



Statement on the Sunset Advisory Commission Staff Report
by Disability Rights Texas and the Client Assistance Program
Sunset Advisory Committee Hearing
August 12, 2026

Introduction

The Client Assistance Program (CAP) helps people who are getting services or who are trying to get services from Texas Workforce Commission (TWC) – Vocational Rehabilitation (VR) Services. Our priorities include helping individuals with disabilities gain access to and benefit from rehabilitation services leading to employment, independent living, and greater community participation. The CAP is administered by and located within Disability Rights Texas.

The CAP stands in agreement with the findings and recommendations made by the Commission as it relates to Issue 3 of the Sunset Advisory Commission Staff Report, dated June 2026. The highlights of Commission findings are as follows:

- TWC's insufficient integration of VR with local workforce services creates barriers to effectively and consistently serving VR customers.
- VR's inefficient administrative structure misallocates personnel and funding resources, exacerbating pressures at the local level to the detriment of customers.
- Inadequate upfront training for new VRCs exacerbates high turnover that negatively affects VR customers.
- The current VR case review system is inefficient and limits the program's ability to prioritize high-risk cases while diverting staff time from critical training and support activities for VRCs.
- The VR program restricts vendor certification options for job placement services, creating an unnecessary barrier to becoming a VR vendor and limiting vendor options for customers.

The CAP highlights and/or reiterates the following concerns, specific to and in addition to the findings and recommendations of the Commission.

Staff Development

The CAP stands in agreement with the findings and recommendations made by the Commission's report and TWC-VR self-proclamation of the need and plan to revamp the training and development of VR Counselors and customer-facing field staff. CAP similarly is available to assist with staff development recommendations and efforts to revamp the system, while also maintaining its willingness to participate in new hire orientation and other education and training opportunities available within TWC-VR. The training should not focus specifically on policy but also on possibility, adhering to the mandate for services to be individualized.

Adherence to individualized Planning and Services Provision

The provision of VR services should be individualized; customized to each customer applying for VR services and/or throughout the VR process, life of the VR case. The expanse of what VR services can provide to a customer is vast. Currently, there presents an organizational philosophy, or perception, that "VR is about employment, not social services". Such philosophies/perceptions, in essence, reduce the potential expanse and limits the possibilities of VR services to "getting a job", rather than focusing on what each individual customer needs to reach an identified and agreed upon employment goal, utilizing informed choice, career hopes and dreams, and the safety of discussing such with their highly trained and interested VR Counselor. The term "Individualized Plan for Employment (IPE)" speaks volumes and should resonate with customers and VR Counselors alike.

- The CAP is in agreement with the recommendations made by the Sunset Advisory Commission and the actions taken, up to this point, by TWC-VRS.
- The CAP further recommends a refocus of training and organizational philosophy to one that emphasizes the individual customer, their needs, goals, and services available with VR services to reach said goal. The individualized emphasis needs to be on what VR can and will do, rather than what VR cannot and will not do.

Staff Investment

Turnover was noted as an upfront training issue. The CAP agrees, in part. The current labor philosophy, however, presents as antiquated. The Sunset recommendations will falter when high performance expectations are matched with an undertrained and overworked labor force but also of significance, underpaid, specifically at the VR Counselor, Supervisor, and Manager levels. Texas continues to grow in a rapid fashion. Rates of pay and comparative market analyses have been discussed for a decade, without much apparent headway. Whether an entry level person stepping into a career as a VRC or as one who is mid-career or more, pay seems to be an issue. A pathway to recruit and pay talented, credentialed, and experienced personnel is a foundational, root-cause concern that has not shown activity, from the CAP perspective. Rather, there's been an influx of turnover, causing educational requirements to be lessened and, hence, with development deficiencies, the outcome is

less than adequate. All of which, of course, affects the customer of VR services. A blend of newly minted VR Counselors with those who are well-tenured provides more organizational stability than the turnstile that has been in-play for the last decade. Training and development improvements present as gloss when paired with an underpaid, underdeveloped, and temporary labor force.

- The CAP recommends
 - pay structure analyses,
 - career ladder enhancements
 - an escalated on-ramp for experienced VR Counselors, with an entry point in accordance with their education, experience, and credentialing.

Pre-Employment Transition Services

One key target group for VR are youth with disabilities. Federal law requires specific spending and provision of a set of VR services collectively referred to as “pre-employment transition services” or pre-ETS. In conjunction with public schools, VR has a critical role in ensuring that youth with disabilities are able to move successfully from high school into the workforce.

- The CAP recommends
 - Fulfilling expenditure requirements for pre-ETS services
 - Reviewing strategic planning with the Texas Education Agency to maximize state efforts to ready youth with disabilities for the workforce

Conclusion

There are a number of challenges and opportunities for individuals with disabilities seeking to meet their employment goals, including youth with disabilities. The challenges are lessened and opportunities magnified with properly provided individualized vocational rehabilitation services. Stakeholders must be mindful of the expansive possibilities available through VR services, albeit according to each customer’s individual need as it relates to a successful employment outcome. It is the CAP’s hope that staff training and development, compensation, reallocation of regional resources, and the host of other recommendations are put into place and practice in a punctual fashion. Disability Rights Texas and the Client Assistance Program appreciates the opportunity to engage with stakeholders moving forward to protect and advance the interests and employment possibilities of all individuals with disabilities seeking employment via vocational rehabilitation services.

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