

North Central Texas Council of Governments

July 23, 2026

Shellonda Rucker
Regional Director
Career Team Workforce Services
1101 Resource Drive #100
Plano, TX 75074

Dear Ms. Rucker:

NCTCOG completed the second review for FY2026 of the Contract #FY26-TWC-02, between Career Team and NCTCOG, for the provision of Workforce Services for Workforce Solutions for North Central Texas.

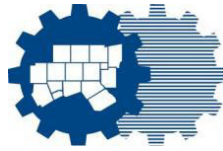
The attached final report details the scope of the monitoring and includes Career Team's response to the required corrective action. Your completion of the required error corrections and management response is greatly appreciated. All errors are resolved pending follow-up monitoring of the successful implementation of your proposed corrective actions.

My staff are available to answer questions about this report and to provide technical assistance as needed.

Sincerely,

Phedra Redifer
Executive Director of Workforce Development

CC: Anthony Terlizzi, President, Workforce Services Division, Career Team
Carlton Tidwell, Board Chair, North Central Texas Workforce Development Board



North Central Texas Council of Governments
Workforce Solutions for North Central Texas
FY2026 NCTCOG Workforce Cycle 2
Career Team Workforce Services
North Central Texas Workforce Services Contract FY26-TWC-02

July 23, 2026

Prepared by
NCTCOG Workforce Development Continuous Improvement Quality Assurance

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BACKGROUND

North Central Texas Council of Governments (NCTCOG) Board Monitoring is conducted to align with TWC requirements based on the Texas Administrative Code (TAC). Monitoring activities are outlined in a Monitoring Plan developed at the beginning of each fiscal year by the Board's Workforce Development Quality Assurance Unit. Texas Administrative Code Section §802.82 notes the following:

- Workforce Boards must conduct and complete regular oversight of their own activities and regular fiscal and program performance monitoring. These monitoring activities must be designed to promote programs achieving intended results and resources being efficiently and effectively utilized for authorized purposes protected from waste, fraud, and abuse. Monitoring activities must focus on areas of highest risk to help ensure the most effective use of monitoring resources. Monitoring activities assess compliance with applicable laws, regulations, provisions of contracts, Board plans, and official directives.

RISK

The FY2026 Risk Assessment determined that data integrity, process changes, and customer service continue to be the primary areas of risk for all Workforce programs. Other risk factors include:

- The acquisition of a new subrecipient for FY26 resulted in staff realignment and turnover.
- The transition of the NCP program case management from the TWIST system to OAG CHAMP and Work in Texas Case Management systems.
- RESEA pilot program requirements and implementation requiring continual staff re-training.

OBJECTIVE

NCTCOG conducts program monitoring as required by TWC to provide:

- Enough information to the workforce services subrecipient to implement timely corrective actions to meet requirements and performance measures as contracted.
- Assurance to TWC that workforce services programs are operated in compliance with regulations and policies so TWC may rely on system data for their reports to federal partners.
- Pertinent information to the North Central Texas Workforce Board to fulfill their oversight responsibilities.
- Assurance to the public and participants that quality and compliant services are being equitably delivered throughout the Workforce Solutions for North Central Texas area.

SCOPE

Desk reviews included a sample of work from the eleven (11) workforce centers in the North Central Texas Board area. The reviews focused on the data integrity and customer service through review of:

- Choices Case Management
- SNAP Case Management
- NCP Case Management
- WIOA Adult and Dislocated Worker Case Management
- TAA Case Management
- AOP Outreach Activities

METHODOLOGY

Programmatic reports are pulled from WorkInTexas.com and individual samples of cases are chosen by simple random selection. The scope of review is determined by each program and the type of review to be performed: previous month, quarterly, etc. The reviews utilized data and reports from WorkInTexas.com, the OAG ChAMP system and the Laserfiche File Management system. The AOP review utilizes the subrecipient's Quarterly AOP Outreach Log.

SUMMARY OF RESULTS

Choices Case Management Review

Twenty-three (23) files were reviewed for the scope of February to March 2026. Areas of review focused on full case management processes. Eleven (11) centers were reviewed, and all but two (2) centers had an overall accuracy rate that fell below 90%. There were ninety-four (94) errors, and sixteen (16) elements of thirty (30) were below 90%. This indicates that there is a lack of compliance with the program. Case management errors found included:

- Participant files did not contain the required documents such as the Orientation to Discrimination Complaint Form and monthly TANF eligibility status forms.
- The Family Employment Plan (FEP) was either incomplete or was not based on an assessment of the customers' skills and abilities.
- Participation hours were not entered accurately in WIT Attendance Tracker or there was not sufficient documentation in the file to support the entries.
- The TABE assessment was not conducted within the specified timeframes.
- HHSC notification was not timely; within 24 hours of a change reported by the participant.
- There was a lack of ongoing assessment to evaluate customer needs, participation requirements, or next steps.
- The overall data entry in WorkinTexas.com was not accurate, timely or there was no supporting documentation in the file.

The accuracy rate is 74.31%.

SNAP Case Management Review

Twenty (20) files were reviewed for the scope of December 2025. Areas of review focused on full case management processes. There were no files available for review during the scope for Granbury and Weatherford, therefore, nine (9) centers were reviewed. Of the centers reviewed five (5) had an overall accuracy rate that exceeded the 90% accuracy rate. There were thirty-five (35) errors, and nine (9) elements of thirty-one (31) were below 90%. This indicates that there is a lack of compliance with the program. Case management errors found included:

- Initial and monthly SNAP eligibility was not verified and/or there were no documents in the file to support the case note.
- The Family Employment Plan (FEP) did not contain the activities that the customer was participating in.
- There was no supporting documentation in the file to support the participation hours entered in WIT Attendance Tracker.
- Staff did not process the request for reconsideration timely within twenty-four (24) hours.
- Staff did not submit to HHSC the form H1822 within twenty-four (24) hours.
- Staff did not initiate a sanction within the required timeframe.
- There was a lack of ongoing assessment to evaluate customer needs, participation requirements, or next steps.
- Case management actions and entries in WorkinTexas.com case notes and services section were not accurate or timely.

The accuracy rate is 87.08%.

NCP Case Management Review

Five (5) files were reviewed for the scope of July 2025 to January 2026. Areas of review focused on full case management processes. The Denton and McKinney centers serve the NCP population. The accuracy rate for McKinney exceeded 90%. There were twelve (12) errors, and five (5) elements of thirty-six (36) were below 90%. This indicates that there is a lack of compliance with the program. Case management errors found included:

- The Family Employment Plan (FEP) was not updated to reflect the customer's most current activities and there was insufficient case note documentation to support the updates.
- The documentation in the file did not support the participation hours entered in WIT Attendance Tracker.
- There was a lack of ongoing assessment to evaluate customer needs, participation requirements, or next steps.
- Case management actions and entries in WorkinTexas.com or the OAG ChAMP system were not accurate or timely within three (3) business days.
- The Orientation to Discrimination Complaint form listed the incorrect EO Officer.

The accuracy rate is 88%.

WIOA Adult and Dislocated Worker Case Management Review

Twenty (20) files were reviewed for the scope period of December 2025-February 2026.

Files were reviewed to ensure correct case management processes were followed for intake/eligibility of the WIOA Adult and Dislocated Worker. There were thirty-five (35) errors found, and eight (8) elements fell below the 90% accuracy rate. Errors and observations found during this review are listed below:

- Incomplete, missing, or unsigned Individual Employment Plans (IEP's).
- WIT case notes were not entered timely in some instances.
- Incomplete training/ITA documentation.
- Verification of veteran status was not found in one case.
- TABE results were not entered in the WIT Assessment/Basic Skills folder.
- Reasonable accommodation discussion was not noted in two cases.
- Exiting customers were either not contacted appropriately or sent an incorrect letter.
- 30-day contact was not maintained with the customers, in several cases.
- Overall observation amongst all centers: Improvement was seen in comparison to previous reviews regarding the customer resume being active and online in WIT or in Laserfiche.

The accuracy rate for the review is 93.05%.

TAA Review

Four (4) cases were reviewed for compliance with Case Management and TAA requirements. Though minor errors and observations were found, overall, the cases reviewed followed compliance with most elements including confidentiality requirements and the Explanation of Services EOS document. Errors and observations found in the review are listed below:

- The 30-day contact requirement was not always maintained.
- WIT case notes were not entered timely.
- A service activity code was not found in WIT.
- Minor gaps were found outside the scope of this review including a discrepancy in the start of employment date on the WIT employment history tab, discrepancy with residency information and customer e-mails not found in Laserfiche. Additionally, in multiple cases reviewed, the customer name is listed as "Error" on the TAA Application and was noted as an observation due to possible WIT issues.

The overall accuracy rate for the review is 90.20%.

Affirmative Outreach Plan (AOP) Review

A sample review of 15 (fifteen) outreach activities conducted from October through December 2025. Its purpose was to determine whether the subrecipient took reasonable steps to provide equal access to WIOA Title I—financially assisted programs and activities by engaging underserved populations protected under 29 CFR 38.40. The outreaches included organizations serving a broad range of underserved populations, such as the Thriving Communities Resource Fair and Denton County Public Health. The errors and observations are listed below:

- In two outreaches, the demographic group outreached did not specify a targeted, protected group within the community (as defined in 29 CFR Part 38).
- The “documented services offered” were noted as “Workforce Services” or appeared to focus only on one program, rather than a generalized, detailed explanation of the vast programs/services offered by WSNCT.
- In multiple instances, staff indicated that correspondence/documentation was saved on the internal drive corresponding to that Workforce Center, however, the documentation was not found or did not have the corresponding folder.
- Overall notes: Several outreach records note that information was provided, but they do not specify what materials were shared or how. The Greenville, Stephenville and Waxahachie office staff demonstrated thorough documentation of the programs/services offered by Workforce Solutions.

The overall accuracy rate for the review is 87.69%.

CONCLUSION-GAP ANALYSIS

The Choices program monitoring review results indicates that there continues to be a gap in program compliance. The accuracy rate is well below the required 90% and there was no significant improvement from the FY26 Cycle 1 review. The lack of case management in the WIT system, missing documentation in the electronic file, and untimely reporting to HHSC may have an impact on a participant’s benefits and/or cause delays in appropriate coding and continuation of services. It is recommended that staff receive programmatic training, internal self-monitoring is conducted, and staff stay acclimated to the most current TWC guidelines and Board policies.

The SNAP program monitoring review results indicates that there continues to be a gap in program compliance. The accuracy rate continues to be below the required 90% although there was a slight improvement from the FY26 Cycle 1 review. There is less than 3% margin to obtain 90%. The lack of case management in the WIT system, missing documentation in the electronic file, and untimely reporting to HHSC may have an impact on a participant’s benefits and/or cause delays in appropriate coding and continuation of services. It is recommended that staff receive programmatic training, internal self-monitoring is conducted, and staff stay acclimated to the most current TWC guidelines and Board policies.

The NCP program monitoring review results indicates that there are deficiencies within the application of the program requirements. The transition from the OAG COLTS system to the new OAG ChAMP system may be considered a factor but most of the errors were case management related. The accuracy rate is within 2% of the required 90%. It is recommended that staff continue to receive programmatic training, internal self-monitoring is conducted, and staff stay acclimated to the most current TWC guidelines and Board policies.

The WIOA Adult/Dislocated Worker program review revealed there was overall compliance in eligibility determination. However, gaps were found in several areas, including timeliness issues, maintaining contact with the customer within 30 days and a

lack of IEP or IEP information. Delays in initiating training for the customer were also noted. Timeliness issues can impact the level of services a customer receives. Staff may need additional programmatic training in these areas. It is recommended that staff continue to review the TWC WIOA Guidelines and Board Policies.

Though minor gaps were found in the TAA program monitoring, such as timeliness issues, the overall accuracy rate was 90%.

The AOP review indicated a lack of documentation of the demographic groups outreached and detailed explanations of the wide variety of programs/services offered by WSNCT. It is recommended that staff review the WIOA demographic analysis provided by TWC and that outreach activities follow the instructions indicated in the Affirmative Outreach Log.

PROGRAM FINDINGS

Finding 1: One hundred and ninety-seven (197) data integrity and case management errors were identified during the file review of one thousand two hundred and sixty-eight (1,268) applicable elements.

Citation: Career Team Workforce Services, North Central Texas Workforce System Contract #FY26-TWC-02:

Section 5: Contract Performance:

- 5.3 The Subrecipient shall provide such services in compliance with all applicable federal and state laws, regulations, and rules.
- 5.4 The Subrecipient shall comply with all Texas Workforce Commission (TWC) policies and procedures or guidance manuals, attached hereto or incorporated herein by specific reference and other Administrative Entity directives as issued. In the event of a conflict between such laws and regulations and the terms and conditions the Contract, precedence shall be given to the laws and regulations.

Section 9: Reporting Requirements:

- 9.3 The Subrecipient understands that it will be held liable for completeness, accuracy, and consistency of all data under its control.
- 9.6 Failure to data input or to report in accordance with the terms of this Contract may result in withholding by the Administrative Entity of any payments otherwise due or, it may result in financial sanctions to be imposed in accordance, with the Administrative Entity's policies and procedures. Recurring failure to meet the terms and conditions for data input or reporting may result in the termination of this Contract.

REQUIRED CORRECTIVE ACTIONS

Career Team Management must correct individual file errors where possible and provide evidence of the corrective actions with their response to this report. Elements that specifically identify program performance and actions that could impact the eligibility benefit for participants should be more heavily reviewed.

CAREER TEAM RESPONSE

Affirmative Outreach Plan (AOP) Review

- The Affirmative Outreach Plan accuracy was 87.69%. This is below the required 90% accuracy rate the areas of concern are: outreaches did not specify a targeted, protected group in the community, documented services offered were not detailed and did not show the vast programs/ services offered, documentation was missing, several records stated information was provided but did not specify what materials were shared or how. The Greenville, Stephenville and Waxahachie office staff demonstrated thorough documentation of the programs/services offered by Workforce Solutions.
- o Beginning with the next quarter, Career Team will conduct an AOP-specific planning discussion with office management and outreach staff at the start of each quarter.
- o During the quarterly planning meeting, each office will review its respective WIOA demographic analysis to identify service gaps, target populations, and opportunities for nearby office or program collaboration when developing outreach activities.
- o Documentation provided will be reviewed monthly by quality assurance staff to ensure the Center Managers completes information appropriately and timely.

Choices Case Management Review

- The Choices Management accuracy was 74.03%. This is below the required 90% accuracy rate the areas of concern are: Participant files did not contain the required documents such as the Orientation to Discrimination Complaint Form and monthly TANF eligibility status forms, The Family Employment Plan (FEP) was either incomplete or was not based on an assessment of the customers' skills and abilities, participation hours were not entered accurately in WIT Attendance Tracker or there was not sufficient documentation in the file to support the entries, the TABE assessment was not conducted within the specified timeframes, HHSC notification was not timely; within 24 hours of a change reported by the participant, lack of ongoing assessment to evaluate customer needs, participation requirements, or next steps, data entry in WorkinTexas.com was not accurate, timely or there was no supporting documentation in the file.
- o Program staff will review each area of concern with staff, provide targeted coaching and technical assistance, and implement additional quality assurance reviews to improve compliance. Staff will be reminded of the importance of adhering to CHOICES policy, documentation standards, and required timelines to ensure program integrity and quality customer service.
- o Choices Training held on June 17 and 18, 2026.

SNAP Case Management Review

- The SNAP Case Management accuracy was 87.08%. This is below the required 90% accuracy rate the areas of concern are: eligibility was not verified and/or there were no documents in the file to support the case note, Family Employment Plan (FEP) did not contain the activities that the customer was participating in, no supporting documentation in the file to support the participation hours entered in WIT Attendance Tracker, staff did not process the request for reconsideration timely within twenty-four (24) hours, staff did not submit to HHSC the form H1822 within twenty-four (24) hours, staff did not initiate a sanction within the required timeframe, lack of ongoing assessment to evaluate customer needs, participation requirements, or next steps, case management actions and entries in WorkinTexas.com case notes and services section were not accurate or timely.
- o Program staff will engage in targeted coaching, policy reinforcement, and conduct self-reviews to identify and correct deficiencies. Staff will also receive additional guidance on meeting required timelines and maintaining complete, accurate documentation to support all case actions in WIT and Laserfiche. Our focus is on strengthening compliance, improving documentation practices, and ensuring consistent application of SNAP E&T policies.
- o SNAP training July 18 and 19, 2026.

NCP Case Management Review

- The NCP Case Management accuracy was 88.00%. This is below the required 90% accuracy rate the areas of concern are: Family Employment Plan (FEP) was not updated to reflect the customer's most current activities and there was insufficient case note documentation to support the updates, documentation in the file did not support the participation hours entered in WIT Attendance Tracker, lack of ongoing assessment to evaluate customer needs, participation requirements, or next steps, management actions and entries in WorkinTexas.com or the OAG CHAMP system were not accurate or timely within three (3) business days, Orientation to Discrimination Complaint form listed the incorrect EO Officer.
- o Program staff will receive targeted coaching, reinforced policy and documentation requirements, and conduct routine quality assurance self-reviews to verify compliance with program standards. Staff scoring below 90% accuracy rate will receive additional guidance on timely documentation, accurate system entries, and maintaining complete case files that support all case management actions.
- o NCP Choices training dates pending.

WIOA Adult and Dislocated Worker Case Management

- The WIOA Adult and Dislocated Worker Program accuracy was 93.05%. Although it meets the required 90% accuracy rate, there were some areas of concern: Incomplete, missing, or unsigned

IEP's (Individual Employment Plan), WIT Case Notes were not entered timely in some instances, incomplete training/ITA documentation, verification of veteran status was not found in one case, TABE results were not entered in the WIT Assessment/Basic Skills folder, reasonable accommodation discussion was not noted in two cases, exiting customers were either not contacted appropriately or sent an incorrect letter, 30-day contact was not maintained with the customers, in several cases, Improvement was seen in comparison to previous reviews regarding the customer resume being active and online in WIT or in Laserfiche.

- o The Program Manager and Program Advisor will provide /coaching for both individual and group targeting the elements that were below 90%.
- o The Program Manager and Program Advisor will meet monthly with individual staff members to address issues and provide coaching on noted case corrections and problem areas.
- o Quarterly staff training conducted on June 24th covered case management requirements, including monthly contact, timely entry of case notes, required documents to be uploaded into WIT/Laserfiche, and required signatures on all documents.
- o The Program Manager and Program Advisor conducts a sample review of files each month and follows up with staff to ensure corrections are made in a timely manner. The Program Advisor will provide Technical Assistance in a one-on-one meeting to review any errors.
- o The Program Manager and Program Advisor will utilize WIT reports to review and ensure monthly contact is completed timely.

APPENDIX A

Program Reviewed	Area of Review	Period of Review	Number of Records Reviewed	Number of Errors found in the Number of Elements Reviewed	Total Elements Yes	Total Elements No	Total Applicable	Overall Case Accuracy Rate
Choices	Case Management	February – March 2026	23	93	269	93	362	74.31%
NCP	Case Management	July 2025 – January 2026	5	12	88	12	100	88%
SNAP	Case Management	December 2025	20	35	236	35	271	87.08%
TAA	Case Management	October 2025- January 2026	4	5	46	5	51	90.20%
WIOA Adult/DW	Case Management	December 2025-February 2026	20	35	319	35	354	90.11%
AOP	Outreach	October 2025 – December 2025	15	16	114	16	130	87.69%

GLOSSARY OF ACRONYMS AND DEFINITIONS

ADA	Americans with Disabilities Act
AOP	Affirmative Outreach Plan
ChAMP	Children Are My Priority
EO	Equal Opportunity
EOS	Explanation of Services
ETPS	Eligible Training Provider System
HIPPA	Health Equus Workforce Services
HHSC	Health & Human Service Commission
ITA	Individual Training Account
LEP	Limited English Proficiency
NCP	NCP Non-Custodial Parent
NCTCOG	North Central Texas Council of Governments
NCTWDB	North Central Texas Workforce Development Board
NDWG	National Dislocated Worker Grant
OAG	Office of Attorney General
ONET	Occupational Information Network
OTDC	Orientation to Discrimination Complaints
PHI	Protected Health Information
PII	Personally Identifiable Information
PRA	Personal Responsibility Agreement
REP	Re-employment Plan
RESEA	Reemployment Services and Eligibility Assessment
SNAP	Supplemental Nutrition Assistance Program
TANF/Choices	Temporary Assistance for Needy Families/Choices
TAA	Trade Adjustment Assistance
TAS	Texas Accessibility Standards
TDS	Talent Development Specialists
TRA	Trade Readjustment Allowance
TTY	Text Telephone
TWC	Texas Workforce Commission
TWIST	The Workforce Information System of Texas
UGMS	Uniform Grant Management Standards
WD	Workforce Development
WIT	WorkInTexas.com, TWC's online job matching system
WSNCT	Workforce Solutions for North Central Texas

Laserfiche The electronic document management system for customer records.