

July 2, 2026
TO: Sunset Advisory Commission
RE: Comment on TWC Sunset Staff Report

Chair Kolkhorst, Vice Chair Hull, and Members of the Sunset Advisory Commission:

On behalf of EdTrust in Texas and the Texas Business Leadership Council, we thank the staff of the Sunset Commission for their in-depth evaluation and informed recommendations to improve the operational impact of the Texas Workforce Commission (TWC).

We are particularly encouraged that the initial report identified the opportunity to more effectively leverage the Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) program to deliver workforce programs and maximize federal funds. We appreciate the opportunity to comment in support of many of the staff report’s findings and recommendations and to offer suggested modifications that would optimize this program to meaningfully connect Texans with credential-based training that equips them for high-demand jobs and transition off public assistance.

The staff report plainly recognizes: “Texas fails to effectively manage SNAP E&T and performs poorly in comparison to other states” (p. 25). The 225,000 Texans required to participate in the program are working age – between the ages of 16 and 59 – but are unemployed or under-employed. Rather than connecting these individuals to community colleges and other workforce partners equipped to provide industry-aligned training, Local Workforce Development Boards (LWDBs) instead assign them to low-value activities that yield median quarterly wages of approximately \$4,500 – far below what is needed to gain self-sufficiency and no longer qualify for public assistance.

On top of failing to produce the employment or wage attainment outcomes the SNAP E&T program is intended to achieve, the report recognizes that the current approach to administering the program comes at a fiscal cost to the state of about \$4.8 million annually rather than generating potentially millions of 50/50 federal reimbursement dollars by leveraging third-party partners (TPPs) that have the capacity to strengthen the program and improve participant outcomes.

Suggested Modifications to Recommendations

Recommendation	Proposed Modification	Rationale
1.9 Direct TWC, in consultation with HHSC, to update SNAP E&T systems and procedures. (p. 32)	Insert the following language: “Direct TWC, in consultation with HHSC, to establish shared performance measures and an annual review process to evaluate SNAP E&T outcomes and inform continuous program improvements.” Insert the following language: “Direct TWC and HHSC to establish a formal interagency governance structure to review SNAP E&T program	Recommendation 1.9 contains a comprehensive list of documentation systems and communication procedures to be reviewed, standardized, and/or updated, all of which are necessary to strengthen administration of the SNAP E&T program. However, as written, this language fails to provide the direction needed to meaningfully shift the program away from a “check-the-box exercise” (p. 25) toward the program’s goal of helping SNAP recipients achieve



	performance and identify policy and rule changes to drive ongoing improvement.”	self-sufficient employment while advancing the state’s workforce strategy. This proposed modification seeks to address the underlying structural challenges identified throughout the report to meaningfully improve outcomes including participation rates, third-party partnership utilization, credential attainment, long-term employment, and wage progression. Recommendation 1.9 directs TWC to “review its rules and policies to identify changes that would remove administrative inefficiencies and improve the SNAP E&T program” (p. 32). This proposed modification seeks to provide a structure to regularly review program performance for this purpose. This modification complements the workgroups envisioned by Recommendation 1.2 as part of a new LWDB Advisory Committee that would be charged with providing regular, structured feedback to advance the other managements actions included in Recommendations 1.8 and 1.9.
1.8 Direct TWC to standardize guidance and procedures for TPPs. (p. 32)	Insert the following language: “Direct TWC to establish clear performance expectations and outcome measures for TPP participation in SNAP E&T.” Insert the following language: “Direct TWC to collaborate with LWDBs and community colleges to address common barriers to serving as TPPs, such as counting coursework participation in Credential of Value programs toward required activity hours and navigating breaks in the school calendar.” Insert the following language: “Direct TWC to establish efficient, standardized case management protocols and systems that meet SNAP E&T compliance requirements	Recommendation 1.8 recognizes the need for greater consistency, guidance, and procedures for third-party partnerships (TPPs). However, as written, the recommendation focuses too narrowly on administrative standardization without addressing broader systemic changes needed to strengthen and expand TPPs. These proposed modifications seek to address the structural barriers that currently limit the state's ability to recruit and retain high-quality TPPs, starting with a clear statewide mandate to do so. Despite starting a statewide TPP initiative in 2024 with the publicly stated goal of all LWDBs participating by 2029, “staff from different agency offices seem confused over whether that is still the



	and reduce unnecessary duplication of effort between LWDBs and TPPs.”	goal or even whether the program is mandatory for all LWDBs” (p. 27). Community colleges are referenced throughout the report as potential TPPs because they offer workforce training programs that are aligned to high-demand jobs leading to a self-sufficient wage, as verified by the Credential of Value methodology used for the state’s outcomes-based funding formula. To date, only one community college has been approved as a TPP due to unique administrative and procedural barriers related to coursework participation and school calendars. One of the most common barriers cited by colleges and other potential TPPs are “complex processes such as dual case management and documentation (p. 27).” This duplication of effort between LWDBs and TPPs – in part the result of archaic communication and IT systems – focuses limited capacity on administrative reporting instead of participant instruction, credential attainment, and employment.
1.4 Update the requirement for TWC to publish LWDB performance data (p. 31)	Insert the following language: “LWDB performance dashboards should include program-level SNAP E&T metrics.”	Recommendation 1.4 recognizes the need for enhanced data access to inform local stakeholders and increase accountability for LWDB performance. This proposed modification seeks to ensure this recommendation yields greater visibility into SNAP E&T participation and outcomes such as the number of individuals referred, orientation completion rates, activity completion rates, third-party partnerships, federal 50/50 funds generated, credential attainment, and employment and wage outcomes. This visibility will help identify high-performing regions and promote best practices to inform improved program delivery statewide.



9.3 Modify statute to modernize workforce data evaluation. (p. 124)	Insert the following language: “In ensuring the continuous availability of integrated data for the evaluation of workforce development and education programs, TWC and THECB should include HHSC among other relevant agencies that rely on this data for decision-making.”	Given the unique way in which SNAP E&T is administered – with HHSC contracting TWC to operationalize the program as required by the federal government – HHSC should be explicitly included as a producer and user of an integrated data system developed through interagency collaboration. Inclusion of HHSC reinforces the consultation and collaboration reflected in Recommendations 1.8 and 1.9 and would enable the comprehensive performance data dashboard envisioned in Recommendation 1.4.
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Thank you for the Sunset Commission and staff’s work on this review. We appreciate the opportunity to comment and look forward to serving as a resource throughout Sunset process and 90th Legislative session.

Sincerely,
Jonathan Feinstein
State Director, EdTrust in Texas

Supporting Organization:

