



# Early Childhood Education Recommendations for the Texas Sunset Advisory Commission

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## 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.

## Recommendations

### 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

**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).

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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.

- **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,

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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 operators 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.

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

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