



August 12, 2026

TO: Sunset Advisory Commission
RE: TWC Review of SNAP E&T

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

Thank you for the opportunity to provide written testimony regarding the Texas Workforce Commission (TWC) and administration of the Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) program.

Lee College has had the unique opportunity to serve as one of the first community college in Texas approved as a SNAP E&T third-party provider. We pursued this opportunity because of the program's potential to help our community meet immediate basic needs while completing education and workforce credentials that lead to meaningful, family-sustaining employment. We believe SNAP E&T represents an important opportunity for Texas to leverage federal resources to support both educational attainment and workforce development. Our experience has also demonstrated that structural inefficiencies in SNAP E&T administration can limit the state's ability to maximize available federal funds and participants' access to services. Addressing these structural challenges will make the program more accessible to additional colleges and providers, increase participation, and ultimately expand its impact.

Our implementation has required significant collaboration across the college and with our local workforce board. We currently identify students enrolled in eligible education and workforce programs who receive SNAP benefits and connect them with SNAP E&T services. Once enrolled, students receive individualized support to help persist in their education and meet program requirements. This includes regular case management, tracking of qualifying activities and participation hours, and connections to academic and student support services such as tutoring, advising, career services, and basic needs resources.

Throughout this process, our local workforce board has been an exceptional partner. They have worked closely with our team to navigate requirements, answer questions, troubleshoot challenges, and develop workable processes. Even with exceptional support from our local Workforce Board, our experience has highlighted the need for a stronger statewide infrastructure so that local workforce boards and colleges can follow an approved process instead of independently developing processes for implementing the same program.

Create a Consistent Statewide Infrastructure

As an early adopter of SNAP E&T, we experienced the complexity of developing the operational infrastructure necessary to implement a highly regulated federal program. Many of the practical tools needed for day-to-day implementation had to be developed through collaboration and problem-solving at the local level. We have an opportunity to create a consistent statewide framework for SNAP E&T third-party providers, including standardized applications, participant forms, intake and eligibility documents, case management templates, time and effort

documentation, reporting and reimbursement tools, monitoring checklists, and implementation guidance. A centralized toolkit would reduce administrative burden, strengthen compliance, and establish greater consistency across workforce board regions. Most importantly, colleges entering SNAP E&T would not have to recreate fundamental program processes independently.

Our local workforce board has helped bridge many of these gaps for Lee College. However, as Texas seeks to expand participation among higher education institutions, this work should not depend on individual workforce boards and colleges developing systems from the ground up. A statewide infrastructure would allow local partners to spend more time supporting participants and less time developing administrative processes.

Reconsider Participation Requirements During College Breaks

Our implementation has also highlighted challenges associated with applying participation requirements to a traditional academic calendar. During the semester, students earn participation hours through in-class instruction, study time, completion of coursework and other qualifying education and support activities. During scheduled breaks, however, classes and many campus services are not available even though the student remains enrolled and intends to continue progressing toward the credential. This can create a situation in which a student is successfully progressing academically but has difficulty satisfying program expectations because qualifying activities are temporarily unavailable.

We encourage the state, to the extent allowable under federal requirements, to consider greater flexibility during documented college break periods. A student who is successfully progressing toward an approved credential should not face unnecessary program barriers simply because the institution is closed or operating on a reduced schedule.

Advance a Human-Centered Compliance Model

Finally, our direct work with students has reinforced the importance of administering SNAP E&T through a model that is both human-centered and compliance-focused. Strong documentation, accountability, fiscal stewardship, and program integrity are essential. At the same time, the individuals served through SNAP E&T are often balancing coursework, employment, parenting responsibilities, transportation challenges, food insecurity, housing instability, and other significant demands.

A human-centered compliance model asks: *How can we help this individual successfully complete an education or training pathway while meeting program requirements?*

This approach does not reduce accountability. Instead, it means simplifying participant-facing processes, reducing unnecessary duplication, improving coordination among state agencies, workforce boards, and colleges, and ensuring requirements are understandable and navigable for the people the program is intended to serve.

An Opportunity for Texas

SNAP E&T offers Texas an important opportunity to connect basic needs support, higher education, and workforce development, while bringing more federal dollars to our state and communities. Community colleges are particularly well positioned to help because we already provide education and workforce training alongside advising, career services, case management, and connections to community resources.

Based on our implementation experience, we encourage Texas to establish a consistent statewide operational infrastructure for third-party providers; promote greater consistency across workforce board regions; examine allowable flexibility in participation requirements during scheduled academic breaks; reduce unnecessary administrative burden; and continue moving toward a human-centered approach that maintains strong compliance and program integrity.

Our experience has demonstrated both the tremendous potential of SNAP E&T and the importance of strong partnerships. Lee College has benefited greatly from a local workforce board that has been willing to collaborate, problem-solve, and build solutions alongside us. A stronger statewide infrastructure would complement those local partnerships and provide workforce boards and colleges across Texas with the tools necessary to replicate and scale this work successfully.

Lee College appreciates the opportunity to share our experience as an early higher education SNAP E&T third-party provider. We remain committed to working alongside TWC, local workforce boards, policymakers, and higher education partners to strengthen the program and help more Texans complete education and training that leads to meaningful employment. Thank you for your consideration and for the Commission's work on behalf of our communities.

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