

October 14, 2025

Monitoring Committee Meeting Notice

Members of the Monitoring Committee will meet on **Tuesday, 10/21/2025, at 3:00 PM** via **Zoom** link below.

Join Zoom Meeting

<https://us06web.zoom.us/j/82610643991?pwd=JepeT3pUtRi0vAa4euKrpzcBgvi6ID.1>

Meeting ID: 826 1064 3991 Passcode: 463409 One tap mobile +13462487799

AGENDA

1. Call to order and introductions – Rhonda Schreiber, Chair
2. TWC 2025 Monitoring Report and MSFW Review Report



25.03.0001 WS



25.03.0001 WS



25.03.0001 WS



Executive

North Texas Report :North Texas WIOA DNorth Texas SNAP MSummary_NorthTexa

3. DSA Follow up review on Equus CAP for Choices and SNAP issues



DSA Equus NTX
Choices_SNAP ET Sp

4. Review summary of Workforce Center reviews



Summary of
Monitoring by Cent

5. Review summary of Child Care reviews
6. Other discussion
7. Next meeting date to be determined with email poll.
8. Adjourn

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

Randy Townsend
Interim Executive Director

Report #25.03.0001

ISSUE DATE: October 14, 2025

Mrs. Lisa McDaniel, Executive Director
Workforce Solutions North Texas
1501 Midwestern Pkwy, Ste. 101
Wichita Falls, Texas 76302

Dear Mrs. McDaniel:

We have completed our review of the Child Care Services, Choices, Employment Services, and Workforce Innovation and Opportunity Act programs administered by Workforce Solutions North Texas. Our review covered the period March 1, 2024, through February 28, 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.

During the review, we tested the Board's monitoring function and found that it incorporates the necessary attributes for certification, e.g., a risk assessment and monitoring plan, program and fiscal reviews, follow ups and resolution process. We are able to place reliance in Fiscal and the following programs: WIOA, Choices, Child Care, and SNAP E&T. As a result, we were able to re-certify the monitoring function.

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

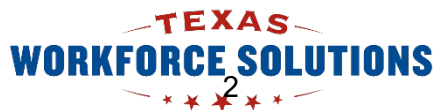
Sincerely,



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

Attachment

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Monitoring Report
#25.03.0001
Workforce Solutions North Texas

Issued by Texas Workforce Commission
Subrecipient Monitoring Department

Board Background

Workforce Solutions North Texas 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: Archer, Baylor, Clay, Cottle, Foard, Hardeman, Jack, Montague, Wichita, Wilbarger and Young.

Equus Workforce Solutions is the subrecipient responsible for management of the Workforce Centers and Rolling Plains Management Corporation is responsible for Child Care Services.

Executive Summary

The Texas Workforce Commission, Subrecipient Monitoring Department conducted a review of Workforce Solutions North Texas. 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 PIRTS Guidelines are Followed

The Board did not ensure PIRTS requirements were met regarding journal notes and pending case closures. The Board should strengthen controls to ensure cases in PIRTS that are open beyond the 90-day requirement have a note to explain the reason for the delay.

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Finding

Ensure PIRTS Guidelines are Followed

The Board did not ensure PIRTS requirements were met regarding journal notes and pending case closures. In two out of three (67 percent) applicable case files tested, the case status was not updated to Pending Case Closure within 90 days and cases in PIRTS were left open past the required timeframe without journal notes to explain the reason for the delay.

Without journal notes in PIRTS to record delays, there is no assurance that fraud cases are being handled properly.

FDCM Letter 01-2024, April 26, 2024, Board Instructions: Reporting Requirements for Suspected Fraud, Waste, Theft, Program Abuse Cases, and Recovery of Improper Payments for the Child Care Program, Information, Definitions states:

“Program Integrity Reporting Tracking System (PIRTS) is a tool that Boards and OI must use to report and track child care fact-finding, fraud determinations, and recoupments. It is also used to report fact-finding for all other TWC programs affected by fraud, waste, and abuse.”

And *Board Investigations* states:

“Boards must ensure that the following occurs for each parent and provider case:

1. PIRTS Entry: Boards must ensure that cases are entered into PIRTS within five business days of learning of the allegation. Creation of the PIRTS entry constitutes sending a notice to OI.

Boards must ensure that all steps of the investigation, recoupment, and appeals process are documented in PIRTS.

Additionally, fact-finding must be concluded within 90 days of case entry into PIRTS. If fact-finding cannot be completed within 90 days, a journal entry must be made in PIRTS to explain the reason for the delay (such as needing assistance from OI with a subpoena).”

Recommendation

The Board should strengthen controls to ensure cases in PIRTS that are open beyond the 90-day requirement have a note to explain the reason for the delay.

Board Response

Views of Responsible Officials:

The Board concurs with your finding regarding case notes and pending case closures.

Corrective Action Plan:

The board will meet monthly with our PIRTS users to ensure all PIRTS cases are monitored for required timely actions to be completed, including case note requirements of cases open beyond 90 days and reason for delay. In addition, the staff PIRTS checklist/desk aid was updated on 4/23/25 with required actions to be completed at the start of PIRTS cases and outlines all duties that staff must take. State audits conducted for June have shown improvement with full

compliance being noted by Office of Investigations staff, on 10/7/25.

Implementation Date: 11/01/2025

Responsible Person: Kayla Crowley, Child Care Contract Manager

Areas of Concern

RESEA

In testing Reemployment Services & Eligibility Assessment (RESEA), all three methods of communication for outreach appointment reminders were not used and documented and the WF-42 forms were not completed or submitted to TWC via encrypted protected email.

Single Audit

The Board's external monitor conducted the Single Audit Review, but there was no documentation to support that the Board reviewed the external monitor's results.

Appendix A. Abbreviations and Terms

Board	Workforce Solutions North Texas
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
OI	Office of Investigations
PIRTS	Program Integrity Reporting Tracking System
RESEA	Reemployment Services & Eligibility Assessment
SNAP E&T	Supplemental Nutrition Assistance Program Employment and Training
TAA	Trade Adjustment Assistance
TWC	Texas Workforce Commission
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 North Texas 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, and WIOA programs administered by the Board. We conducted this review from May 5, 2025, to May 9, 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 March 1, 2024, through February 28, 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
 - Monitoring Recertification
- Automation
- Governance
 - Internal Controls
 - MOUs and IFAs

Child Care

- Client Eligibility
- Recoupment

Service Provider

- Choices
- WIOA

Fiscal

- Allowable Costs and Pooled Expenditures
 - Disbursements
 - Cost Allocation
- 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 North Texas

Rhonda Schreiber, Chair

United States Department of Health and Human Services

Gwendolyn Jones, Regional Program Manager

Deborah Daniels, Program Specialist

Alisa Matthews, Program Specialist

United States Department of Labor

M. Frank Stluka, Regional Director, Discretionary Grants and Financial, Management and Administrative Services Region IV – Dallas, USDOL/Employment and Training

Texas Workforce Commission

Joe Esparza, Chairman, Commissioner Representing Employers

Alberto Treviño, III, Commissioner Representing Labor

Brent Connett, Commissioner Representing the Public

Randy Townsend, Interim 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: May 9, 2025

Attendees:

Lisa McDaniel, Executive Director, WS North Texas

Sharon Hulcy, Contract Manager, WS North Texas

Karen Fite, I.T. Manager, WS North Texas

Kayla Crowley, Child Care Manager, WS North Texas

Crystal Keel, Project Accountant, Equus Workforce Solutions Subrecipient

Sandi C. Stahr, Program Supervisor, Equus Workforce Solutions Subrecipient

Ginger Hannah, Business and Employment Services Supervisor, Equus Workforce Solutions Subrecipient

Darla Silva, Quality Assurance Analyst, Equus Workforce Solutions Subrecipient

Annette Jackson, Accountant, Equus Workforce Solutions Subrecipient

Dennis Wilde, Executive Director, Nortex RPC

Shana Ferguson, Finance Director, Nortex RPC

Keren Whitney, Financial Director, Administrative Staff, Rolling Plains

Donna J. Adams, Program Director, Child Care Assistance, Rolling Plains

Heather Moyer, Financial Services Specialist, Child Care Assistance, Rolling Plains

Kassi Heaton, Client Services Specialist, Child Care Assistance, Rolling Plains

Lanette McHazlett Sanchez, Project Manager, TWC

Rene Trevino, Monitor, TWC

Demetria Rideau, Monitor, TWC

George Daiy, Monitor, TWC

Tangila Johnson, Monitor, TWC

Vincent Miramontes, Monitor, TWC

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Labor

Brent Connett
Commissioner Representing
the Public

Randy Townsend
Interim Executive Director

ISSUE DATE: October 14, 2025

Mrs. Lisa McDaniel, Executive Director
Workforce Solutions North Texas
1501 Midwestern Parkway, Ste. 101
Wichita Falls, Texas 76302

Dear Mrs. McDaniel:

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 North Texas. 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 2024.

Attached is a Summary Report that outlines the results for each program tested in your area. The scope of review was from July 1, 2023, through March 31, 2024.

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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Data Validation Results Report

PY2025 Data Validation Results for North Texas (3)



WIOA Adult

Assessment

Field Description	Records Tested	Records Unmet	Unmet Percentage
Type of Recognized Credential (WIOA)	5	0	0%
Date Attained Recognized Credential (WIOA)	5	0	0%
Category of Assessment #1	3	0	0%
Date of Pre-Test Score #1	3	0	0%
Pre-Test Score #1	3	0	0%
<i>SUB TOTALS</i>	<i>19</i>	<i>0</i>	<i>0.00%</i>

Characteristics

Field Description	Records Tested	Records Unmet	Unmet Percentage
Date of Birth (WIOA)	12	0	0%
Individual with a Disability (WIOA)	8	0	0%
Veteran Status	1	0	0%
Date of Actual Military Separation	1	0	0%
Employment Status at Program Entry (WIOA)	7	0	0%
Supplemental Nutrition Assistance Program (SNAP)	10	0	0%
<i>SUB TOTALS</i>	<i>39</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)	10	0	0%
School Status at Program Entry (WIOA)	10	0	0%
<i>SUB TOTALS</i>	<i>20</i>	<i>0</i>	<i>0.00%</i>

Service Tracking

Field Description	Records Tested	Records Unmet	Unmet Percentage
Type of Training Service #1 (WIOA)	7	0	0%
Date of Program Entry (WIOA)	12	1	8.33%
Date of Program Exit (WIOA)	12	8	66.67%
<i>SUB TOTALS</i>	<i>31</i>	<i>9</i>	<i>29.03%</i>

WIOA Dislocated Worker

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%
Type of Recognized Credential #2 (WIOA)	1	0	0%
Date Attained Recognized Credential #2 (WIOA)	1	0	0%
<i>SUB TOTALS</i>	<i>6</i>	<i>0</i>	<i>0.00%</i>

Characteristics

Field Description	Records Tested	Records Unmet	Unmet Percentage
Date of Birth (WIOA)	3	0	0%
Date of Actual Dislocation	3	0	0%
Supplemental Nutrition Assistance Program (SNAP)	1	0	0%
<i>SUB TOTALS</i>	<i>7</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)	3	0	0%
School Status at Program Entry (WIOA)	3	0	0%
<i>SUB TOTALS</i>	<i>6</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)	3	0	0%
Date of Program Exit (WIOA)	2	1	50%
<i>SUB TOTALS</i>	<i>7</i>	<i>1</i>	<i>14.29%</i>

WIOA Youth

Assessment

Field Description	Records Tested	Records Unmet	Unmet Percentage
Type of Recognized Credential (WIOA)	1	0	0%
Date Attained Recognized Credential (WIOA)	1	0	0%
Category of Assessment #1	1	0	0%
Date of Pre-Test Score #1	1	0	0%
Pre-Test Score #1	1	0	0%
<i>SUB TOTALS</i>	<i>5</i>	<i>0</i>	<i>0.00%</i>

Characteristics

Field Description	Records Tested	Records Unmet	Unmet Percentage
Date of Birth (WIOA)	3	0	0%
Individual with a Disability (WIOA)	3	0	0%
<i>SUB TOTALS</i>	<i>6</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)	1	0	0%
School Status at Program Entry (WIOA)	1	0	0%
<i>SUB TOTALS</i>	<i>2</i>	<i>0</i>	<i>0.00%</i>

Service Tracking

Field Description	Records Tested	Records Unmet	Unmet Percentage
Type of Training Service #1 (WIOA)	1	0	0%
Date of Program Entry (WIOA)	3	0	0%
Date of Program Exit (WIOA)	3	0	0%
<i>SUB TOTALS</i>	<i>7</i>	<i>0</i>	<i>0.00%</i>

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Commissioner Representing
the Public

Randy Townsend
Interim Executive Director

Report #25.03.0001

ISSUE DATE: October 14, 2025

Mrs. Lisa McDaniel, Executive Director
Workforce Solutions North Texas
1501 Midwestern Pkwy, Ste. 101
Wichita Falls, Texas 76302

Dear Mrs. McDaniel:

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

The review covered the period March 1, 2024, through February 28, 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.

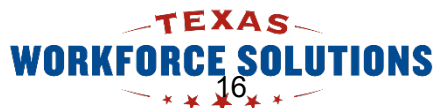
Sincerely,



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

cc: Rhonda Schreiber, Chair, Workforce Solutions North Texas
Gwendolyn Jones, 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
Randy Townsend, Interim 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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EXECUTIVE SUMMARY – SMA MONITORING REPORT – NORTH TEXAS

The review resulted in **four** areas of concern:

Item	Result	Indicator	Standard of Review	WFS Office
A.	AREA OF CONCERN	<p>Deficiencies in Self-Monitoring & Documentation Self-monitoring activities are not occurring on a defined schedule and are not consistently documented. In parallel, MSLI reporting is inconsistent: applicant cohorts (MSFW vs. non-MSFW) are not routinely produced, and there is no monthly review to reconcile contacts → services → referrals → outcomes. The file set did not include a current self-monitoring report or an active CAP that assigns owners, timelines, and closure evidence. (Checklist Items #4, #8) <i>Impact:</i> Inability to effectively assess program performance and identify areas for improvement in serving MSFWs. <i>Initial Recommendations:</i> Establish a clear schedule for self-monitoring activities, ensure consistent documentation, and implement a robust MSLI reporting system with regular reviews</p>	20 CFR 653.101, 20 CFR 653.107, 20 CFR 653.103 (a) through (d); 20 CFR 653.100(b) and 20 CFR 653.108(a), 20 CFR 658.600, 20 CFR 658.601, DOLETA TEGL 23-19, DOLETA TEGL 14-18, ES Guide D-201, 20 CFR 658.600, 20 CFR 658.601	All WFS offices reviewed
B.	AREA OF CONCERN	<p>Complaint System Deficiencies While a general complaint policy exists, it does not clearly document the Wagner-Peyser complaint system, and subrecipient-level directives/guidance are lacking for this specific system. Offices are not completing ETA Form 8429 and have not received general complaint-system training. Staff were not following the Wagner-Peyser ES complaint procedures. There is no documented process for designating the Complaint System Representative (CSR), and no CSR-specific training program was provided (Checklist Items #21, #22) <i>Impact:</i> Inadequate and inconsistent handling of Wagner-Peyser ES complaints <i>Initial Recommendations:</i> Establish a documented board-level policy specifically for the Wagner-Peyser Employment Service (ES) complaint system and ensure that subrecipients develop and implement corresponding directives/guidance for this system. Implement a process for completing ETA Form 8429, provide comprehensive complaint-system training, document the CSR designation process,</p>	20 CFR 658.410; ES Guide A-201; TWC Complaint Procedures Guide	All WFS offices reviewed

		and develop a CSR-specific training program.		
C.	AREA OF CONCERN	<p>Gaps in MSFW Policies/Guides: Informal practices do not clearly define how staff (1) identify and code MSFW status at intake, (2) deliver LEP services and document the offer/acceptance, (3) provide a services list to MSFWs in their language, or (4) complete and document referral/registration steps. (Checklist Item #4) <i>Impact:</i> Inconsistent application of MSFW-specific policies and procedures, potentially leading to unequal access to services. <i>Initial Recommendations:</i> Formalize procedures for identifying and coding MSFW status, delivering LEP services, providing translated service lists, and completing referral/registration steps.</p>	20 CFR 653.101, 20 CFR 653.107, 20 CFR 653.103 (a) through (d)	All WFS offices reviewed
D.	AREA OF CONCERN	<p>Inadequate Agricultural Recruitment System (ARS) Execution Staff show limited understanding of ARS processes and documentation—from job-order intake and coding through local → intrastate → interstate→ clearance. Required checklist items (current ag-employer/partner directory, ag vs. non-ag job-order ledger, FLC monitoring/logs, referral/field-check guide) are incomplete or not standardized. (Checklist Items #17, #19) <i>Impact:</i> Ineffective recruitment and placement of US workers in agricultural jobs and potential non-compliance with ARS regulations. <i>Initial Recommendations:</i> Develop and implement a board-level policy on the Agricultural Recruitment System (ARS), ensure corresponding directives/guidelines at the subrecipient level are developed to ensure consistent application of the ARS policy, and develop and implement a comprehensive training program for staff on ARS processes and documentation.</p>	ES Guide C-302, C-1002, C-1003; 20 CFR 653.503 Subpart F—ARS for U.S. Workers	All WFS offices reviewed

Report on SNAP E&T
and Choices
Follow-up Review
Of the Workforce
Grant Administered
by:

Equus Workforce Solutions
in their capacity of Workforce Contractor in the **North Texas**
Workforce Development Area

September 10, 2025

R

eport Demographics

Report Number:	PY25-04
Report Type:	Follow-up Review Monitoring Report
Report Status:	Final
Report Issue Date:	September 10, 2025
Entity Reviewed:	<i>Equus Workforce Solutions</i>
Review Type:	SNAP E&T and Choices Follow-up Review Monitoring Review of the Workforce Grant administered by Equus and funded by the <i>Workforce Solutions North Texas</i> (the Board)
Applicable Period:	June 1, 2025 – July 31, 2025
Dates of Fieldwork:	Off-site desk review conducted August 20 – September 5, 2025
Review Conducted by:	D iaz, S mith and A ssociates Rachael Robertson
Report Developed by:	Rachael Robertson Sujuane Smith

P rogram Monitoring Review Purpose and Scope

Purpose

The purpose of this review is to assess the Corrective Action Plan implemented by the Contractor in response to findings and an area of concern, identified in the 2024 Board Monitoring Review conducted in February 2025 and finalized in April 2025.

Scope

The program element(s) reviewed included the following:

1) SNAP E&T

- Accurate Attendance Tracking
- Reconsideration
 - i. Accurate Data Entry in WorkinTexas.com
 - ii. Submission of Forms 1817 Documentation to HHSC

The number of SNAP E&T files reviewed was 11. The review period included July 1, 2025 – July 31, 2025.

2) Choices

- Timely and Reasonable Attempt process
- Timely Penalties

The number of Choices files reviewed was 10. The review period included June 1, 2025 – July 31, 2025. The sample was extended to June due to the population of July being low.

Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)

Outcomes:

1. Hard copy documentation of participation hours did not match WIT Attendance Tracking in two (2) of the eight (8) applicable files (25.00 % error rate).

- **STATE ID 168387685:** Job Search July 12, 2025, the total for the week was 34 hours, however the total entered in WIT tracker and case note was 30 hours
- **STATE ID 168530856:** Job Search July 23, 2025, the total for the week was 28 hours. Total entered in WIT Tracker and case note was 30 hours.

Additional Observations:

- Discrepancies between case notes and documentation were found, though WIT matched the documentation therefore were not counted as errors.
- Staff entered hours on incorrect dates, but weekly totals matched documentation and were not counted as errors.

Reference: In Section B-108.a(1): Verification Procedures for SNAP Recipients Participating in Case-Managed Job Search of the TWC, Supplemental Nutrition Assistance Program Employment and Training Guide, it is stated “Boards must ensure that Workforce Solutions Office staff providing job search services supervises the job search of SNAP E&T participants by:

- reviewing job search worksheets to ensure completion;
- reviewing and providing job leads in WorkInTexas.com; and
- recording the participant’s time spent making job search contacts or participating in other job search activities in WorkInTexas.com.”

It further states in Section B-306.c: Monitoring Participation that “Boards must ensure that Workforce Solutions Office staff:

- enters daily hours of participation into WorkInTexas.com—all entries in WorkInTexas.com must support actual participation in allowable SNAP E&T services; and
- uses WorkInTexas.com to document any discrepancies between the employment plan and the entries in WorkInTexas.com.”

RECOMMENDATION FOR ESCALATED ACTION: Contractor must ensure that participation hours entered in WorkInTexas.com match the supporting documentation in the case file. Due to repeated noncompliance and failure to implement corrective measures, recommendations are as follows:

1. Mandatory Staff Retraining:

- Conduct targeted training focused on:
 - Accurate entry of daily participation hours into WIT.
 - Proper review and validation of job search logs.
 - Standardized documentation practices and error prevention.

2. Enhanced Quality Control Measures:
 - Implement a dual-verification process where a second staff member reviews participation hour entries.
 - Require staff to sign off on both hard copy documentation and WIT entries to ensure accountability.
3. Monthly Audits and Error Tracking:
 - Conduct monthly audits of participation hour entries and documentation.
 - Track recurring errors by staff and provide individualized coaching or corrective action as needed.

MONITOR'S RESPONSE : This area will be reviewed during the next monitoring cycle or at the request of the Board. The monitor will assess the effectiveness of the implementation of corrective action.

STATUS: PENDING

2. Form H1817-Reconsideration Request was not recorded in WIT Good Cause Ribbon and Case Notes, per instructions, in two of the six applicable files (33.33%).

In addition, Form H1817 was not completed and submitted to HHSC, timely, for a reconsideration request, in two of the six applicable files resulting in a 33.33% error rate.

- **STATE ID 168387685:** Employment was reported July 29, 2025. The WIT Good Cause Ribbon, Form 1817, and the case note was not completed until August 5, 2025. The case notes also did not include the required information. In addition, the Form 1817 states the client was NOT employed.
- **STATE ID 163252844:** Employment was reported June 2, 2025. The Form 1817 was not sent until June 9, 2025. The reconsideration in WIT was entered July 15, 2025, and 1817 case note was entered June 9, 2025.

Reference: In section, A-204.a(1): Federal Exemption Criteria and Corresponding Work Codes of the TWC, Supplemental Nutrition Assistance Program Employment and Training Guide, it is stated “Boards must ensure that at the time the recipient informs Workforce Solutions Office staff that he or she is potentially eligible for an exemption, a penalty is not initiated, and a reconsideration is processed immediately.”

It is further said in section A-205: Requests for Reconsideration of the TWC, Supplemental Nutrition Assistance Program Employment and Training Guide, “Boards must ensure that Workforce Solutions Office staff:

- completes and sends HHSC Form H1817 to HHSC requesting that the SNAP recipient’s work registration status be reconsidered;
- records the reconsideration request into WorkInTexas.com;
- enters into WorkInTexas.com:
 - a statement that Form H1817 was sent to HHSC;
 - the date Form H1817 was sent to HHSC; and
 - the reason for the reconsideration;
- closes out all SNAP E&T services, support services, and the SNAP E&T application;

- ensures that all completion dates are entered in the employment plan; and
- keeps a copy of Form H1817 and fax confirmation on file at the Workforce Solutions Office.”

RECOMMENDATION FOR ESCALATED ACTION:

Monitoring does recognize improvement in the process however the findings are not resolved. Contractor must ensure that Request for Reconsideration are processed immediately, per instructions. The contractor should also be aware that guidance released August 2025, states that the reconsideration must be processed within one business. Due to repeated noncompliance and failure to implement corrective measures, recommendations are as follows:

1. Initiate Enhanced Oversight: Require weekly monitoring of all reconsideration requests and documentation until compliance reaches 100% for two consecutive months.
2. Mandatory Retraining: All staff responsible for SNAP E&T case management must complete refresher training on:
 - a. Proper use of WIT Good Cause Ribbon.
 - b. Timely and accurate completion of Form H1817.
 - c. Immediate processing of reconsideration requests per TWC guidelines.
3. Performance Review: Conduct a formal review of staff responsible for the errors to determine if further personnel or procedural changes are needed.
4. Documentation Audit: Conduct a full audit of all reconsideration requests submitted in the past 90 days to identify and correct any additional errors.

MONITOR’S RESPONSE: This area will be reviewed during the next monitoring cycle or at the request of the Board. The monitor will assess the effectiveness of the implementation of corrective action.

STATUS: PENDING

Choices

FINDINGS:

1. The Timely and Reasonable Attempt (TRA) process was not followed in two of the ten files, (20 % error rate).
 - **STATE ID 20386577:** the Timely and Reasonable Attempt (TRA) process was not properly documented. The TRA case note was created on June 9, 2025, and later edited on June 11, 2025, making the actual date of the TRA unclear. Additionally, the case note indicated that Preferred Method of Contact (PMOC) was conducted via voicemail, which is not compliant with policy, as PMOC is defined as phone or email during intake. Furthermore, PMOC documentation was not found in the case notes and was only located in the Individual Employment Plan (IEP). The Sanction Ribbon identified June 9, 2025, as the date of noncompliance, but this was not clearly supported by the case notes.
 - **STATE ID 160459800:** the TRA was not provided within the required two business days following the missed appointment on June 5, 2025. Instead, the TRA was sent via email, in which PMOC was identified as phone/voicemail, on June 10, 2025. After the client informed staff of her decision not to participate due to a family loss, staff sent a Volunteer Withdrawal form but did not conduct any follow-up. There was also a discrepancy in the noncompliance date: monitoring identified June 5, 2025, as the correct date, while staff documented June 9,

2025, in the penalty case note and incorrectly stated that the TRA was emailed on June 40, 2025—a likely typographical error.

Reference: Texas Workforce Commission Choices Guide states in Section B-803: Timely and Reasonable Attempt for Failure to Meet Participation Requirements “Boards must ensure that Workforce Solutions Office staff documents the following:

- The date of identification of noncompliance
- The date of the timely and reasonable attempt, which should be no more than two days from the date of non-compliance, to contact the Choices participant in Case Notes.

Boards must make staff aware that voice mail is not an acceptable outreach activity.

Boards must ensure that if a Workforce Solutions Office staff member calls a Choices participant, a telephone conversation with the participant must occur for it to be considered an appropriate, timely, and reasonable attempt. Leaving a voice mail message for the participant or sending a text message is considered appropriate only if the participant indicated during the EPS that a voice mail or text message was his or her preferred method of contact. The preferred method of contact must be documented in Case Notes.

Boards must ensure that Workforce Solutions Office staff enters a notice of non-cooperation into WorkInTexas.com. WorkInTexas.com automatically forwards the notice to HHSC.”

RECOMMENDATION FOR ESCALATED ACTION: Contractor must ensure that the date of the TRA and the date of noncompliance are in the case notes. Monitoring does recognize improvement in the process however the finding is not resolved. Due to repeated noncompliance and failure to implement corrective measures; recommendations are as follows:

1. Mandatory Compliance Review: Contractor should undergo a full compliance review of all TRA-related processes, including documentation, timelines, and use of PMOC, with findings reported to the Board.
2. Targeted Staff Retraining: Mandate immediate retraining for all staff responsible for TRA documentation, with emphasis on the two-day requirement, proper PMOC usage, and accurate case note entries. Training completion should be tracked and verified.
3. TRA Quality Assurance Protocol: Implement a TRA-specific quality assurance checklist to be completed and reviewed by a supervisor before any penalty is initiated. This checklist should include verification of TRA date, PMOC method, and supporting documentation.
4. Performance Accountability Measures: Establish performance benchmarks and accountability measures for staff with repeated TRA errors. This may include increased supervision, corrective coaching, or reassignment of duties.

MONITOR’S RESPONSE: This area will be reviewed during the next monitoring cycle or at the request of the Board. The monitor will assess the effectiveness of the implementation of corrective action.

STATUS: PENDING

AREAS OF CONCERN:

1. In one (1) of the ten (10) files, the penalty was not initiated timely (10 % error rate).

- **STATE ID 160459800:** The noncompliance date was identified as June 5, 2025, by the monitor. The last day to enter the penalty was June 11, 2025. The penalty was entered one day late. In addition, the noncompliance date was identified incorrectly in the WIT Sanction Ribbon.

Reference: Texas Workforce Commission Choices Guide states in section B-803: Timely and Reasonable Attempt for Failure to Meet Participation Requirements *“By the seventh calendar day from the date of noncompliance, the Choices participant is required to be either fully participating, been granted good cause, or a penalty has been initiated.*

RECOMMENDATION: Contractor must ensure that if the client is noncompliant the penalty is entered within the required timeframe. Monitoring considers this area of concern resolved; however, the contractor should continue to support improvements in this area.

FILE REVIEW SAMPLE LISTS

CHART A

SNAP MONITORING SAMPLE LIST

STATE ID	STATE ID
168387685	130701481
10719636	169801460
163252844	166963737
167060174	60816081
120978034	168326882
168530856	

CHART B

CHOICES MONITORING SAMPLE LIST

STATE ID	STATE ID
169862314	160459800
165717364	163572176
169901691	70813614
169901739	166109968
20386577	170005401

CITATIONS:

Texas Workforce Commission SNAP Guide (March 2024)

Texas Workforce Commission Choices Guide (September 2024)



Summary of Monitoring by Center October 2025

Workforce Center Contractor: Equus Workforce Solutions

INTERNAL MONITORING REPORT	Period	Accuracy Rate	Final Accuracy Rate	Disallowed Cost
CHOICES Noncooperation-100%	2025.07	100%	100%	None
CHOICES Work Activities-100%	2025.07	100%	100%	None
SNAP Non-Cooperation-100%	2025.05	92%	92%	None
SNAP Work Activities-100%	2025.07	100%	100%	None
SUPPORT SERVICES REVIEW-100%	2025.05	93%	99%	None
WIOA CASE NOTE REVIEW-100%	2025.06	65%	90%	None
WIOA DV, MSG, Credential-100%	2025.Q2	70%	100%	None
WIOA ELIGIBILITY REVIEW-100%	2025.07	99%	100%	None
PROCUREMENT REVIEW-100%	2024.Q4	100%	100%	None
RESEA [New]	2025.Q3	In Progress		None

Child Care QA Report - March 25

The Quality Assurance (QA) process is an in-house, case file auditing process that involves a preliminary QA audit and a final QA audit for any case being determined eligible for child care services.

Quality Assurance Numbers

Total Cases Reviewed	151	Average Monthly Accuracy rate	97.00%	100% Accuracy for all cases	Disallowed Cost	\$0.00	
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