

Chase Bearden
Executive Director

WRITTEN TESTIMONY

Texas Workforce Commission Sunset Review: Vocational Rehabilitation

Submitted to the Sunset Advisory Commission | August 12, 2026

Chair and members of the Sunset Advisory Commission:

My name is Chase Bearden, and I serve as executive director of the Coalition of Texans with Disabilities (CTD). Founded in 1978, CTD is a member-driven, cross-disability organization working to ensure Texans with disabilities can work, live, learn, play, and fully participate in the communities of their choice.

CTD supports Sunset staff's central finding that the Vocational Rehabilitation (VR) program struggles with integration, administration, and training in ways that hinder fair and consistent service. We urge the commission to adopt the Issue 3 recommendations and strengthen them with enforceable, client-facing standards for communication, continuity, timeliness, and accountability.

What the record shows

The staff report closely reflects what CTD hears from Texans with disabilities: access can depend too heavily on the counselor, management unit, or region assigned to a case. Sunset staff found that coordination with Workforce Solutions often depends on individual staff initiative. Some offices integrate well; in others, integration is practically nonexistent. Co-enrollment ranged from zero to 23 percent across local offices, while the statewide rate was only about 6 percent. The report also found that inadequate training causes counselors to interpret policy differently, resulting in customers receiving different services based on the individual counselor. (Sunset Staff Report, pp. 50-56.)

Communication failures are not minor inconveniences. Sunset staff documented weeks- or months-long delays in responses to time-sensitive communications and failures to notify customers when their counselor changed. These breakdowns occur while the average counselor caseload has risen 34 percent, from 78 cases in fiscal year 2021 to 105 in fiscal year 2025. New-counselor turnover has ranged from 20 to 35 percent annually, more than half of counselors are now entry-level staff, and the average case lasts 2.4 years. When remaining staff inherit cases, workloads can double and customers wait while a new counselor learns the file. (Sunset Staff Report, pp. 53-55.)

TWC's self-evaluation provides another warning sign. The agency reports that its VR ombudsman handled more than 700 complaints after the position was created in 2023. At the time of the report, Customer Engagement Officers were operating in only three regions, with another region planning to add one. A customer's ability to get help escalating a problem should not depend on geography. (TWC Self-Evaluation Report, p. 153.)

CTD recommendations

Adopt the Issue 3 reforms and protect customers during implementation

CTD supports recommendations 3.1, 3.3, 3.4, 3.5, and 3.6, including a statewide integration model, realignment of management units, improved counselor training, and broader vendor certification options. We support recommendation 3.2 with the additional customer-protection safeguard described below. We also support redirecting resources from the regional administrative layer to direct service, supervision, training, and customer support.

The restructuring contemplated by recommendation 3.3 would make approximately 200 positions and \$10.6 million available for more effective use within VR. TWC should be required to publish a transition plan showing where those resources go, how frontline capacity will improve, and how it will prevent missed services, case closures, or lost communication during counselor and office transitions. The restructuring should be invisible to the customer except through better service.

Create statewide communication and case-continuity standards

TWC should establish measurable statewide standards for acknowledging client contacts, providing a substantive response or status update, and escalating time-sensitive needs. Each customer should have a named counselor, supervisor, and backup contact. When a counselor changes, TWC should promptly notify the customer in the customer's preferred accessible format, introduce the new counselor, identify pending actions, and confirm that the new counselor has reviewed the file.

Before closing a case for inability to contact a customer, TWC should verify that it used the correct contact information, honored the customer's communication preferences and accommodations, and made the required accessible attempts. Agency communication failures should never be treated as client noncooperation.

Make regional and management-unit variation visible

Statewide averages can hide local breakdowns. TWC should publicly report, by management unit and in an accessible format, measures such as response timeliness, eligibility and individualized-plan deadlines, time from authorization to service, caseloads, vacancies, counselor turnover, case transfers, complaint categories and resolution times, vendor wait times, employment outcomes, and employment retention. The purpose should be to identify variation, spread successful practices, and direct support where it is needed, not to punish counselors for structural problems.

Strengthen training, mentoring, and quality review

CTD strongly supports recommendation 3.5. Training should be competency-based, completed before a new counselor receives a full caseload, and reinforced through protected mentoring and ongoing scenario-based instruction. It should cover consistent interpretation of eligibility, comparable benefits, informed choice, case closure, accessible communication, job retention, assistive technology, and the RehabWorks system.

CTD does not oppose replacing the 10 percent case-review requirement with statistically valid sampling, as proposed in recommendation 3.2, if the high-risk protocol also captures customer-service risks. Missed federal deadlines, repeated counselor transfers, unresolved communication complaints, long delays in starting approved services, and cases in which a person's current job is at immediate risk should trigger review.

Prioritize services that help people remain employed

VR's mission is not only to help people find jobs, but also to retain and advance in employment. A person who needs an accommodation, assistive technology, job coaching, or a short-term post-employment service may lose a job while waiting weeks for an answer. TWC should establish an expedited employment-at-risk pathway with a single accountable contact and clear turnaround expectations.

Provide a uniform, accessible escalation process

At application and throughout the case, customers should receive plain-language, accessible instructions explaining how to contact a supervisor, the VR ombudsman, and available complaint, mediation, appeal, and Client Assistance Program resources. TWC should track whether escalated concerns are resolved and use complaint trends to improve policy, training, and staffing statewide.

Conclusion

Many VR counselors are committed, capable professionals working under significant pressure. The problem is a system that relies too heavily on exceptional individual effort instead of making good practice routine everywhere. A Texan's opportunity to work should not depend on a ZIP code, an individual counselor's interpretation of policy, or whether anyone returns a voicemail before a job opportunity disappears.

CTD respectfully asks the commission to adopt the Sunset staff recommendations and add clear customer communication, continuity, timeliness, transparency, and employment-retention protections. These changes would help ensure that VR works as a truly statewide program and that Texans with disabilities can obtain the services they need to find, keep, and advance in meaningful employment.

Thank you for the opportunity to provide written testimony.

For A Barrier Free Texas,

A handwritten signature in black ink, appearing to read 'Chase Bearden', written in a cursive style.

Chase Bearden