

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, December 15, 2014 1:20:16 PM

---

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, December 15, 2014 12:39 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, December 15, 2014 - 12:39

Agency: TEXAS WORKFORCE COMMISSION TWC

First Name: Andrea

Last Name: Brauer

Title: Early Education Policy Associate

Organization you are affiliated with: Texans Care for Children

Email: [abrauer@txchildren.org](mailto:abrauer@txchildren.org)

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: Support Recommendations 3.1 to 3.7, with modifications submitted previously in written and oral testimony.

Any Alternative or New Recommendations on This Agency:

Since decision on HHSC are intended to improve accountability, and to streamline and improve service delivery to Texans, it should also consider consolidating the child care subsidy program at TWC at HHSC. The program at TWC is another place in our health and human service delivery system that is fragmented.

The Texas Workforce Commission (TWC) houses the child care subsidy program, which provides child care vouchers to low-income families that qualify.

Though it is housed at TWC, child care is very much a health and human service function. The federal Child Care and Development Block Grant that funds the programs originates from the federal Office of Child Care, under the Administration of Children and Families, which is a Division of the federal Department of Health and Human Services.

It is very unorthodox to have federal Child Care Development Fund administration at a workforce agency. Only four states house this function in a workforce agency, and most are housed in the same agency that licenses child care facilities.

The fragmentation causes the following problems:

- A disconnect between the child care regulatory agency, the Department of Family and Protective Services, and TWC, the child care subsidy administering agency. There are reports of centers

still receiving subsidies (managed by TWC), despite many severe licensing violations (managed by DFPS). If the functions were housed together, it would facilitate better communication and increased safety and quality in child care.

- Child care is not mentioned anywhere in the purpose or mission statement of TWC. Administering child care subsidies is much more related to child care licensing than it is workforce activities, and, to quote the Sunset report "Separation of these services in different agencies as opposed to a more unified location complicates serving the range of persons' needs and creates inefficiencies in eligibility determinations, as clients qualifying for one type of service often qualify for others." This is absolutely true for families qualifying for child care subsidies, and for other programs HHSC administers, such as Medicaid, SNAP, or WIC.

- The Texas Rising Star Program is the only Quality Rating Improvement System we have in Texas, and is housed at TWC. A quality rating and improvement system (QRIS) is a systemic approach to assess, improve, and communicate the level of quality in early and school-age care and education programs. All but 10 states have launched a statewide QRIS, to ensure that quality can be measured and improved in all licensed child care facilities.

However, our Texas Rising Star Program is only available to the 60 percent of centers that take kids in the subsidy system, making it difficult to ensure that quality improvements are available and happening statewide, since the program is not administered by DFPS. If Texas intends to have a statewide QRIS, it should consider housing these functions together so the program can be integrated and offered to all child care providers.

Given the relatedness to DFPS' Child Care Licensing Division, the Sunset Commission may wish to consider merging the TWC child care subsidy program into HHSC, along with the other human service agencies. Reviewing all related pieces on the front end will help the Commission meet its intent to reduce inefficiency and fragmentation in the health and human service system.

My Comment Will Be Made Public: I agree



**Testimony on the Sunset Advisory Commission Report of the Texas Workforce  
Commission**

**December 10, 2014**

Texans Care for Children is a nonprofit organization that works solely to improve outcomes for Texas children through policy change. We come by our recommendations and policy positions through active dialogue with our network of members throughout the state who together represent thousands of Texas children.

I appreciate the Sunset Staff's work, and the opportunity to provide comments on the report. and agree with several of the recommendations. I agree with Recommendations 3.1-3.7 - There is a great need for more child care data and analysis, oversight, and quality assurance.

Regarding recommendation 3.1 - Require TWC to include more in-depth data on the effectiveness and outcomes of child care subsidies in its statutorily required report on the program, I suggest the development of program goals, as there are currently none listed in the proposed rules or guidelines, or on the website.

I also suggest the inclusion of an analysis and report on reimbursement rates. Reimbursement rates have historically been far below market rate, and are a huge concern for child care providers. Moreover, the rates are linked to the effectiveness and outcomes of the program, because they are often the basis for child care provider participation, and the ability to improve quality at a center.

The federal government has provided recommendations on rates, yet the board area rates still vary a great deal, and TWC is not pro-active in ensuring that rates are adequate, or analyzing impact. Texas is one of the only states that allows 28 different regions to set their own rates, which leads to inequities in some regions, and inadequate oversight by TWC. Boards have considerable flexibility in some areas, yet not enough flexibility in others, which results in policies that are not always constructive for kids, or providers. An analysis and report on rates, and what strides TWC is making to meet the federal CCDBG rate recommendations will ensure that the state has better accountability of funds, and that they are achieving the greatest impact possible.

I offer a new issue for the Commission's consideration, and that is for TWC to use some of the new federal quality set-aside dollars to create a plan to increase Texas Rising Star participation by phasing it in as a requirement for all subsidy providers. The intent of H.B. 376 was to incentivize participation in the Texas Rising Star Program, and to improve quality. One way that many other states with a QRIS are approaching this is to require licensed centers that accept subsidized children to participate in the state's QRIS, and to

*Texans Care for Children is a nonprofit organization dedicated to fulfilling the promise of children through improved state policies and programs on child protective services; juvenile justice; mental well-being; health and fitness; and early childhood education and opportunities.*

phase-in this requirement over time. The new Child Care and Development Fund rules from the federal government also require states to do more to monitor, and encourage quality improvements.

Since the federal government is providing funds to put at-risk children in high quality child care settings, TWC can help meet this goal by ensuring that providers that accept these children have some level of oversight and quality, even if it is only at the 2 star level. TWC should work toward this goal by developing a plan and building its technical assistance capacity to facilitate this transition for providers.

Thanks for the opportunity to comment.

*Andrea Brauer  
Early Education Policy Associate  
Texans Care for Children  
512.473.2274  
abrauer@txchildren.org  
www.txchildren.org*

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, November 21, 2014 2:02:35 PM

---

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, November 21, 2014 12:56 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, November 21, 2014 - 12:56

Agency: TEXAS WORKFORCE COMMISSION TWC

First Name: Andrea

Last Name: Brauer

Title: Early Education Policy Associate

Organization you are affiliated with: Texans Care for Children

Email: [abrauer@txchildren.org](mailto:abrauer@txchildren.org)

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

Texans Care for Children is a nonprofit organization that works solely to improve outcomes for Texas children through policy change. We come by our recommendations and policy positions through active dialogue with our network of members throughout the state who together represent thousands of Texas children.

Testimony on the Sunset Advisory Commission Report of the Texas Workforce Commission

I appreciate the Sunset Staff's work, and the opportunity to provide comments on the report and agree with several of the recommendations. I agree with Recommendations 3.1-3.7 - There is a great need for more child care data and analysis, oversight, and quality assurance.

Any Alternative or New Recommendations on This Agency:

Regarding recommendation 3.1, Require TWC to include more in-depth data on the effectiveness and outcomes of child care subsidies in its statutorily required report on the program, I suggest the development of program goals, as there are currently none listed in the proposed rules or guidelines, or on the website.

I also offer a new issue for the Commission's consideration and that is to make Texas Rising Star participation a requirement for all subsidy providers.

The intent of H.B. 376 was to incentivize participation in the Texas Rising Star Program and to improve quality. One way that many other states with a QRIS are approaching this is to require licensed centers that accept subsidized children to participate in the state's QRIS and to phase-in this

requirement over time. The new Child Care and Development Fund rules from the federal government also require states to do more to monitor, and encourage quality improvements.

Since the federal government is providing funds to put at-risk children in high quality child care settings, TWC can help meet this goal by ensuring that providers that accept these children have some level of oversight and quality, even if it is only at the 2 star level. And, with the new technical assistance teams at the workforce boards, centers should be able to get the help they need to raise quality, and will get the added benefit of the increased reimbursement rates. Please consider phasing in mandatory participation in the TRS program for subsidy providers.

Thanks for the opportunity to comment.

My Comment Will Be Made Public: I agree