



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

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

Date: August 28, 2026

Subject: TWC & Associated Monitoring

Summary: Quality Assurance (QA) briefing on the Texas Workforce Commission (TWC) Annual and associated monitoring. The item does not require Board action.

Strategic Goals: The agenda item mainly aligns with the following goal in the Strategic Plan:

Goal 2: Service Optimizers

Enhance the efficiency, quality, and accessibility of workforce services delivered by TWC, ensuring Texans experience seamless access to job training, unemployment benefits, and career support.

Analysis:

TWC Annual Monitoring for BCY 2025-2026 – (27.20.0001)

- TWC's Annual Monitoring is underway, and staff are currently collecting and preparing the submission of documents as part of the Document Request Package (DRP).
- The documents are due to TWC by August 31, 2026.

Estimated Timeline

Num	Process	Est. Date
1	Engagement Letter	07/13/26
2	Document Request Package (DRP)	08/10/26 – 08/31/26
3	Sample Request	09/29/26 – 10/02/26
4	Entrance Conference	10/05/26
5	On-Site Review/Virtual Testing/Center Visits	10/05/26 – 10/16/26
6	Exit Conference & Exit Report	10/16/26
7	TWC Monitoring Report	04/01/27



Fiscal Impact: None.

Recommendation:

- Staff welcome the Board's feedback, guidance, and support for staff's ongoing preparation and coordination efforts.
- QA will continue meeting with Board and Contractor staff to ensure readiness for all phases of the monitoring review.
- Staff have established the technical and logistical requirements for the review, including TEAMS channels, TWC auditors' VPN access, Cabinet access, and related resources.
- Departments and Contractors should continue to prioritize monitoring-related requests to ensure timely and accurate submissions.

Next Steps:

- Continue preparation activities and document collection according to the established timeline.
- Respond to additional information and documentation requests from TWC as they are received.
- Facilitate interviews, file reviews, testing activities, and other monitoring processes conducted by TWC.
- Monitor progress and provide periodic status updates to executive leadership and the Board throughout the review.
- Analyze any preliminary observations or findings issued by TWC and coordinate responses as needed.
- Upon completion of the monitoring review, present the Exit results, recommendations, and any required corrective action plans to the Board of Directors.

Attachments:

f.a – Att 1 - TWC Engagement Letter 27.20.0001

Texas Workforce Commission

A Member of Texas Workforce Solutions

Joe Esparza, Chairman
Commissioner Representing
Employers

Alberto Treviño III
Commissioner Representing
Labor

Brent Connett
Commissioner Representing
the Public

Steve Pier
Executive Director

July 13, 2026

Mr. Adrian Lopez, Chief Executive Officer
Workforce Solutions Alamo
100 North 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 5, 2026, and October 12, 2026**. 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 20, 2026**.

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, CEO

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

Date: August 28, 2026

Subject: TWC Annual Monitoring Report

Summary: Quality Assurance (QA) briefing on the Texas Workforce Commission (TWC) Annual Monitoring. The item does not require Board action.

Strategic Goals: The agenda item mainly aligns with the following goal in the Strategic Plan:

Goal 2: Service Optimizers

Enhance the efficiency, quality, and accessibility of workforce services delivered by TWC, ensuring Texans experience seamless access to job training, unemployment benefits, and career support.

Analysis:

WSA received TWC's letters and final reports for the Annual Monitoring, SNAP E&T, and WIOA Data Validation, as performed last year.

TWC Annual Monitoring for BCY 2024-2025 - (26.20.0001)

TWC issued the Final Letter and Annual Monitoring Report on August 19, 2026. The review included the Child Care Services, Choices (employment services for Temporary Assistance for Needy Families), Employment Services, Trade Adjustment Assistance, and Workforce Innovation and Opportunity Act. The review covered the period August 1, 2024, through July 31, 2025, and identified three (3) Findings and two (2) Areas of Concern:

○ **Findings:**

a) Ensure procurements are properly conducted and documented.

- i) The Board did not maintain documentation in a format to support that the proper procurement steps were completed and documented prior to contract issuance for the procurement of legal services. The highest scorer was not selected, and justification for selection was not documented in the procurement file.
- ii) The Board should reprocure legal services at the end of the current contract period without exercising any remaining options.

workforcesolutionsalamo.org
communications@wsalamo.org

100 N. Santa Rosa Street
San Antonio, Texas 78207
(210) 272-3260



b) Ensure single audit requirements are met.

- i) For two subrecipients, the Board did not review the third-party desk review within six months of the issuance of the single audit reports.

c) Strengthen controls over workforce services (PII in the centers).

- i) During the walkthrough of the Floresville Workforce Center, the monitor noted the Board did not have the first barrier in place at the entrance. There was no staff monitoring the front door to ensure that customers are signing in or registering when they enter the center.

○ **Areas of Concern:**

- a) Property: Untimely submittal of two (2) Forms 7200 - Notification of Property Acquisition.
b) RESEA: Participants did not receive all required services during the initial appointment.

Note: This was the first time TWC monitored the RESEA Pilot program.

SNAP E&T

TWC issued a separate Final Letter dated August 19, 2026, for the Supplemental Nutrition Assistance Program (SNAP) Employment and Training, covering the period of August 1, 2024 through July 31, 2025. The letter confirms there were no findings and indicates that fiscal and program systems are effectively managed.

WIOA Data Validation

TWC issued a WIOA Data Validation Letter and Report on August 19, 2026. The validation initiative was conducted to ensure the accuracy of data collected and reported to the United States Department of Labor (USDOL). The scope of review was from July 1, 2024, through June 30, 2025. The results are for informational purposes only, and no action is required.

WIOA	Adult		Dislocated Worker		Youth	
Element	Accuracy Rate	Records	Accuracy Rate	Records	Accuracy Rate	Records
Assessment	100.00%	4				
Characteristics	93.65%	63	100.00%	32	100.00%	13
Education	97.22%	36	100.00%	24	100.00%	12
Service Tracking	92.68%	41	92.86%	28	50.00%	14
Weighted Avg	94.44%	144	97.62%	84	82.05%	39

Fiscal Impact: The reports did not identify any potential questioned costs.

Recommendation:

- Staff welcome the Board's feedback, guidance, and support as we work to resolve the items.

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- The identified issues do not indicate system deficiencies but present opportunities to strengthen internal controls, enhance documentation practices, and improve in ensuring we maintain two barriers as part of our security measures.
- Staff is committed to addressing each finding promptly and implementing sustainable process improvement to reduce the risk of recurrence.
- The final report includes action items that staff have already taken and are implementing for resolution.

Next Steps:

- Staff have scheduled a meeting with the State's Audit Resolution team (August 26th) and will provide any verbal updates during the Committee meeting.
- Based on the discussion with TWC, staff will finalize corrective action plans, assign responsibilities, and implement the necessary process improvements.
- Progress will be documented, and all efforts will be directed toward resolving the findings within the 45-day timeframe.
- Updates will be provided to the Board as appropriate until all items have been satisfactorily addressed and closed.

Attachments:

- f.a.1 - Att 1 – WS Alamo Report and Letter 26.20.0001
- f.a.1 - Att 2 – TWC WS Alamo SNAP Letter 26.20.0001
- f.a.1 - Att 3 – TWC WS Alamo WIOA Data Validation and Letter 26.20.0001

Texas Workforce Commission

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Joe Esparza, Chairman
Commissioner Representing
Employers

Alberto Treviño III
Commissioner Representing
Labor

Brent Connett
Commissioner Representing
the Public

Steve Pier
Executive Director

Report #26.20.0001

ISSUE DATE: August 19, 2026

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

Dear Mr. Lopez:

We have completed our review of 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 administered by Workforce Solutions Alamo. Our review covered the period August 1, 2024, through July 31, 2025.

Our findings are summarized in the enclosed report. TWC Audit Resolution will contact you with an Initial Resolution Letter requesting the documentation necessary to resolve the outstanding findings identified in the report. The Board will have 45 calendar days from the issuance of that Letter to respond to Audit Resolution with the documentation.

Thank you again for your cooperation and assistance. Should you have any further questions concerning the review, please contact me at (737) 397-4813.

Sincerely,



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

Attachment



Monitoring Report
#26.20.0001
Workforce Solutions Alamo

Issued by Texas Workforce Commission
Subrecipient Monitoring Department

Board Background

Workforce Solutions Alamo is part of Texas Workforce Solutions – a statewide network of 28 Workforce Development Boards for regional planning and service delivery, their contracted service providers and community partners, and the TWC unemployment benefits Tele-Centers. This network, which includes the Texas Workforce Commission, gives customers local access to workforce solutions and statewide services through Workforce Solutions offices and Tele-Centers throughout the state.

The Board serves the following counties: Atascosa, Bandera, Bexar, Comal, Frio, Gillespie, Guadalupe, Karnes, Kendall, Kerr, McMullen, Medina and Wilson.

C2 Global Professional Services is the subrecipient responsible for management of the Workforce Centers. The City of San Antonio (COSA) is responsible for Child Care Services.

Executive Summary

The Texas Workforce Commission, Subrecipient Monitoring Department conducted a review of Workforce Solutions Alamo. This review identified opportunities to strengthen management controls and support compliance with grant requirements.

The Board is responsible for providing its Partners, Subrecipients, and Contractors with these findings and areas of concern and following up to ensure that any needed corrective actions are completed.

Finding #1: Ensure Procurements are Properly Conducted and Documented

The Board did not maintain documentation in a format to support that the proper procurement steps were completed and documented prior to contract issuance for the procurement of legal services. The Board should strengthen controls to ensure adequate documentation is maintained prior to contract issuance to support procurements were conducted in compliance with federal and state procurement requirements. In addition, the Board should reprocur legal services at the end of the current contract period without exercising any remaining options.

Finding #2: Ensure Single Audit Requirements are Met

The Board did not ensure the single audit requirements were met. The Board should strengthen controls to ensure the single audit requirements are met.

Finding #3: Strengthen Controls Over Workforce Services

During the walkthrough of the Floresville Workforce Center, the monitor noted the Board did not have the first barrier in place at the entrance. The Board should strengthen its controls and implement the secure PII barrier at the entrance at the Floresville Workforce Center.

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Findings

Ensure Procurements are Properly Conducted and Documented

The Board did not maintain documentation in a format to support that the proper procurement steps were completed and documented prior to contract issuance for the procurement of legal services. The highest scorer was not selected and justification for selection was not documented in the procurement file.

By not adhering to federal, state, and local procurement requirements, the Board cannot demonstrate that all procurement actions were conducted in a manner providing for full and open competition.

FMGC Supplement on Procurement, Version 1.0, Q. Administrative & Post Award, Q.3 Procurement Records states:

“Policy:

Grantees must maintain records sufficient to detail the history of procurement. Records will be retained and made available to authorized entities in accordance with applicable administrative requirements.

These records must include, but are not necessarily limited to the following:

- Rationale for the method of procurement
- Selection of contract type
- Contractor selection or rejection
- Basis for the contract price”.

And, *E. Competition & Preferences, E.1.2 Basic Standard* states:

“Policy:

All procurement transactions must be conducted in a manner providing full and open competition consistent with the standards in UG, UGMS and this Publication. Except where specified otherwise, selection of subgrantees (subrecipients) must also be conducted in a manner providing full and open competition.”

FMGC Chapter 2.1, General Internal Control Requirements states:

“In relation to TWC grant awards, effective control and accountability must be maintained for all funds... [and] internal controls must provide reasonable assurance of compliance with grant requirements.”

And *Chapter 8.1, General Allowability Criteria* states:

“A cost must meet the following general criteria in order to be allowable under a TWC grant award:

- ...Be adequately documented. Documentation required may include, but is not limited to, travel records, time sheets, invoices, contracts, mileage records, billing records, telephone bills and other documentation that verifies the expenditure amount and appropriateness to the grant.”

Recommendation

The Board should strengthen controls to ensure adequate documentation is maintained prior to contract issuance to support procurements were conducted in compliance with federal and state procurement requirements. In addition, the Board should reprocure legal services at the end of the current contract period without exercising any remaining options.

Board Response

Views of Responsible Officials:

Workforce Solutions Alamo (WSA) recognizes the importance of ensuring that procurement actions are conducted in a manner providing full and open competition in adherence to federal and state requirements. To that effect, WSA respectfully disagrees with the finding that the Board "cannot demonstrate that all procurement actions were conducted in a manner providing for full and open competition."

WSA followed FMGC I.4 Procurement by Competitive Proposals, which states: "Procurement by the competitive proposal method must be conducted in accordance with applicable administrative requirements. This includes public notice, identifying all evaluation factors and their relative importance in the solicitation, and selecting the offeror whose proposal is most advantageous ("best value") after considering price and other factors. Either a fixed price type contract or cost reimbursement type contract is awarded."

The Legal Service Contract in review was awarded after a thorough, publicly advertised competitive solicitation process in accordance with applicable federal, state, and local procurement requirements. After considering estimated and historical expenditures and applying the criteria established in procurement policies and procedures, WSA determined that a competitive solicitation was the appropriate procurement method and proceeded accordingly.

To that effect, in September 2024, WSA issued a Request for Proposals (RFP) seeking qualified agencies or firms with expertise in providing Legal Counsel services. The RFP was published in the Texas Electronic State Business Daily (ESBD) and on WSA's eBid online portal, Bonfire as required by FMGC. Furthermore, Procurement staff sent invitations to thirty-one (31) qualified vendors, from the Centralized Master Bidder List, to submit proposals.

The RFP closed on October 11, 2024, and three responsive proposals were received. The proposals were reviewed independently by external evaluators in accordance with the criteria outlined in the solicitation. In line with the ongoing RFP process, a Best and Final Offer (BAFO) was sent to all respondents to provide a monthly retainer rate. The request for a monthly retainer rate was made to provide a detailed analysis of the previous contract expenditure trends and establish a new contract budget based on historical data.

Following completion of the evaluations, staff presented a briefing on the process to the WSA Board Audit and Finance Committee on November 8, 2024. Staff then provided the results of the evaluation and recommendation to the WSA Board Executive Committee on November 15, 2024. The recommendation was subsequently presented to the WSA Board of Directors on November 22, 2024, for consideration and approval. There was considerable discussion in Executive Session during the full board meeting, as the board considered all the factors associated with the solicitation and ongoing litigation that the incumbent vendor was the lead on. Subsequent to that discussion, the Board approved the awarding of the contract to the incumbent vendor in accordance with Federal, State and local policies and requirements. WSA publicly bid, informed potential vendors of the RFP, hired outside evaluators, posted agendas regarding the briefing and actions in accordance with the Open Meetings Act, included memos that were part of Committee and Board Packets that were sent to the Board and were available to the General Public and

interested parties, and these were certified by WSA Committee and Board actions including the approved actions and approved minutes that reflected the acceptance of the memos and discussion that took place. The memos presented to the Board are the official public records that detail the process and the recommendation to award the contract to the incumbent vendor. In addition, the files requested and provided to the TWC monitoring team included:

- Advertisement
- Bid Tabulation
- Bidders List
- Board Minutes
- Conflict of Interest Forms
- Cost Analysis
- Executed Contract
- Independent Estimate
- Logs and Submissions
- Needs Determination
- Solicitation
- Formal Checklist (that includes the justification for not selecting the highest scoring bidder; TWC monitoring staff acknowledge receipt of this document via email sent on October 17, 2025)

These actions demonstrate that the procurement was conducted through a competitive process that provided vendors with an equal opportunity to compete and incorporated independent evaluation, committee oversight, and Board approval. The TWC Monitoring did not identify any evidence that competition was restricted, that any proposer received an unfair competitive advantage, or that the integrity of the competitive procurement process was compromised. WSA is willing to provide signed sworn statements from the WSA Board members to attest that the process was open and fair, to the facts of the solicitation and reason behind awarding the contract to the incumbent vendor as the "Best Value" in accordance with applicable laws, regulations and policies. Further, no vendor formally protested nor requested a separate explanation for the WSA Board decision.

Regarding the cost concerns, WSA used its historical Legal Services expenditures to evaluate the reasonableness of the proposed pricing. The solicitation referenced the Board's historical average of approximately \$450,000 over a five-year period to provide proposers with proper justification and context on anticipated service needs.

J. Cruz & Associates submitted pricing based solely on an hourly rate with no monthly retainer. For evaluation purposes, WSA estimated the annual cost by applying the proposed hourly rate to an average of 30 hrs. of legal services per month, resulting in an estimated annual cost of approximately \$126,000. However, WSA didn't have to do that given that the proposer could have been deemed non-responsive, because the vendor didn't respond to the request for the Best and Final Offer to include a retainer.

Martin and Drought submitted pricing based on a monthly retainer. The estimated annual cost under the proposed retainer structure was approximately \$94,800. If the proposed hourly rate had been applied using the same estimated hours of service, the projected annual cost would have been approximately \$149,400.

Based on this analysis and price comparisons of proposals, the WSA Board voted to approve the retainer pricing structure, which represented the most cost-effective approach while ensuring the continued availability of legal counsel.

According to FMGC J.1.4 Allowability: Consulting, Professional & Legal Services:

"To be allowable, retainer fees, if any, must be supported by evidence of bona fide services available or rendered."

During the audit, additional information was requested regarding the contract's retainer structure. In response, WSA provided historical invoices and supporting documentation demonstrating that the retainer amount was reasonable compensation for bona fide legal services available and rendered under the contract, rather than a payment solely to reserve the contractor's availability. This information was provided to substantiate the allowability and reasonableness of the cost in accordance with the terms of the grant award.

Without TWC providing a detailed violation of applicable Federal, State and/or local procurement requirements and further requiring WSA to reprocur, this contract could result in legal issues with the existing vendor. WSA believes we have the proper controls in place to ensure adequate documentation and is evidence in the extensive process that WSA executed as part of this contract award.

Corrective Action Plan:

WSA adhered to procurement requirements in alignment with:

- FMGC Supplement of Procurement, Version 1.0, Q. Administrative & Post Award, Q 3 Procurement Records, and
- E. Competition & Preferences, E.1.2 Basic Standard,
- FMGC Chapter 2.1, General Internal Control Requirements, and
- Chapter 8.1, General Allowability Criteria.

Implementation Date: Procurement requirements have been in place.

Responsible Person: WSA's Director of Procurement

Ensure Single Audit Requirements are Met

The Board did not ensure the single audit requirements were met. For two subrecipients, the Board did not review the third-party desk review within six months of the issuance of the single audit reports.

Without timely reviews of the single audit, the Board cannot ensure corrective actions are completed, if necessary.

Alamo Workforce Development, Inc. DBA Workforce Solutions–Alamo, Fiscal Management Manual, Revised 10/21/25, Subrecipient Audits, Subrecipients are Required to Submit an Audit Report states:

“WSA's Chief Financial Officer (CFO) or their designee will perform an initial desk review of the subrecipient's audit report within six months of acceptance from the Federal Audit Clearinghouse, if applicable, and document it on the Precursory Single Audit Desk Review Template. For any audit findings and/or questioned costs pertaining to WSA's programs, a management decision and corrective action plan will be implemented.”

FMGC, Chapter 20 Single Audit, Chapter 20.3 Oversight Responsibilities, Monitoring Responsibilities states:

“Pass-through entities must monitor the activities of the subgrantees as necessary to ensure that subgrant performance goals are achieved, and that the subgrant is used for authorized purposes in compliance with federal statutes and regulations (for federal awards), state laws and rules (for state

awards), and the terms and conditions of the subgrant. Pass-through entity monitoring of the subgrantee must include reviewing financial and performance reports required by the pass-through entity. It must also include the following actions, which are discussed under Management Decision & Corrective action, in this section 20.3:

- Following-up and ensuring that the subgrantee takes timely and appropriate action on all deficiencies pertaining to the subgrant;
- Issuing a management decision for applicable audit findings pertaining to the subgrant; and
- Resolving audit findings specifically related to the subgrant.”

And *20.3 Oversight Responsibilities, Management Decision & Corrective Action* states:

“In addition to the other responsibilities listed under Monitoring Responsibilities, in this section, pass-through entity monitoring of the subgrantee must include the following:

- Issuing a management decision for applicable audit findings pertaining to the subgrant provided to the subgrantee by the pass-through entity. The pass-through entity must issue the management decision within six months of the date specified by the Uniform Guidance or TxGMS, as applicable.”

And *20.4 Management Decision, Corrective Action & Collections, Corrective Action and Management Decision* states:

“The auditee must promptly follow up and take corrective action on audit findings. While the auditee takes corrective action, the pass-through entity must conduct a desk review of the report and may request additional information or documentation.

Upon completion of the desk review, a Management Decision must be issued. For audits prepared under the Uniform Guidance, the management decision must be issued to the auditee within six months of the date that the Federal Audit Clearinghouse accepted the report. For audits prepared under TxGMS, the management decision must be issued to the auditee within six months of receiving the report from the auditee...”

Lastly, *Chapter 2 Internal Controls, Chapter 2.1 General Internal Control Requirements* states:

“...Internal controls must provide reasonable assurance of compliance with grant requirements, reliable reporting, and effective, efficient operations...”

...For federal awards, the internal control standards in the Uniform Guidance and TxGMS require that Grantees must:

- ...Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings;...

...For state awards, the internal control standards in TxGMS call for a Grantee to:

- ...Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings;...”

Recommendation

The Board should strengthen controls to ensure the single audit requirements are met.

Board Response

Views of Responsible Officials:

Workforce Solutions Alamo recognizes the importance of timely review and follow-up of subrecipient Single Audit reports to ensure compliance with federal and state requirements. WSA has updated and implemented procedures to strengthen the internal control necessary for resolution.

Corrective Action Plan:

Workforce Solutions Alamo (WSA) has updated and implemented a Precursory Single Audit Desk Review process to strengthen compliance with Single Audit requirements and ensure the timely review of submitted subrecipient Single Audit reports. WSA's Chief Financial Officer (CFO) or designee will monitor audit submissions to verify that required audits are completed and reviewed within six months of acceptance by the Federal Audit Clearinghouse, when applicable, and will document the review and any resulting actions on the Precursory Single Audit Desk Review form. When audit findings are identified, the Board will issue a management decision and, as necessary, perform follow-up procedures to ensure that appropriate corrective actions are implemented and resolved in a timely manner. These enhanced procedures are intended to strengthen internal controls, improve subrecipient monitoring, and support ongoing compliance with federal and state Single Audit requirements.

Implementation Date: October 21, 2025

Responsible Person: WSA's Chief Financial Officer (CFO) or designee

Strengthen Controls Over Workforce Services

During the walkthrough of the Floresville Workforce Center, the monitor noted the Board did not have the first barrier in place at the entrance. There was no staff monitoring the front door to ensure that customers are signing in or registering when they enter the center. The center only had one staff at the center for workforce services. The second staff was not working that day.

Without minimum protection standards, the Workforce Center is at risk of a security and PII breach.

WD Letter 02-18, Change 1, March 18, 2024, Handling Sensitive Personal Information and Other Confidential Information—Update, Background states:

“Minimum protection standards (MPS) establish a uniform method and minimum standards of physically protecting data and systems that require safeguarding. These standards must be applied. Because local

factors might require additional security measures, management must analyze local circumstances to determine space, container, and other physical security needs.

MPS require two barriers for the protection of SPI under normal operating conditions.”

Recommendation

The Board should strengthen its controls and implement the secure PII barrier at the entrance at the Floresville Workforce Center.

Board Response

Views of Responsible Officials:

WSA is fully committed to the maximum protection of Personally Identifiable Information (PII) as outlined in Texas Workforce Commission Workforce Development Letter (WD) 02-18, Change 1. The incident occurred at one of WSA's smaller offices, at the Floresville Workforce Center, where only one staff member was present and actively serving customers. At that time, the employee was providing services to a customer in an office immediately adjacent to the entrance and resource room.

Corrective Action Plan:

Upon becoming aware of the issue, WSA took the following corrective actions:

- Immediately discussed the incident with the subrecipient to reinforce the requirements of WD 02-18, Change 1.
- Reviewed the requirement that the first layer of protection is to always prevent unauthorized viewing or access to confidential information.
- Conducted refresher training with workforce center staff regarding the handling, display, and safeguarding of PII.
- Reinforced procedures for locking computer screens, securing paper documents, positioning monitors to minimize public viewing, and ensuring confidential conversations cannot be overheard whenever possible.
- Added this topic to future staff meetings and monitoring activities to reinforce ongoing compliance.

WSA will continue to monitor compliance through routine center observations and quality assurance reviews to ensure that staff consistently implement the safeguards required by WD 02-18, Change 1.

Implementation Date: October 21, 2025.

Responsible Person: WSA's Director of Workforce Services

Areas of Concern**Property**

The Board did not submit two Notification of Property Acquisition - Forms 7200 within 30 days following the final acquisition of the equipment, as required. The forms were submitted 83 to 163 days late. The Board implemented a new Standard Operating Procedure for Request for Purchase - Form 7100 and Form 7200 effective date August 15, 2025.

RESEA

In testing Reemployment Services and Eligibility Assessment (RESEA), monitors noted that participants did not receive all required services during the initial RESEA appointment.

Appendix A. Abbreviations and Terms

Board	Workforce Solutions Alamo
CCS	Child Care Services
Choices	Employment services for TANF (Temporary Assistance for Needy Families)
ES	Employment Services
FMGC	Financial Manual for Grants and Contracts
IFA	Infrastructure Facilities Agreement
MOU	Memorandum of Understanding
MPS	Minimum Protection Standards
PII	Personally Identifiable Information
RESEA	Reemployment Services and Eligibility Assessment
SNAP E&T	Supplemental Nutrition Assistance Program Employment and Training
SPI	Sensitive Personal Information
TAA	Trade Adjustment Assistance
TWC	Texas Workforce Commission
TxGMS	Texas Grant Management Standards
UG	Uniform Guidance
UGMS	Uniform Grant Management Standards
WIOA	Workforce Innovation and Opportunity Act

Appendix B. Review Objectives, Scope, and Methodology

Review Objectives

The purpose of our review was to provide reasonable assurance that Workforce Solutions Alamo uses TWC grant resources in accordance with state and federal requirements. We also sought to determine whether activities are conducted toward the goal of achieving program objectives while maintaining fiscal accountability.

Scope and Methodology

Monitoring reviewed the CCS, Choices, ES, TAA, and WIOA programs administered by the Board. We conducted this review from October 14, 2025, to October 23, 2025. Our goal was to provide reasonable but not absolute assurance regarding compliance with grant agreement terms and objectives.

Toward this goal, we randomly selected and tested samples of transactions that occurred during the period of August 1, 2024, through July 31, 2025. Although no material issues came to the reviewers' attention other than those contained in this report, there is no assurance that other issues may not exist. Within the accounting and program books, records and documentation we tested control systems and transactions in the following areas:

Board

- Monitoring and Oversight
- Monitoring Certification
- Automation
- Governance
- Internal Controls
- MOUs and IFAs

Service Provider

- NCP Choices
- WIOA

Fiscal

- Allowable Costs and Pooled Expenditures
- Disbursements
- Cost Allocation
- Support Services & NRPs
- Procurement
- Small and Micro-Purchases
- Formal (including Fiscal Integrity)
- Fiscal Controls
- Cash Management
- Financial Reporting
- Property

Appendix C. Report Distribution List

Copies of the report will be provided to the following parties:

Workforce Solutions Alamo

Leslie Cantu, Chair

United States Department of Health and Human Services

Patti Boulanger, Interim Regional Program Manager

Deborah Daniels, Program Specialist

Alisa Matthews, Program Specialist

Texas Workforce Commission

Joe Esparza, Chairman, Commissioner Representing Employers

Alberto Treviño, III, Commissioner Representing Labor

Brent Connett, Commissioner Representing the Public

Steve Pier, Executive Director

Mary York, Director, Division of Workforce Development

Reagan Miller, Director, Division of Child Care and Early Learning

Jason Stalinsky, Director, Division of Fraud Deterrence and Compliance Monitoring

Chris Nelson, Chief Financial Officer

Jennifer Colehower, Director, Division of Information, Innovation and Insight

Appendix D. Exit Conference

Date: October 23, 2025

Attendees:

Adrian Lopez, Chief Executive Officer, WS Alamo

Teresa Chavez, Chief Operating Officer, WS Alamo

Penny Benavidez, PR/Government Relations, WS Alamo

Eric Vryn, Chief Process Officer, WS Alamo

Kristen Rodriguez, Director of Procurement, WS Alamo

Ricardo Ramirez, Director of Quality Assurance, WS Alamo

Chuck Agwuegbo, Director of Innovation & Technology, WS Alamo

Esmeralda Apolinar-Ramirez,, Interim Director of Accounting, WS Alamo

Victoria Rodriguez, Director of Workforce Services, WS Alamo

Rebecca Espino Balencia, Director of Ready to Work, WS Alamo

Jessica Lockhart, Child Care Manager, WS Alamo

Sandra Alvarez, Assistant Director of Workforce Services, WS Alamo

Paul Briseno, Assistant Director of Innovation and Technology, WS Alamo

John Amaro, Interim Accounting Supervisor, WS Alamo

Carlos Garcia, Child Care Accounting Supervisor, WS Alamo

Edmundo Patoni, Communities Initiatives Manager, WS Alamo

Kimberly Villareal, Child Care Quality Manager, WS Alamo

Marty Pena, Facility & Asset Manager, WS Alamo

Jennifer Ledford, Contract Manager, WS Alamo

Ruby Sanders, Workforce Specialist, WS Alamo

Avis Burrow, Workforce Specialist, WS Alamo

Miriam Barksdale-Botello, Workforce Services Specialist/LMI Specialist-Programs, WS Alamo

Vanessa Garcia, Workforce Specialist, WS Alamo

Monica Godina, MIS Administrator, WS Alamo

Trema Cote, Workforce Monitor II, WS Alamo

Jeanette Jimenez, Staff Accountant II, WS Alamo

Mohammad Haidarasi, Staff Accountant I, WS Alamo

Victor Olmos, Staff Accountant I, WS Alamo
Jesse Inclan, IT Support, WS Alamo
Jesse Maldonado, IT Support, WS Alamo
Juan Palencia, IT Support, WS Alamo
Matthew Aaron Bieniek, IT Department, WS Alamo
Jamesetta Stallion, Program Administration Asst., WS Alamo
Qudrat Ali, Administrative Assistant, WS Alamo
Ruth Bodenbach, Administrative Assistant, WS Alamo
Ernesto Cantú, Project Manager, TWC
Nadine Butler, Program Monitor, TWC
Chiffon Mitchell, Program Monitor, TWC
Lin Banks, Fiscal Monitor, TWC
Alan George, Fiscal Monitor, TWC

Texas Workforce Commission

A Member of Texas Workforce Solutions

Joe Esparza, Chairman
Commissioner Representing
Employers

Alberto Treviño III
Commissioner Representing
Labor

Brent Connett
Commissioner Representing
the Public

Steve Pier
Executive Director

Report #26.20.0001

ISSUE DATE: August 19, 2026

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

Dear Mr. Lopez:

Our review of the Supplemental Nutrition Assistance Program Employment and Training program administered by Workforce Solutions Alamo indicates fiscal and program systems are effectively managed.

The review covered the period August 1, 2024, to July 31, 2025, and included tests of transactions and fiscal and program controls.

We appreciate the cooperation and assistance you and your staff provided throughout the review. Should you have any questions, please contact me at (737) 397-4813.

Sincerely,



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

cc: Leslie Cantu, Chair, Workforce Solutions Alamo
Patti Boulanger, Interim Regional Program Manager, U. S. Department of Health and Human Services
Deborah Daniels, Program Specialist, U. S. Department of Health and Human Services
Alisa Matthews, Program Specialist, U. S. Department of Health and Human Services
Joe Esparza, Chairman Commissioner Representing Employers
Alberto Treviño, III, Commissioner Representing Labor
Brent Connett, Commissioner Representing the Public
Steve Pier, Executive Director, TWC
Mary York, Director, Division of Workforce Development, TWC
Jason Stalinsky, Director, Division of Fraud Deterrence and Compliance Monitoring, TWC
Chris Nelson, Chief Financial Officer, TWC
Jennifer Colehower, Director, Division of Information, Innovation, and Insight, TWC

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Texas Workforce Commission

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Labor

Brent Connett
Commissioner Representing
the Public

Steve Pier
Executive Director

ISSUE DATE: August 19, 2026

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

Dear Mr. Lopez:

We recently completed data validation testing of the Workforce Innovation and Opportunity Act (WIOA) program for the State of Texas, as administered by Workforce Solutions Alamo. Data validation is required by the U.S. Department of Labor Employment and Training Administration Training and Employment Guidance Letter (TEGL) 07-18, "Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)," and Workforce Development Letter 27-19, Change 3, "State Data Validation Requirements-Update". It is a process for verifying data elements in client records by comparing them to source documentation to ensure compliance with federal requirements and appropriateness of fund use. This data validation initiative was conducted to ensure the accuracy of data collected and reported to United States Department of Labor (USDOL) for the Fiscal Year 2025.

Attached is a Summary Report that outlines the results for each program tested in your area. The scope of review was from July 1, 2024, through June 30, 2025.

We appreciate the support of you and your staff and look forward to our continuing partnership to ensure the quality of the data reported by the State of Texas.

Sincerely,



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

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Relay Texas: 800-735-2989 (TTY) and 711 (Voice).



Data Validation Results Report

PY2026 Data Validation Results for Alamo (20)



WIOA Adult

Assessment

Field Description	Records Tested	Records Unmet	Unmet Percentage
Type of Recognized Credential (WIOA)	2	0	0%
Date Attained Recognized Credential (WIOA)	2	0	0%
SUB TOTALS	4	0	0.00%

Characteristics

Field Description	Records Tested	Records Unmet	Unmet Percentage
Date of Birth (WIOA)	20	1	5%
Individual with a Disability (WIOA)	3	1	33.33%
Veteran Status	4	0	0%
Date of Actual Military Separation	4	1	25%
Employment Status at Program Entry (WIOA)	4	0	0%
Supplemental Nutrition Assistance Program (SNAP)	13	0	0%
Low Income Status at Program Entry (WIOA)	15	1	6.67%
SUB TOTALS	63	4	6.35%

Education

Field Description	Records Tested	Records Unmet	Unmet Percentage
Highest Educational Level Completed at Program Entry (WIOA)	18	1	5.56%
School Status at Program Entry (WIOA)	18	0	0%
SUB TOTALS	36	1	2.78%

Service Tracking

Field Description	Records Tested	Records Unmet	Unmet Percentage
Type of Training Service #1 (WIOA)	3	0	0%
Date of Program Entry (WIOA)	20	0	0%
Date of Program Exit (WIOA)	18	3	16.67%
SUB TOTALS	41	3	7.32%

WIOA Dislocated Worker

Characteristics

Field Description	Records Tested	Records Unmet	Unmet Percentage
Date of Birth (WIOA)	13	0	0%
Individual with a Disability (WIOA)	3	0	0%
Veteran Status	2	0	0%
Date of Actual Military Separation	1	0	0%
Date of Actual Dislocation	13	0	0%
<i>SUB TOTALS</i>	<i>32</i>	<i>0</i>	<i>0.00%</i>

Education

Field Description	Records Tested	Records Unmet	Unmet Percentage
Highest Educational Level Completed at Program Entry (WIOA)	12	0	0%
School Status at Program Entry (WIOA)	12	0	0%
<i>SUB TOTALS</i>	<i>24</i>	<i>0</i>	<i>0.00%</i>

Service Tracking

Field Description	Records Tested	Records Unmet	Unmet Percentage
Type of Training Service #1 (WIOA)	2	0	0%
Date of Program Entry (WIOA)	13	0	0%
Date of Program Exit (WIOA)	13	2	15.38%
<i>SUB TOTALS</i>	<i>28</i>	<i>2</i>	<i>7.14%</i>

WIOA Youth

Characteristics

Field Description	Records Tested	Records Unmet	Unmet Percentage
Date of Birth (WIOA)	7	0	0%
Individual with a Disability (WIOA)	3	0	0%
Employment Status at Program Entry (WIOA)	1	0	0%
Pregnant or Parenting Youth	2	0	0%
<i>SUB TOTALS</i>	<i>13</i>	<i>0</i>	<i>0.00%</i>

Education

Field Description	Records Tested	Records Unmet	Unmet Percentage
Highest Educational Level Completed at Program Entry (WIOA)	6	0	0%
School Status at Program Entry (WIOA)	6	0	0%
<i>SUB TOTALS</i>	<i>12</i>	<i>0</i>	<i>0.00%</i>

Service Tracking

Field Description	Records Tested	Records Unmet	Unmet Percentage
Date of Program Entry (WIOA)	7	2	28.57%
Date of Program Exit (WIOA)	7	5	71.43%
<i>SUB TOTALS</i>	<i>14</i>	<i>7</i>	<i>50.00%</i>



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

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

Date: August 28, 2026

Subject: TWC Center Certifications

Summary: Quality Assurance (QA) briefing on the Texas Workforce Commission (TWC) American Job Center Certifications. The item does not require Board action. Board action for this item is approved via the agency's lease agreements for its Center locations.

Strategic Goals: The agenda item mainly aligns with the following goal in the Strategic Plan:

Goal 1: Texas Talent Experts

Build a statewide network of Texas Talent Experts to support workforce development by identifying skill gaps, advising employers and jobseekers, and promoting talent recruitment and retention across Texas.

Goal 2: Service Optimizers

Enhance the efficiency, quality, and accessibility of workforce services delivered by TWC, ensuring Texans experience seamless access to job training, unemployment benefits, and career support.

Goal 3: Partnership Managers

Strengthen and expand strategic partnerships among TWC, employers, educational institutions, and community-based organizations to deliver coordinated and innovative workforce development solutions.

Analysis:

The Workforce Innovation and Opportunity Act (WIOA) regulations at 20 Code of Federal Regulations (CFR) §678.800 require Workforce Solutions Offices in each Local Workforce Development Board (Board) area to be certified by the Texas Workforce Commission (TWC) once every three years.

WIOA regulations at 20 CFR §678.800(d) state that all Workforce Solutions Offices within a workforce area must be certified to be eligible to use infrastructure funds in the state funding mechanism.

As part of the one-stop certification process, Boards must designate one Workforce Solutions

workforcesolutionsalamo.org
communications@wsalamo.org

100 N. Santa Rosa Street
San Antonio, Texas 78207
(210) 272-3260



Office as a comprehensive center (this designation is limited to one comprehensive center per workforce area).

To that effect, on July 31, 2026, staff submitted Center Certification forms to TWC for 13 locations. These included: Boerne, East San Antonio, Floresville, Hondo, Kenedy, New Braunfels, O'Connor, Pearsall, Pleasanton, Northwest San Antonio, Seguin, South Central San Antonio, and South San Antonio. Datapoint has been designated as the area's Comprehensive Center.

Fiscal Impact: None for this briefing; however, the fiscal impact relates to funding associated with leases, physical and service (programmatic) accessibility, as well as the entire service delivery mechanism for the local area.

Recommendation:

- Continue supporting the American Job Center Certification process and support staff's ongoing efforts to maintain compliance with TWC's certification requirements.
- Continue supporting the designation of WSA's Datapoint location as the area's Comprehensive Center.
- Continue supporting initiatives that promote service integration, customer-centered service delivery, accessibility, continuous improvement, and effective workforce system partnerships.
- Ensure staff to continue evaluating local Workforce Solutions Offices against TWC certification standards, including effectiveness, physical and programmatic accessibility, and continuous improvement measures.
- Encourage Board staff, Contractors, and workforce partners to maintain collaboration and responsiveness throughout the certification review process to ensure all certification criteria are met.

Next Steps:

- Staff received a response receipt for our submission and are waiting for confirmation of the certifications.
- Continue completing certification assessments for all Offices in accordance with TWC requirements and established timelines.
- Review findings related to effectiveness, accessibility, customer feedback, workforce partner coordination, and continuous improvement indicators.
- Address any identified gaps or opportunities for improvement and implement corrective actions, as necessary, to ensure compliance with certification standards.
- Document certification results and maintain supporting evidence demonstrating compliance with TWC requirements.
- Provide the Board of Directors with a summary of certification outcomes, identified best



practices, and any improvement actions resulting from the review process.

Attachments:

f.b – Att – Center Certification Form

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communications@wsalamo.org

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San Antonio, Texas 78207
(210) 272-3260

Appendix G: One-Stop Certification Form



Workforce Solutions Office: One-Stop Certification

Local Workforce Development Area:

Office Name and Address:

Office Days and Hours of Operation:

Date Office Opened:

Cost Center #:

Choose One:

Comprehensive Center: ☐

Affiliate Site: ☐

Check all workforce partner programs that are physically colocated or otherwise accessible to customers in the Workforce Solutions Office:

Physical Other

- | | |
|--------------------------|--|
| ☐ | ☐ Workforce Innovation and Opportunity Act (WIOA) Adult program |
| ☐ | ☐ WIOA Dislocated Worker program |
| ☐ | ☐ WIOA Youth program |
| ☐ | ☐ Wagner-Peyser Employment Service program |
| ☐ | ☐ Adult Education and Literacy (AEL) program |
| ☐ | ☐ Vocational Rehabilitation (VR) program |
| ☐ | ☐ Unemployment Insurance (UI) program, including RESEA |
| ☐ | ☐ Trade Adjustment Assistance (TAA) program |
| ☐ | ☐ Choices program, Temporary Assistance for Needy Families (TANF) Employment and Training program |
| ☐ | ☐ Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) program |
| ☐ | ☐ Subsidized Child Care programs |
| ☐ | ☐ Registered Apprenticeship programs (Texas Education Code, Chapter 133) |
| ☐ | ☐ Veteran Employment and Training programs—Disabled Veterans Outreach Program (DVOP) and Local Veterans Employment Representatives (LVER) program |
| ☐ | ☐ Senior Community Service Employment Program (SCSEP) |
| ☐ | ☐ Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 USC §2301 et seq.) |
| ☐ | ☐ Job Corps program |
| ☐ | ☐ Native American programs |
| ☐ | ☐ Community Service Block Grant (CSBG) programs |

- ☐ ☐ Reintegration of Offenders program, authorized under §212 of the Second Chance Act of 2007
- ☐ ☐ US Department of Housing and Urban Development administered employment and training programs
- ☐ ☐ YouthBuild programs
- ☐ ☐ Other Workforce Partners (please list all other workforce partners:

Does the Workforce Solutions Office meet the following WIOA requirements for One-Stop Certification, as defined in WIOA regulations at 20 CFR §678.800?

Provide Workforce Solutions Office services effectively, in accordance with 20 CFR §678.800.

Certification Requirement	Confirmation
Integrates available services for participants and businesses	☐
Meets the workforce development needs of participants	☐
Meets the employment needs of local employers	☐
Operates in a cost-efficient manner; has fiscal management systems that include appropriate fiscal controls in place; and during regularly scheduled Board meetings, the Board includes a quarterly review of the financial status of the Board and its service provider, for all funding sources it administers	☐
Coordinates services among the workforce partner programs	☐
Includes the common identifier tagline “A proud partner of the American Job Center network” on all products; programs; activities; online and in-person services; primary electronic resources; websites; printed, purchased, or created materials; facilities and related property; and new materials	☐
Provides access to partner program services to the maximum extent practicable, including providing services outside of regular business hours, when there is a workforce need identified by the Local Workforce Development Board (Board)	☐
Customer satisfaction (must take into account feedback from customers)	☐

Complies with Equal Opportunity (EO) accessibility requirements, in accordance with 20 CFR §678.800. Please provide a copy of the Board’s completed EO review.

Ensures equal opportunity for individuals with disabilities to participate in or benefit from Workforce Solutions Office services	EO Review completed ☐
Makes reasonable modifications to policies, practices, and procedures when necessary to avoid discrimination against persons with disabilities	EO Review completed ☐

Provides reasonable accommodations for individuals with disabilities	EO Review completed ☐
Administers programs in the most integrated setting appropriate	EO Review completed ☐
Communicates with individuals with disabilities as effectively as with individuals without disabilities	EO Review completed ☐
Provides appropriate auxiliary aids and services, including assistive technology devices and services, when necessary to give individuals with disabilities an equal opportunity to participate in and enjoy the benefits of, the program or activity	EO Review completed ☐
Makes available screen magnifier software (for example, MAGic, ZoomText, CDesk, Dolphin Guide, Supernova)	☐
Makes available screen reader software (for example, NVDA, JAWS, ZoomText)	☐
Provides quality headphones and/or speakers of any brand that support a 3.5 mm connection (so that headphones or personal earbuds can be used)	☐
Makes available qualified staff readers (Any staff member may accommodate upon request.)	☐
Makes available a large-print computer keyboard (for example, MAGic large-print keyboard or other quality keyboard with large-print keys)	☐
Makes available speech amplification systems (for example, microphones and headphones or wireless headset microphones, ChatterVox voice amplifier, pocket talkers)	☐
Makes available telephones with volume control and/or amplification devices to include handset amplifiers, large-button, hearing-aid compatible (HAC) (Phone system specific and at least one publicly accessible phone must be HAC compatible.)	☐
Makes available video text display phones, Video Relay Interpreting Services (VRIS), Video Relay Services (VRS) (for example, P3-Purple, Sorenson Video Relay Service, Cisco ClearCaption, existing TTY/TTD to serve as a backup to VRS or VRIS services or as a primary for areas with limited internet bandwidth)	☐
Makes available interpreters—sign, oral, or cued speech (staff or contracted), Video Remote Interpreting Services (for example, staff or contractors, by appointment—with appointment requests made at least five business days in advance, LanguageLine solutions, UbiDuo by sComm)	☐
Provides written materials for orientations, workshops, training, and so on (materials made available with requests made at least five business days in advance to produce content in formats such as braille and large-print or accessible digital content, based on request)	☐

Makes available a trackball mouse of good quality, with one per assistive technology workstation	☐
Makes available adjustable-height desks with adjustable keyboard tray, work tables, and chairs (for example, adjustable-height desk, quality adjustable chair, and keyboard tray at each assistive technology workstation)	☐

Provides continuous improvement in the local workforce system or local Board area in accordance with WIOA.

Supports or has a plan in place for the achievement of the negotiated local levels of performance for the indicators of performance for the local area described in WIOA §116(b)(2)	☐
---	--------------------------

Executive Director (Signature and Date)

Printed Name of Staff Completing this Form (Name, Title, and Date)

I certify that this Workforce Solutions Office meets the WIOA One-Stop Certification requirements in accordance with 20 CFR §678.800.

Director, Workforce and Board Support (Signature and Date)



MEMORANDUM

To: Board of Directors

From: Adrian Lopez, CEO

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

Date: August 28, 2026

Subject: Strategy – Internal and External Monitoring and Training Schedule

SUMMARY: Quality Assurance (QA) briefing on the monitoring and training schedules. The item does not require Board action.

Strategic Goals: This item mainly aligns with the following goal in the Strategic Plan:

Goal 2: Service Optimizers

Enhance the efficiency, quality, and accessibility of workforce services delivered by the Texas Workforce Commission (TWC), ensuring Texans experience seamless access to job training, unemployment benefits, and career support.

Analysis: QA reports the following estimated and actual monitoring timelines and the staff training schedule for 2025-2026.

Staff adjusted the annual timelines to accommodate several unplanned priorities that required additional resources and oversight, including RESEA, which required a greater level of involvement due to program complexity, TWC's Migrant and Seasonal Farm Worker (MSFW) monitoring review, which we were not informed of until later in the year, and the Youth Work Experience (WEX) review.

Appropriate modifications were made to ensure these responsibilities were addressed while maintaining key Quality Assurance activities. Ongoing oversight and monitoring of WEX activities will continue throughout the remainder of the period.



Estimated Timeline – *External* Program Monitoring Activities 2025-2026

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>	
Estimated Timeline: 2025-2026	218	1/12/2026	11/11/2026	160	239	Duration	1/12/2026		90%	Comments
COSA - CC QIA	37	1/12/2026	3/3/2026	37	37	0	1/12/2026	3/3/2026	100%	Report issued
C2GPS - WIOA Adult	46	3/26/2026	5/28/2026	48	46	2	3/26/2026	6/1/2026	100%	Completing final report
C2GPS - WIOA Dislocated Worker	46	3/26/2026	5/28/2026	48	46	2	3/26/2026	6/1/2026	100%	Completing final report
COSA - Child Care Services	41	5/13/2026	7/8/2026	51	45	10	5/13/2026	7/22/2026	100%	Report issued. Testing extended to complete the review due to issues with TX3C.
Equus - Child Care Services	41	5/13/2026	7/8/2026	73	65	32	5/13/2026	8/21/2026	100%	Completing Final Report. Extended due to TX3C issues and TWC policy clarifications.
C2GPS - NCP	39	6/4/2026	7/28/2026	Moved NCP to be completed by Internal QA						
SERCO - WIOA Youth	40	7/7/2026	8/31/2026	Postponed. Will work with TWC Annual Monitors on next steps.						
C2GPS - TANF/Choices	42	9/3/2026	10/30/2026	Most recent review will be used for TWC Annual Monitoring. The next review will be completed with the new contract starting 10//01/2026.						
CONSORTIUM - Ready to Work	27	10/6/2026	11/11/2026				8/4/2026		40%	Adjusted schedule, initiated earlier to complete by end of Sept.
Avg Duration or Effort (days) →				51	48	12				

Estimated Timeline – *Internal* Program Monitoring Activities 2025-2026



Initial Estimated Timeline				Actual Timeline						
<i>Internal 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: 2025-2026	260	11/3/2025	10/30/2026	201	229	<i>Duration</i>	11/3/2025		100%	
SNAP Phase II Follow Up	51	11/3/2025	1/12/2026	49	45	-2	11/3/2025	1/8/2026	100%	Report issued.
Informal Reviews (attributes <90% accuracy)	69	12/12/2025	3/18/2026	91	76	22	12/12/2025	4/17/2026	100%	Reports issued. Extended to complete additional testing.
TWC Migrant Seasonal Farm Worker (MSFW)				15	15		2/18/2026	3/10/2026	100%	Unplanned TWC Monitoring. Required adjusting timelines.
PII Walkthroughs and Priority of Service	30	3/2/2026	4/10/2026							Adjusting schedule due to RESEA, MSFW, Youth WEX, other projects. Planned for Sept.
C2GPS - RESEA	38	3/9/2026	4/29/2026	34	34	-4	3/2/2026	4/16/2026	100%	Report issued. Adjusted start to begin earlier.
C2GPS- SNAP	36	4/9/2026	5/28/2026	56	31	20	5/6/2026	7/22/2026	100%	Completing final report. Delayed start due to priority projects, which extended the timeframe.
C2GPS- NCP	38	5/7/2026	6/29/2026	50	28	12	6/2/2026	8/10/2026	100%	Completing final report. Testing delayed due to priority projects, which extended the timeframe.
WIOA Youth Work Experience Review - Targeted							6/12/2026			Added to timeline. Ongoing
TWC Annual Monitoring	80	7/13/2026	10/30/2026				7/13/2026			Started.
Avg Duration or Effort (days, excludes Other) →				49	38	0				



Training Schedule

Est. Dates	Num	Topic
<i>Completed</i>	1	Part 1: Workforce Development & Local Boards Workforce Development System
	2	Local Workforce Development Boards
<i>Completed</i>		Part 2: Local Plan
	3	Local Plan
<i>Partially Completed (Sept)</i>	4	High Performing Board
		Part 3: Labor Market Assessment & Planning
	5	Employment-Related Measures I
	6	Employment-Related Measures II
Nov		Part 4: Board Agreements & Contracts
	7	TWC Agreements and Grants
	8	WSA Contracts
Dec		Part 5: Workforce Policies
	9	Federal & State Guidance
	10	Local Policies
Jan		Part 6: Performance
	11	TWC-Contracted Performance
	12	Locally-Developed Performance
Feb		Part 7: Internal Controls
	13	Risk Assessment
	14	Quality Assurance & Quality Control



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

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

Date: August 28, 2026

Subject: Quality Assurance Briefing

Summary: Quality Assurance (QA) briefing on WSA monitoring activities. The item does not require Board action.

Strategic Goals: This item mainly aligns with the following goal in the Strategic Plan:

Goal 2: Service Optimizers

Improve the efficiency, quality, and accessibility of workforce services delivered by the Texas Workforce Commission (TWC), so Texans have seamless access to job training, unemployment benefits, and career support.

Analysis:

External Program Monitoring (Ms. Christine Nguyen, CPA)

- **Child Care Services – COSA:** Testing is 100% complete, with a 100% accuracy rate (no findings).
- **WIOA Adult – C2 GPS:** Testing is 100% complete. Currently working on the Final Report.
- **WIOA Dislocated Worker – C2 GPS:** Testing is 100% complete. Currently working on the Final Report.
- **Child Care Services – Equus:** Testing is 100% complete. Currently working on the Final Report.
- **Ready to Work – Multiple partners:** Testing is 40% complete.

Ms. Nguyen's contract is set to end on September 30th, 2026, at which point WSA will initiate the new contract, as approved by the Board of Directors, effective October 1st, 2026. This will help align the contract with the fiscal/program year.

Internal QA Program Monitoring

workforcesolutionsalamo.org
communications@wsalamo.org

100 N. Santa Rosa Street
San Antonio, Texas 78207
(210) 272-3260



- **Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)** – C2 GPS: Testing is 100% complete. Currently working on the Final Report.
- **Reemployment Services and Eligibility Assessment (RESEA) – C2 GPS:** Testing is 100% complete with an overall accuracy rate of 83.2%, which did not meet the expected 90% threshold.
 1. Accurate Service Delivery and Documentation
 - a. Customer notification and Event Calendar documentation: 66.7% (Control Group)
 - b. Service code entries: 80.0% (Treatment 1), 66.7% (Treatment 2 and 3)
 - c. Virtual Recruiter job alerts in WIT: 73.3% (Treatment 1), 86.7% (Treatment 3)
 - d. Referrals to follow-up meetings: 86.7% (Treatment 2), 60.0% (Treatment 3)
 - e. Big Interview project assignments: 73.3% (Treatment 2)
 2. Case Management
 - a. WF-42 form submissions to TWC: 86.7% accuracy.
- **Noncustodial Parent Choices (NCP) – C2 CPS:** Testing is 100% complete. Currently working on the Final Report.
- **WIOA Youth Work Experience - SERCO:** Collaborative effort involving multiple WSA departments to evaluate Work Experience activities for Youth. The information is reported separately as the agency works with TWC.

Other QA Activities

Additional activities performed by QA include, but are not limited to, the following:

- **Subrecipient Performance & Profits (C2GPS and SERCO):** Will be preparing targets for contracts starting October 1st, 2026.
- **Youth Contractor Transition:** Working with C2GPS as part of the onboarding for quality control and assurance purposes.

Fiscal Impact: WSA's External Program Monitoring contract with Ms. Christine Nguyen, CPA: \$225,000 (annual).

Recommendation:

- Staff welcome the Board's feedback, guidance, and support as we continue our quality assurance and continuous improvement efforts to strengthen compliance with applicable requirements, enhance internal controls, and improve program performance.
- Recommend that contractors review the monitoring results and implement corrective actions to address identified findings and opportunities for improvement.
- Recommend that contractors strengthen processes and controls in areas identified during monitoring to improve performance, accuracy, and compliance with program requirements.



- Recommend that contractors work collaboratively with staff and utilize technical assistance opportunities to support successful implementation of corrective actions.
- Recommend a comprehensive review and refinement of the Risk Assessment process to incorporate additional factors that strengthen risk identification efforts and support continuous improvement in monitoring activities.

Next Steps:

- QA will continue to complete the estimated engagement timeline as presented in a separate agenda item.
- Continue providing support for improvement plans for attributes falling below the 90% accuracy threshold, including the provision of technical assistance and guidance to contractors.
- Conduct follow-up reviews and reporting activities to assess progress and verify that actions appropriately address findings.
- Continue reporting status updates to the Board as appropriate.

Attachments: None.



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Victoria Rodriguez, Director of Workforce Services

Date: August 28, 2026

Subject: Program Briefing

Summary: Workforce Solutions Alamo consistently pursues innovative workforce opportunities to better serve individuals, employers, and communities across our 13-county region. Today, WSA would like to highlight key initiatives that are concluding, including Summer Earn and Learn and Externship for Teachers, as well as programs preparing for their next phase of implementation, such as TX FAME.

Strategic Goals: This agenda item aligns with the following goal(s) in the Strategic Plan:

Goal 2: Service Optimizers

Enhance the efficiency, quality, and accessibility of workforce services delivered by the Texas Workforce Commission (TWC), ensuring Texans experience seamless access to job training, unemployment benefits, and career support.

Goal 3: Partnership Managers

Strengthen and expand strategic partnerships among TWC, employers, educational institutions, and community-based organizations to deliver coordinated and innovative workforce development solutions.

Analysis:

Summer Earn and Learn:

WSA is concluding the Summer Earn and Learn (SEAL) initiative with a record-breaking 468 of 600 participants enrolled. Current program outcomes include:

- 468 participants enrolled
- 36 participants withdrawn
- 436 participants active in SEAL
- 296 participants placed in work experiences, exceeding the placement target of 256
- 278 participants have recorded work experience hours

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- 125 of 432 participants have completed Work Readiness Training (WRT)
- 177 participants have completed the full five-week work experience

SEAL is implemented in collaboration with Vocational Rehabilitation and WSA's community and employer partners, who support work readiness training and meaningful work-based learning opportunities for youth with disabilities.

WSA looks forward to serving even more participants next year and continuing to expand awareness, exposure, and opportunities throughout the region. We greatly appreciate the 77 worksites that opened their doors to SEAL participants and provided meaningful, memorable workplace experiences that help youth explore careers, develop skills, and gain valuable exposure to the world of work.

Externship for Teachers: This initiative provides educators with firsthand exposure to a variety of industry employers, allowing them to gain insight into current industry standards, practices, and workforce needs. Through direct engagement and instruction from employers, educators develop classroom curriculum that incorporates up-to-date industry information and helps better prepare students for future career opportunities.

The program is conducted during the summer to allow educators to participate in employer site visits and professional development activities. Upon completion of the required 10-day program, educators receive a participation stipend and a materials stipend to support the implementation of their newly developed curriculum in the classroom.

As the initiative concludes, 51 of the targeted 100 educators have successfully completed the program. The extension of the participation requirement to 10 days presented scheduling challenges for both educators and industry partners. Despite these challenges, interest in the program remained strong, with 165 educators expressing interest in participating, demonstrating continued demand for industry-connected professional development opportunities.

TX FAME Signing Day and Orientation: On August 12 and 13, TX FAME, in collaboration with Alamo Colleges, hosted its Signing Day for the Advanced Manufacturing Technician (AMT) program. Thirty-six participants officially signed with participating employers, committing to a two-year apprenticeship that combines education with hands-on advanced manufacturing experience.

On the second day, participants took part in orientation and training to prepare for the start of the program. WSA also met with participants to provide information on the workforce services, resources, and supportive services available to help them successfully complete their apprenticeship.

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Alternatives: The Board may choose to maintain the current approach to these initiatives, modify program strategies based on performance and lessons learned, or explore additional partnerships and funding opportunities to expand their reach. WSA may also consider adjustments to recruitment, program structure, employer engagement, and supportive services to address implementation challenges and strengthen participant outcomes in future program cycles.

Fiscal Impact: The Externship for Teachers, Summer Earn and Learn (SEAL), and TX FAME initiatives represent continued investments in work-based learning, career exposure, and regional talent development. Fiscal impacts are supported through existing program and grant allocations, including participant stipends, supportive services, training, work experience costs, and program administration. Continued collaboration with employers, educational institutions, Vocational Rehabilitation, and other community partners helps leverage available resources and maximize the impact of WSA funding.

Board Responsibilities: This item supports the Board's responsibility to understand the scope and purpose of services provided by staff.

Recommendation: Staff recommends continued support of the Externship for Teachers, SEAL, and TX FAME initiatives, with an emphasis on strengthening employer and education partnerships, increasing participant completion and placement outcomes, and expanding access to work-based learning opportunities. WSA should continue evaluating program outcomes and implementation challenges to identify opportunities for improvement and ensure resources are effectively aligned with regional workforce and industry needs.

Next Steps: WSA will continue working with education, employer, Vocational Rehabilitation, and community partners to close out current program activities, evaluate outcomes, and identify opportunities for improvement. Staff will use lessons learned from this year's implementation to strengthen participant recruitment, employer engagement, program completion, and supportive services for future cohorts. WSA will also continue expanding industry partnerships and work-based learning opportunities to increase career exposure and strengthen the regional talent pipeline.



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Victoria Rodriguez, Director of Workforce

Services Date: August 28, 2026

Subject: Performance

Summary: 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.

Strategic Goals: This agenda item aligns with the following goal(s) in the Strategic Plan:

Goal 1: Texas Talent Experts

Build a statewide network of Texas Talent Experts to support workforce development by identifying skill gaps, advising employers and jobseekers, and promoting talent recruitment and retention across Texas.

Analysis:

In July, all 28 Local Workforce Development Boards began the WIOA performance target negotiation process. WSA received proposed performance targets from TWC and was provided five days to review and negotiate the proposed targets. After review, WSA did not request negotiations or modifications to the proposed targets.

The Board also received the May Monthly Performance Report (MPR), which indicates that the Claimant Reemployment (REEMS) and Employed Quarter 4 measures are not currently meeting

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performance. Although these measures appear greyed out on the MPR, indicating that they are suppressed, TWC has advised workforce boards that the reported results are considered accurate.

TWC has not yet provided WSA with a Technical Assistance Plan (TAP) for the REEMS measure, as the agency continues to determine how the performance issue will be addressed. Notably, the four largest workforce boards in Texas are currently not meeting this measure. WSA staff continue to work closely with contractors and TWC to improve performance; however, questions regarding data integrity remain, particularly given that Alamo's reported denominator includes approximately 22,000 individuals.

Measure	Numerator	Denominator	Performance	Current Target	EOY Target	% Current Target	From	To	Notes	% Current Target
Adult: Credential Rate	45	56	80.36%	76.96%	76.96%	104.42%	01/24	09/24	25	N/A 104.42%
Adult: Employed Q2	206	293	70.31%	74.34%	74.34%	94.58%	07/24	03/25	25	N/A 94.58%
Adult: Employed Q4	209	330	63.33%	73.57%	73.57%	86.08%	01/24	09/24	25	N/A 86.08%
Adult: Measurable Skill Gains	71	85	83.53%	70.70%	70.70%	118.15%	07/25	05/26	25	N/A 118.15%
Adult: Median Earnings Q2	N/A	206	\$6,704.96	\$7,000	\$7,000	95.79%	07/24	03/25	25	N/A 95.79%
C&T: Credential Rate	162	237	68.35%	75.00%	75.00%	91.13%	01/24	09/24	25	N/A 91.13%
Child Care: Average # Children Served Per Day - Combined	2,082,910	173	12,040	12,509	12,509	96.25%	10/25	05/26	24	N/A 96.25%
Child Care: Initial Job Search Success Rate	249	439	56.72%	69.20%	69.20%	81.97%	06/25	01/26	23	NM 81.97%
Choices/TANF: Full Engagement Rate - All-Family	N/A	N/A	N/A	50.00%	50.00%	N/A	10/25	05/26	14	N/A N/A
DW: Credential Rate	35	47	74.47%	80.91%	80.91%	92.04%	01/24	09/24	25	N/A 92.04%
DW: Employed Q2	141	181	77.90%	78.28%	78.28%	99.51%	07/24	03/25	25	N/A 99.51%
DW: Employed Q4	155	201	77.11%	82.81%	82.81%	93.12%	01/24	09/24	25	N/A 93.12%
DW: Measurable Skill Gains	64	70	91.43%	76.00%	76.00%	120.30%	07/25	05/26	25	N/A 120.30%
DW: Median Earnings Q2	N/A	141	\$11,927.18	\$9,750	\$9,750	122.33%	07/24	03/25	25	N/A 122.33%
Reemployment: Claimant Reemployment within 10 Weeks	14,641	25,837	56.67%	60.79%	60.79%	93.22%	07/25	02/26	N/A	NM 93.22%
Reemployment: Employers Receiving Texas Talent Assistance	2,895	1	2,895	3,007	4,349	96.28%	10/25	05/26	N/A	AR 96.28%
Youth: Credential Rate	82	134	61.19%	57.45%	57.45%	106.51%	01/24	09/24	25	N/A 106.51%
Youth: Employed/Enrolled Q2	195	255	76.47%	74.21%	74.21%	103.05%	07/24	03/25	25	N/A 103.05%
Youth: Employed/Enrolled Q4	207	289	71.63%	75.56%	75.56%	94.80%	01/24	09/24	25	N/A 94.80%
Youth: Measurable Skill Gains	148	179	82.68%	65.30%	65.30%	126.62%	07/25	05/26	25	N/A 126.62%
Youth: Median Earnings Q2	N/A	175	\$3,732	\$4,000	\$4,000	93.30%	07/24	03/25	25	N/A 93.30%

Alternatives: These items reflect WSA's ongoing work across various services and TWC-funded grants and will require updates as they progress through their respective timelines.

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

Board Responsibilities: This item supports the Board's responsibility to understand the scope and purpose of services provided by staff.

Recommendation: It is recommended that the Board continue to actively engage with TWC throughout the data validation and system transition process while maintaining close monitoring of all WIOA performance measures. Given the instability in reporting during the TWIST to WIT conversion period, the Board should focus on strengthening internal data tracking, documentation practices, and quality assurance processes to ensure accurate reporting and readiness for any future Technical Assistance Plan requirements. Continued collaboration with state partners will be critical to maintaining transparency and positioning the Board for performance stabilization.

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San Antonio, Texas 78207
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Next Steps: The Board should prioritize ongoing communication with TWC to remain informed on updates related to the TAP and any revisions to performance reporting methodologies. Staff should conduct a detailed internal review of Reemployment and other impacted measures to identify potential gaps and support corrective action planning. Additionally, the Board should enhance data reconciliation efforts between internal systems and state reporting platforms, while preparing targeted technical assistance strategies to address identified performance barriers. These actions will help ensure readiness for future reporting cycles and support improved outcomes once system issues are fully resolved.



MEMORANDUM

To: Oversight Committee Meeting

From: Adrian Lopez, CEO

Present By: Victoria Rodriguez, Director of Workforce Services
Dr. Ricardo Ramirez, Director of Quality Assurance
Gabriela Navarro Garcia, Controller

Date: August 28, 2026

Subject: Work Experience and Improvements

Summary: Workforce Solutions Alamo (WSA) established this policy to provide consistent guidance for the administration of paid and unpaid Work Experience (WEX) and Transitional Job activities under WIOA Title I. WEX provides participants with planned, structured, and time-limited workplace learning opportunities designed to develop occupational and employability skills and support progress toward unsubsidized employment. This policy establishes requirements for participant eligibility and service planning, worksite agreements, wages and hours, timekeeping, documentation, monitoring, fiscal controls, and contractor oversight to ensure program integrity and compliance with WIOA requirements.

Strategic Goals: This agenda item is supported by the Texas Talent Strategies below.

Goal 2: Service Optimizers

Enhance the efficiency, quality, and accessibility of workforce services delivered by the Texas Workforce Commission (TWC), ensuring Texans experience seamless access to job training, unemployment benefits, and career support.

Goal 3: Partnership Managers

Strengthen and expand strategic partnerships among TWC, employers, educational institutions, and community-based organizations to deliver coordinated and innovative workforce development solutions.

Analysis: The WIOA Paid/Unpaid Work Experience policy establishes a comprehensive framework for administering WIOA Work Experience (WEX) and Transitional Job activities while strengthening WSA's oversight of participant services, worksite operations, and program expenditures. It defines expectations for participant assessments and IEP/ISS alignment, worksite agreements, meaningful work and training objectives, wages and hours, accurate timekeeping,



payroll reconciliation, participant and employer contact, performance documentation, WorkInTexas data entry, and ongoing contractor monitoring. Collectively, these requirements establish stronger internal controls and clear accountability among WSA, the contractor, worksite employers, and participants to ensure WEX services are properly documented, funds are used for allowable and verified activities, and participants receive structured work-based learning that supports progression toward unsubsidized employment.

Key policy items include:

- **WEX Purpose:** Provides structured, time-limited workplace learning tied to participants' employment goals and IEP/ISS.
- **Youth Requirements:** Youth WEX must include an academic and occupational education component and support career exploration and skill development.
- **Worksite Agreements:** Agreements, training plans, responsibilities, wages, hours, and dated signatures must be completed before placement begins.
- **Participant Compensation:** Establishes WSA requirements for WEX wages, allowable hours, duration, and participant funding limits.
- **Timekeeping & Payroll:** Requires accurate documentation of actual hours worked, timely timesheets, appropriate approvals, and payroll reconciliation.
- **Contractor Internal Monitoring & Documentation:** Requires ongoing contractor contact with participants and employers, worksite monitoring, performance records, case notes, and accurate WorkInTexas documentation.
- **Fiscal Accountability:** Strengthens controls to ensure WEX expenditures are allowable, supported, verified, and protected from waste, fraud, and abuse.
- **20% Youth Requirement:** Supports compliance with the requirement to expend at least 20% of applicable WIOA Youth funds on allowable WEX activities.
- **Contractor Accountability:** Establishes clear expectations for contractor oversight, worksite verification, employer coordination, participant monitoring, and maintenance of supporting records.

Additional Oversight

- **Invoice Review Process:**
 - Monthly invoices and supporting documentation are received and reviewed by WSA fiscal staff. Fiscal Staff verifies expenses, tests supporting records and timesheets, reconciles costs to prior billings, and confirms budget availability for the ISY and OSY programs. All timesheets must contain verifiable electronic approval and supporting documentation. At a minimum, documentation must clearly identify the employee, worksite supervisor, and career counselor, and include the date and time of approval through one or more of the following: an electronic signature, email confirmation, system-generated approval record, or other auditable electronic



evidence.

The invoice is then approved by Fiscal, Program, and Finance management before being posted in the accounting system, processed for payment, and included in monthly financial and TWC reporting.

This review and approval process ensures that all costs are properly supported, allowable under program requirements, accurately documented, budgeted, and independently validated before payment and reporting.

- **Risk Assessment:** Risk-based monitoring incorporates redundancies to enable proactive oversight, alignment with compliance requirements, and the assurance of effective stewardship of grant funds. To achieve this:
 - Staff review existing risk assessment tools and update them to better capture risk.
 - Risk assessments are completed annually at the beginning of each program year by:
 - Contractors,
 - Independent Monitor
 - Quality Assurance.
 - Each grant is evaluated and assigned a risk level based on established criteria.
 - The results of the assessment are communicated to and reviewed by the fiscal, program, procurement, and quality assurance departments.
 - Monitoring plans are developed/tailored to the identified risk level, ensuring resources focus on higher risk areas.
 - Risk assessments are reviewed regularly to recalibrate risk ratings, identify emerging risks and changing conditions, and adjust monitoring activities.
- **Program & Financial Monitoring:**
 - **Program Monitoring**
 - Participant files are sampled and reviewed to verify eligibility, service delivery, activity documentation, and required monthly contacts.
 - Monitoring helps ensure program compliance, data integrity, and consistent service delivery.
 - **Financial Monitoring:**
 - Federal and State requirements mandate annual financial evaluations of federally funded programs to assess compliance with applicable laws and regulations, the effectiveness of internal controls, the accuracy of financial reporting, and the proper stewardship of public funds.
 - Reviews include audits, cash management, cost allocation, disbursements, financial reporting, and insurance coverage. Any issues identified are classified as either observations, which provide opportunities to strengthen processes, or findings, which represent non-compliance and require



corrective action.

- This process helps ensure accountability, compliance, and effective management of federal and state workforce funds.
- **Fiscal Integrity** reviews are conducted by the External Monitor to assess a contractor's ability to responsibly administer workforce services and comply with fiscal requirements.

Key desk review procedures include:

1. Review of prior financial monitoring, accounting policies, and procedures, and audit report to ensure the contractor has the capacity or have program regulations to comply with Federal, State, and TWC.
2. Review and identify any adverse findings, audit issues, sanctions, or legal judgments that may impact contractor performance.
3. Internal controls are assessed to ensure adequate safeguards over fixed assets, cash management, financial reporting, procurement, and cost allocation.
4. Insurance and bonding coverage are reviewed to verify adequate protection of workforce funds.

This process helps ensure contractors have the financial stability, internal controls, and compliance framework necessary to safeguard workforce funds and meet program requirements.

Alternatives:

Fiscal Impact: Implementation will be supported through existing WIOA allocations. The policy establishes controls for the use and documentation of WEX expenditures and supports compliance with the federal requirement that at least 20% of non-administrative WIOA Youth funds be expended on allowable Work Experience activities. No additional Board funding is anticipated as a direct result of this policy.