



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

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

Date: May 15, 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

TWC completed its annual review of WSA from August 14, 2025, through October 23, 2025. TWC has not issued any additional information, nor a Final Report (if there are findings) or a Letter (if there will be no findings).

Fiscal Impact: TWC's Exit Report did not identify any potentially questioned costs.

Recommendation: Staff from the associated departments are developing *action plans* to address TWC's Annual Report potential findings and other items that TWC may have 'flagged' but not reported, including some that staff resolved during the monitoring. The action plans include, at a minimum, four elements:

- An examination of the root causes,
- A review of existing (or the development of) procedures,
- Staff training, and
- Additional internal controls (to monitor and test progress for each item).

Staff will consolidate and prepare the documentation of the actions in anticipation of TWC's audit resolution, which QA will help coordinate.



Next Steps:

- **TWC's 'Embargoed' Report:** TWC will issue an informational (non-public) copy of the report to the CEO five business days before issuing the final report (expected in May 2026).
- **Monitoring Letter:** If there are no issues, TWC will issue a letter (otherwise, they will issue a report).
- **Monitoring Report:** If there are findings, TWC will issue a final report via e-mail to the Board Chair, Board Executive Director, designated representatives of the US Dept of Health and Human Services, Dept of Labor, TWC, and other TWC executive staff.
- **Audit Resolution:** Findings from the report will go to TWC's Audit Resolution department, with whom WSA will coordinate to resolve the issues within 45 days.



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

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

Date: May 15, 2026

Subject: **Migrant Seasonal Farm Worker Monitoring**

Summary: Quality Assurance (QA) briefing on a Migrant Seasonal Farm Worker (MSFW) monitoring review. The item does not require Board action.

Strategic Goals: The 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:

TWC Migrant Seasonal Farm Worker (MSFW) Monitoring

The TWC State Monitor Advocate's (SMA) office completed a review of MSFW services for which an Exit Conference and a follow-up clarification meeting were held on February 18, 2026, and March 23, 2026, respectively.

A Final Report, included as an attachment, was issued April 2, 2026, and addressed by the TWC SMA to TWC's Chief Deputy Division Director (not to WSA). It lists the following areas of concern for WSA:

1. Gaps in MSFW Policies and Guides,
2. Lack of fully standardized Agricultural Recruitment System (ARS) procedures and tools,
3. Need to formalize the Wagner-Peyser complaint framework,
4. Self-monitoring testing consistency and documentation expectations.

The report also requires a comprehensive corrective action plan to be submitted to TWC's Executive Director by May 4, 2026 (however, this is a requirement internal to TWC, not WSA).

Multiple Boards' Executive Directors have expressed their concerns to TWC with the SMA's handling of the monitoring.

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Some of the issues with the monitoring include, but are not limited to:

- The SMA provided technical assistance (TA) to staff while they monitored the same items of the TA that they were providing. Thus, the SMA did not first provide the Boards with technical assistance, second, allow sufficient time to implement the new and unfamiliar elements and requirements, and third, complete the monitoring.
- Throughout the Board's history, only TWC staff have used the ARS system, but the monitors cite that this is not being properly used.
- The Alamo is not a 'significant' MSFW area (based on its MSFW population). However, the SMA monitored the Alamo as if it were a 'significant' area (e.g., some requirements were only applicable to 'significant' areas at the time of monitoring).
- TWC did not issue clear guidelines to Boards concerning the MSFW until after the monitoring.
- The SMA's testing is highly subjective. The 'areas of concern' do not specifically identify objective instances of non-compliance.

Alternatives: Staff is awaiting additional guidance and direction from TWC's Chief Deputy Division Director or Executive Director.

Fiscal Impact: The SMA report does not cite questionable costs.

Recommendation: Staff will continue coordinating with TWC and our partner Boards to be prepared to incorporate and implement updated and new guidance.

Next Steps:

- In coordination with Texoma, QA initiated a *Quality Assurance Network (QAN)* group that will focus on the MSFW changes. Through this group, WSA is coordinating with other Board areas to promote communication, coordination, and implementation of any new requirements.
- WSA and TWC Staff are providing technical assistance to Center Staff, including walkthroughs, planning, logistics, reporting, and documentation.

Attachments: TWC SMA Final Monitoring Report

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

April 2, 2026

Ms. Mahalia Baldini

Chief Deputy Division Director

Workforce Development Regional Operations Texas Workforce Commission

101 E. 15th Street

Austin, TX 78778

Re: Alamo Local Workforce Development Board Monitoring Review Report

Dear Ms. Baldini:

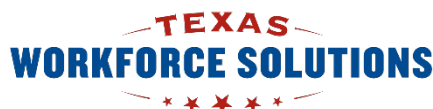
This letter follows the on-site monitoring review conducted by the State Monitor Advocate Program Specialist under delegated authority from February 2, 2026, to February 6, 2026, and the subsequent desk review completed by February 20, 2026. We are pleased to inform that we received full cooperation from Alamo's local Workforce Development Board ("Board") leadership team during our onsite visits.

Please be informed that after the onsite visit and exit conference wrap-up sessions, the Board provided feedback to our executive summary that we feel are important to address in this report. Please see attached response from the Alamo Board to our executive summary (Annex 2).

As part of our standard monitoring process, we provided the Board with an executive summary of our preliminary findings to ensure accuracy and provide an opportunity for clarification before submitting the final report. In this instance, the Board stated both unclarity and disagreement with our preliminary findings (which we identified as areas of concern). After receiving the Board's response, we offered a session to clarify the items included in the executive summary, and on March 23, 2026, we held a virtual meeting (via Teams) with the Board to provide clarifications.

During our meeting, the Board expressed their perspective as an organization subject to numerous audits, monitoring visits and reviews. They suggested that enhanced communication and coordination from TWC could improve the process. Mr. Adrian Lopez further explained that they feel several aspects of TWC's guidance related to applicable regulations and staffing models create operational uncertainty.

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We clarified during our meeting that:

- The State Monitor Advocate (SMA) is an additional layer of the State Workforce Agency’s control function as recipient of the Wagner-Peyser grant, focused on ensuring that the safeguards to Migrant and Seasonal Farmworkers (MSFWs) within federal regulations are in place at the local level, regardless of the designation of significant MSFW offices.
- We explained that because this is the first time the Board has received a monitoring visit from the State Monitor Advocate office, the main purpose is to gather a baseline, and we will note areas of concern as opposed to findings and the review focused on Program Year 2024 compliance.
- Because the staffing model requirements were not yet in effect during that time period and because DOL later extended the implementation date to 2027, we did not look at compliance issues related to the staffing model. We further clarified that the on-site review may yield compliance issues related to regulations in effect at the time of the visit (within program year 2025), such as the prominent display of the complaint posters – which we would include in our monitoring report.
- Although there may be some overlap with other reviews, our review follows a distinct purpose and any findings therefrom, are actionable by different stakeholders: TWC and the US Department of Labor. We further detailed that our final monitoring report is addressed to TWC who is ultimately responsible for any discovered issues, and that TWC will work and collaborate with the Board to address any findings and implement any corrections. We noted that because of this, some of the comments in the Board’s response may be premature or misdirected, as they will have an opportunity to discuss with TWC any implementation strategies after the final monitoring report is submitted. We explained that we strongly suggest and encourage developing a corrective action plan, but it would be up to TWC to develop one with the Board or simply implement measures to ensure that the items noted are addressed and proactively avoid findings the next time we visit.
- Our monitoring reviews are bound by professional standards, and we follow the procedures outlined in regulations as well as applicable DOL guidance, including its Core Monitoring Guide. One particularity of our monitoring reviews is that we must offer technical assistance. We don’t simply point to or list issues, but we provide as much information as possible so that these are understood and how they can be addressed, such as applicable best practices. We do have prepared materials that we present during our technical assistance sessions based on common issues we find in other board areas visited for the first time. These are designed to better illustrate these common pitfalls and best practices, but they are not substitute for staff trainings. TWC is responsible for ensuring that ES staff are trained and for implementing any best practices. We strive to excel in practicing the highest professional standards for each monitoring visit.
- We announced the state-wide monitoring plan during one of TWC’s biweekly communications meetings with all the boards on August 29, 2025¹. We then publicized the possibility of visiting board areas that have not been visited before.

¹ We did not state the precise date during the clarification meeting. We mentioned “less than a year ago”.

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Ms. Mahalia Baldini – Final Monitoring Report Alamo
Chief Deputy Division Director

- We initiated contact with the Board well in advance of the planned monitoring visit² and with the Board's agreement, we selected the week for the on-site portion of the monitoring review. We further explained that for future visits, we can select a week that best suits the Board with sufficient time separation from other monitoring visits, reviews and audits, aiming to avoid overwhelming the staff.

After we provided general clarification statements and the Board expressed their perspective, we offered to address their concerns individually. The Board declined further discussion at that time, and we have addressed their individual concerns in writing within this final report.

For any findings identified, a comprehensive corrective action plan must be submitted in writing to the Texas Workforce Commission Executive Director (or his designee) within 30 *calendar* days, by May 4, 2026. This plan must clearly outline the actions to be taken to correct any compliance issues and specify completion deadlines no longer than 30 *business* days from the date of the plan. If a longer timeframe is required for full compliance, the length of and the reasons for the extended period and the major interim steps to correct the compliance issues must be specifically stated.

Even in the absence of findings in the enclosed report, we strongly encourage developing a corrective action plan to address any issues or areas of concern described in the report. This proactive approach will help preempt potential issues that might otherwise lead to findings in future monitoring reviews.

We trust this review and report will prove valuable to your team and the Alamo Board, particularly ES staff assigned to the offices visited. Please contact the Office of the State Monitor Advocate if you have any questions or feedback or require further technical assistance on any issue raised in the enclosed report. We remain available to support your ongoing efforts to better serve Migrant and Seasonal Farmworkers.

Best Regards,

Horacio Lopez Montes

Horacio Lopez Montes
State Monitor Advocate
Texas Workforce Commission

CC: Adrian Lopez, Chief Executive Director, Workforce Solutions Alamo
Michelle Kranes, Deputy Division Director, Workforce Development, Compliance & Assistance, TWC
Timothy L. Grant, Integrated Service Area Manager, TWC
Russell Hunter, Manager, Migrant & Seasonal Farmworker Outreach, TWC
Teresa Chavez, Workforce Solutions Alamo
John E. DeLeon, State Monitor Advocate Program Specialist, TWC
Brian Hart, Division Chief, DOL, Employment and Training Administration (ETA)
Francine Cornier, Regional Monitor Advocate, DOL, Employment and Training Administration (ETA)

² Significantly, we held an introductory/general overview of the monitoring visit meeting with the Board on January 14, 2026 where we explained these basic concepts, answered questions and provided details of what to expect as we follow the stages of the visit.

FINAL REPORT – MONITORING REVIEW

Board Area:	Alamo (20) (“Board”)	Date of Report: April 2, 2026
Dates of the Monitoring review:	On-site: Feb 2 – Feb 6, 2026 / Desk Review: Feb 7 – Feb 20, 2026	
Workforce Solutions Offices reviewed:	Data Point, Port SA, O’Connor, New Braunfels (non-significant MSFW offices)	
Review period:	PY 2024 (July 1, 2024 – June 30, 2025)	
Scope of the review:	To measure progress and identify areas of compliance with the <i>Wagner-Peyser Employment Services Allotment (including distribution to the Board)</i> , as well as to offer opportunities for technical assistance	
Standards for review:	The Wagner-Peyser Act (as amended), 20 CFR parts 651, 652, 653, and 658 (Subparts E and G), ETA’s Core Monitoring Guide (2025), TWC’s Employment Service Guide (March 10, 2025), TWC’s Migrant and Seasonal Farmworker Guide (April 15, 2025), TWC’s Complaint Procedures Guide (July 23, 2025) TEGLs 07-18, 08-17, 10-16 (change 2), 10-23 ¹ , 12-23, 14-18, 23-19, and 33-14 (attach. 2)	

REPORT STRUCTURE AND KEY TERMS

All areas of compliance, areas of concern, and findings shall be deemed applicable to all workforce solutions offices reviewed, unless otherwise specifically stated as applicable to a particular workforce solutions office.

Areas of Compliance: Items that meet the standards for review under the scope of the review. Only noteworthy items will be addressed during the monitoring review. Items reviewed but not specifically addressed in this report are deemed compliant.

Areas of Concern: Items or issues discovered during the monitoring review that are potential non-compliance issues (issues that will result in a finding if not addressed). While some level of compliance exists, implementation may be ineffective or negatively impact program indicators. Recommendations will follow each area of concern identified in this report to assist in addressing potential future non-compliance.

¹ TEGL 10-23 was rescinded on 3/27/2025 via TEGL 10-23 (change 1) and a new TEGL 10-23 (change 2) was published on July 10, 2025. On 3/19/2025 TEGL 10-23 (change 2) was rescinded.

Findings: Conditions discovered during the monitoring review that are confirmed noncompliant with a specific regulation or standard for review (listed above). This includes missing required items or practices, and those existing that clearly violate current regulations. Recommendations for improvement are included to assist in developing corrective action plan(s). Unless extension(s) were timely filed and granted, corrective action plan(s) must be received by the Texas Workforce Commission with a copy to the office of the State Monitor Advocate within 30 days of the date of the final report.

Promising Practices: Items that show notable, useful, innovative, or exemplary practices that should be continued or enhanced to improve program effectiveness and better serve the Migrant and Seasonal Farmworkers (MSFWs) in the area of service.

The State Monitor Advocate Office offers technical assistance and general guidance in developing corrective action plans to address identified and potential non-compliance issues as well as other plans or actions developed to address areas of concern.

EXECUTIVE SUMMARY – SMA MONITORING REPORT – ALAMO

The review resulted in **four (4)** areas of concern:

Item	Result	Indicator	Standard of Review	WFS Office
A.	AREA OF CONCERN	<p>Gaps in MSFW Policies and Guides:</p> <p>Workforce Solutions Alamo demonstrates a strong commitment to quality MSFW service practices through customer-focused support, Spanish-language and translation assistance, WIT registration help, and recent MSFW trainings. Furthermore, the February 2026 Draft MSFW Policy provides a solid foundation for continued progress. The Board now has an opportunity to implement these new tools and develop local step-by-step guidelines for MSFW identification, LEP accommodations, bilingual service lists, and documentation of referrals and registrations. Aligning these practices, supported by written formal procedures across centers will help ensure consistency in MSFW intake and service delivery throughout the region.</p> <p>(Checklist Item #4)</p> <p><i>Impact:</i> Without an implementation strategy and clear local procedures, some practices may still differ across centers, which can affect consistency in MSFW identification, LEP services, and documentation.</p> <p><i>Initial Recommendations:</i> Develop an implementation strategy and strengthen the draft policy with concise local procedures, standard tools, and continued staff training to support consistent MSFW service delivery across all centers.</p>	20 CFR 653.101, 20 CFR 653.107, 20 CFR 653.103 (a) through (d)	All WFS offices reviewed
B.	AREA OF CONCERN	<p>Agricultural Recruitment System (ARS) Execution:</p> <p>Alamo staff show commitment to agricultural employers and workers. The questionnaire highlights helpful practices such as maintaining communication with agricultural employers, staying aware of seasonal hiring needs, promoting agricultural job postings to center staff, and documenting follow-up in WorkInTexas.com. Alamo’s ARS work is supported by several developing tools and documents—such as employer directories, job-order ledgers, and referral or field-check logs—and as these resources continue to take shape, the Board has an opportunity to bring greater consistency to ARS procedures across centers.</p> <p>(Checklist Items 17-20)</p> <p><i>Impact:</i> Without fully standardized ARS procedures and tools, centers may handle agricultural job orders and referrals differently, affecting consistency in documentation, follow-up, and clearance-order processing.</p> <p><i>Initial Recommendations:</i> Develop a Board-level ARS policy with clear local procedures for job-order intake, referrals, documentation, and clearance-order steps. Standardize ARS tools across centers and reinforce consistency through targeted staff training.</p>	ES Guide C-302, C-1002, C-1003; 20 CFR 653.503 Subpart F—ARS for U.S. Workers	All WFS offices reviewed

C.	AREA OF CONCERN	<p>Need for Formalized Wagner-Peyser Complaint Framework:</p> <p>Alamo staff demonstrate a strong customer-service approach to handling concerns, with ETA Form 8429 available at all centers and a clear intake process involving the Local Complaint System Representative. Recent staff trainings further support consistent practice, creating a solid foundation for a fully compliant Wagner-Peyser complaint system while leaving the Board an opportunity to formalize these practices into a complete local policy and strengthen documentation consistency across centers. (Checklist Items 21, 22)</p> <p><i>Impact:</i> Because several core complaint-system practices are already in place but not yet formalized at the Board level, centers may still handle documentation and follow-up differently, which can affect consistency in how ES-related complaints are recorded and routed.</p> <p><i>Initial Recommendations:</i> Strengthen the existing foundation by adopting a Board-level complaint policy that clearly outlines local procedures for CSR designation, intake, routing, and documentation, helping ensure that centers apply the complaint process consistently across the region.</p>	20 CFR 658.410; ES Guide A-201; TWC Complaint Procedures Guide	All WFS offices reviewed
D.	AREA OF CONCERN	<p>MSFW Policy & Self-Monitoring:</p> <p>Alamo has several formal monitoring tools in place—including ADM 65, the C1 Monitoring Policy and Procedures, the Self-Monitoring Draft, and the Texas Self-Monitoring Checklist—and staff described quality-assurance activities that show a growing commitment to oversight of ES and MSFW services. Opportunities remain to establish a consistent review schedule, strengthen documentation practices, and incorporate regular analysis of Minimum Service Level Indicators, quarterly numerical assessments and annual non-numerical assessments into a unified monitoring process. (Items 5, 8 of the SMA Checklist)</p> <p><i>Impact:</i> A more robust self-monitoring system that incorporates the Board’s existing tools would bring greater consistency to ES and MSFW performance reviews across centers and support continued progress toward regulation expectations.</p> <p><i>Initial Recommendations:</i> Build on the existing MSFW Policy draft by developing a clear framework that outlines a consistent review schedule, standardized documentation expectations, and a defined approach for incorporating MSLI analysis, quarterly and annual assessments into routine monitoring. Enhancing these elements will help ensure that the strong tools already in place are applied consistently across centers and support a more unified, data-informed review process.</p>	20 CFR 653.101; 20 CFR 653.109; and ES Guide D-201 20 CFR 653.100(b) and 20 CFR 653.108(a) DOLETA TEGL 23-19, DOLETA TEGL 14-18, ES Guide D-201, 20 CFR 658.600, 20 CFR 658.601	All WFS offices reviewed

Areas of Compliance:

ES office facilities, co-location of one-stop operations with ES and accessibility workstations	20 CFR 678.305 - 20 CFR 678.315	✓
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General Office Assessments

Centers visited during the review consistently demonstrated a welcoming and professional environment, with facilities that were clean, spacious, and designed to create a positive customer experience. Their strategic locations—often near public transportation and community hubs—support accessibility and reflect the Board’s commitment to reducing barriers for job seekers. Clear and effective signage, both inside and outside the centers, further enhances customer navigation and contributes to an efficient service environment. Additionally, the layout and organization of the facilities align with integrated service delivery, supporting co-located partner services and reinforcing the Board’s emphasis on collaboration and coordinated workforce support as outlined in its Local Plan. It is important to note that this assessment is based on **4 (four) of the 17 (seventeen)** centers within the Alamo Local Workforce Development Board Area. Future reviews will include additional centers, providing a more comprehensive overview.

Concern Regarding the Board’s Role and the Role of the One-Stop Operator: During the clarification session on March 23, 2026, the Board indicated that their discussions with other boards and TWC surrounding the staffing model influenced their perspective on the areas of concern raised in our executive summary (See Annex 2). Specifically, they stated:

“They [areas of concern] refer to areas not currently required in the Board’s contracts and grants with TWC, or that can be specifically found in guidance received from TWC.

“They [areas of concern] appear to be applicable to TWC, SWA (State Workforce Agency)[SIC], and ES Staff, and not to the Board”

“They [areas of concern] refer to TWC guidance that is not, or was not, in effect for WSA at the time of monitoring in February 2026”

It is important to clarify that the Board retains responsibility for Wagner-Peyser (ES) oversight, even when TWC staff provide services at the local centers. As a pass-through entity and subrecipient of federal grant funds under the Agency Board Agreement (ABA) (see ABA pages 3 and 4 and Part 6, subpart 19, 19.2, 19.3), the Board is ultimately accountable for ensuring that all services provided at the local centers adhere to federal regulations. This includes services provided by TWC staff, the Board’s One-Stop Operator or OSO, and any contracted party providing services at the local centers (e.g., business services by one of their contractors), as outlined in Section L of the Wagner-Peyser agreement between TWC and the Board, which specifies compliance with applicable provisions, a monitoring system, performance accountability, and outcome-based evaluations.

This takes us to the discussions held during the exit conference related to the role of the One-Stop Operator. The Board utilizes two competing contractors to provide services at the local workforce solutions offices (these contractors typically bid against each other). One contractor provides ES services, including services to employers (the Business Unit), and also functions as the One-Stop Operator. However, our review found no formal record of this designation, nor documentation of firewalls to prevent potential conflicts of interest arising from the competing nature of the contractors or the dual role as operator and service provider. Furthermore, the contract and related documentation (checklist item #2) lacked key elements typically included in a Memorandum of Understanding (MOU) as required by regulations (20 CFR Part 679 Subpart D and 20 CFR Part 678), such as

detailed descriptions of coordinated service delivery among One-Stop program partners and service providers at each center, including referral processes, data sharing protocols (with privacy safeguards), and conflict resolution mechanisms.

- **MSFW and Accessibility:** The contract lacks clear methods for ensuring that the needs of workers, youth, and individuals with barriers to employment (e.g. MSFWs), including individuals with disabilities, are proactively addressed in providing access to services, including technology and materials.
- **Accountability for Coordination and Integration:** There are no stated goals or performance measures specifically requiring the designated contractor and OSO to make referrals or perform coordinated services.

The Board should consider TWC as a partner when it comes to Wagner-Peyser as much as it does for other programs. Otherwise, the lack of documented responsibilities of the One-Stop Operator, significantly increases the potential risks: diminished customer service when it comes to ES, reduced ES staff productivity, and impaired collaboration between staff involved in other core programs (TWC staff and other staff working for a separate competing contractor), potentially limiting MSFW access to comprehensive services. While the informal practices we observed during this year's visit point to a strong culture of respectful, attentive, and solution-oriented customer service, these issues should be addressed to mitigate the noted risks.

Promising Practices:

Promising practices observed across the four centers include robust partnerships, sector-based planning, and employer-driven strategies that intentionally support priority populations, including MSFWs. A clear example is the MOU the Board holds with the National Farmworker Jobs Program (NFJP) partner: Motivation Education & Training, Inc (MET). Center staff demonstrated a willingness to strengthen their understanding of the process for MSFWs to participate in workforce development activities, outreach requirements, the Agricultural Recruitment System (ARS), and the Wagner Peyser complaint system, signaling readiness to align operations with federal regulations. The Board has also strengthened language access by hiring a language assistance agency to provide on-the-spot translation support, helping ensure that customers with limited English proficiency receive timely and accurate assistance.

FINAL REPORT

All areas of concern described in this report are attributable to the four workforce solutions offices visited.

A. Area of Concern: *Gaps in MSFW Policies and Guides*

Although the Board disagrees with this area of concern, our review acknowledged Workforce Solutions Alamo's commitment to improving quality MSFW service practices through customer-focused support, Spanish-language and translation assistance, WIT registration help, and recent MSFW trainings. Furthermore, the February 2026 Draft MSFW Policy provides a solid foundation for continued progress. The Board cites in its response to the Executive Summary (Annex 2): "*MSFW strategy and procedures are documented in the Migrant Seasonal Farmworker Guide released in April 2025 by TWC. Procedures addressing identification and services are detailed in the Employment Services Guide released by TWC on March 10, 2025*" suggesting an opportunity to implement these tools and develop local step-by-step guidelines for MSFW identification, LEP accommodations, bilingual service lists, and documentation of referrals and registrations. Aligning these practices with written procedures across centers will enhance consistency in MSFW intake and service delivery.

Specific Examples of Deficiencies:

- **Lack of Formal MSFW Intake Procedure:** As confirmed by Alamo's response to the executive summary (see Attachment 2), MSFW identification depends entirely on self-disclosure; there is no formal staff intake procedure for MSFW identification.
- **Inconsistent MSFW and LEP Service Practices:** Identification and coding of MSFW status, delivery and documentation of LEP services, provision of bilingual service lists, and completion of referral and registration steps vary between the centers visited.
- **MSFW Policy Not Locally Developed:** The Board initially acknowledged the absence of a formal MSFW policy and indicated intent to consult peer Boards; however, the subsequently submitted document largely reproduces state guidance and does not demonstrate locally developed procedures and practices.

Cause Analysis: The Board has relied on informal practices to serve their community without specific focus on the protections afforded to MSFWs within federal regulations and consideration of the responsibilities of the One Stop Operator (OSO). Moreover, in the Board's response to our executive summary (see Annex 2), the Board states:

"In addition, WSA has letters (available upon request) from TWC's Equal Opportunity (EO) annual monitoring, which document and validate that there have been no findings or areas of concern in the provision of services to all customers, including MSFWs. WSA provides these services consistently throughout the region in accordance with Chapter 801.23 of TWC Rules as codified in the Texas Administrative Code, title 40, part 20."

This may indicate a need for further clarification regarding the distinct requirements of Wagner-Peyser regulations and equal opportunity provisions. Finalizing and fully implementing the new draft MSFW materials is essential. Without complete procedures and standardized tools, along with staff trainings, inconsistencies in MSFW intake and service delivery are likely to persist across centers.

A.1. Criteria: 20 CFR 653.101, 20 CFR 653.107, 20 CFR 653.103 (a) through (d).

A.2. SMA Recommendations: Strengthen and implement the draft MSFW policy by developing Board-level procedures that clearly define MSFW identification and coding steps, LEP accommodation processes, bilingual service list requirements, and documentation standards for referrals and registrations. Incorporate accountability measures for the OSO with concise local procedures and standardized tools to support consistent service delivery across centers. Prioritize putting in place a structured staff training program to ensure all ES staff (regardless of employer of record) understand and apply the procedures uniformly and establish an implementation strategy to reinforce alignment with federal regulations and state guidance.

A.3. Means for Improvement: TWC will continue offering statewide guidance and training to support Boards in refining MSFW policies and service procedures. As new resources become available—particularly those addressing MSFW identification, LEP accommodations, and documentation—the Board can review its draft materials and OSO performance measures to ensure alignment with statewide expectations. Incorporating TWC tools and training content into local procedures will help strengthen consistency across centers and improve intake, coding, and service delivery. The SMA office remains available to provide technical assistance and support coordination efforts between the Board and TWC in applying MSFW best practices regionwide.

B. Area of Concern: *Agricultural Recruitment System (ARS) Execution*

The Board disagrees with this area of concern, asserting that “*TWC staff follow the ARS system’s instructions*” (see Annex 2). However, Section A-103 of TWC’s ES Guide also stipulates: “When placing ARS clearance orders, **Workforce Solutions Office staff** must:” (further describing collaboration efforts to clear the job orders). As business services for agricultural employers are provided by contractor staff, adherence to these steps is expected for *all* ES staff - regardless of employer of record, and, the Board’s oversight responsibilities remain. Questionnaire responses highlighted positive practices such as maintaining communication with agricultural employers, staying aware of seasonal hiring needs, promoting agricultural job postings, and documenting follow-up in WorkInTexas.com. Despite Alamo’s developing ARS tools and documents, including employer directories and job order ledgers, the ARS is not functioning as intended, presenting an opportunity to enhance consistency in ARS procedures across centers.

Specific Examples of Deficiencies:

- **Non-Standardized ARS Procedures:** ARS procedures are not yet fully standardized across centers, including the use of forms ETA 790, 790B and 790A.
- **Incomplete ARS Documentation and Employer Records:** Agricultural employer information, ARS-related documentation, and job order processing steps are not consistently maintained.
- **Limited Staff Understanding of ARS Requirements:** Staff understanding of clearance requirements and required ARS tools varies, and several standard ARS documents—such as employer directories, job order ledgers, and referral/field check logs—are not yet in place.

Cause Analysis: Staff primarily utilized general employer-service practices and locally developed methods that do not fully align with federal regulations for agricultural job order intake, referrals, documentation, and clearance order steps. Although the Board now has several developing ARS tools and documents, the local procedures needed to guide consistent ARS implementation are still being finalized. Without completed procedures and standardized ARS tools, centers apply these processes differently, resulting in variation in documentation, follow-up, and handling of agricultural job orders across the region.

B.1. Criteria: ES Guide C-302, C-1002, C-1003; 20 CFR 653.503 Subpart F—ARS for U.S. Workers.

B.2. SMA Recommendations: Develop and implement Board-level ARS policies and procedures that clearly outline agricultural job order intake steps, referral processes, documentation requirements, and clearance order handling. Standardize ARS tools—such as employer directories, job order ledgers, and referral or field-check logs—to support consistent use across centers. Ensure that targeted ARS training is provided to ES staff (regardless of employer of record) to ensure that they understand and apply the procedures uniformly and reinforce implementation through ongoing guidance and monitoring to promote consistent ARS service delivery throughout the region.

B.3. Means for Improvement: TWC will provide statewide guidance and training to support Boards in developing a sustainable ARS framework, including expectations for Board-level ARS policy, domestic recruitment procedures, documentation requirements, and staff training. As TWC’s ES team finalizes ARS training, the Board can review its local processes to ensure alignment with statewide standards and consistent implementation across centers. Applying TWC’s guidance will help strengthen the ARS procedures and promote more uniform execution of ARS responsibilities. The SMA office offers technical assistance aimed at implementing the ARS and collaboration efforts between TWC ES staff and the Board.

C. Area of Concern: *Need for Formalized Wagner-Peyser Complaint Framework*

The Board disagrees with this area of concern stating:

“WSA’s complaint system has been formalized by the Board for many years. TWC’s EO Annual Monitoring letters, which do not include any reported areas of concern or findings, validate the process and WSA’s policies alignment with requirements. The complaint policy and procedures are consistently implemented across the region and clearly identify each step. In addition to the Board’s policy, the TWC ES Guide on page 15 A-201 outlines the complaint procedure established by the state staff.”

The Board’s response suggests a potential misunderstanding regarding the existence of distinct, co-existing complaint systems within One-Stop Centers, including the specialized Wagner-Peyser complaint system. It is crucial to clarify that all staff, regardless of employer or position, play a vital role in the Wagner-Peyser complaint process. The Board has access to two key tools for implementing this system: TWC’s ES Guide and TWC’s Complaint Procedures Guide. As stated in Section A-201 of the ES Guide: “TWC **and Boards**

are responsible for the operation of the Complaint System in each Workforce Solutions Office. Additionally, each Workforce Solutions Office must be assigned a trained ES Complaint System representative to process ES complaints and to maintain a log for recording all complaints received. Although a physical office presence isn't required, each office must have a designated ES Complaint System Representative available, even if virtually. **All staff located in the Workforce Solutions Office may receive complaints. TWC and Boards** must provide Workforce Solutions Office staff access to training regarding the Complaint System.” These provisions are mirrored in TWC’s Complaint Procedures Guide, which the Board provided for our review.

Despite the Board's disagreement, we observed that Alamo staff demonstrate a strong commitment to customer service when addressing Wagner-Peyser concerns. ETA Form 8429 was available at all centers, and there was a clear intake process involving the Complaint System Representative (CSR). Recent staff trainings on the Wagner-Peyser complaint system further support these practices, providing a foundation for a fully compliant system, and the Board has an opportunity to formalize these practices into a complete local policy and strengthen documentation consistency across centers.

Specific Examples of Deficiencies:

- **Incomplete Wagner-Peyser Complaint System:** Alamo maintains general complaint procedures and a strong customer service culture; however, the Board has not yet established a fully developed Wagner-Peyser complaint system, as reflected in inconsistent awareness and use of ETA 8429 across centers.
- **Lack of a Formalized Complaint Framework:** Staff rely on informal resolution during appointments, and although the Board uploaded the TWC Complaint System Guide as support documentation, there is no evidence of a Board Level complaint policy as prescribed in such Guide (see Introduction section, page 4: “Boards must ensure that they develop and maintain local complaint policies that fully comply with the requirements and procedures included in this guidance. Local complaint policies must identify requirements for the training of Workforce Solutions Office staff on applicable local complaint procedures.”).
- **Lack of CSR Designation and Training Procedures:** The Board did not provide documentation describing its local process for designating a CSR.

Cause Analysis: The current situation suggests a potential for confusion arising from the presence of coexisting grievance procedures. The E.O. complaint system (which the Board asserts is in full compliance) is distinct from the Wagner-Peyser complaint system, which is in early stages of implementation at the local level. While the Board already has several complaint handling practices in place across multiple complaint systems, formalizing the Wagner-Peyser framework would enhance consistency, particularly in areas specific to Wagner-Peyser regulations, such as CSR designation, ES-specific intake steps, routing requirements, and documentation standards. Without finalized procedures and standardized tools tailored to the Wagner-Peyser system, centers may continue to apply processes inconsistently, resulting in variations in how employment services and employment-related law complaints are recorded and routed across offices.

C.1. Criteria: 20 CFR 658.410; ES Guide A-201; TWC Complaint Procedures Guide.

C.2. SMA Recommendations: Develop and adopt a Board-level Wagner-Peyser complaint policy that clearly outlines CSR designation, ES complaint intake steps, recording in complaint logs, routing, documentation and training requirements, including on the use of ETA Form 8429. Ensure that concise local procedures and standardized tools are incorporated to support consistent application across centers, and reinforce implementation through ongoing training and monitoring to promote uniform documentation and routing of complaints throughout the region.

C.3. Means for Improvement: TWC has recently issued statewide guidance and training to support Boards in developing clear ES and employment-related law complaint system procedures, including establishing a CSR designation process, maintaining consistent complaint documentation, and integrating TWC’s Complaint Procedures Guide into local operations. The SMA office offers technical assistance aimed at implementing the Wagner-Peyser complaint system and collaboration efforts between TWC ES staff and the Board.

D. Area of Concern: MSFW Policy & Self Monitoring

The board disagrees with this area of concern stating:

“The item pertains to ‘significant’ MSFW Workforce Solutions offices, which the Alamo is not (MSFW Guide, pp. 12-13). It also requires a full-time outreach merit staff member dedicated to performing the requested role, which the Alamo also does not have. The MSFW Guide, p. 12, states that “MSFW outreach staff are the only staff authorized to perform MSFW outreach work.” The ES Guide, D-202, requires that “MSFW outreach staff must... be year-round ES Merit employees.””

It is important to clarify that this item has no bearing on office designation or MSFW outreach. It relates to the Board’s primary role of oversight. Alamo already has several formal monitoring tools in place—including ADM 65, the C1 Monitoring Policy and Procedures, the concern is that no Wagner-Peyser elements are being monitored. Promising actions to address this are the Self-Monitoring Draft, and the Texas Self-Monitoring Checklist—and that staff described quality-assurance activities. All of these show a growing commitment to oversight of ES and MSFW services. Opportunities remain to establish a consistent review schedule, strengthen documentation practices, and incorporate regular analysis of Minimum Service Level Indicators, quarterly numerical assessments and annual non-numerical assessments into a unified monitoring process.

Specific Examples of Deficiencies:

- **No Defined ES Review Schedule:** The Board does not have a defined schedule for ES-specific reviews, and documentation practices vary across offices.
- **Insufficient Monitoring Documentation:** Monitoring reports and supporting documentation were inconsistently available, with centers describing general review activities in the questionnaire while the checklist reflected missing MSFW applicant data, absent ES-specific monitoring schedules, and no recent CAPs to verify implementation.

- **Lack of Integrated MSLI Analysis:** Routine analysis of Minimum Service Level Indicators (MSLIs) has not yet been incorporated into a consistent review process, and recent ES-related self-monitoring reports or Corrective Action Plans (CAPs) were not available for review.

Cause Analysis: Discussions with the Board indicate lack of specific TWC guidance on integrating Wagner-Peyser elements into self-monitoring practices. There appears to be an opportunity to reinforce the Board’s role derived from the following statement in response to our executive summary (see Annex 2):

“Other comments from the area of concern pertain to the State Monitor Advocate’s role, not the Board’s (e.g., incorporating MSLI analysis and quarterly and annual assessments into routine monitoring). For example, 20 CFR § 653.108 states that the State Workforce Agencies (SWAs) “monitor their own compliance” and that the “State Administrator has overall responsibility for SWA self-monitoring,” which § 658.601 further describes by requiring “each SWA to establish and maintain a self-appraisal system.” The SWA must also collect and track performance accountability measures, as required by § 653.109. The SWA is defined as the State ES agency designated under sec. 4 of the Wagner-Peyser Act.”

It is important to clarify that multiple stakeholders can and should review the same data sets for distinct purposes. While provisions require the State Monitor Advocate to review data, this does not preclude other stakeholders, including the Board, from conducting their own assessments. As subrecipient of the Wagner-Peyser grant funds (pass through entity), the Board is obligated to adhere to all relevant regulations for the SWA (TWC). More specifically, the Board has a contracted responsibility to monitor performance, see ABA art 6, subpart 19, 19.2 “Board shall develop and maintain a monitoring system”. See also the Wagner-Peyser Agreement section 6.2.2. “a monitoring system, performance accountability and outcome-based evaluation”, and Section L Monitor subrecipient (business services). With regard to Subpart G of 20 CFR 658, it is important to note these other provisions not cited in the response:

20 CFR 658.601(a)(1) Numerical appraisal **at the ES office level** must be conducted as follows:

20 CFR 658.601(a)(1)(iv) Results of **ES office** numerical reviews must be documented and significant deficiencies identified. A corrective action plan as described in paragraph (a)(6) of this section must be developed to address these deficiencies.

(v) The result of **ES office** appraisal, including corrective action plans, must be communicated in writing to the next higher level of authority for review. This review must cover adequacy of analysis, appropriateness of corrective actions, and need for higher level involvement. When this review is conducted at an area or district office, a report describing **ES office** performance within the area or district jurisdiction must be communicated **to the SWA** on a quarterly basis.

Numerical appraisal at the SWA level must be conducted as follows:

(i) Performance must be measured on a quarterly basis against planned service levels as stated in the State Plan. The State Plan must be consistent with numerical goals contained in **ES office plans**.

Subpart G emphasizes a collaborative assessment effort where the Board conducts its own assessments at the local office level, aligns with its local plan, and communicates results to TWC. As previously noted, the Board already utilizes several monitoring tools; however, the limited integration of Wagner-Peyser elements remains a concern. This may stem from a lack of specific TWC guidance and/or a misunderstanding of federal regulations. Without a structured Board-level framework, monitoring practices may continue to vary across centers, leading to inconsistent review of MSFW performance at the service level.

D.1. Criteria: 20 CFR 653.101; 20 CFR 653.109; and ES Guide D-201, 20 CFR 653.100(b) and 20 CFR 653.108(a), DOLETA TEGL 23-19, DOLETA TEGL 14-18, ES Guide D-201, 20 CFR 658.600, 20 CFR 658.601

D.2. SMA Recommendations: Establish Board-level procedures that incorporate review of Wagner-Peyser elements with a defined schedule and standardized documentation expectations. Include clear steps for incorporating MSLI analysis, quarterly numerical assessments, and annual non-numerical assessments with their corresponding reports into routine monitoring. Align existing tools—ADM 65, the C1 Monitoring Policy, and the Texas Self-Monitoring Checklist—within a unified framework applied consistently across centers. Provide staff training and ongoing oversight to ensure reviewers understand the legal framework and support a consistent, data-informed reporting.

D.3. Means for Improvement: TWC provided Boards with statewide guidance and tools to support the development of a structured self-monitoring process and to strengthen reporting and documentation practices. Consistent use of TWC’s guidance and tools will help ensure the Board’s monitoring activities are timely, well-documented, and effective in evaluating progress and strengthening program performance. The SMA office offers technical assistance aimed at implementing self-monitoring practices and collaboration efforts between TWC ES staff and the Board.

[END OF FINAL REPORT]

MSFW Service Level Indicators Report

Annex 1

PIRL File Type: PIRL by Program
 Region/LWDB : Alamo WF Board
 Report Period: 4th Quarter 2024
 Quarter Type: Rolling 4 Quarters
 Report Run Time: 04/02/2026 12:25:12 PM

Equity Ratio Indicators (Cohort Period: 07/01/24 - 06/30/25)						
Indicator Name	MSFW's		Non-MSFW's		Equity	
	Count	Percent	Count	Percent	Yes	No
Total Participants	19	100.00%	19694	100.00%		
1. Received Basic Career Services (Staff-Assisted)	19	100.00%	19560	99.32%	Yes	
2. Received Staff-Assisted Career Guidance Services	4	21.05%	1643	8.34%	Yes	
3. Received Staff-Assisted Job Search Activities	18	94.74%	17334	88.02%	Yes	
4. Referred to Employment	10	52.63%	12562	63.79%		No
5. Received Unemployment Insurance (UI) Claim Assistance	0	0.00%	242	1.23%		No
6. Referred to Federal Training	2	10.53%	4288	21.77%		No
7. Referred to Other Federal /State Assistance	2	10.53%	228	1.16%	Yes	
8. Received Individualized Career Service	8	42.11%	7229	36.71%	Yes	
					5	3

Minimum Service Level Indicators								
Indicator Name	MSFW's			Non-MSFW's			Level Met	
	Den	Num	Rate	Den	Num	Rate	Yes	No
Individuals Placed in a Job (as defined in "Employment Rate 2nd Qtr After Exit ") (Cohort Period: 07/01/23 - 06/30/24)	28	15	53.57%	16552	10154	61.35%		No
Median Earnings of Individuals in Unsubsidized Employment (as defined in "Median Earnings 2nd Qtr After Exit ") (Cohort Period: 07/01/23 - 06/30/24)	15	\$3,856.20	NA	10154	\$8,167.59	NA		No
Individuals Placed Long term in Non-agricultural Jobs (as defined in "Retention with the same Employer in the 2nd and 4th Qtr after Exit " for whom a non-agricultural industry is reported (Cohort Period: 01/01/23 - 12/31/23)	9	5	55.56%	9708	6380	65.72%		No
							0	3

MSFW Participant Characteristics (Cohort Period: 07/01/24 - 06/30/25)	Count	Percent
Characteristic Group		
MSFW Participants	19	100.00%
Sex		
Male	11	57.89%
Female	8	42.11%
Age		
<16	0	0.00%

16-18	0	0.00%
19-24	0	0.00%
25-44	<u>9</u>	47.37%
45-54	<u>2</u>	10.53%
55-59	<u>5</u>	26.32%
Race		
60+	<u>3</u>	15.79%
Hispanic/Latino	<u>10</u>	52.63%
American Indian or Alaskan Native	0	0.00%
Asian	0	0.00%
Black or African American	<u>2</u>	10.53%
Native Hawaiian or Other Pacific Islander	0	0.00%
White	<u>13</u>	68.42%
Barriers		
More Than One Race	0	0.00%
Displaced Homemakers	0	0.00%
English Language Learners, Low Levels of Literacy, Cultural Barriers	<u>6</u>	31.58%
Exhausting TANF Within 2 years (Part A Title IV of the Social Security Act)	0	0.00%
Ex-offenders	<u>1</u>	5.26%
Homeless Individuals / Runaway Youth	0	0.00%
Long-term Unemployed (27 or More Consecutive Weeks)	0	0.00%
Low-Income Individuals	<u>2</u>	10.53%
Eligible Migrant and Seasonal Farmworkers	<u>8</u>	42.11%
Individuals with Disabilities	<u>1</u>	5.26%
Single Parents (Incl. Single Pregnant Women)	0	0.00%
Youth in Foster Care or Aged Out of System	0	0.00%



March 17, 2026

John E. DeLeon, Ph.D. - *State Monitor Advocate Program Specialist*
 Texas Workforce Commission
 101 E 15th St, Austin, TX 78778

WSA appreciates **the State Monitor Advocate's** (SMA) visit to the Alamo and the information provided in the service of Migrant Seasonal Farm Workers (MSFWs). We also appreciate the Technical Assistance (TA) and welcome the monitoring review. However, the MSFW monitoring appears to depart from common business practice in several ways.

Common business practice involves agencies: a) issuing written guidance clarifying roles and responsibilities; b) providing TA covering the guidance; c) allowing time for implementation, and d) performing monitoring after these steps and phases have been completed.

The **'areas of concern'** in the *Executive Summary* are being issued outside of these standard business practices:

- They refer to areas not currently required **in the Board's contracts and grants with TWC**, or that can be specifically found in guidance received from TWC.
- They appear to be applicable to TWC, SWA (State Workforce Agency), and ES Staff, and not the Board.
- They refer to TWC guidance that is not, or was not, in effect for WSA at the time of monitoring in February 2026.
- They include general statements that are not applicable to any specific instance, event, or action that could be cited as being in misalignment with federal, state, or local policies.
- They are being issued simultaneously while the State Monitor Advocate provided Technical Assistance, **exhibiting a preconception of "areas of concern."**

In addition, while Texas may have outreach and other performance goals, the Alamo region is not a designated **'significant' MSFW Workforce Solution office**. Further, the MSFW-related outreach requires a fully dedicated merit ES Staff, which TWC does not employ in the Alamo region.

WSA looks forward to continuing to serve MSFWs and, should this be the case in the future, incorporating the functions pertaining to the Texas Workforce Commission (TWC), the State Workforce Agency (SWA), and merit ES Staff, which the report addresses.

WSA looks forward to continuing to serve MSFWs and agricultural employers by promoting local employment.

Sincerely,

DocuSigned by:

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Adrian Lopez
 Workforce Solutions Alamo, CEO

Please find Workforce Solutions Alamo’s (WSA) responses to the Migrant Seasonal Farm Worker (MSFW) *Executive Summary – SMA Monitoring Report* for the Alamo. The report includes four “areas of concern.”

WSA also notes that the Technical Assistance (TA) provided by the monitors was offered at the same time as the monitoring, without allowing a reasonable time for potential implementation, as would be standard practice prior to monitoring and issuing ‘areas of concern.’ In addition, the ‘areas of concern’ do not appear to coincide with currently active guidelines; rather, they may be based on upcoming changes, which WSA looks forward to implementing should these changes occur.

Item A. Gaps in MSFW Policies and Guides

WSA is unclear about this area of concern and disagrees. The report lists actions, items, and services that have been in place as part of WSA’s delivery of services, and which were demonstrated to the monitor during the visit. These items include:

- **MSFW identification:** When an MSFW self-identifies at the reception, staff refer the participant to the appropriate TWC services and resources.
- **LEP accommodations:** WSA offers services to customers in need of LEP accommodations.
- **Bilingual service lists:** WSA offers bilingual services to customers.
- **Documentation of referrals and registrations:** Documentation of referrals and registrations is processed by TWC staff as required.

MSFW strategy and procedures are documented in the *Migrant Seasonal Farmworker Guide* released in April 2025 by TWC. Procedures addressing identification and services are detailed in the *Employment Services Guide* released by TWC on March 10, 2025.

In addition, WSA has letters (available upon request) from TWC’s Equal Opportunity (EO) annual monitoring, which document and validate that there have been no findings or areas of concern in the provision of services to all customers, including MSFWs. WSA provides these services consistently throughout the region in accordance with Chapter 801.23 of TWC Rules as codified in the Texas Administrative Code, title 40, part 20.

Item B. Agricultural Recruitment System (ARS) Execution

WSA is unclear about this area of concern and disagrees. State guidelines state that the ARS system is to be used only by Merit Staff, and TWC staff follow the ARS system’s instructions. As part of WSA’s policy implementation, WSA adheres to the ES Guide page 8 “Participate in clearing labor between states, including the use of a standardized classification system (Agricultural Recruitment System [ARS])” The ES Guide, A-103, requires that “TWC must ensure ES Merit staff follows [the guidelines provided by the guide] to administer the ARS.”

Item C. Need for Formalized Wagner-Peyser Complaint Framework

WSA is unclear about this area of concern and disagrees. WSA’s complaint system has been formalized by the Board for many years. TWC’s EO Annual Monitoring letters, which do not

include any reported areas of concern or findings, validate the process and WSA's policies alignment with requirements. The complaint policy and procedures are consistently implemented across the region and clearly identify each step. In addition to the Board's policy, the TWC ES Guide on page 15 A-201 outlines the complaint procedure established by the state staff.

Item D. MSFW Policy & Self-Monitoring

WSA is unclear about this area of concern and disagrees. The item pertains to 'significant' MSFW Workforce Solutions offices, which the Alamo is not (MSFW Guide, pp. 12-13). It also requires a full-time outreach merit staff member dedicated to performing the requested role, which the Alamo also does not have. The MSFW Guide, p. 12, states that "MSFW outreach staff are the only staff authorized to perform MSFW outreach work." The ES Guide, D-202, requires that "MSFW outreach staff must... be year-round ES Merit employees."

Other comments from the area of concern pertain to the State Monitor Advocate's role, not the Board's (e.g., incorporating MSLI analysis and quarterly and annual assessments into routine monitoring). For example, 20 CFR § 653.108 states that the State Workforce Agencies (SWAs) "monitor their own compliance" and that the "State Administrator has overall responsibility for SWA self-monitoring," which § 658.601 further describes by requiring "each SWA to establish and maintain a self-appraisal system." The SWA must also collect and track performance accountability measures, as required by § 653.109. The SWA is defined as the State ES agency designated under sec. 4 of the Wagner-Peyser Act.



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

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

Date: May 15, 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 Request for Proposal

WSA released a Program Monitoring request for proposals (RFP), which is currently underway. The procurement department will report the item to the Board's Audit & Fiscal Committee.

External Program Monitoring (Ms. Christine Nguyen, CPA)

- **Child Care Quality Improvement Activities (CCQIA) – COSA:** 100% complete, with an overall 94.11% accuracy rate, which exceeded the 90% threshold. The testing identified one (1) attribute for continuous improvement:
 - Accurately documenting the entire Inclusion Assistance process in TX3C case notes and accurately completing the Children with Disabilities Log (53.33% accuracy).
- **WIOA Adult – C2 GPS:** Testing is 84% complete.
- **WIOA Dislocated Worker – C2 GPS:** Testing is 84% complete.

Internal QA Program Monitoring

- **Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)**
 - **Follow-Up – C2 GPS:** 100% complete. The testing revealed significant progress since the annual review: 10 of the 14 incorrect instances (about 70%) were resolved. The remaining four (4) attributes continue to require progress to attain resolution and prevent recurrence:

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- Case management – Participation Hours (78.9% accuracy),
 - Good Cause and/or Sanctions – Timely and Accurate Entries (88.9% accuracy),
 - Sanctions – Sanction Follow-Up (13.3% accuracy), and
 - Performance – Employment (86.7% accuracy).
- **Annual Review – C2GPS:** 14% complete.
- **Reemployment Services and Eligibility Assessment (RESEA) – C2 GPS:** 100% complete. Currently working on the Final Report.
 - **Informal Follow-Up Testing (of attributes <90% accuracy):** 100% complete, including:
 - **C2 GPS:** Choices (one attribute), NCP (six attributes), WIOA Adult (4 attributes), WIOA Dislocated Worker (five attributes).
 - **SERCO:** WIOA Youth (four attributes).
- Although testing revealed improvements, we recommend continuing quality improvement efforts.

Other QA Activities

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

- **Subrecipient Performance & Profits (C2GPS and SERCO):** Completed estimating contractor profits for 2024-2025 and are in the process of coordinating invoicing and payment for close-outs.
- **Performance Analysis:** In coordination with the Operations/Programs department, development of a performance tracking and target-setting system.
- **Data Release Analysis:** Building a workforce strategy framework for the Alamo region using various data sources to measure labor market dynamics. Some of the data sources include TWC's UI, as well as JOLTS, CES, QCEW, ACS, and LAUS.
- **Staff Training:** Dr. Ricardo continues providing staff training (reported in the next agenda item).

Alternatives: Federal and state laws, rules, and regulations require Boards to implement regular oversight and monitoring of contractors, subrecipients, and service providers that receive public and other funds administered by the Board. To that purpose, TWC and entities associated with its funding, including other federal and state agencies, monitor WSA's oversight and monitoring systems.

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

Recommendation: QA will continue performing informal testing as staff transition the system to formal Follow-Up reviews. Informal reviews serve as quality control to track attribute progress



with <90% accuracy. In contrast, formal Follow-Up reviews determine whether these attributes have been resolved and help fulfill TWC requirements. To that purpose:

- QA has been coordinating meetings with our subrecipients to provide technical assistance tied to their internal and ongoing testing of items with <90% accuracy, and critical items, including repeat findings.

Next Steps: QA will continue to implement the estimated engagement timeline as presented in a separate agenda item.



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

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

Date: May 15, 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: Monitoring plays an integral role in the workforce system's internal controls. It helps ensure that programs achieve intended results, that resources are protected from waste, fraud, and abuse, and that these are used efficiently and effectively for authorized purposes. The monitoring also helps ensure that staff capture and report reliable, timely information to support improved decision-making.

QA reports the following estimated and actual program timelines and the WSA staff training schedule for 2025-2026.



Training Schedule

Est. Dates	Num	Topic
		Part 1: Workforce Development & Local Boards
Completed	1	Workforce Development System
July-Aug	2	Local Workforce Development Boards
		Part 2: Local Plan
Partial Compl.	3	Local Plan
Feb-Mar	4	High Performing Board
		Part 3: Labor Market Assessment & Planning
Apr-May	5	Employment-Related Measures I
	6	Employment-Related Measures II
		Part 4: Board Agreements & Contracts
Jun-Jul	7	TWC Agreements and Grants
	8	WSA Contracts
		Part 5: Workforce Policies
Aug-Sept	9	Federal & State Guidance
	10	Local Policies
		Part 6: Performance
Oct-Nov	11	TWC-Contracted Performance
	12	Locally-Developed Performance
		Part 7: Internal Controls
Dec-Jan	13	Risk Assessment
	14	Quality Assurance & Quality Control

Alternatives:

- The monitoring plan helps retain QA's certification in preventing waste, fraud, and abuse and ensuring resources are efficiently and effectively invested in productive and allowable activities.
- The training plan helps staff gain a greater understanding of the workforce development mission and environment as one of the 28 workforce boards in Texas serving job seekers and employers.

Fiscal Impact:

- External Program Monitoring contract with Ms. Christine Nguyen, CPA: \$225,000.
- Staff Training: No reportable costs.



Recommendation:

- **Program Monitoring Timeline:** QA will continue transitioning the informal reviews to the formal Follow-Up reports and will provide updates to the Board.
- **Training Schedule:** Dr. Ricardo will continue scheduling the training not only for WSA directors and managers but also for all staff. The training topics and schedule will be adjusted as may be needed.

Next Steps: QA will:

- Continue implementing the monitoring timeline, make any necessary adjustments as they arise, and report the outcomes of the engagements to the Board.
- Provide the staff training as planned, gather feedback from the Board, CEO, and staff, and continue instilling a workforce development-oriented culture framed within WSA's goals and mission.

ATTACHMENTS: None.



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Victoria Rodriguez, Director of Workforce Services

Date: May 15, 2026

Subject: Program Briefing

Summary: Workforce Solutions Alamo consistently pursues innovative workforce opportunities to better serve our 13-county region. Among the 44 current projects and special initiatives underway, staff would like to highlight two key efforts today: PROWD (Partners in Reentry Opportunities in Workforce Development) and the National Dislocated Worker Grant. These initiatives reflect our continued commitment to expanding workforce access, supporting targeted populations, and strengthening regional economic mobility.

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:

PROWD (Partners in Reentry Opportunities in Workforce Development)- Staff continue to advance key operational and performance activities related to the grant, including ongoing Department of Labor (DOL) monitoring, Stage 3 budget implementation, and verification that all required information is accurately reflected in GPMS. Program performance continues to show strong progress, with 227 of the 600 targeted participants enrolled to date, 154 participants placed into employment, 173 participants completing training, and 162 participants achieving measurable skill gains (MSGs) through documented skill progression.

Staff anticipate that the Stage 3 budget approval process will be delayed, which is expected to impact participation levels during the final phase of the grant. Because participants were required to be active during the initial contract period in order to qualify for follow-up services under Stage 3, staff expect a lower volume of participant engagement and service activity during the remaining grant period.



National Dislocated Worker Grant (NDWG)- The NDWG program continues to strengthen outreach and recruitment strategies to address disaster recovery workforce needs across the region. During this reporting period, staff successfully engaged employers supporting recovery efforts and secured a total of 13 Disaster Relief Employment (DRE) positions. Coordination efforts remain ongoing with the Kerr Economic Development Corporation, as well as the City and County of Kerr, to further expand placement opportunities and strengthen local recovery partnerships. To date, 15 participants have been enrolled in the program, with 8 participants successfully matched to DRE positions. Staff continue to work closely with participants currently in the pipeline to secure additional placements and ensure timely service delivery.

For participants not immediately matched to a DRE opportunity, staff are providing individualized career services, including employment assistance, career exploration, and evaluation of potential training opportunities. Once the program reaches its DRE placement goal of 10 participants, the primary focus will transition toward training services, with an emphasis on upskilling and credential attainment aligned with regional labor market demand within the Alamo area. Outreach activities remain active, with staff conducting up to three outreach attempts through multiple communication methods for referred and interested individuals. The team also continues to expedite eligibility determinations and enrollment processes to support rapid participant engagement and service access.

Alternatives: The PROWD and NDWG programs continue to advance coordinated workforce strategies that support both reentry populations and disaster recovery needs across the region. Through PROWD (Partners in Reentry Opportunities in Workforce Development), staff are strengthening pathways to employment for justice-involved individuals by connecting participants to supportive services, training opportunities, and employer partnerships designed to reduce barriers to employment and promote successful reintegration. In parallel, the NDWG program is expanding disaster recovery workforce capacity by engaging employers, securing Disaster Relief Employment (DRE) positions, and coordinating with regional partners to support community recovery efforts. Both initiatives reflect ongoing efforts to align individualized career services, training opportunities, and employer engagement to meet evolving labor market demands while increasing employment outcomes across the Alamo region.

Fiscal Impact: These efforts generate a direct return on investment by connecting available talent to employment opportunities within expanding industries.

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 both the PROWD and NDWG initiatives continue to be fully supported and strategically aligned as key components of the region's workforce development strategy. These programs demonstrate strong return on investment by effectively connecting targeted populations to employment opportunities in growing and in-demand industries, while also addressing critical regional needs such as reentry support and disaster recovery. Continued investment in employer engagement, individualized career services, and training pathways will further strengthen outcomes, improve placement rates, and ensure that workforce services remain responsive to labor market demands across the Alamo region.

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Next Steps: Moving forward, staff should prioritize expanding employer partnerships to increase placement opportunities for both PROWD and NDWG participants, while accelerating enrollment and eligibility processes to ensure timely service delivery. For NDWG, efforts should continue toward achieving and sustaining the Disaster Relief Employment (DRE) placement goal, followed by a structured transition toward training and credential attainment services. For PROWD, continued focus should be placed on reducing barriers to employment and strengthening supportive services that lead to long-term retention. Across both programs, staff should maintain consistent outreach efforts, strengthen data tracking and performance reporting, and align training opportunities with high-demand occupations to maximize participant success and program impact.

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MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Victoria Rodriguez, Director of Workforce Services

Date: May 15, 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 Expert: 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: For October, November, and December Monthly Performance Reports (MPRs) for BCY 2025, WSA did not meet key WIOA performance measures, including the Credential Rate for Dislocated Workers, Measurable Skills Gains for Dislocated Workers, Credential Rate for C&T participants, and Claimant Reemployment within 10 Weeks. In response to these outcomes, the Board has initiated a technical assistance plan focused on improving performance through a detailed analysis of data trends and the identification of underlying root causes impacting outcomes. This effort is intended to guide targeted corrective actions, strengthen program implementation strategies, and improve overall performance in subsequent reporting periods.

The Board Staff has taken proactive steps to strengthen performance and respond to Workforce Innovation and Opportunity Act (WIOA) measures. The Texas Workforce Commission (TWC) previously informed boards that 18 of 28 workforce boards would be placed on a Technical Assistance Plan (TAP) for the Reemployment measure. Following extensive discussions between Board staff and TWC, a formal communication was issued indicating that the implementation of the TAP would be postponed until after the February Monthly Performance Report (MPR) results. The February MPR was subsequently released with several performance measures not displayed, accompanied by a notice from

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TWC stating that data would be further reviewed and reconciled to ensure integrity due to ongoing systemic issues related to the TWIST to WIT system conversion.

Monthly Performance Report | Official Release | February 2026 | Report Type: Board Contracted | Area: Board | LWDA: 20: Alamo
 Release Date: 04/21/2026

Measure	Numerator	Denominator	Performance	Current Target	EOY Target	% Current Target	From	To	Notes	% Current Target
Adult: Credential Rate	25	32	78.13%	76.96%	76.96%	101.52%	01/24	06/24	18	N/A 101.52%
Adult: Employed Q2	174	218	79.82%	74.34%	74.34%	107.37%	07/24	12/24	18	N/A 107.37%
Adult: Employed Q4	160	229	69.87%	73.57%	73.57%	94.97%	01/24	06/24	18	N/A 94.97%
Adult: Measurable Skill Gains	44	69	63.77%	70.70%	70.70%	90.20%	07/25	02/26	18	N/A 90.20%
Adult: Median Earnings Q2	N/A	174	\$7,059.97	\$7,000	\$7,000	100.86%	07/24	12/24	18	N/A 100.86%
C&T: Credential Rate	71	104	68.27%	75.00%	75.00%	91.03%	01/24	06/24	18	N/A 91.03%
Child Care: Average # Children Served Per Day - Combined	1,322,870	108	12,249	12,509	12,509	97.92%	10/25	02/26	15	N/A 97.92%
Child Care: Initial Job Search Success Rate	96	209	45.93%	69.20%	69.20%	66.37%	06/25	10/25	19	NM 66.37%
Choices/TANF: Full Engagement Rate - All-Family	N/A	N/A	N/A	50.00%	50.00%	N/A	10/25	02/26	14	N/A N/A
DW: Credential Rate	27	36	75.00%	80.91%	80.91%	92.70%	01/24	06/24	18	N/A 92.70%
DW: Employed Q2	99	115	86.09%	78.28%	78.28%	109.98%	07/24	12/24	18	N/A 109.98%
DW: Employed Q4	128	153	83.66%	82.81%	82.81%	101.03%	01/24	06/24	18	N/A 101.03%
DW: Measurable Skill Gains	42	58	72.41%	76.00%	76.00%	95.28%	07/25	02/26	18	N/A 95.28%
DW: Median Earnings Q2	N/A	99	\$10,832.73	\$9,750	\$9,750	111.10%	07/24	12/24	18	N/A 111.10%
Reemployment: Claimant Reemployment within 10 Weeks	9,218	16,260	56.69%	60.79%	60.79%	93.26%	07/25	11/25	N/A	NM 93.26%
Reemployment: Employers Receiving Texas Talent Assistance	1,732	1	1,732	2,000	4,349	86.60%	10/25	02/26	N/A	NM 86.60%
Youth: Credential Rate	30	57	52.63%	57.45%	57.45%	91.61%	01/24	06/24	18	N/A 91.61%
Youth: Employed/Enrolled Q2	191	229	83.41%	74.21%	74.21%	112.40%	07/24	12/24	18	N/A 112.40%
Youth: Employed/Enrolled Q4	123	150	82.00%	75.56%	75.56%	108.52%	01/24	06/24	18	N/A 108.52%
Youth: Measurable Skill Gains	95	129	73.64%	65.30%	65.30%	112.77%	07/25	02/26	18	N/A 112.77%
Youth: Median Earnings Q2	N/A	183	\$4,334.86	\$4,000	\$4,000	108.37%	07/24	12/24	18	N/A 108.37%

As of the February MPR, based on the available information, the Board is not meeting the Reemployment measure, Initial Job Search, or Texas Talent Assistance performance targets. However, the REEMS measure did show a 3% improvement in a positive direction, and other previously identified areas of concern also appear to be trending upward, indicating early signs of performance improvement despite remaining below target levels.

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 into 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

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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.

Next Steps: The Board Staff 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

From: Adrian Lopez, CEO

Presented By: Dr. Sammi Morrill, Chair

Date: May 15, 2026

Subject: **Board Retreat**

Summary: The Oversight Committee breakout session engaged in a detailed discussion on data integrity, performance monitoring, and governance challenges within workforce program oversight. The primary concern centers on the limitations of externally generated (TWC/contractor) data and the need for stronger, more proactive Board-level oversight tools.

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 job seekers, and promoting talent recruitment and retention across Texas.

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: Current performance reporting is largely lagging, compliance-driven, and reactive. Significant data inconsistencies exist between TWC reports, CCS systems, and internal datasets. Board oversight is constrained by timing delays, limitations in reporting structures, and a lack of predictive indicators. A structural gap exists between reported performance metrics and true program effectiveness. Governance risk increases due to reliance on external systems without independent validation capacity.

Alternatives:

- **Continue reliance on TWC/contractor reports:** Low cost, but high risk of incomplete oversight.
- **Enhanced Reporting:** Increase frequency and detail of existing reports; Improves

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visibility but does not resolve data integrity issues.

- **Independent Data Validation Layer:** Establish an internal reconciliation and validation framework. Cross-check external reports with internal administrative data. Introduce predictive dashboards and risk indicators
- **Full Enterprise Data Governance Model:** Build an integrated data governance and analytics infrastructure. Includes ERM framework, KPI alignment, and real-time monitoring.

Fiscal Impact:

- **Low (Status Quo):** No additional cost, but increased risk exposure and inefficiencies
- **Moderate (Enhanced Reporting):** Staffing and system reporting adjustments required
- **Moderate–High (Validation Layer):** Investment in analytics tools, data staff, and dashboard development
- **High (Full Governance Model):** Significant infrastructure, IT systems, staffing, and ongoing maintenance costs

Board Responsibilities:

Ensure fiduciary oversight through accurate, validated performance data. Require independent verification of key performance metrics. Approve governance structures supporting risk management and accountability. Monitor alignment between: Strategic goals Contractor performance; Federal/state compliance requirements, and Strengthen Board capacity to interpret technical workforce data systems (WIOA/TWC frameworks).

Recommendation:

- Adopt a phased data governance enhancement strategy beginning with:
- Independent data validation and reconciliation protocols
- Development of predictive and leading indicator dashboards
- Formalization of a Board-level Enterprise Risk Management (ERM) framework
- This approach balances improved oversight, fiscal responsibility, and operational feasibility while addressing core data integrity risks.

Next Steps:

- Define scope for data validation and reconciliation framework
- Identify key leading indicators and risk thresholds
- Develop a prototype executive-level dashboard
- Establish data alignment matrix (KPIs, sources, cadence, ownership)
- Launch Board/staff technical briefing series on WIOA/TWC reporting systems
- Present phased implementation plan for Board approval

Attachments: NA

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