational domain
- Plan departmental rollout and comprehensive staff training for initial implementation, recognizing this represents WSA's first formal risk management initiative
- Develop policy framework to accompany the ERM tools
- Complete development of three (3) ERM tools within Cognito Forms platform
- Finalize training materials and implementation support documentation

September 2025 (Expected):

- **Anticipated Delivery:** September 15, 2025

This timeline ensures thorough preparation while maintaining momentum toward comprehensive agency implementation, with particular attention to organizational change management needs for staff new to formal risk assessment processes. The metrics within the tool are designed to guide staff in carefully considering projects and initiatives more thoroughly.

Next Steps

Our immediate priorities for August completion include:

1. Policy Development: Finalizing comprehensive policy framework for ERM implementation
2. Tool Development: Completing development of three tailored ERM tools in Cognito Forms
3. Implementation Planning: Preparing detailed implementation strategy for departmental deployment



4. Training Materials: Developing comprehensive training and ongoing support materials

Fiscal Impact

We will implement this approach utilizing existing staff resources and current technology infrastructure. No additional budget allocation is required at this time.

Attachments: None.



MEMORANDUM

To: Strategic Committee
From: Adrian Lopez, CEO
Presented By: Victoria Rodriguez, Director of Workforce Services
Date: August 15, 2025
Subject: Program Briefing

Summary: The workforce service staff is actively planning and preparing special initiatives, including WCI events, Summer Earn and Learn, and the Externship for Teachers program. Additionally, Workforce Solutions Alamo was awarded the Military to Civilian Employment grant which will kick-off soon.

Special Grants & Other Initiatives:

Summer Earn and Learn: Summer Earn and Learn provides students with unique abilities the opportunity to gain paid, on-the-job workplace readiness training, hands-on work experience, and transferable skills. This year, the wage for participants has increased to \$13.50, enhancing engagement and aligning with WSA’s local plan. The program is already off to a strong start, with 60 participants in the pipeline and approximately 40 employer worksites.

- 181 enrolled into SEAL
- 114 job placements
- 78 completed Work Readiness Training
- 108 actively working
- 84 completed 5 weeks

Externship for Teachers: This initiative aims to enhance educators' knowledge of workforce topics, especially STEM careers in the Alamo region. By providing five days of on-site and virtual externships with 15-20 local businesses and industries, the program will equip approximately 100 teachers with practical insights into real-world applications of classroom content.

- 93 educators completed

Partners for Reentry Opportunities in Workforce Development (PROWD): Implement evidence-based, dedicated services that will improve the outcomes for individuals currently in, or recently released from the custody of the Federal Bureau of Prisons (FBOP).

- 129/600 enrolled

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- 87 earned credentials
- 87 earned a Measurable Skill Gain
- 66 job placements

Workforce Commission Initiatives:

National Intern Day Celebration – July 31, 2025

- Aimed at high school juniors, seniors, and college students, this event will connect youth with internship opportunities to reinforce skills through work-based learning.
- Employers will showcase available internships to foster real-world experience and career readiness.
- Serviced approximately 178 youth

Fiscal Impact: Investments in special projects and initiatives have historically yielded a high return on investment across the 13-county region. The completion of these projects will highlight their impact and ROI in these memos.

Recommendation: Recommendation is for WSA staff to review internal processes for supporting employers and community partners in leveraging TWC funded opportunities. This includes establishing standard performance measures demonstrating the proposed program’s contribution to increasing employment within the sector-based model. WSA is also exploring the collection of data from grant funded initiatives to determine the collective contribution across existing grant programs.

Next Steps: Continue collaborating with staff, partners, the board, and TWC to enhance and optimize the services offered through the initiatives mentioned above.



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Victoria Rodriguez, Director of Workforce Services

Date: August 15, 2025

Subject: Performance

Summary: Boards experienced a change in case management system of April 2023, a performance negotiation, performance adjustment, and reporting difficulties due to change in WF CSM. In April 2025, the boards received an additional MPR that covered measures in October, November, and December of 2024. Since then, Alamo has been working towards improving measures that were unmet and initiated a Technical Assistance Plan (TAP) that took place in May. Youth measures have not been reported for the past three MPR's.

Performance: There are fifteen siloed measures tracked across all WIOA programs (Adult, Dislocated Worker, and Youth) in the Monthly Performance Report (MPR) by TWC. These measures include Claimant Re-Employment within 10 Weeks, Employers Receiving Workforce Assistance from Boards or Self-Services, Choices Full Engagement Rate, and the Average Number of Children Served per Day Combined. Each measure has a specific definition outlined in the presentation. Performance targets vary by measure, with some requiring 90% of the target performance to be met and others 95%. WIOA measures have start periods that run either from July to June or January to December, with the End of Year Report concluding in August. Meanwhile, Claimant Re-Employment within 10 Weeks, Employers Receiving Workforce Assistance, Choices Full Engagement Rate, and the Average Number of Children Served per Day Combined follow a rolling start period from the previous month to the current year, with their End of Year Report concluding in September.

The Technical Assistance Plan addresses the following measures:

1. Performance Targets for BCY 2024 End of Year MPR

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- a. Employed Quarter 4 Post Exit- Adult
- b. Employed Quarter 4 Post Exit- Dislocated Worker
- c. Credential Rate- Adult
- d. Credential Rate- Dislocated Worker
- e. Credential Rate- C&T Participants

- 2. Performance Targets for BCY 2024 October, November, December
 - a. Adult Employed Q4
 - b. Adult Credential
 - c. DW Credential
 - d. C&T Employed Q2
 - e. C&T Credential

The TAP addressed the measures above in May. Soon after TWC released for February on May 23rd, then March and April’s MPR shortly after. On August 6th, TWC released May’s MPR. The results of that report are shown below.

WIOA Outcome Measures	Status	% Cur Trgt
Employed Q2 Post Exit - Adult (DOL)	MG	102.26%
Employed Q4 Post Exit - Adult (DOL)	MG	100.40%
Measurable Skills Gains - Adult (DOL)	EX	110.55%
Median Earnings Q2 Post Exit - Adult (DOL)	MG	105.71%
Credential Rate - Adult (DOL)	AR	92.71%
Employed Q2 Post Exit - DW (DOL)	MG	103.56%
Employed Q4 Post Exit - DW (DOL)	MG	104.68%
Measurable Skills Gains - DW (DOL)	MG	96.08%
Median Earnings Q2 Post Exit - DW (DOL)	MG	104.20%
Credential Rate - DW (DOL)	NM	89.35%
Credential Rate - All C&T	NM	93.52%

While the TAP addresses the adult measures, youth measures are unfortunately not able to be produced. Staff has been addressing this challenge by producing “predictive reports.” This method was suggested by TWC; however these reports predict the measures, it does not replace the Monthly Performance Report (MPR) from TWC.



Fiscal Impact: If TWC decides to impose disciplinary action on the Board, it could have significant consequences on the Board's ability to secure future grant funding. Such actions may result in reduced eligibility for certain funding opportunities, restrictions on grant allocations, or increased oversight in financial and programmatic operations.

Recommendation: Board staff will work closely with contractors to assess current performance levels and identify key areas for improvement. This collaboration will involve analyzing data, reviewing service delivery methods, and implementing strategic adjustments to enhance overall effectiveness. By evaluating necessary steps forward, the Board and contractors will develop targeted action plans aimed at not only meeting but exceeding performance expectations. Additionally, ongoing communication, training, and support will be provided to ensure continuous improvement and sustained success in service delivery.

Next Steps: Continue to monitor the progress of the Technical Assistance Plan (TAP). This plan involves a detailed analysis of unmet performance metrics, strategies, logistics, and service delivery to identify solutions for reaching TWC performance targets. To foster collaboration between contract and board staff, the plan's progress is reviewed every two weeks. Lastly, staff will continue to utilize predictive reports for the youth measures until TWC provides an accurate MPR.