

Public Comments on the Sunset Advisory Commission Staff Report: Texas Workforce Commission

Submitted by **CHILDREN AT RISK**

July 2, 2026

To: Sunset Advisory Commission

Re: Public comments regarding the Sunset Staff Report on the Texas Workforce Commission

From: CHILDREN AT RISK

CHILDREN AT RISK appreciates the Sunset Advisory Commission staff review of the Texas Workforce Commission (TWC). The staff report describes ways to strengthen the administration, accountability, transparency, technology infrastructure, and coordination of workforce and child care programs that affect children, families, young adults, and vulnerable populations.

These comments consolidate CHILDREN AT RISK recommendations related to child care program integrity and early childhood education, SNAP Employment and Training (SNAP E&T), Opportunity Youth and Young Adults (OYYA), and workforce supports for human trafficking survivors. We respectfully urge the Commission to adopt the Sunset staff recommendations and strengthen them with the targeted policy additions outlined below.

Executive Summary

The Sunset Staff Report confirms several system-wide challenges that CHILDREN AT RISK has heard from families, service providers, and community partners. These challenges include fragmented systems, uneven implementation across Local Workforce Development Boards (LWDBs), flawed technology, insufficient transparency, inconsistent training, and limited cross-agency coordination. The challenges affect whether families can access child care, whether SNAP recipients can obtain meaningful training, whether young adults can reconnect to school or work, and whether human trafficking survivors can achieve long-term economic stability.

CHILDREN AT RISK recommends that the Sunset Commission strengthen the TWC review in four priority areas:

1. **Strengthen the integrity of the child care program, increase access to early childhood education, and better coordinate the system. This can be done** by retaining and strengthening Sunset Recommendations 4.1-4.7, 5.4-5.6, 6.1-6.3, and relevant Issue 1 LWDB oversight and training recommendations. TWC should develop TX3C/KinderConnect corrective action, contractor audits, public board-level CCS data, cross-agency early childhood coordination, and improved Market Rate Survey with cost-of-care analysis.
2. **Transform SNAP E&T from a compliance program into a workforce strategy** by strengthening Sunset Recommendation 1.8, 1.9 and related IT modernization recommendations 4.1-4.4 to recognize and align SNAP E&T participation to education and credential pathways to economic mobility, standardize Third-Party Partnership administration, improve quality and guidance, modernize TWC-HHSC data sharing, maximize federal funds, and publicly report outcomes.
3. **Create a statewide strategy for Opportunity Youth and Young Adults (OYYA)** that builds on Sunset Commission recommendations regarding coordination, TWC's oversight of OYYA-serving programs, technology modernization, and performance measurement — leading to the adoption of a statewide definition, a shared data framework, youth-focused metrics, a cross-agency advisory structure, and enhanced navigation supports.
4. **Embed trauma-informed workforce supports for human trafficking survivors** by building on Sunset recommendations related to standardized training, coordination, accountability of LWDB, and modernization of technology to establish dedicated navigators, survivor-centered training, consistent service standards, formal partnerships, and outcome tracking.

For questions or comments please contact:
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I. Integrity of the Child Care Program, Early Childhood Education, Access, and System Coordination

The Child Care Services (CCS) program is a critical work support for families and a major public investment. The Sunset review identifies operational concerns that affect program integrity, service delivery, and access, including challenges related to modernizing technology, detecting fraud and processes related to investigation, oversight of workforce partners and contractors, fragmented administration of child care, data transparency, market rate methodology, and inconsistent implementation across workforce areas. CHILDREN AT RISK recommends that TWC address these issues together because the integrity of child care, access, provider sustainability, and coordination of the early childhood system are interdependent.

C@R Recommendations

1. **Resolve deficiencies of TX3C/KinderConnect technologies.** Require a corrective action plan addressing data visibility issues, coding errors, attendance and payment issues, user-friendliness of technology for providers and families, and operational deficiencies.
2. **Strengthen cross-agency coordination of early childhood education.** Improve coordination among TWC, HHSC, DFPS, TEA, DSHS, and other agencies that shape access to and quality of child care, licensing, eligibility, health, safety, and family supports. Establish an interagency workgroup to develop a comprehensive Early Childhood Integrated Data System.
3. **Improve data and its use in setting provider rates that sustain providers, help eliminate Child Care Deserts, and ensure adequate child care supply in every Texas community.** Strengthen the methodology for the Market Rate Survey, increase survey participation among family child care homes, rural providers, and infant/toddler providers, and explore cost-of-care data to inform reimbursement, provider sustainability, Child Care Deserts, and geographic equity.
4. **Reduce child care provider administrative burden, and improve consistent implementation of administrative requirements.** Streamline requirements for compliance, reduce duplicative reporting, provide consistent guidance, and require training for contractor staff, workforce board members, agency partners, and relevant HHSC child care regulation staff.
5. **Improve accountability of contractors and LWDBs.** Require biennial audits of intake and eligibility contractors. Standardize financial and programmatic accountability measures. Clarify roles and responsibilities among TWC, LWDBs, fiscal agents, and direct-service contractors. Address repeat poor performance.
6. **Publish timely board-level data on child care.** Publicly report number of children on waiting lists by age group, priority populations, and geographic distribution; participation in Texas Rising Star, percentage of allocated funding spent for subsidies, and regional service trends.
7. **Review distribution of child care funding to LWDB at least every ten years.** Ensure resources align with changing demographics, local workforce needs, gaps in access, and prioritized populations.
8. **Strengthen detection and investigation of fraud and recovery of funds.** Expand use of advanced analytics, artificial intelligence, and other technology tools. Establish statewide investigation standards, and improve case management, recovery efforts, reporting, and the management of fraud-related data.

Summary of C@R's Priorities and Recommendations and Sunset Recommendation Numbers: Child Care

Priority of CHILDREN AT RISK (C@R)	Sunset Recommendation Number(s)	How the Commission Can Strengthen the Recommendation
TX3C/KinderConnect corrective action and technology modernization	4.1, 4.5, 4.7; related IT modernization recommendations 4.1-4.7	Sunset recommends a two-year strategic modernization plan, revisions to IT procurement framework, and mandatory program-led Go/No-Go criteria. CHILDREN AT RISK recommends that these actions explicitly address current TX3C/KinderConnect, data visibility, implementation, and operational issues.
Fraud analytics, investigation standards, recovery, and reporting	5.4, 5.5, 5.6	Sunset recommends authority to use bank levies to recover fraudulent overpayments, detailed procedures for agency staff supervising child care fraud investigations, and enhanced data tracking of fraud, analysis, and reporting. CHILDREN AT RISK supports these actions and recommends standardized statewide case management and analytics-driven detection of fraud.
Accountability of contractors, LWDBs, and programs	1.1, 1.2, 1.3, 1.4, 1.5, 1.6	Sunset recommendations on oversight of LWDBs, advisory structures, fiscal agent/direct-service contractor separation, publication of performance data, adverse action rules, and contractor staff training support stronger child care accountability. CHILDREN AT RISK recommends biennial audits and standardized financial and programmatic measures.
Cross-agency child care coordination	6.1, 6.2,	Sunset recommends formalized coordination, guidance, training, and internal process improvements for administering child care subsidies. CHILDREN AT RISK supports these actions and recommends expanding coordination to include HHSC, TEA, DSHS, and other early childhood partners, not only TWC and DFPS.
Public child care data and transparency	1.4; 5.6;	Sunset emphasizes performance data, management of fraud data, and improved administration of child care. CHILDREN AT RISK recommends a public-facing dashboard and board-level CCS data on access, waitlists, prioritized populations, Texas Rising Star, funding, and regional trends.
Training and consistent implementation	1.6; 6.2	Sunset recommends minimum standards for training of contractor staff and improved guidance, training, and communication around child care. CHILDREN AT RISK recommends extending training to board members and agency partners, so families and providers receive consistent information from these entities.
Market Rate Survey, cost of care, and provider sustainability	Issue 6	CHILDREN AT RISK supports improving the Market Rate Survey and recommends pairing market price data with cost-of-care analysis to better support participation of providers, infant and toddler care, access in areas, and Child Care Deserts.

Requested Commission Action Related To Child Care

CHILDREN AT RISK urges the Commission to retain and strengthen the staff recommendations related to the modernization of TWC technologies, oversight of child care fraud, administration of child care subsidy, and accountability of LWDBs. The Commission should direct TWC to publish a corrective action plan to improve technology related to the child care program, implement statewide investigation standards for fraud related to child care, report board-level CCS access and performance data, conduct regular audits of contractors responsible for eligibility, expand cross-agency coordination of data on early childhood, and use improved Market Rate Survey and cost-of-care data to improve sustainability among providers and increase access to child care.

II. SNAP Employment and Training

SNAP E&T should help Texans receiving food assistance access education, training, credentials, employment, and economic mobility. The Sunset Staff Report found that SNAP E&T often operates as an administratively burdensome compliance exercise rather than a meaningful workforce strategy. CHILDREN AT RISK recommends that the Commission strengthen Recommendation 1.4, 1.8 and 1.9 and related recommendations for technology to modernize SNAP E&T and maximize federal resources.

C@R Recommendations

1. Direct TWC to collaborate with LWDBs and community colleges to develop specific guidance and rules to address common barriers to Credential of Value programs serving as TPPs, such as counting coursework participation toward required activity hours and navigating breaks in the school calendar.
2. Direct TWC, in consultation with HHSC, to update SNAP E&T systems and procedures that increase the number of third-party partners (TPPs) providing credential-based training leading to self-sufficient employment.
3. Develop a statewide SNAP E&T provider dashboard tracking key program metrics, including enrollment, completion, job placement, and job retention.

Summary of C@R's Priorities and Recommendations and Sunset Recommendation Numbers: SNAP E&T

C@R Priority	Sunset Recommendation Number(s)	Recommended Strengthening Language
Recognize education and credential pathways as core SNAP E&T activities	1.9	Recommendation 1.9 improves SNAP E&T administration by standardizing TPP guidance and updating systems and procedures with HHSC. CHILDREN AT RISK recommends specifying that education, training, and credential pathways are central workforce activities, not optional add-ons.
Standardize statewide contracting, reimbursement, documentation, and fiscal guidance for TPPs	1.8, 1.9	Sunset found low participation in TPP, insufficient guidance, and inconsistent local practices. TWC should develop standard contract templates, reimbursement policies, expectations for documentation, and operational requirements for SNAP E&T participants.
Improve TWC-HHSC coordination and communication	1.9	Recommendation 1.9 should include designated points of contact, formal communication protocols, streamlined verification, and shared guidance, so people are not shuffled among disconnected systems.
Modernize data systems and administrative processes	1.4; 4.1, 4.2, 4.3, 4.4	Sunset recommends updated SNAP E&T systems and governance of agencywide IT, modernization planning, project management, and oversight of vendors. CHILDREN AT RISK recommends eliminating outdated documentation practices and improving data sharing.
Create a statewide SNAP E&T outcomes dashboard	Builds on 1.4	Texas should publicly track participation, engagement, completion, credential attainment, employment, participation in TPP, and performance of LWDBs.
Leverage federal SNAP E&T funds through partnerships	1.8, 1.9	Better administration of TPP can help Texas draw down additional federal dollars for education and training and improve economic mobility for families.

Requested Commission Action for SNAP E&T

CHILDREN AT RISK urges the Commission to retain and strengthen Recommendation 1.8 and 1.9 by specifying that standardized SNAP E&T guidance should include education and credential pathways, statewide TPP contracting and reimbursement practices, improved TWC-HHSC technology and data-sharing procedures, and transparent public reporting of participant outcomes.

III. Opportunity Youth and Young Adults

Opportunity Youth and Young Adults (OYYA) are young Texans, ages 16 to 24, who are disconnected from school and work or at risk of disconnection. While the Sunset Staff Report does not explicitly address this population, it validates the structural problems that CHILDREN AT RISK has identified: fragmented systems, weak coordination, inconsistent accountability, insufficient performance data, and customer navigation barriers.

C@R Recommendations

1. TWC to create a discreet definition for this age group of youth and young adults in order to better track progress and assess resources for this population. Specifically the definition for this population would be: between the ages of 16-26 who are not in school, not in postsecondary and not working OR who are systems involved (DFPS, HHS, TJJD)
2. Ensure the state's workforce plan explicitly defines measurable goals, targeted strategies, and performance indicators to enhance access to workforce opportunities and improve outcomes for low-income and underserved Texans, particularly those served under the Workforce Innovation and Opportunity Act (WIOA).
3. Create subcommittee or advisory committee focused on supporting opportunity youth and young adults (OYYA) (ages 16–24 not in school, training, or employment) across agencies. Appointments from: the Governor, Lieutenant Governor, Speaker of the House, Members include THECB, HHSC, DSHS, TJJD, and TWC Chair serves as Advisory Chair. Include 1-2 spots for Opportunity Youth and/or parents of OYYA.
4. Appoint a Youth Disconnection Prevention & Reengagement Ombudsman within TWC, appointed by the Governor, reporting to the TWC Executive Director, with a pre-determined term, authority to coordinate statewide strategy, and required annual public reporting to the Legislature. Ombudsman will collaborate formally with TEA, THECB, HHSC, DFPS, TJJD, local workforce boards, and CBO's.

Summary of C@R's Priorities and Recommendations and Sunset Recommendation Numbers: OYYA

C@R Priority	Sunset Recommendation Number(s)	Recommended Strengthening Language
Adopt a statewide OYYA definition and shared data framework	No direct Sunset recommendation; builds on the recommendations to enhance poor performance, enhance data and cross-agency coordination	Texas cannot improve outcomes for a population it does not consistently identify or measure. The Commission should direct TWC and workforce partners to develop a common definition and cross-agency reporting framework.

C@R Priority	Sunset Recommendation Number(s)	Recommended Strengthening Language
Create youth-focused workforce performance measures	1.4 performance data publication; 1.6 training	As the Commission strengthens accountability of LWBDs, youth reengagement, attainment of credentials, employee retention, and transitions to postsecondary school should be included as measurable outcomes.
Establish an interagency OYYA advisory committee	No direct Sunset recommendation. Sunset acknowledged fragmented systems create barriers to Texans	Sunset recommends formal coordination structures to address siloed communication. A standing OYYA advisory committee would coordinate education, workforce, health and human services, child welfare, juvenile justice, behavioral health, and housing systems.
Create a reengagement navigator or ombudsman strategy	No direct Sunset recommendation.	Young people often navigate multiple systems at once. A phased ombudsman strategy would address the failures in navigation documented by Sunset.
Include OYYA in workforce strategic planning and annual reporting	No direct Sunset recommendation.	Opportunity Youth should be identified as a prioritized population in workforce planning, data modernization, and annual performance reporting.

Requested Commission action for OYYA

CHILDREN AT RISK urges the Commission to direct TWC and the Texas Workforce Investment Council to evaluate options for establishing a statewide Opportunity Youth and Young Adult definition, shared data framework, youth-focused workforce performance measures, and a cross-agency advisory structure. These actions would operationalize Sunset's broader findings on fragmented systems, weak data, and inconsistent accountability.

IV. Workforce Supports for Human Trafficking Survivors

Survivors of human trafficking may need employment, education, housing, behavioral health services, legal assistance, transportation, child care, and public benefits simultaneously. The Sunset Staff Report documents workforce system challenges related to navigation, inconsistent training, organizational silos, and accountability. These challenges are especially harmful for survivors who need trauma-informed and coordinated support to achieve long-term stability.

C@R recommendations

1. Direct TWC to require each LWDB to designate a staff member responsible for coordinating services for trafficking survivors, serving as a point of contact for community-based organizations (CBOs), and ensuring alignment with statewide trafficking response efforts. Establish tailored employment services that address the unique barriers faced by trafficking survivors, including resume gaps, limited work history, unmet educational needs, mental health challenges, and trauma-related barriers. Services should include flexible training pathways, supportive services, assistance in procuring ID's and other necessary documents, and individualized career planning.
2. Develop and implement standardized, trauma-informed employment pathways for trafficking survivors across all LWDBs. Ensure consistency in service delivery while allowing for local flexibility to meet individual needs. Develop training and guidance for employers participating in workforce programs to ensure they understand the needs of trafficking survivors and the commitments involved in providing supportive, trauma-informed workplaces.

Summary of C@R's Priorities and Recommendations and Sunset Recommendation Numbers: Human Trafficking

C@R Priority	Sunset Recommendation Number(s)	Recommended Strengthening Language
Create dedicated workforce navigators or coordinators for trafficking survivors	No direct Sunset recommendation. Builds off of 1.6	Navigators can coordinate workforce, education, benefits, housing, and supportive services for trafficking survivors.
Require trauma-informed training for workforce staff and relevant contractors	1.6	Sunset recommends minimum standards for contractor staff training. CHILDREN AT RISK recommends adding survivor-centered and trauma-informed modules for staff serving trafficking survivors and other people with complex barriers.
Establish statewide survivor-serving protocols and service standards	1.1-1.6	Sunset identifies inconsistent service delivery across workforce areas. Statewide protocols would reduce geographic disparities in access to trauma-informed workforce supports.
Track workforce outcomes for trafficking survivors while protecting confidentiality	Builds off of 1.4.	TWC should assess employment, credential attainment, earnings, job retention, and use of supportive service in a way that protects safety and confidentiality among survivors.

Requested Commission action for survivors of human trafficking

CHILDREN AT RISK urges the Commission to direct TWC to develop survivor-centered workforce guidance that includes trauma-informed training, referral protocols, confidentiality protections, formal partnerships with anti-trafficking service providers, and outcome measures to evaluate whether workforce services are supporting long-term stability among survivors.

V. Cross-Cutting Recommendations for Commission Consideration

Across all issue areas, CHILDREN AT RISK urges the Sunset Commission to strengthen the TWC review with the following cross-cutting actions:

- 1. Require clearer public accountability for LWDBs' performance.** TWC should publish meaningful performance data that allows policymakers and the public to assess outcomes across workforce areas, including access to child care, engagement with SNAP E&T, youth outcomes, and consistency of services.
- 2. Modernize technology with program-led safeguards during implementation.** Technology projects should include clear performance measures, user testing with providers and families, Go/No-Go launch criteria, checks on data quality, and corrective action plans after launches.
- 3. Improve interagency data sharing and governance.** TWC programs intersect with HHSC, DFPS, TEA, DSHS, THECB, TJJD, TDHCA, and community providers. Stronger data-sharing agreements, common definitions, and integrated reporting are necessary for accountability.
- 4. Reduce administrative burden on providers, participants, and contractors.** Standardized guidance, streamlined documentation, modern data systems, and consistent training can reduce duplicative processes while improving compliance.
- 5. Distinguish fraud from administrative error.** Efforts to improve the integrity of the program should target intentional misuse and improper payments without creating unnecessary barriers for eligible families, providers, or participants. Clear definitions, reliable data, and consistent investigation standards are essential.
- 6. Maintain access while strengthening oversight.** Stronger accountability should improve stewardship of public resources while ensuring eligible families, young adults, and vulnerable populations can still access services.

Conclusion

CHILDREN AT RISK appreciates the Sunset Commission's thoughtful review of the Texas Workforce Commission. The staff report provides an important opportunity to strengthen accountability and improve technology, oversight, coordination, and transparency across programs that affect children, families, young adults, and vulnerable Texans.

The recommendations outlined in these public comments complement the Sunset Staff Report. They provide practical strategies to improve stewardship of public resources, reduce opportunities for fraud and improper payments, improve access to high-quality child care, maximize federal workforce funding, reconnect young adults to opportunity, and support survivors of human trafficking on a path toward long-term economic stability.

CHILDREN AT RISK urges the Sunset Commission to adopt the staff recommendations and strengthen them with the additional actions described above.