

July 2, 2026

TO: Sunset Advisory Committee

RE: Comment on TWC Sunset Staff Report

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

Feeding Texas appreciates the Commission's assessment of SNAP Employment & Training. The report identifies both the challenges and opportunities within the program and elevates SNAP E&T as an important part of Texas' workforce system.

The report highlights key areas for improvement, including the need to better leverage federal funding through third-party partnerships, reduce administrative burden on providers and participants, strengthen coordination between TWC and HHSC, and modernize outdated systems and processes.

We are especially encouraged by the focus on improving the participant experience and ensuring more consistent, high-quality program delivery across the state.

To further strengthen SNAP E&T and maximize its full potential, Feeding Texas recommends the following:

1.4 Update the requirement for TWC to publish LWDB performance data:

Feeding Texas supports Recommendation 1.4 and encourages TWC to include program level SNAP E&T metrics in any public dashboard. While transparency around overall LWDB performance is important, Texas would benefit from greater visibility into SNAP E&T participation and outcomes. Public dashboards should include measures such as the number of individuals referred to SNAP E&T, orientation completion rates, participation rates, activity engagement rates, third-party partnership utilization, federal SNAP E&T funds leveraged, credential attainment, and employment outcomes. Given the report's finding that only 10 percent of required participants began orientation and only 6 percent began E&T activities, greater transparency would help identify high-performing regions, promote best practices, and improve accountability for program delivery statewide.

1.8 Direct TWC to standardize guidance and procedures for TPPs:

Recommendation 1.8 centers third party partnerships as a scalable way to expand SNAP E&T participation while making better use of existing federal funding. It recognizes that Texas has underutilized the 50/50 reimbursement model and positions partnerships with community colleges, nonprofits, and other providers as a practical path to increase investment in training and support services without relying solely on state general revenue. The recommendation also addresses real implementation barriers, such as inconsistent guidance, unclear reimbursement expectations, and high administrative burden. The report itself concludes that “Texas potentially leaves millions in federal education and training funds on the table” and highlights that, among the 224,149 Texans required to participate in SNAP E&T, only 10 percent began participation and just 6 percent began program activities in federal fiscal year 2025. These participation rates lag well behind many other states and underscore the need to maximize both program engagement and federal funding opportunities.

Feeding Texas recommends going further with these recommendations to strengthen both the quantity and quality of third party partnerships. On quantity, local workforce boards are not currently incentivized to pursue or sustain TPPs, which limits participation regardless of how streamlined the process becomes. Establishing minimum expectations (e.g. LWDBs should ensure third partner partners can serve a minimum of 50% of mandatory SNAP E&T participants in their service area) or incorporating stronger performance drivers would help ensure that more boards are actively developing partnerships and fully leveraging available federal resources. On quality, TWC should prioritize developing and working with partners that align with high demand industries within each region’s labor market to ensure SNAP E&T investments lead to better employment outcomes.

Additionally, Feeding Texas also recommends that TWC further strengthen the quality of TPPs by recognizing higher education and postsecondary credential attainment as a core SNAP E&T strategy. Community colleges are specifically identified throughout the report as potential third-party partners, and many SNAP participants could benefit from career and technical education programs that lead directly to employment in high-demand occupations. TWC should encourage workforce boards to develop partnerships with institutions of higher education and treat enrollment in eligible education and training programs as a primary workforce pathway. Feeding Texas recommends specifying that education, training, and credential pathways are central workforce activities, not optional add-ons. TWC should also establish clear performance expectations related to credential

attainment, employment placement, and wage progression so that SNAP E&T investments are evaluated based on participant outcomes rather than process alone.

Finally, we appreciate the report's emphasis on standardizing TPP processes, forms, and procedures across all LWDB. To summarize, Feeding Texas recommends that TWC:

- **Set concrete standards for the quantity and quality of TPPs that each LWBD should contract with** based on the size of their mandatory E&T participant population and the specific workforce needs of their region.
- **Identify and reduce administrative and procedural barriers that limit participation by qualified TPPs**, including burdensome application processes, inconsistent requirements across regions, and other challenges; and
- **Establish efficient, standardized case management protocols** and systems that meet SNAP E&T compliance requirements, reduce duplicative documentation between Local Workforce Development Boards (LWDBs) and Third-Party Partners (TPPs), and enable TPPs to focus on participant instruction, credential attainment, and employment outcomes versus administrative reporting.

1.9 Direct TWC, in consultation with HHSC, to update SNAP E&T systems and procedures:

Recommendation 1.9 takes an important step in reducing administrative and system level barriers that limit participation in SNAP E&T. However, improving systems alone will not meaningfully increase participation if the core SNAP E&T program requirements remain misaligned with federal standards. The Sunset report makes it clear that Texas is underperforming in SNAP E&T administration and "fails to effectively manage SNAP E&T and performs poorly in comparison to other states." It also highlights that the current approach does not address the underlying structural inefficiencies in program design and delivery.

To address these challenges, Feeding Texas recommends aligning Texas' SNAP E&T participation requirements with the federal standard. While federal SNAP policy is built around a 20-hour work or work-program participation threshold, Texas requires mandatory SNAP E&T participants ages 16–59 to engage in 30 hours of weekly activities. This misalignment prevents many nationally recognized workforce training providers and community colleges from being able to participate in the SNAP E&T program because their

accredited programs/coursework fall short of the 30-hour threshold. Aligning Texas with the federal 20-hour standard would reduce barriers to participation for both TPPs and participants, better accommodating working adults, caregivers, and individuals pursuing education and training.

The recommendation also highlights the need to improve customer service within TWC, in consultation with HHSC. Feeding Texas recommends expanding this review to better understand the barriers that prevent participants from completing their initial SNAP E&T orientation. Many Texans, particularly those in rural communities, face challenges such as transportation limitations, caregiving responsibilities, fluctuating and unpredictable work schedules, and limited internet access that can make attending orientation difficult.

We recommend that TWC and HHSC analyze why participants are unable to take this first step into the program and identify opportunities to reduce those barriers. This is especially important given the localized workforce system, where orientation processes can vary significantly across workforce board areas. Some boards offer online orientation options, while others primarily require in-person attendance. In addition, many SNAP E&T participants report that they received the letter notifying them of their mandatory orientation date with less than 1 week notice, making it difficult for them to rearrange their caregiving, work schedules, or other responsibilities in order to attend. Understanding how participation rates differ across LWDBs could help identify best practices and improve engagement statewide. Given the report's finding that only 10 percent of required participants began participation, TWC should use this analysis to establish and measure practices that improve participation, engagement, and access to training opportunities.

To summarize, Feeding Texas recommends that TWC:

- **Amend SNAP E&T policy to align with the federal standard of 20-hours per week of required participation** in order to maximize participation from nationally accredited third party partners and institutes of higher education.
- **Analyze TWC and LWDB policies and procedures that may prevent individual participation** – such as the timing of notices and orientation structure – and update as necessary to improve participation and engagement. Hosting focus groups with SNAP E&T participants is recommended to better understand the barriers to participation from the client perspective.

- **Establish a formal, ongoing interagency governance structure for SNAP Employment and Training (SNAP E&T)** that meets regularly to review program performance, participation, provider capacity, implementation of the SNAP E&T State Plan, and participant outcomes, and to identify and implement policy, operational, and systems improvements that reduce administrative barriers, improve interagency coordination, and maximize federal SNAP E&T funding.
- **Establish shared performance measures and an annual review process to evaluate SNAP E&T outcomes**, including participant enrollment and activity completion, credential attainment, employment, wage progression, utilization of federal reimbursement opportunities, and third-party partner engagement, and use these findings to inform continuous program improvements.
- **Standardize the treatment of participation in approved postsecondary education and training programs within SNAP E&T**, including community college Credential of Value pathways, to ensure consistent counting of credit-bearing coursework toward participation requirements across workforce areas.

We appreciate the Sunset Commission and staff's work on this review and the opportunity to comment. Please let us know if we can be a resource on any of these issues and we look forward to working together.

Sincerely,

Jamie Olson
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Feeding Texas