From:	Sunset Advisory Commission
To:	Jalisa Broussard
Subject:	FW: Public Input Form for Agencies Under Review (Private/Before Publication)
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Submitted values are:

Choose the agency that you would like to provide input about
Texas Workforce Commission

Public Comments
1

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Your Comments or Concerns
TWC's 2023 ReHabWorks infrastructure modernization did not necessarily resolve the frontline workflow problems affecting vocational rehabilitation counselors and customers. Counselors may still re-enter information already held by the agency, rely on reports that are not updated in real time, search across separate systems for customer documents, manually route service records, and track compliance deadlines outside the case-management workflow. These limitations consume time that should be devoted to counseling, employment planning, assistive technology, and direct customer services. They can also create significant accessibility barriers for customers who are blind, newly blind, or unable to use conventional document-submission methods independently. These concerns and their effects are detailed in the attached Paper 1, "Technology That Empowers People."

Your Proposed Solution
As detailed in the attached Paper 1, I recommend that the Sunset Advisory Commission direct TWC to conduct an independent, user-centered assessment of ReHabWorks and the surrounding VR technology environment. The assessment should determine whether the current system can provide secure and accessible document submission, one-time data entry, near-real-time caseload reporting, automated compliance reminders, integrated service authorizations and IPE amendments, reliable audit trails, and accessible electronic signatures. TWC should then develop a measurable modernization plan comparing continued enhancement of ReHabWorks with other technology options, while including customers with disabilities and frontline VR staff in system design, testing, and implementation.

Attachment
Paper_1_Technology_That_Empowers_People - Sunset Advisory Commission Recommendation.pdf (244.38 KB)

My Comments Will Be Made Public
Yes

TEXAS SUNSET ADVISORY COMMISSION

PAPER 1

Technology That Empowers People

A Vision for Modernizing Information Technology to Strengthen Vocational Rehabilitation Services in Texas

Central proposition: Texas should evaluate vocational rehabilitation technology by whether it reduces administrative friction, protects disability and medical information, expands independent access, and gives counselors more time to deliver counseling, guidance, and employment services.

Submitted by Jeanette S. Lee, MRC, CRC

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Former private-sector information technology executive

August 2, 2026

Document Purpose and Author Perspective

This paper is submitted as public policy analysis for the Sunset review of the Texas Workforce Commission (TWC). It is not a request for the Sunset Advisory Commission to decide an individual employment dispute. It uses firsthand operational observations to identify system-level risks and opportunities that can be tested through records, user research, accessibility testing, workflow measurement, and audit evidence.

The author brings a dual professional perspective: experience leading private-sector information technology work and experience as a Certified Rehabilitation Counselor serving Texans who are blind or visually impaired. That combination matters because a case-management system is not merely a database. It shapes how quickly a customer can enter the program, how reliably documents reach the case record, how counselors monitor deadlines, how managers interpret performance, and how much professional time remains for direct vocational rehabilitation work.

Scope limitation: This paper does not prescribe a particular vendor or assume that replacement is the only acceptable answer. It recommends a requirements-led, independently validated modernization process. TWC should be allowed to demonstrate whether its present platform can meet the required outcomes before the State commits to replacement, re-platforming, or further renovation.

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Executive Summary

Texas has already invested in ReHabWorks modernization. TWC reports that a three-release renovation completed in August 2023 migrated the system to Amazon Web Services, integrated legacy TxROCS reporting functions, added single sign-on and database upgrades, introduced a caseload dashboard and customer messaging through SARA, and streamlined reports. TWC's own award submission states that the system is used by more than 1,300 staff statewide. Those accomplishments are material and should be recognized. They also create the right moment for a second question: did the renovation measurably transform the daily experience of customers and frontline vocational rehabilitation staff? [1]

From a frontline perspective, significant friction can remain even after a successful infrastructure project. Counselors may still re-enter information already held by the agency; wait for overnight reporting before seeing current caseload status; search across ReHabWorks and separate collaboration repositories; manually generate or route service records; track compliance deadlines outside the case-management workflow; and spend time helping customers deliver documents through channels that are difficult for people who are newly blind or who do not have accessible technology. A document referenced in a case note may not be readily available where the counselor expects to find it. When the system does not make the next required action visible, compliance depends too heavily on memory, parallel spreadsheets, email, calendars, and supervisory reconstruction.

These are not minor convenience issues. Every repeated field, delayed dashboard, manual handoff, and inaccessible document step consumes capacity that should be used for vocational counseling, informed choice, assistive technology planning, training coordination, job development, and employer engagement. Federal VR rules emphasize individualized planning, the full range of necessary services, coordination with the statewide workforce system, informed choice, timely service, and access for individuals with disabilities. Technology should operationalize those duties rather than add another layer of work. [2]–[6]

Recommended Sunset action: Direct TWC to complete an independent, user-centered VR technology capability assessment and submit a modernization plan with measurable requirements, costs, risks, timelines, accessibility results, and implementation options. The plan should compare continued enhancement of ReHabWorks against re-platforming or procurement of a specialized solution without preselecting a vendor.

The proposed standard is straightforward: information should be entered once and reused lawfully; documents should travel securely into the authoritative case record; deadlines should generate visible, graduated alerts; common authorizations and plan amendments should be assembled from approved case data; dashboards should update in near real time; customers should be able to complete, sign, upload, and review information independently using accessible technology; budget tools should support—not ration—individualized services; and every consequential data action should be auditable.

1. The Sunset Issue

Issue statement

TWC cannot demonstrate that the ReHabWorks technology environment consistently converts its 2023 infrastructure modernization into reduced frontline burden, independent customer access, reliable record handling, real-time compliance visibility, and integrated workforce service delivery.

Why this belongs in Sunset review

Sunset review examines whether an agency's structures and processes are effective, accountable, efficient, and aligned with statutory purpose. The question is therefore larger than whether ReHabWorks is online, cloud-hosted, or supported. The relevant performance question is whether the complete technology environment enables TWC VR to deliver individualized services promptly and securely while making prudent use of counselor time and public funds.

23. **Operational efficiency.** Redundant entry and manual routing consume skilled staff time and create avoidable error opportunities.
24. **Program effectiveness.** Delayed or incomplete information can postpone eligibility, planning, authorizations, training, or case progress.
25. **Accessibility.** Customers with visual, cognitive, physical, hearing, or communication disabilities must be able to use digital channels independently.
26. **Accountability.** TWC needs traceable records showing receipt, access, modification, deletion, routing, and resolution of customer documents and tasks.
27. **Workforce integration.** A consolidated agency should be able to coordinate services across WIOA partners without forcing customers and counselors to recreate information.
28. **Stewardship.** The State should know the full lifecycle cost and benefit of maintaining, enhancing, replacing, or re-platforming ReHabWorks.

A testable policy question

Can a counselor and customer complete the core VR lifecycle—from referral and application through eligibility, the Individualized Plan for Employment (IPE), service authorization, progress monitoring, employment, and closure—through an accessible, secure, integrated workflow that avoids unnecessary re-entry and exposes the next required action in real time? Sunset should require TWC to answer this with evidence, not architecture descriptions alone.

2. What TWC Has Already Modernized

TWC's ReHabWorks renovation should be treated as the baseline for assessment, not dismissed. According to the agency's NASCIO award materials, the project migrated VR systems to AWS, integrated TxROCS functions, sustained Enterprise Data Warehouse connectivity, enhanced information sharing and virtual case files, integrated workflows, and expanded customer messaging. The final release was

deployed August 31, 2023. Earlier releases added a caseload management dashboard, reporting changes, and the SARA virtual assistant. [1]

Reported 2023 improvement	Intended value	Sunset follow up question
Cloud migration	Modern, supportable infrastructure	What measurable reductions occurred in downtime, latency, defect rate, maintenance cost, and processing time?
TxROCS integration	Fewer legacy systems and streamlined reporting	Which tasks or duplicate fields were eliminated for counselors, assistants, managers, and customers?
Caseload dashboard	Better visibility into case health	How current is the data, and can users act directly from the dashboard?
SARA messaging	Additional customer communication path	Is the complete interaction accessible, retained in the authoritative record, and linked to actionable workflow?
Virtual case files	Improved information sharing	Are all case documents stored, routed, retained, and audited within one authoritative environment?

This distinction is important: modernization can succeed at the infrastructure layer while leaving process debt at the user layer. Moving a manual workflow to the cloud does not by itself remove duplicate entry, improve document intake, make a form accessible, connect an incoming report to the next required task, or create real-time compliance intelligence. Sunset should evaluate the end-to-end service pathway rather than treating cloud hosting as proof that modernization is complete.

3. The Remaining Frontline Problem

3.1 Redundant entry and avoidable reconstruction

Information gathered at referral, application, intake, eligibility, and planning should populate later workflows when legally and programmatically appropriate. Yet counselors may be required to rekey demographic, provider, service, and planning information when requesting services or preparing documents. Re-entry creates four costs: staff time, inconsistency between records, delayed approvals, and difficulty determining which field is authoritative.

A modern workflow should present pre-populated data with clear source attribution and require the counselor to confirm or update it. Reuse must never convert professional judgment into an automatic decision. It should eliminate clerical duplication while preserving a visible review step.

3.2 Split document handling

Frontline work may involve ReHabWorks plus Microsoft Teams or other collaboration locations used for images and documents. The concern is not that collaboration technology is inherently insecure. The concern is whether the specific configuration, permissions, retention rules, audit logs, ownership, and transfer workflow provide controls equivalent to an authoritative case record. If a case note says a

customer supplied a document but the document cannot be found where needed, the agency needs a traceable answer: when was it received, where was it stored, who accessed it, whether it was moved or deleted, and whether the customer was notified of any deficiency?

3.3 Delayed caseload status

When reports update only after an overnight cycle, counselors and supervisors cannot see the effect of work completed that day. A stale dashboard can cause unnecessary follow-up, duplicate effort, inaccurate management conversations, and missed opportunities to correct a deadline before it becomes a violation. Near-real-time visibility is especially important for large caseloads and for counselors returning from leave or covering another caseload.

3.4 Compliance managed outside the workflow

Eligibility, IPE development, annual review, student progress, service reports, and other time-sensitive actions should not depend primarily on an individual remembering dates or maintaining a private tracking system. The platform should calculate clocks from authoritative events, display the rule and due date, warn the responsible team, and provide a lawful escalation path. A system should prevent accidental finalization of an inconsistent action where appropriate, but it should not indiscriminately freeze a case in a way that blocks needed customer services.

3.5 Customer barriers become counselor workload

A customer who is blind, newly blind, has low digital literacy, lacks accessible hardware, or cannot travel easily may need extensive assistance simply to transmit information. That assistance is sometimes appropriate rehabilitation counseling. But when the difficulty comes from an inaccessible or fragmented intake and document-delivery process, the technology has shifted an administrative burden to the customer and then to the counselor. The result is less time for employment exploration, specialized training, assistive technology coordination, employer engagement, and direct counseling.

Frontline vision: If technology worked as it should, counselors could spend more time exploring employment opportunities, specialized training, and partnerships with technology entities advancing access for people who are blind or visually impaired.

4. Design Principles for a Modern VR Platform

Principle	Operational meaning
Enter once, reuse responsibly	Capture information at its source; pre-populate later forms; show provenance; require confirmation when a decision or attestation is involved.
Authoritative record	Keep case documents, messages, decisions, and task history in or reliably linked to one governed record.
Accessible by design	Test with disabled customers and staff using real assistive technologies throughout design

Principle	Operational meaning
	and release.
Real-time actionability	Show current status, next action, owner, due date, and dependencies without waiting for overnight reports.
Professional judgment preserved	Automate assembly, reminders, routing, and validation; reserve eligibility, informed choice, service need, and case decisions for qualified staff.
Transparent rules	Explain why an alert, validation, restriction, or recommendation appears and identify the governing policy.
Minimum necessary access	Use role-based access and segregation appropriate to the sensitivity and purpose of the information.
Interoperability	Exchange data through governed interfaces and avoid forcing customers to recreate information already held by the workforce system.
Measurable improvement	Tie every feature to a baseline and outcome: time saved, errors prevented, access improved, or service accelerated.
Human support remains available	Digital access expands choices; it does not eliminate telephone, in-person, interpreter, or accommodation pathways.

5. Required Functional Capabilities

5.1 Unified customer profile and reusable data

29. Create a single, governed customer profile with field-level source, verification date, and update history.
30. Pre-populate recurring demographic, contact, disability, provider, and service fields from approved data.
31. Allow customers to propose corrections through an accessible portal while preserving staff review and audit history.
32. Identify conflicts between records rather than silently overwriting information.
33. Support lawful household, guardian, representative, interpreter, and alternate-format preferences without confusing those roles with the customer.

5.2 IPE drafting and amendment support

The system should assemble a draft IPE from confirmed intake, eligibility, assessment, informed-choice, employment-goal, and service information. When an assistive technology purchase or other agreed service is approved, the platform should offer to prepare the corresponding amendment and carry forward continuing services. The counselor must review the proposed content, discuss it with the customer as required, and authorize the final plan. The system should identify what changed and retain every signed version.

5.3 Service authorization automation

For commonly purchased services, the platform should generate a draft authorization using confirmed customer, provider, service, rate, location, and funding data. It should validate required fields, detect

duplicate or conflicting authorizations, route approvals, deliver the authorization securely to the correct provider, and connect incoming reports and invoices to the authorization. An override should be available when a different provider is needed because of availability, customer informed choice, accessibility, geography, specialization, or another documented reason.

5.4 In-house service routing

When the customer is likely to need an in-house service—such as vocational rehabilitation teaching or specialized deaf-blind consultation—the system should create a draft referral or service record, notify the appropriate staff, and track acceptance and scheduling. Assignment rules must allow documented exceptions, including customer preference when relevant to effective service delivery.

5.5 Document and report intake

34. Accept accessible customer uploads, mobile capture, provider submissions, routed fax, secure email ingestion, and staff scanning.
35. Stamp receipt time and source; scan for malware; classify the document; associate it with the correct case; and place it in a review queue.
36. Notify the counselor and other authorized team members when a report arrives and identify the task it may satisfy or trigger.
37. Prevent untraceable deletion; preserve version history; and document correction of misfiled records.
38. Give customers an accessible receipt and explain whether further action is required.

5.6 Accessible electronic signatures

Customers and staff should be able to review and sign documents using keyboard navigation, screen readers, magnification, voice control, and mobile devices. The workflow should distinguish consent, acknowledgment, approval, and attestation; record the version signed; provide an accessible copy; and support a documented alternative when electronic signature is not appropriate.

5.7 Student and education workflows

The platform should track measurable skill gains and education milestones, remind students about transcripts and progress documentation, and generate an authorization form when the customer elects to allow TWC to request records directly. Reminders should be accessible, configurable, and coordinated so the customer is not flooded with duplicate notices from multiple staff members.

6. Accessibility and Customer Independence

Accessibility is not a final compliance check applied after procurement. It is a product requirement, a testing discipline, and a governance responsibility. One-stop services provided electronically are

expected to improve efficiency, coordination, and quality, and one-stop systems must be evaluated for programmatic accessibility and equal opportunity for people with disabilities. [5][6]

6.1 Required testing model

39. Define critical user journeys before design: application, document upload, status review, appointment confirmation, message receipt, IPE review, signature, correction request, and appeal or complaint information.
40. Recruit customers and staff with diverse disabilities, including people who are blind, have low vision, are deaf-blind, use alternative input, have cognitive disabilities, or rely on mobile accessibility features.
41. Test with actual assistive technologies and realistic documents, not only automated scanning tools.
42. Record completion rate, time, errors, requests for sighted assistance, and abandonment.
43. Treat any step requiring avoidable sighted help as a service-design defect and document remediation before statewide release.
44. Repeat testing after meaningful interface or workflow changes and publish a plain-language accessibility conformance summary.

6.2 Newly disabled customers

A newly blind customer may not yet have mastered screen-reading software or accessible document capture. A well-designed system should not assume advanced technical skill. It should offer simple language, progressive disclosure, saved progress, clear telephone support, optional staff-assisted entry, alternate formats, and confirmation that a submission arrived. Accessibility must include usability for people still acquiring adaptive skills.

6.3 Digital choice, not digital-only service

A portal should expand independent access, not become a gatekeeping mechanism. Customers must retain practical ways to apply, communicate, sign, and provide documents by telephone, in person, mail, or another reasonable method. Staff should be able to record an accommodation or preferred communication mode once and have it respected across workflows.

7. Information Governance, Privacy, and Auditability

VR records may contain highly sensitive disability, medical, educational, financial, employment, and family information. The policy question is not whether a named product is categorically secure or insecure. It is whether TWC has defined and enforced controls for the way each repository is configured and used.

Control domain	Minimum evidence Sunset should require
System of record	Written designation of the authoritative location for each record type and the process for reconciling copies.
Access	Role-based permissions, periodic access recertification, separation of duties, and prompt removal of access.
Audit logs	Who viewed, downloaded, changed, moved, shared, or deleted information; timestamps; retention; review procedures.
Retention and legal hold	Schedules by record class, suspension of deletion when required, and documented disposition.
Data loss prevention	Rules governing external sharing, download, device storage, printing, email, fax, and collaboration spaces.
Misfiled or missing records	Incident workflow, customer impact review, recovery steps, notification criteria, and corrective action.
Third parties	Provider identity, secure submission, contractual controls, breach duties, and access termination.
Continuity	Backup, recovery objectives, restoration testing, and procedures for continued service during disruption.

TWC should conduct a targeted data-flow inventory showing how a document moves from customer or provider receipt to classification, review, case association, decision, retention, and disposal. Every transfer between systems is a potential delay, access, integrity, or accountability risk. The inventory should identify manual downloads, local copies, email attachments, fax queues, collaboration folders, and integrations.

8. Real-Time Caseload Intelligence

A counselor dashboard should be a decision tool, not a delayed report. It should answer five questions immediately: What changed? What is due? What is blocked? Who owns the next action? Which customers may be experiencing avoidable delay?

8.1 Compliance clock engine

45. Start clocks from authoritative triggering events and show the underlying date and rule.
46. Use graduated alerts at configurable intervals, with clear severity that does not rely on flashing alone.
47. Notify the counselor and designated assistant; escalate according to a written policy when the risk becomes imminent.
48. Explain acceptable extension or exception pathways and require documentation rather than silently resetting dates.
49. Allow supervisors to see aggregate risk without exposing more customer detail than necessary.
50. Avoid blanket case freezes that could prevent urgent or necessary services; use targeted validation and supervisory override.

8.2 Caseload analysis

The platform should identify cases approaching eligibility, IPE, annual-review, education, employment, and closure milestones; cases with missing recent contact or counseling documentation; provider reports awaiting review; open authorizations without expected deliverables; customers whose progress has stalled; and cases that may need short-term services before closure. Results should link directly to the relevant case and task.

8.3 Workload context

A count of open cases does not show workload. A useful dashboard should distinguish intake volume, active service coordination, training and education cases, assistive technology complexity, employer development, deaf-blind coordination, cases covered for absent staff, and administrative recovery after leave. These indicators should support staffing and assistance decisions, not create an automated score that substitutes for individualized review.

9. Workflow Automation and Professional Judgment

The most valuable automation removes copying, searching, routing, waiting, and reconciliation. It should not decide who is worthy of service or reduce individualized planning to a standardized bundle. Federal regulations require assessment of each person's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice. [3]

Appropriate to automate	Must remain human led
Pre-populating verified fields	Determining eligibility and priority
Calculating deadlines and reminders	Selecting an employment outcome through informed choice
Drafting standard documents	Determining the nature and scope of necessary services
Routing authorizations and reports	Evaluating conflicting evidence and exceptions
Checking completeness and consistency	Counseling, guidance, relationship-building, and advocacy
Forecasting budget commitments	Approving expenditures and balancing individual need with policy
Summarizing task history with citations	Making disciplinary or personnel judgments about staff

10. Integration Across the Workforce System

TWC describes itself as operating an integrated workforce development system, and Texas's consolidation of all six WIOA core programs within one agency is unusual. [7] That structure creates an opportunity: customers should not have to repeatedly provide the same basic information, and counselors should be able to coordinate with workforce partners through governed, consent-aware processes.

Integration should begin with defined use cases rather than unrestricted access. Examples include confirming co-enrollment, referring a customer to a workforce service, receiving status of a referral, accessing relevant labor-market information, avoiding duplicate assessments, and verifying outcomes where authorized. Each exchange should have a legal purpose, minimum data set, consent or other authority, responsible owner, correction process, and audit trail.

Integration safeguards

51. Do not expose disability or medical information merely because systems can be connected.
52. Use role- and purpose-based access, not broad visibility across divisions.
53. Tell customers what information will be shared, with whom, and why in accessible language.
54. Preserve a record of referrals and outcomes without forcing counselors to enter the same event in multiple systems.
55. Create a correction and dispute process when data received from another system is inaccurate.
56. Measure whether integration reduces customer and staff effort and improves service coordination.

11. Responsible Use of Artificial Intelligence

AI may help counselors draft case notes, summarize lengthy provider reports, suggest missing documentation, classify incoming records, or identify deadlines. It also introduces risks of fabricated content, omitted nuance, bias, unauthorized disclosure, and automation complacency. Any AI feature used in VR should be narrow, transparent, reviewable, and subordinate to professional judgment.

Minimum AI controls

57. Define the permitted use case and prohibit use outside it without review.
58. Keep protected data within an approved environment and contractually prohibit reuse for unrelated model training.
59. Show the source material supporting a summary or recommendation.
60. Require the counselor to review, correct, and affirmatively approve generated case-record text.
61. Label AI-assisted content in system history without stigmatizing the customer or counselor.
62. Test for differential errors affecting disability groups, language groups, and assistive-technology users.
63. Provide a non-AI workflow and a way to report harmful or inaccurate output.
64. Prohibit automated eligibility, service denial, closure, disciplinary, or performance-rating decisions.

12. Governance and Accountability

Modernization should be governed jointly by VR program leadership, frontline users, customers, accessibility experts, information security, privacy, records management, data governance, procurement, and enterprise IT. No single group sees the whole service pathway.

12.1 Standing VR Digital Governance Council

65. Include voting frontline representation from general and blind/visually impaired caseloads, rehabilitation assistants, supervisors, specialists, and field regions.
66. Include customers with disabilities and the State Rehabilitation Council through a compensated, accessible participation process.
67. Publish prioritized problems, decision criteria, accessibility findings, release notes, and performance measures, with lawful redactions.
68. Require written disposition of significant user recommendations: accepted, deferred, rejected, or under study, with rationale.
69. Maintain a transparent backlog separating defects, compliance risks, accessibility barriers, enhancements, and policy changes.

12.2 Product ownership

TWC should name a senior product owner accountable for end-to-end VR outcomes, not merely software delivery. Success measures should include customer task completion, accessibility, counselor time, service timeliness, document integrity, and defect resolution. The product owner should have authority to resolve cross-divisional conflicts and should report at least quarterly to executive leadership and the Commission during implementation.

12.3 Change control

Changes to deadlines, validations, required fields, reports, or workflow logic can alter how employees are evaluated and how customers receive services. TWC should document the policy authority, user impact, testing, training, effective date, and rollback plan for each consequential change. Staff should not discover a new compliance rule through a system error message.

13. Procurement and Options Analysis

The State should not begin with the conclusion that ReHabWorks must be replaced or that continued internal enhancement is necessarily best. It should compare at least three realistic options using the same requirements and lifecycle horizon.

Option	Potential strength	Primary risk to test
Continue enhancing	Preserves investment, internal knowledge, and	Process debt may remain; enhancements may

Option	Potential strength	Primary risk to test
ReHabWorks	continuity	be slower or costlier than projected.
Re-platform modularly	Allows staged replacement of high-friction capabilities	Integration complexity and temporary dual workflows can increase burden.
Procure specialized VR platform	May provide proven federal VR workflows and vendor maintenance	Fit, accessibility, migration, customization, lock-in, and total cost must be independently validated.
Enterprise public-sector platform	May support cross-program integration and configurable workflows	Configuration can become custom development under another name; VR specialization may be insufficient.

Required cost model

70. Ten-year licensing, hosting, infrastructure, vendor, contractor, and state staff costs.
71. Enhancement backlog, federal reporting changes, security remediation, accessibility remediation, and technical debt.
72. Data cleansing, migration, reconciliation, parallel operations, training, and productivity transition.
73. Integration development and recurring interface maintenance.
74. Exit costs, data portability, configuration ownership, and vendor transition assistance.
75. Benefits stated in measurable labor hours, cycle time, error reduction, service access, and risk reduction—not generalized transformation claims.

Market research standard

Vendor demonstrations should use scripted Texas scenarios and representative assistive technologies. TWC should not accept a vendor's general statement that a product is "accessible," "integrated," "AI-enabled," or "VR-ready." Each claim must be demonstrated against a requirement, recorded, scored by independent users, and incorporated into enforceable acceptance criteria.

14. Pilot and Implementation Roadmap

Phase	Timeframe	Required output
1. Independent discovery	0–6 months	Workflow inventory, baseline measures, accessibility evaluation, data-flow map, user research, requirements, and options screening.
2. Prototype and procurement preparation	6–12 months	Clickable prototypes, user tests, target architecture, security/privacy requirements, cost model, procurement or enhancement plan.
3. Controlled pilot	12–20 months	Pilot in varied regions and specialty caseloads; parallel validation; defect, accessibility, and burden results.
4. Incremental rollout	20–36 months	Wave-based deployment, training, support, migration reconciliation, and public performance dashboard.
5. Optimization and audit	36–48 months	Benefits realization review, independent accessibility retest, security audit, backlog closure, and legislative report.

Pilot selection

The pilot should include urban and rural offices; general and BVI caseloads; high-volume intake; students; customers needing assistive technology; deaf-blind coordination; counselors and assistants with disabilities; and staff returning from extended leave or covering cases. This is not to test employees. It is to test whether the platform supports the full range of work conditions.

Go/no-go gates

76. No unresolved critical accessibility barrier in a core customer or staff workflow.
77. No unexplained loss, duplication, or corruption of migrated documents or case events.
78. Demonstrated reduction in duplicate entry and task completion time.
79. Reliable calculation and display of compliance clocks.
80. Documented recovery, rollback, and continuity capability.
81. Training and support readiness, including accessible materials and role-based practice environments.
82. User acceptance results disaggregated by role, region, and disability without exposing individual identities.

15. Measures Sunset Should Require

Measure	Baseline and reporting approach
Duplicate entry burden	Time and keystrokes for representative workflows before and after; number of fields re-entered.
Customer independence	Percentage completing each core digital journey without staff or sighted assistance, disaggregated by access need.
Document integrity	Receipt-to-case time; misfile, duplicate, missing, and recovery rates; unresolved exceptions.
Dashboard currency	Age of displayed data and latency between case action and dashboard update.
Compliance prevention	Number and rate of deadlines corrected before violation; alert precision; overrides and reasons.
Service velocity	Median days across referral, application, eligibility, IPE, authorization, service start, and report review.
Counselor capacity	Estimated hours shifted from clerical processing to counseling, guidance, employment, and employer work.
Accessibility defects	Critical/high defects opened, fixed, retested, and aged; task completion by assistive technology.
User experience	Customer and staff task-level satisfaction, not only general system satisfaction.
Lifecycle cost	Actual versus forecast cost by development, operations, vendors, integration, remediation, and training.

Measures should not be used to punish staff for defects created by the system. During transition, TWC should identify metrics affected by migration, training, parallel work, defects, or reporting latency and explain those effects before using data for performance conclusions.

16. Proposed Sunset Recommendations

Recommendation 1 — Require an independent VR technology capability assessment

Direct TWC to contract for or otherwise obtain an independent assessment of ReHabWorks and the surrounding technology environment. The assessment should evaluate end-to-end workflows, duplicate entry, data latency, document handling, accessibility, privacy, cybersecurity, auditability, integrations, reporting, user burden, and total lifecycle cost. It should include customers and frontline staff and should be delivered to TWC's governing Commission and Sunset staff.

Recommendation 2 — Require a requirements-led modernization plan

Require TWC to submit a plan comparing continued enhancement, modular re-platforming, specialized VR procurement, and enterprise-platform alternatives. The plan should identify requirements, costs, benefits, risks, milestones, procurement strategy, migration approach, workforce impact, and contingency plans. No vendor should be preselected in the directive.

Recommendation 3 — Establish enforceable accessibility and user-acceptance gates

Require TWC to define critical journeys and demonstrate independent completion by customers and staff using representative assistive technologies before statewide release. Automated accessibility scans may supplement but not replace human testing. Contract acceptance and payment milestones should depend on remediation of critical barriers.

Recommendation 4 — Designate one authoritative case-record and document-governance model

Require TWC to document the authoritative repository for every VR record type, the approved use of collaboration repositories, access controls, audit logging, retention, incident response, reconciliation, and procedures for missing or misfiled records. Incoming documents should generate a traceable receipt and workflow status.

Recommendation 5 — Implement real-time compliance and caseload intelligence

Require TWC to provide near-real-time dashboards, authoritative compliance clocks, graduated accessible alerts, task ownership, provider-report notifications, education milestones, and actionable caseload analysis. Validation controls must preserve lawful exceptions and must not block necessary customer services without review.

Recommendation 6 — Automate clerical work while protecting individualized decision-making

Require one-time data capture, pre-populated forms, draft IPE and amendment support, draft service authorizations, integrated referrals, and accessible signatures. TWC should publish a decision-rights matrix identifying which actions may be automated and which require qualified professional judgment or customer informed choice.

Recommendation 7 — Create permanent VR digital governance with frontline and customer participation

Require a standing governance body with compensated and accessible customer participation, frontline representation across program specialties, and transparent disposition of material recommendations. Establish a single accountable product owner and quarterly outcome reporting during modernization.

Recommendation 8 — Require benefits realization and legislative reporting

Require TWC to report baseline and post-implementation measures for customer independence, document integrity, service timeliness, dashboard latency, accessibility, staff burden, defects, and lifecycle cost. An independent review should occur after major rollout and before the project is declared complete.

Conclusion

Texas has already demonstrated that it can undertake a substantial ReHabWorks technology project. The next phase should be judged by a more demanding standard: whether modernization reaches the customer and the counselor. A cloud-hosted system can still require manual copying. A dashboard can still be stale. A messaging tool can still sit outside the next action. A document can still be received but difficult to locate. A nominally digital process can still require sighted assistance.

The purpose of vocational rehabilitation is not to maintain records; it is to help people with disabilities prepare for, obtain, advance in, and retain competitive integrated employment and live more independently. Records and controls are necessary, but the technology should make those duties easier to perform correctly. Every hour recovered from searching, re-entry, routing, and reconstruction can be redirected to counseling, assistive technology, training, job development, employer engagement, and customer problem-solving.

Sunset can give TWC a constructive, accountable path forward: recognize the 2023 renovation, independently measure the remaining gaps, define the outcomes Texas expects, compare options fairly, build with disabled customers and frontline professionals, and require evidence that promised benefits were achieved. That is how Texas can move from technology that stores vocational rehabilitation work to technology that empowers it.

Appendix A — Minimum Capability Standard

ID	Capability	Acceptance evidence
A1	Reusable customer data	Later forms populate from verified source fields, display provenance, and allow correction without silent overwrite.
A2	Accessible customer portal	Critical journeys are independently completed with representative assistive technologies and mobile devices.
A3	Document receipt and routing	Every submission receives a timestamp, case association, status, owner, audit history, and accessible receipt.
A4	Real-time dashboard	Case actions appear within a defined service-level target and link to the next actionable task.
A5	Compliance clocks	Rules, trigger dates, due dates, alerts, extensions, and overrides are visible and testable.
A6	IPE support	Drafts reuse confirmed information, show changes, preserve all versions, and require counselor/customer review.
A7	Authorization support	Draft authorizations reuse approved data, validate completeness, route approvals, and link reports and invoices.
A8	Integrated referrals	In-house and external referrals show acceptance, scheduling, deliverables, and exceptions.
A9	Budget intelligence	Committed, spent, projected, and high-cost services are visible without creating automated service rationing.
A10	Case analysis	Users can identify stalled cases, missing contacts, pending reports, milestones, and cases nearing closure.
A11	Auditability	Access, change, sharing, movement, deletion, and restoration events are retained and reviewable.
A12	Interoperability	Defined workforce exchanges reduce re-entry and include lawful purpose, correction, and access controls.
A13	AI safeguards	AI output cites sources, requires human approval, is logged, and cannot autonomously deny or close services.
A14	Accessible staff workflow	Employees with disabilities can perform all essential system tasks without avoidable assistance.
A15	Continuity and recovery	The agency demonstrates backup, restoration, rollback, and operation during system disruption.

Appendix B — Audit Questions for Sunset Staff

83. Which ReHabWorks workflows still require users to enter information already held in another ReHabWorks field, report, form, or TWC system?
84. What are the median and 90th-percentile completion times for application, eligibility, IPE, authorization, plan amendment, annual review, and case closure?
85. How long after a case action does each dashboard or management report reflect the change?
86. Which VR documents are stored outside the authoritative ReHabWorks case record, and why?
87. What audit evidence exists for viewing, download, modification, movement, sharing, and deletion of VR documents in each repository?

88. How many incidents during the last three fiscal years involved missing, misfiled, duplicated, inaccessible, or unrecoverable VR documents, and what customer impact resulted?
89. Can a customer who is blind independently apply, upload a document, review an IPE, sign, read a message, and verify receipt using the portal?
90. What human accessibility testing has TWC completed since the 2023 renovation, with which disabilities and assistive technologies, and what defects remain open?
91. How does the system notify a counselor of an incoming provider report, and can the user act directly from that notice?
92. Which compliance clocks are calculated by the system, what events trigger them, and how are extensions and exceptions recorded?
93. What is the total ten-year lifecycle cost of ReHabWorks, including state staff, contractors, hosting, enhancement, federal reporting changes, accessibility, security, integrations, and technical debt?
94. What benefits were promised for the 2023 renovation, what baselines were recorded, and what realized results can TWC demonstrate?
95. How many counselor and assistant hours are spent weekly on duplicate entry, manual uploads, searching, routing, and reconciliation?
96. What systems can exchange information with ReHabWorks today, what data are exchanged, and which workflows still require manual copying?
97. How are customers and frontline employees included in requirements, prioritization, acceptance testing, and post-release evaluation?
98. What controls prevent automated tools or performance dashboards from discouraging necessary services for people with the most significant disabilities?
99. What is TWC's plan for data portability and continued operations if a vendor, platform, or major integration becomes unavailable?
100. Who is accountable for end-to-end VR digital outcomes, and what measures are reported to the three-member Commission?

Appendix C — User-Acceptance Test Scenarios

Newly blind applicant submits records

A customer using a smartphone and basic screen reader completes an application, uploads medical and identity records, receives an accessible receipt, and checks what remains due without sighted assistance.

Counselor develops an IPE

The counselor reviews intake and assessment data, selects confirmed information, drafts an IPE, discusses informed choice, adds specialized services, obtains accessible signatures, and retrieves the signed version.

Assistive technology amendment

An approved technology purchase triggers a proposed IPE amendment and authorization; the counselor reviews the scope, customer approves, provider receives the correct document, and delivery/report milestones appear.

Incoming provider report

A provider submits a report; the system associates it with the correct case and authorization, alerts authorized team members, records review, and creates the next task.

Impending annual review

The system calculates the due date, sends graduated accessible alerts to the counselor and assistant, schedules outreach, records the customer response, and documents any lawful extension.

Return from extended leave

A counselor sees changes, urgent items, pending reports, upcoming deadlines, and work completed by coverage staff without reconstructing the caseload through emails and separate spreadsheets.

Document filed to wrong case

An authorized user identifies a misfiled record, initiates correction without destroying audit history, restricts inappropriate access, evaluates customer impact, and documents resolution.

Customer changes communication preference

A customer changes from print mail to accessible electronic communication; the preference propagates to relevant workflows and can be overridden for one transaction with documented consent.

Rural customer and unavailable provider

The system identifies provider delay, supports a documented override based on availability and informed choice, updates authorization routing, and retains the reason.

System interruption

Staff follow a continuity workflow, record necessary service actions, restore them without duplication when service returns, and reconcile all timestamps and documents.

Appendix D — Source Notes

[1] Texas Workforce Commission, "ReHabWorks and WINS in Texas: The Vocational Rehabilitation Replacement Project," NASCIO State IT Recognition Awards submission. Describes the 2023 AWS migration, TxROCS integration, dashboard, SARA messaging, reporting improvements, and statewide use. https://www.nascio.org/awards-library/awards/rehabworks-and-wins-in-texas-the-vocational-rehabilitation-replacement-project/

[2] 34 C.F.R. Part 361, State Vocational Rehabilitation Services Program. https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-361

[3] 34 C.F.R. § 361.45, Development of the Individualized Plan for Employment; requires individualized assessment, including strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice. https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-361/subpart-B/subject-group-ECFR8c5f55ccf5c0da2/section-361.45

[4] 34 C.F.R. § 361.48, Scope of vocational rehabilitation services, including counseling and guidance, rehabilitation technology assessment, and referral/coordination with the statewide workforce system. https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-361/subpart-B/subject-group-ECFR8c5f55ccf5c0da2/section-361.48

[5] 34 C.F.R. Part 361, Subpart F, electronic access to one-stop partner services and expectations for efficiency, coordination, and quality. https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-361/subpart-F

[6] 34 C.F.R. § 361.800, one-stop certification for effectiveness, physical and programmatic accessibility, continuous improvement, and equal opportunity for people with disabilities. https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-361/subpart-F/section-361.800

[7] Texas Workforce Commission, Self-Evaluation Report to the Sunset Advisory Commission, August 2025, especially agency organization and Vocational Rehabilitation program sections. https://www.sunset.texas.gov/public/uploads/2025-09/Texas%20Workforce%20Commission%20Self-Evaluation%20Report_0.pdf

[8] 34 C.F.R. § 361.36, ability to serve all eligible individuals, including timely eligibility, IPE development, and provision of services. https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-361/subpart-B/subject-group-ECFR598a81fff49e46d/section-361.36

Author evidence note. Descriptions of frontline workflows and desired capabilities are based on the author's professional experience and a written operational questionnaire completed for this submission. They are presented as observations and testable hypotheses. The recommendations expressly call for independent validation using system logs, workflow measurements, configuration review, accessibility testing, customer research, and staff input.