



July 2, 2026

Eric Beverly  
Executive Director  
Texas Sunset Advisory Commission  
PO Box 13066  
Austin, Texas 78711

Dear Mr. Beverly:

On behalf of the Texas Workforce Investment Council (Council), we are pleased to present the response to the Texas Sunset Advisory Commission (Sunset) Staff Report.

The Council would like to express its appreciation for Sunset's professionalism and dedication to our State and the time that your staff spent engaging with the Council, its work, and history to better conduct their review. Their efforts included interviewing Council members and attending briefings, Council meetings, and Council sub-committee meetings. As recognized in the report, the Council performs a unique and essential function in the state's workforce system: the development and management of a system-level strategy for the entirety of the workforce system, including all workforce programs and partners.

The Council's response, requested in your letter dated June 18, 2026, incorporates input from its members and includes Issue 1 of the Sunset Staff Report for the Texas Workforce Commission (TWC), the Council, and Purchasing from People with Disabilities Program to the extent this recommendation affects the Council.

**ISSUE 9: The State Has a Continuing Need for the Texas Workforce Investment Council.**

**9.1 Continue the Texas Workforce Investment Council for 12 years.**

**Council Response:** The Council serves a critical role in the workforce system and agrees with the recommendation for its continuation given its role as the objective oversight body to the many actors in the workforce system. Its ability to influence the entire workforce system is directly tied to its role as the author and coordinator of the workforce system strategic plan. Not only does the Council bring together key workforce stakeholders to align their workforce programming, but also the Council ensures a system-level approach to state and local workforce strategy to deliver measurable results for employers and workers. Additionally, the federal requirement for a state-level workforce development board under the Workforce Innovation and Opportunity Act of

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Kaki Leyens  
*Executive Director*

2014, is met by the Council's existence, thus qualifying Texas for \$600 million of annual federal funds. Overall, the continuation of the Council protects the objective assessment of the performance of all parts of the workforce system and critical federal funds for workforce programs in the state.

## **9.2 Abolish the Texas Skill Standards program.**

**Council response:** The Council agrees with this recommendation as it presented its concerns about the continuing need for the Texas Skill Standards program with the advent and expansion of industry-based certifications in the Council's Self-Evaluation Report (SER). The discontinuation of the program will remove duplication of certifications as well as remove any layer of confusion for academic institutions offering certifications and students interested in obtaining useful qualifications for the workforce.

## **9.3 Modify statute to modernize workforce data evaluation.**

**Council response:** The Council agrees, as it discussed as one of its issues in its SER, the statutory requirement for TWC to maintain the Automated Follow-Up and Evaluation System, for which the Council is obligated to provide a funding formula to the Governor. The Council considers the entire system, including the funding formula, obsolete as TWC has modernized its case management systems through WorkInTexas.com, which provides a more efficient platform for managing workforce services. As such, the removal of the statutory mandate for the Automated Follow-Up and Evaluation System will remove redundancy in workforce system evaluation and align data evaluation more appropriately with TWC's work on data integration with its partners in the Tri-Agency Workforce Initiative.

## **9.4 Modify statute to remove the Council's responsibility to serve as fiscal intermediary for the Automated Follow-up and Evaluation System.**

**Council response:** The Council also agrees, as it discussed the statutory requirement for TWC to maintain the Automated Follow-Up and Evaluation System for which the Council is obligated to provide a funding formula to the Governor, as one of its issues in its SER. The removal of the statutory mandate for the Council to serve as the fiscal intermediary for the Automated Follow-Up and Evaluation System would remove an outdated practice and allow the Council to devote its resources to other mandates supporting an integrated and aligned workforce system.

## **9.5 Update the standard across-the-board requirement related to board member training.**

**Council response:** The Council agrees that ensuring all members are adequately equipped to carry out their duties should be a part of the Council's responsibilities. The Council currently provides onboarding training and a handbook to members regarding the statutory functions of the Council.

## **9.6 Update the standard across-the-board requirement related to complaint information.**

**Council response:** The Council agrees that updated statutory language regarding complaint management would better reflect existing practices.

# **ISSUE 1: Enhancing TWC's Coordination With and Oversight of LWDBs Would Better Ensure Effective Workforce Program Delivery for Texans.**

## **1.1 Transfer certain Council authority and responsibility for LWDB oversight to TWC.**

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**Council Response:** The Council does not agree with the Sunset recommendation to transfer the Council's statutory authority of designation and redesignation of local workforce development boards (LWDBs); technical assistance to LWDBs; development of a reorganization plan for underperforming LWDBs; and sanction of LWDBs who violate state or federal law to TWC as this change would eliminate the neutral, independent party in the oversight of LWDBs.

TWC, by nature of its involvement in workforce programming, is directly associated with LWDBs and unable to serve as an objective assessor of LWDB performance alone. The Sunset report indicated that the Council lacks visibility into LWDB performance and, while the Council agrees on this point, this lack of visibility can be addressed without a change in statute. As the report findings suggest, reporting and performance checks currently are not shared with or provided to the Council should there be a documented issue of board performance. By removing the Council from the process entirely, the Council's visibility into the performance of LWDBs, which are key actors in the workforce system, would only be further impaired, thus hindering its position as the oversight body of the workforce system. As the Sunset report found in Issue 9, page 119, the Council's ability to facilitate planning and evaluation effectively across the workforce system is tied to the fact that it is administratively attached to the Office of the Governor, preserving its neutral position as the workforce system oversight body. It is this position that, through LWDB oversight authority presently being split between TWC and the Council, balances TWC's direct involvement in programing, fund distribution, and operational support among the LWDBs.

Additionally, under federal law, namely the Workforce Investment Act of 1998, reauthorized as the Workforce Innovation and Opportunity Act of 2014, the Council serves as the federally required state-level workforce development board. As the official state workforce development board, the Council's authority as the oversight body of the LWDBs is in line with federal statute and the shared responsibility between TWC and the Council reflects the blended nature of the Texas workforce system. The Council recognizes that better coordination between TWC and the Council on LWDB monitoring is needed for the current statute to work as it should and believes that can be accomplished in cooperation with TWC.

Thank you for the opportunity to respond to the Sunset staff report. We look forward to working with the Sunset Advisory Commission and the legislature on the above-mentioned recommendations as identified through the Council's Sunset review process.

Sincerely,



Kaki Leyens  
Executive Director