

Recommendations for Sunset Advisory Commission

Scope and Focus

The following policy recommendations are intended to inform the Sunset Commission's review of state agencies, programs, and investments **affecting children, youth, and families** in Texas. These recommendations emphasize evaluating the effectiveness of existing statutes and agency operations, assessing implementation and outcomes of enacted policies, and identifying statutory, regulatory, and administrative changes needed to improve efficiency, coordination, transparency, and accountability across state systems.

AREAS OF FOCUS INCLUDE:

- **Early Childhood Education:** Improve access to high-quality early learning through better affordability, workforce stability, and interagency coordination.
- **Opportunity Youth and Young Adults:** Enhance cross-system alignment to expand career pathways, credential attainment, and workforce participation for youth 16-24 years.
- **SNAP Employment & Training:** Align policies to support eligible individuals access education and training programs that meet the state's demand for skilled workers and reduce reliance upon public benefits.
- **Human Trafficking:** Strengthen cross-system coordination to improve prevention, training, and response efforts, while expanding access to services and long-term support for survivors.

Early Childhood Education

Cross-Agency: TWC/HHSC

Background: Currently, TWC has approximately 24 agreements with different state agencies to support the delivery of quality services for children birth through age 5. Seven out of the 24 programs funded by TWC are housed at HHSC, including Child Care Regulations, 211 and ECI among others. Lack of centralization limits TWC's ability to provide legislatively mandated oversight and coordination. The current structure requires parents and providers to have multiple interactions with a variety of state agencies and entities, creating extra expense for the state and confusion about rules and regulations.

- **Recommendation:** Identify a person/entity/agency with decision-making authority over ALL the programs that impact childcare and development services (HHSC/TWC/DFPS/DSHS) to improve efficiency and effectiveness of the system.

Background: Families and day care providers must maneuver multiple state agencies to access the services they need. Variations with intake and referral systems, as well as multiple forms asking for the same information, create inefficiencies and create undo costs for families, providers, and the state.

- **Recommendation:** Create a coordinated intake and referral system across TWC, HHSC, and other relevant agencies so that families can access multiple programs—workforce, human services, and education—through a single-entry point. This cost-saving recommendation will reduce duplication of resources and ensure that families are connected to all services for which they are eligible.
 1. Create a common application form for providers to access programs in TWC & HHSC
 2. Create a common application form for families to access programs in TWC & HHSC

FOR QUESTIONS OR COMMENTS PLEASE CONTACT:

Mandi Kimball, VP & Chief Government Relations Officer, 512.785.7132 or mkimball@childrenatrisk.org,

Background: A Licensed Day Care Provider who accepts scholarships, and is a Texas Rising Star (TRS) Quality program must complete paperwork through two different agencies and systems that both work to make sure the childcare program meets standards. One set of paperwork through Child Care Regulations to become licensed, to engage with the system that reflects the programs' history of assessments through CCR (HHSC). The same provider must complete different paperwork to apply to be a CCS scholarships (TWC) provider, and yet another to apply to be a TRS program provider (TWC). If these systems were integrated, or shared a common portal, application, and way of showing compliance (i.e. training requirements are in Texas Early Childhood Professional Development System portal, used by TRS, feedback from the field indicates Child Care Regulations Representatives are unable to access this “paperwork” to show compliance with the training requirement.)

- **Recommendation:** Modernize the regulatory framework by consolidating compliance paperwork for both childcare providers and families.

Background: When nonprofits or governmental entities contract with HHSC, TWC or other agencies, there are separate contracting, reporting and compliance processes for each state agency. This creates multiple sets of requirements along with any federal requirements if applicable.

- **Recommendation:** Direct HHSC, TWC, (other agencies) to strengthen nonprofit and government contracting by simplifying and coordinating reporting and compliance processes, evaluating contract compliance staff on a regular basis, and reducing duplication and administrative burdens.

Background: Providers report contradictory information from different state agencies. For example, staff of Child Care Regulations at HHSC and Texas Rising Star staff at TWC may interpret laws and regulations differently. Consistent interpretation and understanding of minimum standards and of Texas Rising Star standards by both TWC's TRS and HHSC's CCR staff who are out in the field could minimize confusion, making it more efficient for everyone.

- **Recommendation:** Require joint training across agencies and programs on childcare minimum standards and Texas Rising Star (TRS) standards, including their interpretation and application. Ensure that all TWC's TRS mentors and HHSC's Child Care Regulation staff receive comprehensive training to provide consistent guidance and strengthen alignment between TRS standards and state licensing requirements

Texas Workforce Commission

Background: Families and providers have been frustrated by their inability to know where families are on the waitlist for Child Care Scholarships, or easily access a place that indicates this information.

- **Recommendation:** Create parent-facing portals, or add to the childcare availability portal, to enhance transparency by showing real-time scholarship availability and subsidy eligibility; transparent public dashboard for waitlist data and processing times.

Background: TWC's transition from a Child Care Services platform, TWIST, to TX3C in January 2025 has been challenging. This system tracks attendance: it sends payments to childcare providers and holds the entire data system for the Child Care Services across the state. The transition has had many challenges of the past year. And while it is improving, there are still many inaccuracies including errors in attendance and payments.

- **Recommendation:** Conduct a full audit of the technological upgrade of the CCS platform TX3C (KinderConnect).

Background: The 28 Local Workforce Development Boards who provide Child Care Services and Texas Rising Star support to their local regions through funding by Texas Workforce Commission, contract with an outside entity, LWDB Contractors, to deliver those services. These LWDB Contractors vary across the State, adding another layer of interpretation to rules and standards which leads to a lack of consistency between these contractors with little oversight from TWC.

FOR QUESTIONS OR COMMENTS PLEASE CONTACT:

Mandi Kimball, VP & Chief Government Relations Officer, 512.785.7132 or mkimball@childrenatrisk.org,

- **Recommendation:** Develop a system to ensure coordination among LWDB Contractors so that programs are delivered uniformly statewide.

Background: The 28 Local Workforce Development Boards (LWDBs) were established three decades ago, based on the geographic boundaries, population, and community needs of that time. Since then, Texas has experienced significant population growth and demographic shifts. As a result, the LWDBs now differ widely in the number of childcare providers, families served, and employers seeking childcare supports for their workforce.

- **Recommendation:** Conduct a comprehensive review of the current LWDB structure to ensure a balanced and strategic distribution of resources that reflects today's population patterns, community needs, and economic realities.

Background: Recent feedback on a survey from 1200 providers indicated that 40% did not know how to appeal an assessment result they disagree with (called the Reconsideration process in TRS (TWC) and an Administrative Review CCR (HHSC)--another 24% said they were only slightly familiar with the process Even using the same language would help.

- **Recommendation:** Making sure that TRS program leaders know this process exists and how to engage in it would improve transparency, partnership and quality, potentially impacting the TRS rating and reimbursement level for a childcare program.

Health and Human Services Commission

Background: A recent survey of over 1200 providers indicated that background checks are a big barrier to being able to provide staffing for classrooms. According to respondents, the issue was mainly due to the time they had to wait to get a response, and also frustration in the inability of companies, organizations, or other associate groups of providers to allow one teacher to sub-in at a program that is not their home program. Additionally, a teacher may have a cleared background check in the system used by public schools, yet they have to get an additional background check through the approved system for HHSC, which costs both time and money.

- **Recommendation:** Centralize and simplify the Background Check process across state agencies; allow reciprocity between school districts and childcare programs.

Background: The Administrative Review is the process day care operates use when they need to challenge a citation or ruling from Child Care Regulations. This process is cumbersome, time consuming, and with limited information regarding the process nor the Day Care operators' rights throughout the process.

- **Recommendation:** Require mandatory training for all CCR staff on the Administrative Review process and professional development focused on the Texas Rising Star (TRS) quality rating system. In addition, create a streamlined system, with clear instructions and supports, to help childcare operators understand and effectively navigate the Administrative Review process.

Modernize HHSC Texas Child Care website to improve the process for providers to promptly correct inaccurate information on their public-facing records, enhancing transparency and fairness, building on the current high accuracy rate.

Background: Child care providers report that Texas Rising Star (TRS) Mentors are accessible and responsive resources for technical assistance, including timely responses to questions by phone or email. In contrast, providers indicate that Child Care Regulation representatives at the Texas Health and Human Services Commission (HHSC) are less consistently available for informal guidance and that interactions are primarily focused on compliance and deficiency citations. Providers note a difference in approach between technical assistance-oriented support and regulatory enforcement, which may limit opportunities for proactive clarification and continuous quality improvement. Increased access to non-punitive guidance could support compliance, improve program quality, and enhance child safety.

FOR QUESTIONS OR COMMENTS PLEASE CONTACT:

Mandi Kimball, VP & Chief Government Relations Officer, 512.785.7132 or mkimball@childrenatrisk.org,

- **Recommendation:** Implement risk-based inspection models that balance regulatory oversight with targeted technical assistance to support compliance and continuous quality improvement.

Opportunity Youth & Young Adults Texas Workforce Commission

Background: Young adults aged 16–24 represent the bridge between the education pipeline and Texas’ future workforce. However, many face significant barriers in this transition.

- Over 13% of Texans aged 16–24 are disconnected from school and work (“opportunity youth and young adult [OYYA]”).
- Many OYYA face challenges related to child welfare involvement, housing instability, mental health needs, or justice involvement.
- Services span multiple state agencies—including TEA, THECB, TWC, HHSC, DSHS, DFPS, TJJJ, and TDHCA—each with differing eligibility criteria, funding streams, and data systems.

The result is a fragmented landscape that makes it difficult for OYYA to access consistent, coordinated support. Establishing a formal interagency subcommittee would improve systems alignment, reduce duplication, and enable more effective investments in the next generation of Texas workers.

- **Recommendation:** 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, TJJJ, and TWC Chair serves as Advisory Chair. Include 1-2 spots for Opportunity Youth and/or parents of OYYA.

The committee will explore and advise Commissioners on how to strengthen coordination among human services, education and training for youth 16-24 in order to have a strong and healthy workforce. Identify braided funding strategies that align workforce, education, and human services programs, allowing young adults to receive support without gaps or conflicting requirements. Additional details will be developed (i.e. creation and abolishment dates for committee, reporting structure).

- **Recommendation:** Texas needs a single, accountable point of contact to prevent youth disconnection (ages 16–24 not in school, training, or employment) and to coordinate reengagement across education, workforce, justice, and health systems. An ombudsman would provide leadership, problem-solving, and transparent reporting focused on reconnecting “opportunity youth.” Create in statute 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, TJJJ, local workforce boards, and CBO’s. Core duties include developing statewide strategies, promoting cross-agency coordination, program development, and data dissemination. Ombudsman will be responsible for reporting annually to the Legislature on performance metrics such as: OYYA metrics: education reconnection (i.e. school re-enrollment rate, credential attainment, program enrollment), workforce/employment metrics (i.e. earnings rate, employment rate, employer engagement), support metrics (i.e. housing, access to insurance, food support), cross-system metrics (i.e. OYYA served by more than one agency, reduction in services or duplication of services, agency referrals), and long-term impacts (i.e. decrease in disconnection rate for OYYA)
- **Recommendation:** Ensure the state’s workforce plan explicitly defines measurable goals, targeted strategies, and performance indicators to enhance access to workforce opportunities and improve

FOR QUESTIONS OR COMMENTS PLEASE CONTACT:

Mandi Kimball, VP & Chief Government Relations Officer, 512.785.7132 or mkimball@childrenatrisk.org,

outcomes for low-income and underserved Texans, particularly those served under the Workforce Innovation and Opportunity Act (WIOA).

- **Recommendation:** Advance two-generational strategies throughout the Tri-Agency and related state systems to streamline services and strengthen outcomes for individuals and families.
- **Recommendation:** Require TWC to partner with the Texas Education Agency to develop a mechanism to target schools with the highest need for vocational services for students who are transitioning from school to work.

Background: Across the state there are an estimated 500,000 youth between the ages of 16-26 who are not plugged in to school, post-secondary and work or who are systems involved. This population is shared across multiple agencies, yet we have not clear understanding of how many youth are served through any of these agencies and therefore cannot determine how effective we are in supporting them. Furthermore, this population is uniquely challenged with eligibility because they often face housing insecurity, foster care and other conditions that have limited their ability to obtain state identification and paperwork to determine eligibility for services.

We recommend four specific actions to better optimize support for this age group with existing resources and in anticipation of potential block grants in skills development funneling through the Texas Workforce Commission.

- **Recommendation:** 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)
- **Recommendation:** All agency recipients of youth service funding would be required to provide publicly available unduplicated counts of youth served. Agencies serving youth concurrently (i.e. TWC and DFPS) are required to report how many of this age range that they share.
- **Recommendation:** Simplify the eligibility determination process for youth in youth- serving agency programs through the following actions:
 1. Develop “fast track” eligibility requirements for income-based eligibility such as evidence from year prior tax records and extend “self-attestation” protocols to 90 days.
 2. Provide free and expedited processes to obtain state identification cards for eligible work.

Health and Human Services Commission

Background: Texas continues to face a significant challenge in serving Opportunity Youth and Young Adults (OYYA), individuals ages 16 to 24 who are disconnected from education and employment and often experience complex behavioral, social, and mental health needs. Many of these youth have histories of involvement with the Department of Family and Protective Services (DFPS) or the juvenile justice system, and they frequently encounter barriers to achieving educational or economic stability.

The Health and Human Services Commission (HHSC) reaches this population through several programs, including the Youth Empowerment Services (YES) Waiver, the Youth Crisis Outreach Team (YCOT), Community Resource Coordination Groups (CRCGs), and Peer and Family Support Services. While these programs provide critical behavioral health and crisis support, there is no unified framework within HHSC to identify, track, or report outcomes for OYYA across systems. Current data collection primarily measures service utilization and behavioral outcomes (e.g., crisis encounters, functional improvements, or family stability), but does not consistently capture long-term transition outcomes, such as educational attainment,

FOR QUESTIONS OR COMMENTS PLEASE CONTACT:

Mandi Kimball, VP & Chief Government Relations Officer, 512.785.7132 or mkimball@childrenatrisk.org,

workforce participation, or stable housing, that are essential to understanding and improving OYYA success.

- **Recommendation:** For Youth Empowerment Services (YES), Youth Crisis Outreach Teams (YCOT) and peer programs, extend eligibility from age 18 to age 24 and align with workforce, housing, and higher education supports.
- **Recommendation:** Embed OYYA indicators into CRCG reporting tools and performance dashboards, tracking outcomes such as educational re-engagement, workforce participation, housing stability, and behavioral health access. In doing this, CRCG operations would help align local coordination efforts with state priorities for workforce readiness, behavioral health, and community reintegration. Example of OYYA metrics: education reconnection (i.e. school re-enrollment rate, credential attainment, program enrollment), workforce/employment metrics (i.e. earnings rate, employment rate, employer engagement), support metrics (i.e. housing, access to insurance, food support), cross-system metrics (i.e. OYYA served by more than one agency, reduction in services or duplication of services, agency referrals), and long-term impacts (i.e. decrease in disconnection rate for OYYA)

Department of Family and Protective Services

Background: Youth and young adults served by DFPS, particularly those transitioning out of foster care or involved in extended care, often face significant barriers to stable employment and self-sufficiency. Many lack access to career pathways, industry-recognized credentials, and postsecondary supports that are critical for long-term economic independence. While DFPS administers transition and independent living programs, formal coordination with the Texas Workforce Commission (TWC), Texas Higher Education Coordinating Board (THECB), and community colleges remains limited and inconsistent across regions. Without statutory requirements for structured collaboration, opportunities for career development, credentialing, and job placement are not fully leveraged for youth exiting care.

- **Recommendation:** Direct the Department of Family and Protective Services (DFPS) to strengthen interagency coordination with the Texas Workforce Commission and the Texas Higher Education Coordinating Board, in collaboration with Local Workforce Development Boards and community colleges, to expand access for former foster youth to industry-recognized credentials, apprenticeships, and certificate programs aligned with regional workforce needs. Prioritize enrollment in programs eligible for Workforce Innovation and Opportunity Youth and Young Adult (OYYA) funding, and require reporting to the Legislature on standardized OYYA education, workforce, support, cross-system coordination, and long-term outcome metrics.

Department of State Health Services

Background: Opportunity Youth and Young Adults (OYYA) are young people ages 16–24 who are not in school or employed. They represent a significant, untapped workforce in Texas, with an estimated 500,000 individuals. At the same time, the state faces critical healthcare workforce shortages, especially in rural areas. With targeted support and training, OYYA can help meet this demand while accessing stable, well-paying career pathways. Expanding and coordinating healthcare career pathways for this population is a key opportunity to strengthen both the workforce and economic mobility.

- **Recommendation:** Expand public health career pipelines to include OYYA through paid apprenticeships, community health worker training, and targeted recruitment partnerships with LWDBs, reentry programs, and CBOs.

FOR QUESTIONS OR COMMENTS PLEASE CONTACT:

Mandi Kimball, VP & Chief Government Relations Officer, 512.785.7132 or mkimball@childrenatrisk.org.

SNAP Employment & Training

Cross Agency TWC/HHSC

Background: In Texas, SNAP recipients aged 16-59 are required to participate in the SNAP Employment & Training program (SNAP E&T) unless they qualify for an exemption or are already working 30+ hours per week.

While the stated goal of SNAP E&T is to “help SNAP recipients get jobs and become self-sufficient,” HHSC’s self-evaluation report acknowledges SNAP E&T “participation levels are not at acceptable levels, and sanction levels are much higher than desired.” The small fraction of participants who do complete their assigned E&T component (less than 5%) earn median quarterly wages of approximately \$4,500 — below the monthly income limit for an individual to maintain SNAP eligibility. This means that even those individuals that complete their assigned training activities are not reaching self-sufficiency. That data confirms that without access to credential-based training and career pathways, most participants land back in the same place within a year and miss out on high-demand opportunities within the Texas workforce.

Currently, Texas requires SNAP E&T participants to engage in 30 hours of training per week, which exceeds the standard federal requirement (20 hours per week) and creates a mismatch between policy/regulations and the structure of most workforce training programs. Many qualified and proven workforce development organizations are prevented from participating in Texas’s SNAP E&T program because their nationally-recognized curricula do not meet the 30 hour/week threshold. In addition, Texas has the opportunity to recognize “credentials of value” (HB 8 (88R), SB 1786 (89R)) as being “equivalent to SNAP E&T”, which would allow students enrolled in those programs to satisfy SNAP work requirements with their coursework, which by definition, must lead to a self-sufficient wage.

Table 3. Texas SNAP E&T program participation and sanction data.^b

Measure	FFY 2022	FFY 2023	FFY 2024
Number of required participants	454,635	472,670	367,708
Number of required participants who began participation in E&T program by attending orientation [percent of total number of required participants]	29,330 [6.45%]	20,792 [4.40%]	26,520 [7.21%]
Number of required participants participating in qualifying component [percent of total number of required participants]	22,329 [4.91%]	16,432 [3.48%]	12,529 [3.41%]
Number of required participants determined ineligible for failure to comply [percent of total number of required participants]	372,923 [82.03%]	240,874 [50.96%]	245,703 [66.82%]

Texas’ SNAP E&T program is currently failing to help eligible individuals access education and training programs that meet the state’s demand for skilled workers and reduce reliance upon public benefits. Aligning Texas’ requirements with the federal standard could reduce confusion, lower administrative burden, and improve participation and outcomes in SNAP E&T. In addition, Texas could better leverage community colleges and other workforce partners, which are already equipped to provide industry-aligned training and support, to improve completion, connect participants to credentials, and strengthen economic mobility.

- **Recommendations:**

FOR QUESTIONS OR COMMENTS PLEASE CONTACT:

Mandi Kimball, VP & Chief Government Relations Officer, 512.785.7132 or mkimball@childrenatrisk.org,

1. Direct HHSC (in collaboration with TWC and THECB) to define and identify postsecondary programs that are “equivalent to SNAP E&T” components to ensure students enrolled in “credentials of value” have their coursework recognized as satisfying SNAP’s work requirements. This will improve completion rates for students and lead to greater self-sufficiency post-credentialing.
2. Direct TWC and HHSC to develop and implement standardized contracting and reimbursement models for third-party SNAP E&T providers to be applied across all local workforce development boards & set ambitious goals to scale the number of third-party partners contracted to provide SNAP E&T, with an emphasis on community colleges and other credential-based training providers.
3. Require HHSC to align SNAP E&T program requirements with the federal baseline (20 hours per week/80 hours per month) to simplify compliance, reduce administrative complexity, and support more consistent program engagement.
4. Develop a statewide SNAP E&T provider dashboard tracking key program metrics, including enrollment, completion, job placement, and job retention.

Human Trafficking

Cross Agency TJJD/DFPS

Background: The Texas Juvenile Justice Department (TJJD) serves a population of youth who are at heightened risk of or have experienced human trafficking, yet gaps remain in consistent identification, training, and cross-system coordination. Stakeholders report that trafficking screening and staff training are not uniformly implemented, and that youth, particularly boys, are often misidentified as offenders rather than potential victims. There is also a limited understanding of the role that trauma and substance use play in trafficking, which can affect how youth are treated, supervised, and connected to services. Additionally, coordination challenges between TJJD and other systems, particularly DFPS, can result in disruptions in care and uncertainty around custody and responsibility during transitions. Strengthening TJJD’s approach to training, identification, and interagency coordination is necessary to improve outcomes and ensure trafficking-impacted youth are appropriately recognized and supported.

- **Recommendations:**

1. Enhance and standardize training for staff on:
 - a. Gender-inclusive identification protocols and training to ensure all youth, including boys and LGBTQ+ youth, are appropriately recognized as potential victims of trafficking. Training should address and correct biases that may result in youth being misidentified solely as offenders.
 - b. Incorporate comprehensive training on the relationship between trafficking victimization, substance use, and delinquent behavior.
 - c. Implement mandatory annual training for staff that incorporates survivor perspectives and emphasizes the role of trauma and addiction in trafficking. Training should be practical, scenario-based, and relevant to frontline staff responsibilities. Integrate guidance, tools, and supervision practices that reinforce staff understanding of addiction as part of the trafficking continuum, and to ensure this perspective is reflected in case planning, service referrals, and disciplinary decisions.
2. Address inconsistencies in current screening practices by standardizing CSE-IT implementation and ensuring adequate training and fidelity, requiring routine and event-triggered re-screening (e.g., at placement changes and regular intervals) across agencies and CBOs, and embedding trauma-informed approaches into all screening protocols.
3. In coordination with DFPS, establish clear, enforceable protocols governing the transition of youth between systems, such as custody, responsibility, and service coordination for youth who become involved with TJJD, including when DFPS maintains or relinquishes custody. Protocols should define roles, responsibilities, and timelines to ensure continuity of care. Ensure youth are actively connected to appropriate placements and services upon release. Require documentation and accountability measures to prevent gaps in custody or care. Ensure continuity of care and accountability for meeting the needs of trafficking survivors across systems.

FOR QUESTIONS OR COMMENTS PLEASE CONTACT:

Mandi Kimball, VP & Chief Government Relations Officer, 512.785.7132 or mkimball@childrenatrisk.org,

Department of Family and Protective Services

Background: The Department of Family and Protective Services (DFPS) plays a primary role in identifying and serving children who are at risk of or have experienced human trafficking, particularly within the foster care system. However, stakeholders report significant variation across Community-Based Care (CBC) regions and Single Source Continuum Contractors (SSCCs) in how trafficking is identified, screened, and addressed. Inconsistent implementation of screening tools, gaps in training, and uneven access to specialized services contribute to disparities in outcomes for youth across the state. Data fragmentation across systems and partner agencies further limits DFPS's ability to track trafficking indicators and coordinate care effectively. Additionally, challenges in interagency coordination, particularly with TJJD, can result in disruptions in custody and services during critical transition points. Strengthening DFPS's oversight of contractors, standardizing practices, improving data systems, and enhancing coordination with partner agencies is necessary to ensure a more consistent and effective response to human trafficking statewide.

- **Recommendations:**

1. Develop and enforce consistent, statewide requirements for human trafficking training, screening, and response protocols across all Single Source Continuum Contractors (SSCCs)/Community-Based Care (CBC) regions. Ensure all contractors implement training and protocols with fidelity and in alignment with DFPS expectations.
 - a. Establish clear, enforceable standards to reduce variability across catchment areas in how youth are screened for trafficking risk and connected to services. Require DFPS to monitor contractor performance and ensure equitable access to trafficking-related resources statewide.
2. Coordinate with partner agencies, including CASA and TJJD, to transition toward interoperable or unified data systems for trafficking-related information. Reduce fragmentation caused by multiple platforms (e.g., IMPACT vs. Lighthouse) and improve data sharing and continuity of care.
3. Improve coordination with key partner agencies, including the Texas Workforce Commission, to better support youth aging out of care who are at risk of or have experienced trafficking. Require formalized coordination to improve outcomes related to housing, employment, and stability.

Texas Workforce Commission

Background: The Texas Workforce Commission (TWC) plays an important role in supporting the long-term stability of trafficking survivors through employment and workforce development services. However, stakeholders report that awareness of available workforce services among survivors and community-based organizations remains low, limiting access to critical supports. Survivors often face significant barriers to employment, including gaps in work history, unmet educational needs, mental health challenges, and trauma-related impacts that are not consistently addressed within existing workforce programs. Additionally, workforce systems and employers may lack the training and tools needed to provide trauma-informed support, which can make employment difficult to obtain and sustain. Limited tracking of survivor-specific employment outcomes further constrains the state's ability to assess program effectiveness. Strengthening TWC's role in outreach, service design, employer engagement, and data collection is necessary to improve employment pathways and long-term outcomes for trafficking survivors.

- **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,

FOR QUESTIONS OR COMMENTS PLEASE CONTACT:

Mandi Kimball, VP & Chief Government Relations Officer, 512.785.7132 or mkimball@childrenatrisk.org,

- 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.

Health and Human Services Commission

Background: The Health and Human Services Commission (HHSC) is central to Texas' response to human trafficking through its administration of behavioral health, substance use, and social service programs. However, stakeholders report gaps in timely access to mental health services, limited integration of substance use treatment with trafficking-specific care, and ongoing challenges related to confidentiality that hinder coordination among providers. Survivors often face urgent behavioral health needs and are at high risk of relapse or re-exploitation without rapid access to services. At the same time, the intersection of trafficking and substance use is not consistently addressed through integrated, trauma-informed care models. Community-based organizations also report that unclear or restrictive confidentiality practices can impede effective collaboration, even when information sharing is in the best interest of the individual. Strengthening HHSC's role in rapid response, integrated treatment, and coordinated care is necessary to improve outcomes and reduce vulnerability for trafficking survivors.

- **Recommendations:**

1. Develop and implement a 72-hour rapid-response pathway to ensure trafficking survivors have immediate access to mental health and crisis stabilization services. The pathway should prioritize timely intervention to reduce the risk of relapse, re-exploitation, or other adverse outcomes.
2. Review, clarify, and standardize confidentiality policies across programs and providers to facilitate appropriate information sharing among state agencies and community-based organizations (CBOs). Ensure policies balance client privacy with the need for coordinated, effective service delivery and do not create unnecessary barriers to care.

Department of State Health Services

Background: The Department of State Health Services (DSHS) plays a critical role in identifying and responding to human trafficking through its oversight of public health programs, provider training, and data collection. However, gaps remain in the consistency and scope of trafficking-informed medical training, the availability of gender-inclusive forensic examination services, and the integration of trafficking risk into

broader public health prevention efforts. Stakeholders report that healthcare providers are often not adequately equipped to identify trafficking indicators, particularly among male victims, and that current prevention strategies do not fully account for the intersection of trafficking, substance use, and youth risk factors. Additionally, limited data collection on trafficking exposure and related risks constrains the state's ability to design targeted interventions. Strengthening DSHS's role in training, service capacity, and data collection is necessary to improve early identification, ensure equitable access to care, and enhance prevention efforts statewide.

Additionally, HHS, specifically the Health Services User Group (HSUG), administers the Texas Youth Risk Behavior Survey (YRBS). This survey has been conducted biennially since 1991 and is a primary statewide source for data on health-risk behaviors among youth. While the survey rigorously tracks traditional risk behaviors such as tobacco and alcohol use — which are declining nationally — it underrepresents several growing risks, including online safety, social media use, and mental health concerns. Updating the survey instrument would improve Texas's ability to identify emerging risks, target interventions, inform regulatory action by Texas' Attorney General and inform evidence-based policy across partner agencies, including DSHS and TEA.

FOR QUESTIONS OR COMMENTS PLEASE CONTACT:

Mandi Kimball, VP & Chief Government Relations Officer, 512.785.7132 or mkimball@childrenatrisk.org,

- **Recommendations:**

1. Expand the availability of SANE-certified providers and ensure protocols and training are inclusive of all victims, including men and boys. Require training and support to ensure providers are equipped and comfortable conducting examinations for male survivors and increase access to these services statewide.
2. Incorporate human trafficking and exploitation risk factors into existing public health prevention efforts, including existing substance use prevention and other youth-focused initiatives. Ensure prevention strategies address the intersection of trafficking, substance use, and other vulnerabilities.
3. Modernize the Texas YRBS questionnaire to better reflect the current risk landscape facing Texas youth by: (1) app specific measures of online harms; (2) adding validated measures of problematic social media use; (3) strengthening online victimization items by expanding electronic bullying questions to include deepfake image sharing; (4) adding brief measures of loneliness and anxiety; and (5) expanding the social media section to capture in-school use frequency, school phone policies, and student compliance.

FOR QUESTIONS OR COMMENTS PLEASE CONTACT:

Mandi Kimball, VP & Chief Government Relations Officer, 512.785.7132 or mkimball@childrenatrisk.org,