

**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 1:19:51 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, December 15, 2014 12:49 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 - 12:48

Agency: TEXAS WORKFORCE COMMISSION TWC

First Name: Mark

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State: Texas

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

I write in opposition to recommendation 2.1, which would require that TWC collect occupation information from employers in order to better regulate career schools.

By way of background, I am chair of the Gulf Coast Workforce Board, and immediate past chair of the Texas Association of Workforce Boards (the association of Texas 28 local workforce boards), but I write only in my individual capacity. I have served as a volunteer employer representative on the Gulf Coast Workforce Board since its inception in 1996.

Recommendation 2.1 would unduly burden employers to gather and report this occupation information. This occupation information likely would be reported based on the Standard Industry Codes (SIC), which are sometimes complicated. The benefits of Recommendation 2.1 would be substantially outweighed by the cost to and burden on employers to report it and to TWC to implement and answer questions about it - in both cases an unfunded mandate.

If greater regulation of career schools is desired, the costs of regulating them should be borne by them, and not employers or TWC.

Further, we want to encourage employers to use the public workforce system.

I am concerned that the costs and burdens of Recommendation 2.1 would have the unintended consequence of discouraging employers from using the other benefits of the public workforce system - a challenge which the public employment system constantly faces due to employer frustrations with the unemployment insurance system. I also fear that the recommendation may discourage employers from hiring career school graduates.

In short, there should be another way to monitor and track career school graduates without burdening their employers if that is advisable. However, you also should be aware to that to the extent public employment funds are used on career schools, the workforce boards also track graduation outcomes and require that these schools be qualified under the board vendor list.

Poor outcomes should result in a board removing the school from the approved vendor list. I submit that the free market, together with TWC's existing power to audit these schools, and the local board's power to decline to deal with them, are a sufficient level of protection against poor career schools.

Thank you for your attention to this.

Any Alternative or New Recommendations on This Agency: Leave the existing regulatory scheme as is, or place the cost and burden on the career schools if necessary to expand oversight.

My Comment Will Be Made Public: I agree