

# QUAD AGENCY CHILD CARE INITIATIVE COMMISSION: RESPONSES TO PUBLIC COMMENTS

March 2026

This summary includes comments received between November 6, 2025, and February 28, 2026. This summary was approved by the Quad Agency Commission on March 24, 2026.

The Quad Agency Commission has received comments from 21 stakeholders on a range of early childhood care and education topics. These stakeholders represent child care programs, trade associations, early childhood advocates, and community members.

Comments are grouped together when they address the same topic. Comments are only included here if they address activities the Quad Agency Commission is charged with reviewing – those that impact the cost, quality, or accessibility of child care in Texas.

A reference number has been added to each comment topic in the format of “[month and year of approval]-Comment-[#]”. This numbering system will allow stakeholders to more easily find a comment if it is referenced in a future summary.

## Comment Summaries and Responses

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*March 2026-Comment-01*

### **COMMENT:**

Four commenters recommended modifications to Quad Agency Commission membership or additional advisory committees to promote partnership and assist with identifying issues and successful implementation. These suggestions included:

- Additional membership on the Quad Agency Commission to include child care owners or directors
- Establishing a formal advisory committee that would include child care owners, directors, and teachers representing a broad spectrum of provider types and communities
- Establishing a family advisory council to support the work of the Quad Agency Commission and ensure policies reflect the needs of Texas families

**RESPONSE:**

The Quad Agency Commission's membership is defined in Texas state law. The Quad Agency Commission appreciates the commentors' desire to be active participants in the Quad Agency Commission. The Quad Agency Commission continues to accept public comment, as outlined on the [Quad Agency Commission webpage](#). Additionally, as noted in Texas state law, the Quad Agency Commission may engage with subject matter experts during its review of any issues. The Quad Agency Commission will continue to use these mechanisms to engage with interested stakeholders.

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*March 2026-Comment-02*

**COMMENT:**

Four commentors suggested revisiting state-funded prekindergarten (pre-k) offerings by local educational agencies (LEAs). Concerns and suggestions included:

- Loss of financial viability for licensed child care providers who are unable to compete with free pre-k services and who must meet higher health and safety standards than school districts.
- LEAs not meeting requirements to attempt to partner with local child care providers, through the provision of pre-K partnerships (PKPs), in which pre-k instruction is provided in the child care program.
- Consider funding pre-k directly (rather than through PKPs) through high-quality child care centers who could then offer rebates to families

**RESPONSE:**

The [Texas Education Code](#) establishes requirements and eligibility criteria for PKPs. This includes [§29.153](#), [§29.1531](#), [§29.1533](#), and [§29.171](#). Any mandates for LEAs to partner with community-based providers or to automatically direct education funding to community-based providers would require statutory change.

The Quad Agency Commission notes that during the 89th Texas legislative session in 2025, [House Bill \(HB\) 2](#) was enacted which amended several state laws affecting PKPs. These changes go into effect for the 2027-2028 school year. The bill:

- Requires school districts and open-enrollment charter schools to provide child care programs with which they have established a PKP an amount of money no less than

85% of what the school receives for the students enrolled in the PKP classroom, unless they have received a waiver from the Texas Education Agency (TEA).

- Removes the requirement for qualified teachers in pre-k 3 partnership classrooms to obtain and hold a valid certificate issued by the State Board of Educator Certification, aligning with the existing requirements established by [HB 2729](#) (88<sup>th</sup> Texas Legislature, 2023) for teachers in pre-k 4 partnership classrooms.
- Eliminates the supervisory requirement for certified PKP teachers established by [HB 2729](#) (88<sup>th</sup> Texas Legislature, 2023), except when necessary for effective instruction of emergent bilingual students.
- Requires that school districts operating a full-day pre-k 4 program receive Early Education Allotment funding from TEA in an amount equal to one-half of the Average Daily Attendance calculated under [Texas Education Code \(TEC\) §48.005](#) for each student enrolled in the pre-k program. This allocation must occur before TEA can distribute the remaining funds to school districts.
- Requires TEA to designate at least four PKP intermediaries to assist with the development of PKPs and establish guidelines for these intermediaries. HB 2 also requires that the PKP intermediaries:
  - Provide school systems with an official determination before a school system may construct, repurpose, or lease a classroom facility, or issue bonds for the construction or repurposing of a classroom facility to provide pre-k classes required under [TEC §29.153](#). This determination must state that the child care providers from which the school system has considered proposals for PKPs are unable to serve the students for whom the district or school plans to provide pre-k classes in the classroom facility to be constructed, repurposed, or leased.
  - Provide school systems seeking to provide a tuition-based pre-k program an official determination that no eligible child care providers can serve the students for whom the district plans to provide pre-k classes on a tuition basis.
- Allows PKP facilities to comply with municipal ordinances applicable to private pre-k programs instead of those applicable to school districts and open-enrollment charter schools.

In addition, the TEA has contracted with the Texas A&M University System (TAMUS) to administer a [PKP Collaborative District grant](#) for the 2026-2027 school year to expand access to high-quality pre-k across Texas. The grant identifies three Collaborative Districts within the state who will each establish PKPs in a designated region.

- Each Collaborative District will partner with at least ten Texas Rising Star Three- or Four-Star providers located *outside* the Collaborative District’s attendance boundaries, but within the designated region. The purpose of the grant is to offer eligible child care providers who have consistently expressed an interest in partnerships with the opportunity to connect with participating Collaborative Districts.
- To continue prioritizing local PKPs, the school district where each selected child care provider is located will be notified about the provider’s interest in partnering before any formal agreement is made with a Collaborative District. This allows the local school district to explore establishing a partnership directly with the community child care provider.
- If a local school district expresses interest in partnering with a child care provider that is already actively partnered with a Collaborative District, the existing PKP with the Collaborative District will continue for the remainder of the current school year. The following year, the partnership will transfer to the local school district.
- A potential benefit is that this grant may encourage other school districts to prioritize developing partnerships with community child care providers, which could increase the number of children served within their own school district boundaries. This could lead to a broader expansion of high-quality pre-k opportunities across the state.
- TAMUS, TWC, and TEA staff will collectively support the Collaborative Districts and child care providers with the development and ongoing sustainability of the partnerships.

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*March 2026-Comment-03*

**COMMENT:**

Two commentors suggested requiring LEA-run pre-k programs to meet the same health and safety standards as regulated child care providers.

**RESPONSE:**

As outlined in [§42.041\(b\)\(7\)](#) of the Human Resources Code, accredited educational facilities that operate primarily for educational purposes for pre-k and above are exempt from requiring Child Care Regulation licensure. The Quad Agency notes that any requirement for these programs to be licensed would need a statutory change by the Legislature.

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*March 2026-Comment-04*

**COMMENT:**

Four commentors requested that agencies ensure requirements and policies are consistent and aligned across programs. One commenter provided a specific example related to the qualifications needed to be a bus driver for a school district versus the qualifications needed to transport children in a child care setting.

**RESPONSE:**

The Quad Agency will continue to seek out specific examples from stakeholders to identify viable solutions for consistency and alignment.

The Quad Agency acknowledges that the requirements for bus drivers/transporters are different across the Health and Human Services Commission (HHSC) Child Care Regulation (CCR) and TEA programs. In the child care setting, those who transport children are considered employees of the child care provider and must meet employee eligibility and training requirements, which includes background check screening.

The Quad Agency has shared this input with HHSC so it can be considered as part of the review of child care minimum standards required by Rider 165 from the 89<sup>th</sup> Texas Legislative session.

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*March 2026-Comment-05*

**COMMENT:**

Three commenters expressed a desire for the citation system used by the HHSC CCR program to redefine accountability for certain rule violations, allowing citations to be attached to the staff responsible for the violation, rather than to the child care provider. Commenters also proposed making these citations visible to child care providers to inform hiring decisions.

**RESPONSE:**

The Quad Agency notes that this would require a statutory change. HHSC Child Care Regulation is granted statutory authority through Texas Human Resources Code (HRC) Chapter 42. [§42.001](#) Human Resources Code explains the purpose of Chapter 42 is to ensure safety of children by “regulating the facilities through the licensing program.”

Violations of minimum standards are connected to a child care provider's license under the authority of Human Resources Code.

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*March 2026-Comment-06*

**COMMENT:**

Three commentors voiced recommendations related to communication and information access tools, requesting that platforms be modernized, shared across agencies, provide timely information, and allow child care providers to communicate back to agencies. One of these commentors specifically requested timely information on the impacts to Texas child care funding because of recent fraud activities in Minnesota.

**RESPONSE:**

The Quad Agency notes that fully integrated platforms shared across agencies would require significant funding to implement. The Quad Agency will continue to be receptive to stakeholder feedback on specific communication and information barriers and solutions that could be implemented within existing resources.

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*March 2026-Comment-07*

**COMMENT:**

Three commentors suggested expansion of property tax exemptions, such as mandatory statewide adoption of the exemption and removal of Child Care Services enrollment criteria for eligibility.

**RESPONSE:**

The Quad Agency notes that this would require a statutory change. Senate Bill (SB) 1145, passed by the 88<sup>th</sup> Texas Legislature, added [§11.37](#) to the Texas Tax Code. The Legislature would need to amend this statute to expand any tax exemptions for child care providers.

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*March 2026-Comment-08*

**COMMENT:**

Three commentors made recommendations about financial supports that could be offered to lower the costs of care and increase financial stability for child care providers. These

included stabilization grants, mortgage relief options, and better compensation solutions for child care providers participating in the Child Care Services program.

**RESPONSE:**

The Quad Agency notes that any of the suggested financial supports to child care providers would require legislative approval and be dependent upon the availability of funds.

The Quad Agency also notes that Texas Workforce Commission (TWC) has been increasing the Child Care Services (CCS) payment rates. TWC uses the annual Child Care Market Rate Survey (MRS) to set payment rates each year. The MRS is conducted by the University of Texas for TWC and asks child care providers what tuition amounts they are charging parents for child care. The provider tuition amounts are then ranked from lowest to highest and grouped in “percentiles”. The Administration for Children and Families’ Office of Child Care recommends as a benchmark that states set their payment rates no less than the 75<sup>th</sup> percentile. This means that 75% of child care providers charge this rate or less and ensures that families receiving child care subsidies have access to three-quarters of the available child care market. TWC’s base payment rate (the rate before any enhanced quality rates are applied) is set at the 75<sup>th</sup> percentile each year.

A national child care organization, the Prenatal to Three (PN-3) Policy Impact Center, recently released their 2025 state policy roadmap, which includes a summary of state payment rates - [Child Care Subsidies - Prenatal-to-3 Policy Impact Center](#) (see: “What are the Key Policy Levers to Increase Access to Child Care Subsidies”). One of the key policies in this roadmap hinges on states paying equitable rates based on what child care providers in their markets charge. The roadmap notes that a total of 20 states, including Texas, meet this benchmark because their payment rates are set at the 75<sup>th</sup> percentile or higher.

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*March 2026-Comment-09*

**COMMENT:**

Three commentors voiced that child care regulations should be streamlined and reduced. One of these three commentors encouraged the Quad Agency Commission to not wait for CCR’s legislatively mandated review when there are known issues that can be addressed immediately.

**RESPONSE:**

The Quad Agency notes that members voted at the Commission meeting on November 17, 2025, and unanimously agreed to defer any suggestions related to changes in CCR Minimum Standards at this time. This suggestion for streamlining and reduction will be sent to HHSC's contracted entity for consideration in their required report. The Quad Agency also notes that Rider 165 requires the independent entity conducting the review to issue a report to HHSC before September 1, 2026. HHSC must then issue a report before the 90<sup>th</sup> day after receiving the independent entity's report. There is an expedited timeline for the CCR Minimum Standards review, with a final report being available no later than December 29, 2026.

In addition, CCR is working on a low weighted minimum standards project within Texas Administrative Code (TAC) Chapter 746. This project is occurring in close coordination with the Rider 165 project and is intended to complement the Rider 165 work.

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*March 2026-Comment-10***COMMENT:**

Two commenters suggested changes to the CCR processes for issuing citations and the due process (appeals process) for such citations. These suggestions include:

- Citations should be grounded in verified and objective evidence, as should the process for appealing the citations.
- Formal appeals hearing should be automatic for violations that result in reduced payment to child care providers participating in the Child Care Services (CCS) program.

**RESPONSE:**

The Quad Agency notes that HHSC CCR staff verify an operation's compliance with licensing statutes, rules, and minimum standards through careful gathering and analysis of evidence. The preponderance of evidence threshold must be reached based on the evidence gathered. An operation always has the right to request an administrative review if they disagree with HHSC CCR actions or decisions, in accordance with [26 TAC §745.8801](#) and [26 TAC §745.8803](#)

HHSC Regulatory Enforcement conducts administrative reviews for all licensed child care operation types - both residential (where children live) and day care (where

children spend part of their day). Texas Rising Star providers are one type of provider that receives outside funding. There are other organizations that rely on the Regulatory Enforcement administrative review process and outcomes to make decisions about funding, accreditation, placements, contracts, etc. for other operation types. This proposal creates an unequitable due process system that does not promote fairness, accountability, consistency, and transparency across child care operations.

Regarding appeals, [HRC §42.078](#) permits all child care operations, to include Texas Rising Star providers, to request a hearing to be held by an administrative law judge of the State Office of Administrative Hearings (SOAH) on minimum standard citations that result in administrative penalties imposed by HHSC. The hearing is on the occurrence of the violation, the amount of the penalty, or both the occurrence of the violation and the amount of the penalty. Statute does not authorize HHSC to offer due process related to actions imposed by outside agencies, programs, or organizations, including a reduction in payments from the CCS program.

There are approximately 6,300 Texas Rising Star providers. Proposals to trigger automatic administrative reviews or appeals hearings for certain violations could result in a significant increase in workload for both HHSC Regulatory Enforcement and SOAH which would necessitate additional staff resources.

Due to the factors noted above, the Quad Agency Commission will not pursue a change to automatically initiate an appeal for CCR deficiencies for a Texas Rising Star program. Texas Rising Star programs may continue to appeal citations using the same process as other regulated child care providers.

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*March 2026-Comment-11*

**COMMENT:**

Two commentors suggested implementation of collaborative opportunities across state agency programs. The suggestions included interagency workgroups, a collaborative summit for agencies as well as child care providers and other stakeholders, pilot projects in local areas, use of the Texas Licensed Child Care Association to assist with implementation or refinement of initiatives, or joint training sessions for agency staff and child care providers.

## **RESPONSE:**

The Quad Agency notes that several such collaborations are already utilized for early childhood programming in Texas, as outlined below.

An Early Childhood Interagency Workgroup currently includes lead representatives from the TWC Child Care and Early Learning (CCEL) Division, HHSC Early Childhood Intervention (ECI), HHSC Family Support Services (FSS), TEA Department of Standards and Programs, and TEA Office of Special Populations and Student Supports. Additional members include staff from HHSC CCR and Department of State Health Services Maternal and Child Health Unit. This group meets monthly to discuss progress toward shared goals and action items from the [Texas Early Learning Strategic Plan](#) and the [Preschool Development Grant](#), provide updates on legislative implementation or initiatives that impact early childhood services, share information on upcoming meetings or trainings relevant to early childhood programs, provide input for agenda topics for the quarterly [Texas Early Learning Council](#) meetings, and identify opportunities for additional cross-agency collaboration. This group is led by the Early Childhood Interagency Coordinator (currently housed at TWC but previously housed at TEA), whose salary is equally derived from each of the three lead agencies.

TWC currently hosts four Texas Rising Star Early Educator Conferences held across the state, and local and state agency staff from HHSC CCR, HHSC ECI and Texas A&M AgriLife Extension participate as exhibitors and/or presenters, connecting with approximately 500 – 800 early childhood educators at each conference. TWC plans to continue supporting these conferences and will continue to look for collaborative opportunities for other early childhood agencies and programs to participate.

Since 2022, TWC has been the lead planner for the annual Texas Early Learning Interagency Collaborative Symposium. This virtual symposium brings together TWC CCEL staff, Texas Rising Star mentors, Local Workforce Development Board Child Care Quality staff, and HHSC CCR staff for the purpose of strengthening the collaboration between agencies to build high-quality child care throughout Texas. Additional agency partners have been added over time, including HHSC ECI providers and FSS grantee directors, Head Start State Collaboration Office, TEA early childhood education staff and local education service center staff, Texas A&M AgriLife Extension agents and education staff, Help Me Grow grantees, and regional HHSC Women, Infants, and Children (WIC) employees. Content focuses on resources and supports provided by partnering agencies, training on policies and policy clarifications, team and partnership building, and collaborative efforts amongst participating agencies.

TWC and TEA also engage in ongoing collaboration to support PKPs through a formal memorandum of understanding (MOU) and a related subgrant to Texas A&M University System as well as through less formal regular meetings

TEA is currently leading an Early Childhood Integrated Data System (ECIDS) Steering Committee including a data workgroup and a legal workgroup comprised of representatives from HHSC ECI, HHSC FSS, TWC and TEA. The ECIDS Steering Committee serves as the central coordinating body to develop shared policies, resolve cross-agency issues, prioritize data needs and system enhancements, track implementation progress, and engage external stakeholders to ensure successful development and deployment of the Texas Early Childhood Integrated Data System.

The Quad Agency acknowledges the importance of cross agency collaboration, and the agencies it represents will continue to look for and support further opportunities for collaboration.

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*March 2026-Comment-12*

**COMMENT:**

Two commentors suggested state-backed liability insurance, liability pools, and liability caps to reduce the cost of required liability insurance.

**RESPONSE:**

The Quad Agency acknowledges the challenges that child care providers have faced related to the availability and affordability of liability insurance.

The Quad Agency is seeking additional information from the Texas Department of Insurance (TDI) to better understand the barriers and solutions available. The Quad Agency notes that creating liability caps for claims against a child care provider is an issue that would require changes to state law by the Legislature.

In addition, implementation of [House Bill 2789](#), 89<sup>th</sup> Texas Legislature, Regular Session, reduced the amount of liability insurance that a licensed or registered child care provider must carry from \$300,000 per negligent occurrence to \$100,000 per negligent occurrence. While this legislation will not fully resolve the concerns that have been raised, it does provide some relief to child care providers.

The Quad Agency has also invited TDI to present at the March 24, 2026, Quad Agency Commission Meeting to provide an overview of liability insurance issues for child care providers.

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*March 2026-Comment-13*

**COMMENT:**

Two commentors requested that agencies review requirements to reduce redundancy and duplication.

**RESPONSE:**

The Quad Agency acknowledges this general suggestion. The Quad Agency welcomes additional feedback that outlines specific requirements that are redundant or duplicative.

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*March 2026-Comment-14*

**COMMENT:**

Two commentors expressed the need for consistent interpretation of requirements among state agency staff.

**RESPONSE:**

The Quad Agency acknowledges this suggestion and welcomes additional feedback that outlines specific examples of inconsistent interpretation of requirements.

The Quad Agency notes that TWC has established procedures to support Texas Rising Star assessor inter-rater reliability, to ensure assessors are consistently interpreting the Texas Rising Star standards correctly. All assessors are required to complete the Assessment Training and Certification Program before they may begin conducting Texas Rising Star program assessments. In addition, all assessors must complete a quarterly inter-rater reliability check. If an assessor does not pass all or a portion of the quarterly check, they may not assess any child care provider for Texas Rising Star certification until they have demonstrated competency. Additionally, Texas Rising Star mentors participate in the Assessment Training and Certification Program before they begin supporting child care providers with mentoring services. Together, mentors and assessors have standardized weekly meetings where they can seek clarification and guidance on Texas Rising Star measures as needed.

Texas Department of Family and Protective Services (DFPS) is engaged in an ongoing effort to enhance the knowledge and skills of agency Child Care Investigations (CCI) staff. These staff are responsible for conducting investigations alleging abuse or neglect at a child care operation. DFPS invites organizations to submit information on training topics they wish to offer DFPS investigative teams, as these trainings help ensure staff stay informed on emerging issues, best practices, and specialized subjects relevant to child care investigations. DFPS is preparing for their next All Staff Training in July 2026 and welcomes proposed topics, learning objectives, presenter details, and any other information that would support investigator trainings. DFPS will evaluate submissions for alignment with program needs and may follow up for clarification or additional information. Submissions may be sent to: [dfpschildcareinvestigations@dfps.texas.gov](mailto:dfpschildcareinvestigations@dfps.texas.gov).

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#### *March 2026-Comment-15*

#### **COMMENT:**

Two commentors suggested reviews or consolidation of curriculum and school readiness metrics across Texas Education Agency and Child Care Services programs, ensuring accountability across both settings. One of the two commentors suggested that these requirements should live with TEA as a single set of standards.

#### **RESPONSE:**

TWC's Texas Rising Star program allows for the use of any Texas State Board of Education approved pre-k instructional materials or another approved curriculum from a fully reviewed and certified list ([Texas Rising Star Approved Curriculum](#)). TEA does not approve curriculum for infants and toddlers, whereas the curriculum on TWC's Texas Rising Star Centralized Assessment Entity's approved curriculum list includes curricula for all ages. If the curriculum is not on either list, the child care provider may submit a request for a Texas Rising Star curriculum review by TWC's Centralized Assessment Entity. This process ensures quality curriculum while allowing child care providers the flexibility to select curriculum that best meets the needs of their program and the children they serve.

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*March 2026-Comment-16*

**COMMENT:**

One commentor suggested using statewide child care provider surveys to gather feedback to guide the Quad Agency Commission's action plans.

**RESPONSE:**

The Quad Agency acknowledges this suggestion and recognizes the importance of stakeholder feedback in our work. The Quad Agency will be reviewing feedback from two recently distributed stakeholder-led surveys (Early Matters and Children at Risk) to inform our work. The Quad Agency is happy to review relevant survey data from other stakeholders should they be provided.

Additionally, as part of the Rider 165 assessment, provider surveys related to the child care minimum standards are being conducted. CCR will share feedback received that is relevant to the Quad Agency Commission's work.

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*March 2026-Comment-17*

**COMMENT:**

One commentor stated that child care providers should be included in the Texas school voucher program.

**RESPONSE:**

The Texas Comptroller of Public Accounts is responsible for implementing the Texas school voucher program, referred to as Texas Education Freedom Accounts. Information can be found on their website: [Home - Texas Education Freedom Accounts](#).

The Quad Agency notes that certain child care providers are eligible pre-k providers; please see the Texas Education Freedom Accounts webpage for more information.

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*March 2026-Comment-18*

**COMMENT:**

One commentor suggested that the Quad Agency Commission revisit the recommendations from the 2022 Child Care Workforce Taskforce.

**RESPONSE:**

The Quad Agency notes that the 2022 HB619 Child Care Workforce Strategic Plan workgroup submitted recommendations to the Texas Workforce Commission. A link to those workgroup recommendations are posted on TWC’s website - [Child Care Data, Reports & Plans - Texas Workforce Commission](#) (see “Child Care Workforce Strategic Plan” and see “[The Workgroup Recommendations to Inform the 2022 Texas Child Care Workforce Strategic Plan](#)”).

The Quad Agency notes that TWC has approved two Texas Child Care Workforce Strategic Plans, based on workgroup input. The Strategic Plans adopted by TWC included actionable items, which could be accomplished within existing funding resources. The [2026-2028 Child Care Workforce Strategic Plan](#) was approved by TWC on December 16, 2025.

TWC notes that many recommendations from “[The Workgroup Recommendations to Inform the 2022 Texas Child Care Workforce Strategic Plan](#)” would require statutory changes and additional funding.

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*March 2026-Comment-19*

**COMMENT:**

One commentor encouraged the Quad Agency Commission to “think outside the box” on ways to make child care affordable, describing the child care co-op model the commentor has implemented in their community.

**RESPONSE:**

The Quad Agency appreciates the information provided.

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*March 2026-Comment-20*

**COMMENT:**

One commentor suggested that the CCR citation categories (i.e. weights assigned to a particular regulation) be re-evaluated and only those that are life-threatening or cause severe injury should be categorized as “High”.

**RESPONSE:**

The Quad Agency notes that members voted at the Commission meeting on November 17, 2025, and unanimously agreed to defer any suggestions related to changes in CCR Minimum Standards at this time. This suggestion will be sent to HHSC’s contracted entity for consideration in their required report. The Rider 165 assessment is evaluating all minimum standards and includes an evaluation of the Weighted Enforcement System.

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*March 2026-Comment-21*

**COMMENT:**

One commentor requested that participating agencies find ways to coordinate funding streams and simplify eligibility processes.

**RESPONSE:**

The Quad Agency notes the [Early Childhood Texas website](#) was developed by the Early Childhood Interagency Workgroup (which is comprised of TWC, HHSC ECI, HHSC CCR, HHSC FSS, TEA, and DSHS). This website was recently enhanced to include a new [eligibility screener](#) to help families determine if they may qualify for different early childhood programs. The Quad Agency notes that a fully integrated eligibility system shared across agencies would require significant funding to implement.

The Quad Agency also notes that TWC’s CCS program is governed by federal eligibility parameters that cannot be modified. Additionally, TEA’s public pre-k services are governed by state eligibility parameters. Although state legislation was introduced in previous sessions to allow CCS-eligible families to automatically qualify for public pre-k, the legislation has not been enacted.

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*March 2026-Comment-22*

**COMMENT:**

One commentor requested that CCR revisit the current enforcement of rules related to change in ownership of a child care business, allowing a seamless transition for children and their families.

**RESPONSE:**

The Quad Agency notes that requirements regarding change in ownership of a licensed child care facility are outlined in state law in [Human Resources Code §42.048\(e\)](#). HHSC CCR is committed to reducing the disruption of regulated child care in Texas. HHSC CCR recently developed an expedited [change of ownership \(CHOW\) licensure process](#) that ensures HHSC CCR fulfills its statutory obligation, addresses provider concerns, and minimizes disruption of child care services.

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*March 2026-Comment-23*

**COMMENT:**

One commentor suggested there is a need for additional ongoing professional coaching since child care workers are only required to receive 24 hours of training before they are allowed to teach. The commentor also suggested that child care have similar outcome metrics as pre-k, which examine school readiness and are coupled with ongoing child progress monitoring. The commentor further noted that because public pre-k is serving 3- and 4-year-old children that used to be served in private child care, any underutilized funds could be used to support these efforts.

**RESPONSE:**

The Quad Agency notes that child care providers who participate in the Texas Rising Star program are assigned a designated mentor who is available to provide individualized coaching. The mentor can also help identify opportunities for ongoing professional development for child care workers and other resources to help improve the quality of child care.

In addition, the Texas Rising Star standards include a measure based on a child care provider's use of child progress monitoring instruments, with the most points being awarded for the use of formal child progress monitoring tools. Texas Rising Star providers have access to a free child progress monitoring tool through the University of Texas Health Science Center Houston's Children's Learning Institute (CLI) – Circle Progress Monitoring -- which is also on the TEA Commissioner's approved list of pre-k Progress Monitoring Instruments.

The Quad Agency further notes that the Early Childhood Interagency Workgroup, in consultation with the Texas Early Learning Council (TELC), is developing an Early Childhood Integrated Data System (ECIDS). The TELC's Early Childhood Data Roadmap Workgroup

developed a [Texas Early Childhood Integrated Data System Roadmap](#) which includes an overview of the current early childhood landscape, lessons learned from other states, and business case recommendations that will assist in informing the development of an ECIDS in Texas. The Roadmap recommends the inclusion of School Readiness data not only for children in public pre-k but also for children receiving services from CCS, ECI, and Family and Support Services (FSS). TEA is taking the lead in the ECIDS development work, with input from the ECIW.

Regarding funding, the Quad Agency is not aware of any available underutilized funds that could be directed to expand these efforts. TWC and TEA currently provide funding support to CLI each year. In addition, TWC provides funding to Local Workforce Development Boards to pay for Texas Rising Star mentors and has increased those funds in recent years due to the expansion of Texas Rising Star with more CCS child care providers participating.

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*March 2026-Comment-24*

**COMMENT:**

One commentor suggested that child care minimum standards should state that outdoor trash receptacles positioned for waste pickup be placed at least 50 feet away from any entrance to the child care building that is used by parents and children.

**RESPONSE:**

The Quad Agency notes that members voted at the Commission meeting on November 17, 2025, and unanimously agreed to defer any suggestions related to changes in CCR Minimum Standards at this time. This suggestion has been sent to HHSC for consideration in their regulatory reform project.