

From: [Sunset Advisory Commission](#)
To: [Jalisa Broussard](#)
Subject: FW: Public Input Form for Agencies Under Review (Private/Before Publication)
Date: Tuesday, August 18, 2026 8:06:35 AM

From: sunset.website@brightleafgroup.com <sunset.website@brightleafgroup.com>
Sent: Monday, August 17, 2026 5:02 PM
To: Sunset Advisory Commission <sunset@sunset.texas.gov>
Subject: Public Input Form for Agencies Under Review (Private/Before Publication)

Submitted on Mon, 08/17/2026 - 16:01

Submitted by: Visitor

Submitted values are:

Choose the agency that you would like to provide input about
[Texas Workforce Commission](#)

Public Comments

1

First Name

Cynthia

Last Name

Pearson

Organization you are affiliated with

Day Nursery of Abilene Inc

City

Abilene

State

Texas

Your Comments or Concerns

These comments are primarily focused on the Texas Workforce Commission's Child Care Services subsidy system, an area with which I am most familiar. However, many of the same opportunities for improvement—particularly related to technology modernization, communication, customer service, timely processing, and clear accountability will also help streamline and strengthen TWC operations agency-wide, including unemployment claims, related processes, and hearings.

Child care is not simply a family service. It is critical workforce infrastructure and the workforce behind the workforce. Parents cannot go to work if they cannot find safe, reliable child care, and Texas employers cannot maintain the workforce they need without it.

As TWC considers improvements to Child Care Services, I encourage the Commission to focus on four areas: technology, reimbursement rates, accountability, and clear responsibility for eligibility and case management.

Recent Sunset findings reinforce concerns providers have experienced firsthand. TWC's IT modernization efforts, including the TX3C rollout, resulted in provider payment delays, inaccurate payments, messaging problems, and unreliable wait-list data. More than a year after implementation, unresolved data issues have continued to affect the reliability of information available to TWC and policymakers.

Technology modernization should make government work better and more efficiently for everyone who interacts with it. Systems should reduce duplication, provide accurate and timely information, improve communication, and make it easier, not harder, for customers, providers, workforce boards, and TWC staff to do their jobs.

For Child Care Services specifically, TWC systems should securely interface with child care management systems already being used by providers. Eligibility, Notices of Action, attendance, parent share of cost, authorization changes, and payment information should flow electronically whenever possible. Providers should not have to repeatedly enter the same information into multiple systems.

Reimbursement Rates Must Keep Pace With the Cost of Care

Reimbursement rates also require attention. Sunset identified concerns with outdated market-rate survey methodology, low response rates, and information that is not timely enough for legislative decision-making.

Texas needs current, reliable data to make informed decisions. Reimbursement policy

must also recognize the actual cost of providing quality child care.

Providers must maintain required staffing ratios while paying increasing costs for wages, insurance, food, facilities, utilities, technology, curriculum, regulatory compliance, and the additional requirements associated with higher levels of Texas Rising Star quality.

If reimbursement does not keep pace with the cost of providing care, providers will eventually be forced to reduce participation in Child Care Services or limit capacity. That affects far more than the child care industry. It affects parents' ability to work and employers' ability to recruit and retain employees.

Accountability Must Be Clear and Consistent

Texas taxpayers deserve confidence that every public dollar is used appropriately. Fraud should never be tolerated.

At the same time, oversight should be consistent, fair, and based on clear statewide standards. Sunset's findings regarding inconsistent fraud investigation practices among Local Workforce Development Boards demonstrate the importance of TWC establishing uniform procedures and improving statewide tracking, analysis, and reporting.

Eligibility determination and authorization must remain the responsibility of the workforce system—not the child care provider.

Providers do not determine whether families qualify for Child Care Services. An active Notice of Action should be provided to the provider before care begins, confirming that eligibility has been determined and services have been authorized.

Caseworkers should communicate directly with providers when care is authorized, changed, or terminated. Whenever practical, consistent caseworker/provider assignments would strengthen communication, accountability, and working relationships.

Providers should also not be expected to create or retrieve their own authorization documentation from a system that allows those documents to potentially be edited or deleted. Clear separation of duties protects the taxpayer, the family, the provider, and TWC.

Texas already has attendance verification, monitoring, site visits, and other safeguards.

The goal should be to strengthen those protections through better technology, reliable data, consistent oversight, responsive customer service, clear accountability, and sustainable reimbursement—not additional administrative layers that do little to prevent fraud.

Every new requirement should be measured against a simple question:

Does this meaningfully protect taxpayer dollars and improve program integrity and service delivery, or does it simply create another administrative burden?

Texas needs child care providers to remain open, participate in Child Care Services, maintain quality, employ qualified staff, and expand capacity to meet workforce demand.

Child care is the workforce behind the workforce.

When Texas strengthens child care, it strengthens working families, employers, communities, and the state's economy. Modern technology, responsive customer service, accurate data, sustainable reimbursement rates, clear case management, and consistent accountability can protect taxpayers while making TWC more efficient and effective for the Texans it serves.

When child care works, Texas works.

Your Proposed Solution

Solutions to each of these important areas already identified are incorporated within the comments above.

My Comments Will Be Made Public

Yes

From: [Sunset Advisory Commission](#)
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[Texas Workforce Commission](#)

Public Comments

1

First Name

Cynthia

Last Name

Pearson

Title

President/CEO

Organization you are affiliated with

Day Nursery of Abilene Inc

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Your Comments or Concerns

My apologies for sending this in again! I failed to include the topic of workforce as it relates to TWC Child Care Services and Workforce Solutions Boards. Therefore, I have redone it and am submitting it again, including that this time. Thank you again! Thank you for the opportunity to provide public comment.

These comments are primarily focused on the Texas Workforce Commission's Child Care Services subsidy system, an area with which I am most familiar. However, many of the same opportunities for improvement, particularly technology modernization, communication, customer service, timely processing, and clear accountability, could also streamline and strengthen TWC operations agency wide, including unemployment claims, related processes, and hearings.

At the foundation of this discussion is something Texas must recognize:

Child care is critical workforce infrastructure. Child care is the workforce behind the workforce.

Parents cannot go to work without dependable child care, and Texas employers cannot recruit and retain the workforce they need without it.

Recognize Child Care as a Demand Occupation Statewide

For that reason, I strongly encourage TWC to recognize child care as a demand occupation in every one of Texas' 28 Local Workforce Development Board areas.

Demand occupation determinations should not be based solely on wages. Wage levels are certainly relevant, but they do not fully measure an occupation's economic importance or its value to the broader workforce.

Few industries demonstrate that better than child care.

A shortage of child care teachers does not affect only the child care industry. It affects hospitals, schools, manufacturers, restaurants, retailers, construction companies, small businesses, government agencies, and virtually every other Texas employer whose employees depend upon child care to work.

Texas is making an enormous public investment in Child Care Services through TWC and the local workforce system. We should be equally intentional about developing the workforce necessary to provide that care.

Every Local Workforce Development Board should therefore be expected to include child care among its demand occupations and actively recruit individuals into the early childhood workforce through its Workforce Solutions career centers and contractors.

That should include connecting job seekers with child care employers, promoting early childhood career opportunities, supporting training and credentials, identifying available workforce funding for eligible participants, and helping providers recruit and retain qualified employees.

It makes little sense to invest substantial workforce dollars helping parents access child care so they can work without also investing in the workforce required to keep those child care classrooms open.

Modernize Technology

Recent Sunset findings reinforce concerns providers have experienced firsthand. TWC's IT modernization efforts, including TX3C, resulted in provider payment delays, inaccurate payments, messaging problems, and unreliable waitlist data. Unresolved data issues also limit the quality of information available to TWC and policymakers.

Technology modernization should make government work better and more efficiently for everyone who interacts with it.

For Child Care Services, TWC systems should securely interface with child care management systems already used by providers. Eligibility, Notices of Action, attendance, parent share of cost, authorization changes, and payment information should flow electronically whenever possible.

Providers should not have to repeatedly enter the same information into multiple systems.

Establish Sustainable Reimbursement Rates

Reimbursement rates also require attention. Sunset identified concerns with outdated market rate survey methodology, low response rates, and information that is not timely

enough for legislative decision making.

Texas needs current, reliable data, but reimbursement policy must also recognize the actual cost of providing quality child care.

Providers must maintain required staff to child ratios while absorbing increasing costs for wages, insurance, food, facilities, utilities, technology, curriculum, regulatory compliance, and Texas Rising Star quality requirements.

If reimbursement does not keep pace with the cost of care, providers will reduce participation or capacity. That affects parents' ability to work and employers' ability to maintain their workforce.

Strengthen Accountability Without Shifting Responsibility

Texas taxpayers deserve confidence that every public dollar is used appropriately, and fraud should never be tolerated.

Oversight, however, must be consistent and based on clear statewide standards. Sunset's findings regarding differing fraud investigation practices among Local Workforce Development Boards demonstrate the need for uniform procedures and improved statewide tracking, analysis, and reporting.

Likewise, eligibility determination and authorization must remain the responsibility of the workforce system, not the child care provider.

Providers do not determine whether families qualify for Child Care Services.

An active Notice of Action should be provided to the provider before care begins, confirming eligibility and authorization. Caseworkers should communicate directly with providers when services are authorized, changed, or terminated.

Providers should not be expected to generate their own authorization documentation from a system that allows documents to potentially be edited or deleted. Clear separation of duties protects taxpayers, families, providers, and TWC.

Texas already has attendance verification, monitoring, site visits, and other safeguards. Improvements should focus on better technology, reliable data, consistent oversight, responsive customer service, sustainable reimbursement, and clear accountability, not

simply additional administrative requirements.

Every proposed requirement should answer a basic question:

Does this meaningfully protect taxpayer dollars and improve service delivery, or does it simply create another administrative burden?

Finally, Texas should align its workforce policies with its investment.

If Texas is investing substantial public resources to help working families obtain child care, then the state and all 28 Local Workforce Development Boards should also recognize, recruit, train, and support the workforce necessary to provide it.

Child care should be a demand occupation throughout Texas because its value cannot be measured by wages alone. Its value is also measured by every other Texan who is able to go to work because child care is available.

Child care professionals make the rest of the workforce possible.

Child care is the workforce behind the workforce. When child care works, Texas works.

Your Proposed Solution

Proposed solutions are embedded into the comments/concerns as related in the prior section

My Comments Will Be Made Public

Yes

From: [Sunset Advisory Commission](#)
To: [Jalisa Broussard](#)
Subject: FW: Public Input Form for Agencies Under Review (Private/Before Publication)
Date: Tuesday, August 18, 2026 8:06:11 AM

From: sunset.website@brightleafgroup.com <sunset.website@brightleafgroup.com>
Sent: Monday, August 17, 2026 6:09 PM
To: Sunset Advisory Commission <sunset@sunset.texas.gov>
Subject: Public Input Form for Agencies Under Review (Private/Before Publication)

Submitted on Mon, 08/17/2026 - 17:08

Submitted by: Visitor

Submitted values are:

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[Texas Workforce Commission](#)

Public Comments

1

First Name

Cynthia

Last Name

Pearson

Title

President/CEO

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State

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Texas is making an enormous public investment in Child Care Services through TWC and the local workforce system. We should be equally intentional about developing the workforce necessary to provide that care.

Every Local Workforce Development Board should therefore be expected to include child care among its demand occupations and actively recruit individuals into the early childhood workforce through its Workforce Solutions career centers and contractors as well as required board seats

That should include connecting job seekers with child care employers, promoting early childhood career opportunities, supporting training and credentials, identifying available

workforce funding for eligible participants, and helping providers recruit and retain qualified employees.

It makes little sense to invest substantial workforce dollars helping parents access child care so they can work without also investing in the workforce required to keep those child care classrooms open.

Ensure Meaningful Child Care Representation

Local Workforce Development Board composition should reflect the significant role child care plays in the workforce system and the substantial public investment each board administers.

One child care representative is simply not sufficient, and a minimum number alone does not ensure meaningful representation.

TWC should require child care representation that reflects the scope of Child Care Services funding, families served, participating providers, and the board's responsibility for administering the program.

Representatives should have current, practical child care industry and provider experience and understand the operational, financial, regulatory, workforce, and quality challenges of delivering care.

Providing this knowledge and perspective should not in itself be viewed as a conflict of interest. It is industry expertise that helps a board understand the impact of its decisions and make informed policy and funding decisions. Appropriate conflict of interest policies can continue to govern matters involving a representative's individual organization.

Child care policy decisions should include meaningful child care expertise at the table. Representation should reflect responsibility, investment, and impact.

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Your Proposed Solution

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My Comments Will Be Made Public

Yes

From: [Sunset Advisory Commission](#)
To: [Jalisa Broussard](#)
Subject: FW: Public Input Form for Agencies Under Review (Private/Before Publication)
Date: Tuesday, August 18, 2026 8:05:42 AM

From: sunset.website@brightleafgroup.com <sunset.website@brightleafgroup.com>
Sent: Monday, August 17, 2026 6:28 PM
To: Sunset Advisory Commission <sunset@sunset.texas.gov>
Subject: Public Input Form for Agencies Under Review (Private/Before Publication)

Submitted on Mon, 08/17/2026 - 17:15

Submitted by: Visitor

Submitted values are:

Choose the agency that you would like to provide input about
[Texas Workforce Investment Council](#)

Public Comments

1

First Name

Cynthia

Last Name

Pearson

Organization you are affiliated with

Day Nursery of Abilene Inc

City

Abilene

State

Texas

Your Comments or Concerns

Develop a Statewide Child Care Workforce Strategy

The Texas Workforce Investment Council should provide strategic leadership in recognizing and developing the child care workforce as an essential part of Texas' broader workforce strategy.

Texas already has established apprenticeship and workforce development programs. Child care and early childhood education can be intentionally incorporated into these existing structures, adding tremendous value without creating an entirely new system. The Council can help align TWC, Local Workforce Development Boards, school districts, Career and Technical Education programs, higher education, workforce contractors, apprenticeship programs, and child care employers to create clear pathways into the profession.

Those pathways can begin with CTE programs in high school and continue through work based learning, apprenticeships, industry recognized credentials, postsecondary education, employment, and career advancement.

Local Workforce Development Boards and their contractors can then help implement the strategy by building relationships among schools, training providers, Workforce Solutions centers, apprenticeship programs, and child care employers while actively recruiting students and adult job seekers into the profession.

Texas already makes a substantial investment in helping working families access child care. Using existing workforce and apprenticeship infrastructure to intentionally develop the child care workforce would strengthen the return on that investment.

Child care workforce development should not happen by chance or independently across 28 workforce areas. It should be part of a coordinated statewide strategy that creates pathways from education to training to employment to career advancement. If child care is the workforce behind the workforce, developing that workforce should be a statewide workforce priority.

Your Proposed Solution

By utilizing the apprenticeship programs already in place through the council, just adding in child care as one that is viable for so many reasons and connecting school districts, community colleges, and child care owners, operators, and businesses. We have done this on our own and having the backing of the TWC and the Council with opportunities statewide would be amazing!

My Comments Will Be Made Public

Yes