



Thank you for the opportunity to provide comments on the Sunset Advisory Commission staff's review of the Texas Workforce Commission (TWC). TexProtects advances public policy and local implementation to strengthen families to prevent child abuse and neglect. We respectfully offer the following comments and recommendations to ensure that families with children of all ages are connected to the resources they need, including child care.

Cross-Agency Coordination and Alignment

1) Sunset Staff found that TWC should improve coordination with DFPS and update its internal processes to more effectively administer the Child Care Subsidy Program (Issue 6).

We support these actions and **recommend expanding coordination to include Texas Health and Human Services Commission (HHSC), the Texas Education Agency (TEA), the State Department of Health Services (DSHS), and other early childhood partners, not only TWC and DFPS.**

Over the last few years, some efforts have been made to improve services to families with young children. Several state agencies have each contributed a small amount of funding to support the Early Childhood Interagency Workgroup and a shared full-time position that coordinates work between the Texas Health and Human Services Commission, the Texas Education Agency, the State Department of Health Services, and the Texas Workforce Commission. A few achievements of the Early Childhood Interagency Workgroup include applying for the federal Preschool Development Grant (PDG) and coordinating work funded by the \$33M three-year PDG grant within different agencies, as well as initiating efforts to create an integrated early childhood data system coordinating data between these state agencies. While these are significant steps, the work of the group is limited due to capacity and authority.

TexProtects recommends expanding the Early Childhood Interagency Workgroup by providing adequate staffing, over and above the existing one fulltime staff person funded through pooled state agency dollars. This will ensure the work aligns with other efforts within the various individual state agencies that support two-generational approaches to streamline and strengthen services to families with young children.

2) Sunset Staff found that TWC lacks consistent front-end planning practices, resulting in poorly scoped initiatives and avoidable implementation challenges (Issue 4).

The No Wrong Door Initiative is supposed to be a centralized "main door" for customers to access TWC services and help coordinate referrals and case activity across programs. Sunset staff reported that because of a lack of planning, the agency spent nine months drafting the solicitation, only for all of the bids to exceed the budget. This led to TWC downsizing the project and providing the contract to a previous vendor instead of pursuing a competitive or innovative solution.

Accessing services and coordinating referrals and case activities is important across agencies, not just across programs within TWC. TWC is part of a larger body of state agencies that serve families with children, including HHSC, DFPS, DSHS, TEA, and others. Ensuring Texas has a no wrong door approach is necessary for families to receive the resources and services they need, not just child care.

As a state, Texas has valued the importance of communities having multiple ways in which families can connect to resources, as opposed to prioritizing a single source of connection. Connection points can be a

physical place within a neighborhood like a Family Resource Center, virtual platforms like findhelp.org, or a phone line like 2-1-1 Texas, Help Me Grow, Kinship Navigators, and DFPS' Parent and Youth Helpline.

Each of these connection/access points are managed and funded differently depending on their respective community – some are funded and managed by the state including HHSC, DFPS and DSHS; others are managed and funded privately; some are both privately and publicly funded and managed. There are also communities in which none of these centralized access points or connection points exist.

A benefit of multiple connection points is that individuals and families in need can connect to services and resources within their communities in the way that suits them best – whether that connection point is a technology platform, a phone hotline or a physical space in their neighborhood. While the strategy of having a range of ways to connect families with resources is helpful, it also can cause confusion to navigate the various points of connection. In addition, the infrastructure to help connect families to services exists in silos, based on how it is funded and structured. Even when connection points exist within the same state agency – such as 2-1-1 and Family Resource Centers - they exist siloed alongside programs and are treated as programs, instead of as connection points between families and programs. As a result, families and professionals often do not know about these “connectors”, let alone the services and programs available to help them thrive.

Because of the current structure, none of the connection points are as comprehensive as they could be. None are connected with each other, and each contains limited, often duplicative information. This causes more confusion, making it difficult for families to know where to turn when they need help, and for professionals, like pediatricians, teachers, childcare providers and home visitors, to effectively connect families in their care to community supports.

TexProtects believes a more coordinated, less siloed system could connect more families to the resources they need in a timelier way, ultimately leading to less families in crisis. We recommend improving alignment, interconnectivity, and efficiency of operations of state and local level infrastructures that connect families to the resources they need. The most urgent need is to eliminate the current fragmentation across and within family-serving systems and agencies. Investment is required to ensure that all existing resource connectors and warmlines are interconnected. This system-wide coordination must be supported by cross-systems training for staff to better understand what services are available for their clients and offered by other agencies. Collaboration within and between the agencies and connectors must be met with the authority to take actionable steps, shared outcomes and increased capacity to ultimately foster a single, unified approach to family well-being.

Child Care

The Child Care Services (CCS) program is a critical work support for families and a major public investment.

1) Sunset Staff emphasizes performance data, management of fraud data, and improved administration of child care (Issues 1 and 5). A public-facing dashboard and board-level CCS data on access, waitlists, prioritized populations, Texas Rising Star, funding, and regional trends would be helpful. **TexProtects recommends publishing timely board-level data on child care.**

2) Sunset Staff found that improving the child care market rate assessment methodology and timing would provide the agency and Legislature with better quality data for decision making (Issue 6). We



support improving the Market Rate Survey and recommend 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.

SNAP Employment and Training

SNAP E&T should help Texans that receive food assistance to also access education, training, credentials, employment, and economic mobility to help them become economically self-sufficient. The Sunset Staff Report found that SNAP E&T often operates as an administratively burdensome compliance exercise rather than a meaningful workforce strategy.

1) Sunset Staff recommends improving SNAP E&T administration by standardizing TPP guidance and updating systems and procedures with HHSC (Recommendations 1.8 and 1.9). Better administration of TPP can help Texas draw down additional federal dollars for education and training and improve economic mobility for families. **TexProtects recommends specifying that education, training, and credential pathways are central workforce activities, not optional add-ons.**

2) TexProtects additionally recommends:

- Directing 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.
- Directing 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.
- Developing a statewide SNAP E&T provider dashboard tracking key program metrics, including enrollment, completion, job placement, and job retention.

Thank you again for your consideration and commitment to the children and families of Texas. We are hopeful that you will consider these additional improvements and recommendations. TexProtects looks forward to serving as a resource and partner as you continue your work.

Please don’t hesitate to contact us at:

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