Commissioner Mike Morath Commissioner Harrison Chairman Bryan Daniel
Texas Education Agency   Keller   Texas Workforce
1701 N. Congress Avenue   Texas Higher Education Commission
Austin, Texas, 78701   Coordinating Board   101 E. 15th Street
                          P.O. Box 12788   Austin, TX 78778
                          Austin, TX 78711

Commissioner Morath, Commissioner Keller, and Chairman Daniel,

The undersigned business, education, and civic organizations write to applaud your work to date on the Tri-Agency Workforce Initiative and to offer joint feedback to the state workforce development goals (Texas Gov't Code 2308A.006). Your work in setting these goals and developing joint strategies to achieve them is essential as our state rallies to meet its post-pandemic workforce needs.

Every year, Texas spends more than $100 billion on its education-to-workforce system, yet often employers struggle to locate the skilled talent they need to grow their businesses and too many Texans struggle to earn wages sufficient to meet the needs of their families. Addressing this joint problem – for both working Texans and for Texas businesses – will require that all state government entities that play a role in preparing our fellow Texans for the workforce collaborate and listen to the employer community.

We are encouraged by the actionable steps taken to date by each of your agencies to improve joint planning, integrate agency workflows, and listen to stakeholder guidance. The role of government in these issues is best served when tax dollars are spent efficiently and businesses have minimal governmental barriers to creating new jobs that pay good wages. We hope that your continued collaboration – both as mandated by House Bill 3767 (87-R) and as directed by Governor Abbott – serves as a model for interagency cooperation, taxpayer efficiency, and quantifiable outcomes that improve the lives of Texans.

The comments that follow seek to ensure that the strong start provided by the agencies can reach its full potential, both by fully complying with the legal requirements of HB 3767 and by comprehensively addressing the state's workforce needs.
- The first section will address the agencies' statutory need to define a "self-sufficient wage" under Texas Gov't Code 2308A.012 to guide the goal setting process.
- The second section will propose alternate goals language, including specific targets for measurable metrics, as well as a new goal for the Tri-Agency's Priority 1 on pathways.
- The third section will propose alternate goals language, including specific targets and deadlines for measurable metrics, for the Tri-Agency's Priority 2 on student supports.
- The fourth section will propose alternate goals language to clarify and highlight specific data improvements for the Tri-Agency's Priority 3 on infrastructure.

Throughout these comments, frequent references will be made to the need to comply with the legal requirements under Texas Gov't Code 2308A.006(b)(c) that the goals "be disaggregated

by race, ethnicity, and gender for each workforce development region[."] While the initially-proposed goals point in the correct direction, they lack the specificity to comply with state law and should be revised to contain the legally-mandated disaggregations.

The undersigned organizations have also identified revisions to the goals to improve education and workforce resources and best practices in Texas. Committing to investing in improvements to these resources, such as the state's databases, and leveraging evidence-based practices via the goals will maximize the state's ability to build and sustain a strong, educated workforce. These revisions have been aligned as much as possible to existing state efforts to guarantee coherent integration.

Thank you again for your efforts to date and for your openness to engage on this vital issue.

Section 1: Self-Sufficient Wage

Overview

HB 3767 requires the Tri-Agency to determine a self-sufficient wage for each Texas county that is based on a common standard and accounts for regional factors. [1] We address this issue first, before specific goal language, because this baseline definition is essential for the agencies to meet the statutory requirements of the Texas Education and Workforce Alignment Act. Texas Gov't Code 2308A.006(b)(2) states that the agencies must develop "goals for the attainment of employment of jobs that pay a *self-sufficient wage* for all career education and training programs in the state[.]" Much like the recent *Building a Talent Strong Texas* process at THECB, which orients around credentials of value, the HB 3767 goal setting process is designed to align state actions around outcomes goals that will leave Texans with the marketable skills necessary to support themselves and their families without government aid.

In the context of Gov't Code 2308A.012, a self-sufficient wage refers to a wage that allows Texans and their families to meet basic needs without participating in state public assistance programs. While a definition was not included in the draft plan, we offer the following as statutorily-compliant language:

> *Proposed Self-Sufficient Wage Definition*
>
> A self-sufficient wage is the wage level within a county necessary to meet the basic needs of a family of three on one income, with earnings at least high enough to put that family above the eligibility thresholds for Supplemental Nutrition Assistance Program (SNAP), Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and reduced lunch prices (RLP) under the National School Lunch Program.

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[1] Texas Government Code, Sec. 2308A, https://statutes.capitol.texas.gov/Docs/GV/htm/GV.2308A.htm.

We recommend a standardized county-level definition based on basic needs of a family of three, supported by a single income, rather than a series of separate standards determined by family size. The average Texas household has 2.85 people. [2] According to our proposed definition, this equals to an annual wage around $40,700 for a family of three on a single income. [3] A single-income family is the appropriate metric, both due to relative simplicity in calculation and the societal case that our workforce goals should not be oriented to either assume both parents in a two-parent household are in the workforce or that single-parent households are destined for public assistance. A standardized definition oriented to meet the needs of a family of four on one income would similarly allow government goal setting to assist the prosperity of Texas families.

This definition should be paired with a new goal, which aims to ensure that more Texas families are earning wages sufficient to meet their needs without the support of government programs.

Proposed Self-Sufficient Wage Goal

> At least 65 percent of Texas households for each racial, ethnic, gender, and regional demographic will earn a self-sufficient wage that allows them to meet basic needs, including the ability to purchase food, without assistance from state programs by 2030.

Background

HB 3767 is clear in referring to self-sufficient wages as regionally adjusted minimum employment earnings that are above the eligibility thresholds of state public assistance programs. While the TWC currently utilizes a separate "self-sufficient wage" calculation as part of its administration of the federal Workforce Innovation & Opportunity Act (WIOA) program, that alternate definition of "self-sufficient wage" does not comply with the legal requirements of HB 3767 and should not be used in this context.

Broad Public Support: A recent poll indicates that 77% of Texas voters agree that state leaders should set goals for our education and workforce systems that ensure Texans earn wages at least high enough to stay off all government benefits. [4] These sentiments are shared across party lines, races, genders, and in all regions of the state.

WIOA Standard Inapplicable: Currently, the TWC adopts alternative "self-sufficient wage levels" calculated by the Department of Labor (DOL) across four different Texas MSAs – Dallas, Fort Worth, Arlington; Houston; Texas non-metro, and Texas metro. [5] The DOL annually

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[2] United States Census Bureau, Texas QuickFacts, https://www.census.gov/quickfacts/fact/table/TX/PST045221, Accessed Feb. 21, 2022.

[3] This annual wage recommendation is based on the amount necessary to put a family of three above the eligibility thresholds for WIC and RLP. Appendix A contains wage levels and eligibility thresholds across every Texas MSA included in the 100% LLSIL guidelines for various public assistance programs.

[4] Texas 2036, 4th Texas Voter Poll, https://texas2036.org/poll/, Feb. 10, 2022.

[5] Texas Workforce Commission, Workforce Innovation & Opportunity Act: Self-Sufficiency Wage Levels, https://www.twc.texas.gov/workforce-innovation-opportunity-act-self-sufficiency-wage-levels, Apr. 9, 2021.

develops Lower Living Standard Income Level (LLSIL) guidelines as required by the WIOA, which is then calculated at 70% and 100% levels for various areas in the country to determine WIOA eligibility thresholds. [6] [7] The TWC notes that the DOL's 100% LLSIL guidelines that determine the WIOA "self-sufficient wage levels" can be used by local workforce development boards to identify WIOA participants eligible for WIOA training services. [8]

While there is no official definition of a self-sufficient wage in WIOA, it does state that workforce investment activities, such as training services, must "increase the employment, retention, and earnings of participants, and increase attainment of recognized postsecondary credentials by participants, and as a result, improve the quality of the workforce, reduce welfare dependency, increase economic *self-sufficiency*, meet the skill requirements of employers, and enhance the productivity and competitiveness of the Nation." [9]

While there is some alignment between WIOA's reference to self-sufficiency and HB 3767, the DOL's 100% LLSIL guidelines fall short of meeting the legal requirements of HB 3767. Specifically, across all four of the Texas MSAs in the 100% LLSIL guidelines for family sizes of 1-4, Texans earning a wage equivalent to those 100% LLSIL levels still qualify for the Supplemental Nutrition Assistance Program (SNAP), Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and reduced lunch prices (RLP) under the National School Lunch Program. In essence, despite being employed, WIOA participants earning a WIOA "self-sufficient wage" still do not earn wages high enough to feed themselves and their families without assistance from the state. Appendix A provides comparisons of the 100% LLSIL wage levels with the eligibility thresholds of various state public assistance programs.

Section 1 Conclusion

We strongly recommend that the Tri-Agency adopt self-sufficiency wage levels that orient state goals toward Texans earning wages at least high enough to put them and their family above the eligibility thresholds for SNAP, WIC, and RLP. [10] We believe this is necessary to comply with the statutory requirements of HB 3767 and ensure that the state's career and education training programs put Texans on a path to economic security where they can adequately live and work in a modern economy. We believe that the threshold should be based on a family size of three or four, with a single earning parent.

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[6] Federal Register, Vol. 86, No. 67, Department of Labor Workforce Innovation and Opportunity Act 2021 Lower Living Standard Income Level, https://www.dol.gov/sites/dolgov/files/ETA/llsil/pdfs/2021-LLSIL-FRN.pdf, Apr. 9, 2021.

[7] 70% LLSIL guidelines are used to determine WIOA eligibility pursuant to the requirements in Sec. 3(36) of WIOA.

[8] Texas Workforce Commission, Workforce Innovation & Opportunity Act: Self-Sufficiency Wage Levels, https://www.twc.texas.gov/workforce-innovation-opportunity-act-self-sufficiency-wage-levels, Apr. 9, 2021.

[9] 29 U.S.C § 3101.

[10] This is also reasonably aligned with Texas Administrative Code Ch. 835, which contains the TWC's rules for administering the Texas Self-Sufficiency Fund authorized by Texas Labor Code Ch. 309. The rules define "self-sufficiency" as "Employment with wages reasonably calculated to make the employee independent of financial assistance under Texas Human Resources Code, Chapters 31, 33 and 34." Texas Human Resources Code Chs. 31, 33, and 34 refer to TANF and SNAP.

<h2>Section 2: Pathways</h2>

<h3>Overview</h3>

The following comments will address Priority 1 in the released Tri-Agency goals: "Support efficient and flexible pathways to earning high-value credentials linked to high-wage, in-demand jobs." The comments will first address the four existing goals and will then propose one additional goal.

<h3>Goal 1</h3>

Current Goal Language

Goal 1 – 60 percent of Texans ages 25-34 will have a degree, certificate, or other post-secondary credential of value by 2030.

The goal's commitment to a measurable metric with targets and deadlines is laudable as it provides the Tri-Agency and stakeholders with a clear objective for tailored planning. We encourage the Tri-Agency to assess and focus its education and workforce programs towards the achievement of this goal. This is critically important as workforce attainment in Texas has shifted towards those who hold higher credentials across all wage bands since 2011. [11] A strong Texas workforce demands strong education and job training programs.

Disaggregation: Focusing on the enhancement and support of the state's career and education programs will also produce improvements in drivers for this goal, such as enrollment and completion rates and expanded program capacity. However, this will require state-level visibility on disaggregated demographic outcomes data so that the Tri-Agency and stakeholders can appropriately target efforts. According to 8th-grade cohort data, Hispanic and Black Texas students' postsecondary attainment rates are 18% and 15%, respectively, compared to the rates of White and all students of 31% and 23%, respectively. [12] Considering that 95.3% of Texas' population growth between 2010 and 2020 was attributable to the growth of populations of color, a trend that is expected to continue into 2050, it is important that we equitably address their needs in obtaining credentials of value. [13] As such, this goal's progress must be measured through disaggregated metrics accounting for race, ethnicity, gender, and regions.

Proposed Goal Revisions

Goal 1 – 60 percent of Texans <u>across all racial, ethnic, gender, and regional demographics</u> ages 25-34 <u>and 35-64</u> will have a degree, certificate, or other post-secondary credential of

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[11] Aim Hire Texas, 2021 Initial Findings, https://www.aimhiretexas.org/research_and_findings, p. 68.

[12] Texas Higher Education Data, 8th Grade Cohorts Tracked through Higher Education, FY 2009.

[13] Texas Demographic Center, Texas Demographic Characteristics and Trends: The Changing Faces of Texas, https://demographics.texas.gov/Resources/Presentations/OSD/2022/2022_02_10_LonestarCollegeTomball.pdf, February 10, 2022, slides 7 and 24.

value by 2030.

Alternate Goal Revisions

Goal 1 – 60 percent of Texans ages 25-34 will have a degree, certificate, or other post-secondary credential of value by 2030.
- For all racial, ethnic, gender, and regional demographics aged 25-34, at least 55 percent of Texans within each group will have a degree, certificate, or other post-secondary credential of value by 2030.

Goal 2

Current Goal Language

Goal 2 - 550,000 students will complete postsecondary credentials of value each year

This goal's focus on local Texans' attainment of postsecondary credentials with proven workforce value is especially commendable. Texas has relied on annual net migration over the past decade to buoy its workforce. [14] Migrants have been crucial to meeting Texas employers' need for educated workers as migrants were twice as likely to hold a baccalaureate degree or higher compared to the state's incumbent workforce. [15] We are grateful to the Tri-Agency for reiterating the state's commitment to local Texans' postsecondary outcomes by supplementing the THECB's *Building a Talent Strong Texas* efforts with support from the TEA and TWC.

Disaggregation: To ensure that we are equitably serving all local Texans, this goal must be measured through metrics disaggregated by race, ethnicity, gender, and region. We also ask the Tri-Agency to consider setting sub-targets for disaggregated student populations who are underperforming in order to close achievement gaps.

Proposed Goal Revisions

Goal 2 - 550,000 Texas students across all racial, ethnic, gender, and regional demographics will complete postsecondary credentials of value each year while closing achievement gaps necessary to meet the target.

Goal Alignment: One supplementary effort for consideration would be to clearly tie how progress in Goal 2 drives progress in Goal 1. The quality of our educational institutions and their ability to produce a skilled and educated workforce is becoming increasingly important to employers. Transparent data measuring the educational progress of local Texans is valuable to employers, particularly those looking to develop and hire talent from inside the state.

Goal 3

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[14] Aim Hire Texas, 2021 Initial Findings, https://www.aimhiretexas.org/research_and_findings, p. 71.
[15] *ibid.*

Goal 3 – Develop a plan by January 2023 to identify, monitor, and address emerging workforce needs for high- and middle-skilled jobs in high-demand and/or high-growth industries, including expanded opportunities for apprenticeships, internships, and other programs.

General Data Improvements: Goal 3's aim to ensure that the state's programs are responsive to employers' workforce needs is a principal focus necessary for accurate workforce alignment. We applaud the Tri-Agency's movement in this direction. It is important that the Tri-Agency rely on up-to-date statewide and regional labor market data and trends while assessing emerging workforce needs. Additionally, we encourage the Tri-Agency to broaden its visibility on all available workforce development programs in the state to include the full breadth of opportunities that can help achieve this goal.

Labor Market Data: This goal is an opportunity for the Tri-Agency to more distinctly highlight data on workforce development trends and the education-to-workforce pipeline. In particular, the Tri-Agency can transparently provide information on the statewide and regional workforce demand trends that it will address through expanded opportunities. The Texas Labor Market Information (LMI) contains profiles for each Workforce Development Area (WDA) showing data on employment by industry as well as projections on the fastest growing industries per WDA. Leveraging up-to-date labor market data such as this tailors the Tri-Agency's efforts around current workforce needs while building in flexibility to ensure that the Tri-Agency is responsive to labor market changes.

CIP-SOC/NAICS Crosswalk: The Tri-Agency can also authoritatively link the state's higher education programs with standardized industry and occupational designations. The National Center for Education Statistics has an existing partnership with the Bureau of Labor Statistics establishing an official data crosswalk that links Classification of Instructional Programs (CIP) codes with Standard Occupational Classification (SOC) codes. [16] This resource was developed to help both employers and students by providing them with a resource outlining which programs delivered the knowledge and skills necessary for entry into a certain industry or occupation. The LMI platform contains data on both SOC and North American Industry Classification System (NAICS) codes, while the Texas Higher Education Data (THED) platform contains Texas' CIP codes. Formally linking the codes across both platforms through a data crosswalk would provide employers, postsecondary graduates, higher education and workforce advisors, and other stakeholders with valuable information on career pathways in the state's education-to-workforce pipeline.

Proposed Goal Revisions

Goal 3 – Develop a plan by January 2023 to identify, monitor, and address emerging <u>regional and statewide</u> workforce needs <u>identified through up-to-date labor market data and trends</u> for

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[16] National Center for Education Statistics, CIP SOC Crosswalk, https://nces.ed.gov/ipeds/cipcode/post3.aspx?y=56.

high- and middle-skilled jobs in high-demand and/or high-growth industries, including expanded opportunities for <u>pre-apprenticeships</u>, apprenticeships, internships, and other <u>work-based</u> programs. <u>This data will include:</u>
- <u>Workforce supply and demand trends at the state and regional level.</u>
- <u>Data crosswalks establishing a connection between Texas CIP codes and NAICS and SOC codes.</u>

Goal 4

Current Goal Language

Goal 4 – Increase mid-career reskilling and upskilling opportunities through public institutions of higher education and other educational settings.

Similar to Goal 3, this goal will improve the state's ability to more nimbly respond to employers' workforce needs, particularly as the pandemic has highlighted Texans' desire to reskill and upskill for better employment opportunities. Data from the Bureau of Labor Statistics supported this trend in 2021, revealing that while Texas saw more individuals quitting their jobs than any other state in the country in the fall, the state simultaneously saw strong hiring trends. [17]

Provider Alignment: The Tri-Agency should seek to provide Texans with quality assurance in the reskilling and upskilling opportunities it will promote. Alongside the attainment of a credential of value, Texans and employers are interested in the most efficient and cost-effective opportunities that provide entry to in-demand jobs, including lateral entry and promotions. By focusing on expanding opportunities that are aligned with state and regional workforce needs, value is inherently provided to both workers and employers.

Program Accessibility for Incumbent Workers: Additionally, to bolster the Tri-Agency's efforts in improving accessibility to these opportunities, the types of programs falling under the scope of this goal should be more explicit. This will allow the Tri-Agency to account for the unique needs and behaviors of adult learners, who seek education and training differently than traditional students. For example, adult learners often seek out additional education or training at the request of their employer or when they are seeking a new job opportunity where their potential employer requires that they participate in training to obtain the skills necessary for the position. As such, adult learners also turn to job training providers outside of higher education institutions to fulfill their job requirements.

Proposed Goal Revisions

Goal 4 – Increase mid-career reskilling and upskilling opportunities through <u>programs offered by public and private training providers, including program offerings of</u> institutions of higher education <u>and skills training offered in collaboration with employers, that are aligned to state</u>

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[17] Bureau of Labor Statistics, State Job Openings and Labor Turnover Estimates, August-November 2021.

> and regional labor market needs.

Expansion Targets: We also encourage the Tri-Agency to add specific targets or percentages by which to increase these opportunities. One possibility is to tie those increases towards the progress that will be needed to meet Goals 1 and 2 of this priority. Additionally, the Tri-Agency should set targets for each local workforce development board to scale the job training programs they administer through funds received from the TWC, such as WIOA Eligible Training Providers, to meet their respective region's labor market needs. This would ensure that the state has the capacity to provide Texans with degrees, certificates, and credentials of value.

New Goal

We offer the following new goal for inclusion into Priority 1 and provide justification.

New Goal Language: Low-Skilled, Low-Wage Workers

> New Goal 1 – By January 2023, develop a plan leveraging education and job training pathways that will allow 50% of Texas low-skilled, low-wage workers across each racial, ethnic, gender, and regional demographic to advance in economic mobility and prosperity through the attainment of a self-sufficient wage by 2030.

While the Tri-Agency's proposed goals will provide some opportunities for low-skilled, low-wage workers to receive the training and education necessary to secure higher wages, such as Goal 3 and Goal 4, they are not specifically tailored to address this population. As soon as 2036, 71% of all Texas jobs are going to require some kind of postsecondary credential. [18] To meet the demands of our evolving workforce, our state's low-skilled workers will need clear pathways and opportunities for skills training. This can also improve the type of job growth that we see in Texas in the future. Since 2011, Texas has lost 2.5% and 0.6% of high and mid-high wage jobs, [19] respectively, while those jobs experienced growth nationwide. [20] A strong locally-educated workforce will be necessary to attract these types of jobs and solidify the state's economic competitiveness.

Section 2 Conclusion

Our comments proposing alternative goal language and a new goal for Priority 1 focused on revisions that align the goals with statutory requirements on disaggregation, provide a clear commitment to using labor market data, incorporate the full breadth of education and job training programs available in the state, and highlight the needs of underemployed Texans. These revisions will amplify the Tri-Agency's proposed goals and ultimately empower Texas

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[18] Texas 2036, Shaping Our Future, A Strategic Framework for Texas, https://3hr27o3s9nj8m84dw4489i31-wpengine.netdna-ssl.com/wp-content/uploads/2020/06/Texas-2036-Strategic-Framework.pdf, p. 56.

[19] "High wage" is defined as a job with a 2019 annual salary greater than $65,000. "Mid-high wage" is defined as a job with a 2019 annual salary between $45,000-$65,000.

[20] Aim Hire Texas, 2021 Initial Findings, https://www.aimhiretexas.org/research_and_findings, p. 5-6.

employers to more precisely grow jobs while providing Texans with value for their postsecondary education through meaningful employment and career opportunities.

Section 3: Student Supports

Overview

The following comments will address Priority 2 in the released Tri-Agency goals: "Ensure students receive the supports necessary to succeed at all stages of their educations and in their transitions to the workforce." The comments will address two of the existing goals.

Goal 1

Current Goal Language

Goal 1 – Establish a common definition of kindergarten readiness measured by a valid, reliable assessment by fall 2023.

Kindergarten Readiness Target: We support the work of the Tri-Agency to establish a common definition of kindergarten readiness measured by valid, reliable assessment, and we look forward to engaging in that process leading up to fall 2023. We request that the Tri-Agency adopt a goal that will establish a specific percentage of kindergarten-ready students that the state will aim to achieve by 2030. Furthermore, this goal should be disaggregated by student subgroups, including race, ethnicity, gender, and region, to match Goal 2 of Priority 2 and allow the Tri-Agency to close achievement gaps.

Pre-Kindergarten Attendance: House Bill 3 (86-R) made historic investments into high-quality, public pre-kindergarten (Pre-K) programs through the new Early Childhood Reading Allotment (ECRA). While the ECRA was necessarily flexible in its scope in supporting overall strategies to improve early childhood reading proficiency by the 3rd grade given the state's classroom capacity issues with offering full-day pre-k to all eligible students immediately upon passage of HB 3, high-quality, full-day pre-k remains a strong strategy to improve early childhood literacy. [21] To further support Goal 2 under this priority, it is important that there are goals earlier in a child's education to ensure they are in the best position to succeed and read proficiently by the 3rd grade. This proposed sub-goal would provide that earlier touchpoint.

Proposed Goal Revisions

Goal 1 – Establish a common definition of kindergarten readiness measured by a valid, reliable assessment by fall 2023.
- 75 percent of all Texas pre-kindergartners in publicly-funded pre-kindergarten programs for each student racial, ethnic, gender, and regional demographic will be kindergarten ready by 2030.

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[21] The Commit Partnership, The Impact of HB 3 on Early Childhood Education, https://commitpartnership.org/blog/the-impact-of-hb-3-on-early-childhood-education, Aug. 21, 2019.

> - Establish a goal by January 2024 to increase the percentage of eligible three- and four-year-olds in Texas who attend high-quality, public pre-kindergarten programs across all racial, ethnic, socioeconomic, and regional groups.

Goal 2

Current Goal Language

> Goal 2 – Increase percentages of students meeting achievement benchmarks as follows:
>   a. Increase 3rd-grade reading and math outcomes for all students while closing achievement gaps;
>   b. Increase 8th-grade reading and math outcomes for all students while closing achievement gaps; and
>   c. Increase percentages of students demonstrating college, career, and military readiness while closing achievement gaps.

3rd- and 8th-grade Proficiency Targets: We appreciate the Tri-Agency's listing of specific student outcomes metrics in this goal. In order to achieve these metrics, specific proficiency targets and deadlines for each proposed metric must be set by the Tri-Agency. We propose two different options for setting these targets and deadlines, listed in priority order: set a goal for each 3rd-grade and 8th-grade metric that increases proficiency by 25 percentage points relative to 2019 proficiency levels (*See Appendix B for proposed proficiency targets*), or establish proficiency goals for each metric that will ensure that the state will meet its credential attainment goals under *Building a Talent Strong Texas*.

Closing Achievement Gaps: We also appreciate this goal's intent to close achievement gaps across the listed metrics. We want to highlight that setting proficiency targets for each metric, as we suggest, will require separate "closing the gaps" targets. This is because setting an across-the-board proficiency target will lift all achievement levels by 25 percentage points; however, the gaps between different student populations will still persist. To address this, we recommend that the Tri-Agency set a 50 percent reduction target between student populations for closing achievement gaps. This can be done by closing gaps between racial, ethnic, and gender demographics compared to the aggregate proficiency levels for all Texas students. Alternatively, it can be done by closing the gaps of economically disadvantaged students, similar to the reforms of House Bill 3 (86-R). However, in general, it is important that the progress towards these achievement benchmarks be disaggregated by race, ethnicity, and gender across all the measurable metrics to more accurately portray students' outcomes.

4th-grade Reading Outcomes: In addition to the listed 3rd- and 8th-grade achievement benchmarks, we ask that the Tri-Agency add 4th-grade reading outcomes as a metric to measure with specific targets and deadlines. Given that 3rd-grade reading outcomes is the first touchpoint assessing Texas students' ability to read, a 4th-grade reading metric would allow the state to target interventions towards students who failed to meet sufficient outcomes and

subsequently assess the efficacy of those interventions. In the long-term, this will put students in a stronger position to meet the achievement benchmarks further down their educational journey.

Proposed 3rd-, 4th-, and 8th-grade Goal Revisions

Option 1: Set achievement benchmark targets and deadlines to increase proficiency levels by 25 percentage points relative to 2019 levels while also closing achievement gaps between racial, ethnic, and gender demographics by 50 percent.

Goal 2 – For each student racial, ethnic, gender, and regional demographic, increase percentages of students meeting the following achievement benchmarks by 25 percentage points relative to 2019 proficiency levels, while also closing achievement gaps between all students' aggregate proficiency levels and each student racial, ethnic, gender, and regional demographic by 50 percent by 2030:
a. 3rd-grade reading and math outcomes;
b. 4th-grade reading outcomes; and
c. 8th-grade reading and math outcomes.

Option 2: Set achievement benchmark targets and deadlines to increase proficiency levels by 25 percentage points relative to 2019 levels while also closing achievement gaps between economically disadvantaged and non-economically disadvantaged students by 50 percent.

Goal 2 – For each student racial, ethnic, gender, and regional demographic, increase percentages of students meeting the following achievement benchmarks by 25 percentage points relative to 2019 proficiency levels, while also closing achievement gaps between economically disadvantaged and non-economically disadvantaged students by 50 percent by 2030:
a. 3rd-grade reading and math outcomes;
b. 4th-grade reading outcomes; and
c. 8th-grade reading and math outcomes.

Additional Student Populations: To supplement the disaggregation by race, ethnicity, gender, and region, we ask that the Tri-Agency consider tracking the progress of, and possibly setting proficiency and "closing the gaps" targets for, other student subgroups for which data is available through TEA. This could include Special Education (SpEd) students and English Language Learners (ELL). Appendix B contains the 2019 proficiency levels and associated targets necessary to increase their respective levels by 25 percentage points by 2030.

College, Career, and Military Readiness: We are highly supportive of the achievement benchmark for CCMR as this is a direct link to how our public school system is meeting the state's workforce needs. To strengthen the Tri-Agency's efforts to ensure students are ready for college, careers, or the military, we suggest a tiered system in which components of the CCMR outcomes formula and other important educational drivers are assigned specific targets and deadlines. We propose tiers where components that are more directly aligned with the state's workforce needs will rank higher. The secondary tier would include educational drivers that are

tied to improved CCMR outcomes. We suggest metrics for both tiers in our proposed revisions to the goal's language. Appendix C contains the 2019 achievement levels for the proposed tiers and associated targets necessary to increase those levels by 25 percentage points by 2030 where data is available.

Proposed CCMR Goal Revisions

Goal 2 – Increase percentages of students meeting achievement benchmarks as follows:

c. Increase percentages of students demonstrating college, career, and military readiness <u>for each student racial, ethnic, gender, and regional demographic by 25 percentage points in each of the following metrics</u> while closing achievement gaps <u>by 50 percent by 2030:</u>
    <u>1. Top Tier:</u>
        <u>A. Percentage of associate degrees that are credentials of value awarded in Texas public high schools.</u>
        <u>B. Percentage of career-aligned industry-based certifications that are credentials of value awarded in Texas public high schools.</u>
        <u>C. Percentage of level I and level II certificates that are credentials of value awarded in Texas public high schools.</u>
        <u>D. Percentage of Texas public high school students who qualify for the CCMR outcomes bonuses.</u>
    <u>2. Secondary Tier:</u>
        <u>A. Percentage of Texas eighth graders enrolled in Algebra I or above.</u>
        <u>B. Percentage of Texas high school students enrolled in an AP or IB course.</u>
        <u>C. Percentage of Texas high school students enrolled in a dual credit course.</u>
        <u>D. Percentage of Texas public high school students enrolled in P-TECH or early college high school models.</u>
        <u>E. Percentage of Texas students completing a coherent sequence of CTE courses in a high-wage, high-demand field.</u>

Section 3 Conclusion

Our comments on proposing alternative goal language for Priority 2 have emphasized statutory compliance through disaggregation across all of the goals, introducing specific targets and deadlines for each measurable achievement benchmark, explicitly closing achievement gaps through proposed targets, more explicitly tracking metrics indicating college, career, and military readiness, and tracking progress on kindergarten readiness. We have also provided justification for targets and deadlines for new achievement benchmarks, including pre-kindergarten attendance, 4th-grade reading outcomes, and 8th-grade Algebra I enrollment and completion, among others. These are all important drivers to improving the outcomes of students, including postsecondary and workforce outcomes, as they navigate the entirety of our education-to-workforce pipeline. The adoption of these revisions would be a strong commitment from the Tri-Agency to provide students with the supports they need throughout their educational journeys.

Section 4: Data and Infrastructure

The following comments will address Priority 3 in the released Tri-Agency goals: "Create a robust infrastructure for agency collaboration around common goals, data, and processes to ensure improved student outcomes." The comments will address three of the existing goals.

<u>**Goal 1**</u>

Current Goal Language

> Goal 1 – Identify gaps in agencies' data collections and develop a plan to address any such gaps, including recommendations of statutory changes needed to do so, by January 2023.

We highly commend the Tri-Agency's continued focus on improving the state's education and workforce databases. This goal's focus on identifying and addressing gaps, combined with the Tri-Agency's intent to approach the Legislature for statutory revisions necessary to fill those gaps, is especially appreciated. In its planning efforts, we recommend that the Tri-Agency specifically address possible enhancements to Unemployment Insurance (UI) wage data and the improving overall data accessibility.

UI Data Enhancements: HB 3767 provides authorization for the TWC to work with employers and enhance their reporting of employment and earnings data as part of routine UI wage filings (Texas Labor Code 204.0025). Similar projects can be found throughout the country, such as the U.S. Chamber Foundation's Jobs and Employment Data Exchange (JEDx) project. JEDx touts the possibility of obtaining higher quality workforce data while simultaneously reducing the associated data reporting and collection costs for both employers and the state. [22] In its plan, we ask the Tri-Agency to explore such solutions and consider collecting the following data elements through UI wage filings: occupation titles and SOC codes to the 6-digit level; employee age; employee hours and months worked; employment start and end dates; physical work location, such as the address or ZIP code; remote work designation; full or part-time designation; and gig and seasonal work designation. Overall, these data elements would help employers better analyze their regional talent supply through improved insights on factors like workforce migratory patterns, average workforce ages, and competitive wage trends.

Data Accessibility: Overall, it is critical that the state's progress in meeting workforce development goals be transparent. This can be accomplished through the establishment of publicly-available and user-friendly data dashboards, such as those authorized by HB 3767 (Texas Gov't Code 2308A.008). Reporting data elements such as students' outcomes disaggregated by income, race, ethnicity, gender, and region allows for innovation and collaboration in overcoming barriers to meeting the state's goals. These will also be helpful tools in communicating the Tri-Agency's commitment to securing the state's economic

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[22] U.S. Chamber Foundation, Jobs and Employment Data Exchange Report: Modernizing America's Workforce Data Through a Public-Private Approach,
https://www.uschamberfoundation.org/sites/default/files/JEDx%20Report_June2021.pdf, June 2021.

competitiveness through its efforts to improve our in-state workforce talent development pipeline. Additionally, education and workforce practitioners should have access to relevant state data to measure their own performance in meeting workforce development goals. This is especially important when considering the outcomes of education and training providers. For instance, Texas higher education leaders have provided us with feedback that institutions do not have ready and secure access to TWC wage and employment data, preventing them from knowing the ultimate workforce outcomes of Texas higher education graduates. Providing secure data access to our state's practitioners while ensuring compliance with data privacy requirements can help with provider accountability and targeted interventions.

Proposed Goal Revisions

> Goal 1 – Identify gaps in agencies' data collection and develop a plan to address any such gaps, including recommendations of statutory changes needed to do so, by January 23. The plan will specifically address:
> - Data element and infrastructure improvements to the state's Unemployment Insurance wage data.
> - Improved data accessibility through public data dashboards outlining the state's progress in meeting workforce development goals.
> - Improved data accessibility for education and workforce practitioners, including independent school districts, higher education institutions, and local workforce development boards.

Goal 3

Current Goal Language

> Goal 3 – Establish integrated project management tools and processes to be used for Tri-Agency shared initiatives by January 2023.

Braided Funding: We strongly believe that the successful alignment of the state's education and job training programs with workforce needs will require similar alignment of relevant TEA, THECB, and TWC initiatives, and we commend the Tri-Agency for moving in this direction with regards to shared initiatives. To meet the state's workforce needs, however, Texas employers and education and training providers will need more tailored investments towards effective programs. One method to achieve this is the establishment of an infrastructure and accompanying processes in the Tri-Agency allowing for braided funding. Such an infrastructure would further enable the Tri-Agency to synchronize budget decisions, leverage numerous funding sources, and ultimately maximize the state's investments of taxpayer dollars into effective career education and job training programs and support services.

Regional and Local Integration: We applaud the Tri-Agency's work to better align each agency's individual functions, tools, and processes where there are shared initiatives and responsibilities. We recommend that the Tri-Agency ensure that this integration will also serve the functions and services handled by their regional and local constituencies, such as independent school districts, institutions of higher education, and local workforce development

boards. This can ensure that the state's tools and processes are compliant with HB 3767's requirement that the goals provide for locally determined priorities and collaborative planning and coordination with local and regional entities. This will also help drive efficiencies throughout the different regional and local components of the state's education-to-workforce systems.

Proposed Goal Revisions

> Goal 3 – Establish integrated project management tools and processes, <u>including tools and processes enabling the Tri-Agency to jointly invest in effective career education and training programs and support initiatives through braided funding,</u> to be used for Tri-Agency shared initiatives by January 2023.
> - <u>Develop a plan to align state workforce development goals with workforce development regions and streamline the initiatives of regional and local entities, including education service centers, higher education regional councils, and workforce development boards, through the Tri-Agency's integrated project management tools and processes by January 2023.</u>

Goal 4

Current Goal Language

> Goal 4 – Develop a process by January 2023 through which postsecondary credentials of value, including industry-based certifications, are defined, identified, and promoted across the agencies.

Publishing with Formal Employer Engagement Processes: The THECB's inclusion of credentials of value in *Building a Talent Strong Texas* represents not only a landmark effort to provide value to students, but also to establish Texas as a leader in producing higher education graduates with credentials that are tailored towards the needs of employers, a major benefit to businesses. We ask the Tri-Agency to formally engage industry leaders and employers in jointly defining, identifying, publishing, and promoting credentials of value on an annual basis so that their relevance in the workforce can be corroborated.

Self-Sufficient Wage Alignment: As required by Texas Gov't Code 2308A.006(b)(2), the state's workforce development goals must include efforts that lead Texans to employment opportunities delivering a self-sufficient wage. While *Building a Talent Strong Texas* may feature its own value thresholds for postsecondary credentials, we believe that aligning credentials of value with county-level self-sufficient wages will be a strong, parallel effort to provide value to Texans while also complying with statutory requirements.

Proposed Goal Revisions

> Goal 4 – By January 2023, <u>in consultation with employers, publish a unified list of</u> postsecondary credentials of value, including industry-based certifications, <u>that are targeted towards the achievement of a self-sufficient wage.</u>

Section 4 Conclusion

Our comments proposing alternative goal language to Priority 3 have underscored the importance of specificity across these goals. Employers and other stakeholders support the existing work that the Tri-Agency has done to modernize its data infrastructures as well as its future direction for this work. We are especially interested in modernization efforts that will ensure that data is not only improved but also transparent so that it can be easily accessed through user-friendly platforms and formats. To this end, our comments have highlighted the need for enhanced UI data elements and collection processes, accessible data dashboards, infrastructure and processes for braiding funding, full integration by regional and local entities, continued employer engagement, and self-sufficient wage attainment. These revisions are necessary to achieving all of the Tri-Agency's goals and priorities by allowing for harmonious collaboration between the state, regional and local entities, and outside stakeholders.

Concluding Comments

We extend our gratitude once more for the opportunity to provide you with comprehensive feedback on the proposed Tri-Agency state workforce development goals. We identified our recommendations through a collaborative process featuring the perspectives of employers, education advocates, and civic leaders, many of whom provided national insights. What remained resoundingly clear is that we must be ambitious in educating and training our state's pool of talent – especially local Texans. Now and in the future, this will be pivotal in plainly communicating to businesses and Americans outside of Texas that we take seriously our designation as the best place to do business.

We encourage the Tri-Agency to appropriately stake its goals in supplying every Texan with equitable opportunities to either begin or build upon their careers. Doing so helps guarantee that government is providing the public resources necessary for the state's businesses and citizens to achieve their private interests while reducing bureaucratic barriers that may hamper individual, local, and regional innovation and collaboration.

The comments we have provided are based entirely on helping the Tri-Agency achieve this, with the ultimate goal of strengthening and sustaining the state's economic competitiveness through the improvement of its education-to-workforce system. We carefully devised our recommendations to ensure that they complement the state's existing and planned efforts. Broadly, we sought to undergird our comments with the following themes: statutory compliance on disaggregation and self-sufficient wage attainment, specific and time-bound commitments to achieving metrics and benchmarks, and the intentional involvement of employers and stakeholders through direct engagement and transparent and accessible platforms.

We are pleased to submit these comments for your consideration. We look forward to working with you in upcoming months to finalize these goals and ensure the state pursues robust strategies to achieve them.

Signed,
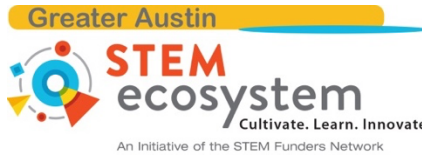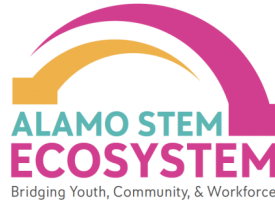
Appendix A: Matrix Comparing WIOA Self-Sufficient Wage Levels and State Public Assistance Eligibility Thresholds

This section contains the WIOA "self-sufficient wage" levels across 4 Texas MSAs (Dallas-Fort Worth-Arlington; Houston; Texas non-metro; and Texas metro) as calculated by the DOL's 100% LLSIL guidelines. Henceforth, these wage levels are referred to as "LLSIL". Each LLSIL level for family sizes 1-4 is compared against the eligibility thresholds for the respective family size across various state public assistance programs. This provides insight on which Texas families earning a wage equivalent to LLSIL qualify for any of the listed public assistance programs. Across every MSA, LLSIL levels qualify Texans for SNAP, WIC, and RLP.

Dallas-Fort Worth-Arlington MSA

Workforce Area: Dallas-Fort Worth-Arlington MSA									
Program: Free Lunch					**Program:** TANF Cash (2-Parent)				
Family Size	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**	**Family Size**	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**
1	13,536	16,744	Eligible	3,208	1	13,536	-	Above Threshold	(13,536)
2	22,181	22,646	Eligible	465	2	22,181	1,500	Above Threshold	(20,681)
3	30,446	28,548	Above Threshold	(1,898)	3	30,446	2,472	Above Threshold	(27,974)
4	37,578	34,540	Above Threshold	(3,038)	4	37,578	2,772	Above Threshold	(34,806)
Program: Reduced Lunch					**Program:** Children's Medicaid				
Family Size	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**	**Family Size**	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**
1	13,536	23,828	Eligible	10,292	1	13,536	17,136	Eligible	3,600
2	22,181	32,227	Eligible	10,046	2	22,181	23,172	Eligible	991
3	30,446	40,626	Eligible	10,180	3	30,446	29,208	Above Threshold	(1,238)
4	37,578	49,025	Eligible	11,447	4	37,578	35,256	Above Threshold	(2,322)
Program: WIC					**Program:** CHIP				
Family Size	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**	**Family Size**	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**
1	13,536	23,832	Eligible	10,296	1	13,536	25,896	Eligible	12,360
2	22,181	32,232	Eligible	10,051	2	22,181	35,016	Eligible	12,835
3	30,446	40,632	Eligible	10,186	3	30,446	44,148	Eligible	13,702
4	37,578	49,032	Eligible	11,454	4	37,578	53,268	Eligible	15,690
Program: SNAP					**Program:** Caretaker's Medicaid (1-Parent)				
Family Size	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**	**Family Size**	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**
1	13,536	21,300	Eligible	7,764	1	13,536	1,236	Above Threshold	(12,300)
2	22,181	28,752	Eligible	6,571	2	22,181	2,352	Above Threshold	(19,829)
3	30,446	36,240	Eligible	5,794	3	30,446	2,760	Above Threshold	(27,686)
4	37,578	43,728	Eligible	6,150	4	37,578	3,324	Above Threshold	(34,254)
Program: TANF Cash (1-Parent)					**Program:** Caretaker's Medicaid (2-Parent)				
Family Size	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**	**Family Size**	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**
1	13,536	936	Above Threshold	(12,600)	1	13,536	-	Above Threshold	(13,536)
2	22,181	1,956	Above Threshold	(20,225)	2	22,181	1,932	Above Threshold	(20,249)
3	30,446	2,256	Above Threshold	(28,190)	3	30,446	3,012	Above Threshold	(27,434)
4	37,578	2,712	Above Threshold	(34,866)	4	37,578	3,420	Above Threshold	(34,158)

Appendix A: Matrix Comparing WIOA Self-Sufficient Wage Levels and State Public Assistance Eligibility Thresholds

Houston MSA

Workforce Area: Houston MSA									
Program: Free Lunch					Program: TANF Cash (2-Parent)				
Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold	Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold
1	13,522	16,744	Eligible	3,222	1	13,522	-	Above Threshold	(13,522)
2	22,152	22,646	Eligible	494	2	22,152	1,500	Above Threshold	(20,652)
3	30,404	28,548	Above Threshold	(1,856)	3	30,404	2,472	Above Threshold	(27,932)
4	37,529	34,540	Above Threshold	(2,989)	4	37,529	2,772	Above Threshold	(34,757)
Program: Reduced Lunch					Program: Children's Medicaid				
Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold	Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold
1	13,522	23,828	Eligible	10,306	1	13,522	17,136	Eligible	3,614
2	22,152	32,227	Eligible	10,075	2	22,152	23,172	Eligible	1,020
3	30,404	40,626	Eligible	10,222	3	30,404	29,208	Above Threshold	(1,196)
4	37,529	49,025	Eligible	11,496	4	37,529	35,256	Above Threshold	(2,273)
Program: WIC					Program: CHIP				
Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold	Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold
1	13,522	23,832	Eligible	10,310	1	13,522	25,896	Eligible	12,374
2	22,152	32,232	Eligible	10,080	2	22,152	35,016	Eligible	12,864
3	30,404	40,632	Eligible	10,228	3	30,404	44,148	Eligible	13,744
4	37,529	49,032	Eligible	11,503	4	37,529	53,268	Eligible	15,739
Program: SNAP					Program: Caretaker's Medicaid (1-Parent)				
Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold	Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold
1	13,522	21,300	Eligible	7,778	1	13,522	1,236	Above Threshold	(12,286)
2	22,152	28,752	Eligible	6,600	2	22,152	2,352	Above Threshold	(19,800)
3	30,404	36,240	Eligible	5,836	3	30,404	2,760	Above Threshold	(27,644)
4	37,529	43,728	Eligible	6,199	4	37,529	3,324	Above Threshold	(34,205)
Program: TANF Cash (1-Parent)					Program: Caretaker's Medicaid (2-Parent)				
Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold	Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold
1	13,522	936	Above Threshold	(12,586)	1	13,522	-	Above Threshold	(13,522)
2	22,152	1,956	Above Threshold	(20,196)	2	22,152	1,932	Above Threshold	(20,220)
3	30,404	2,256	Above Threshold	(28,148)	3	30,404	3,012	Above Threshold	(27,392)
4	37,529	2,712	Above Threshold	(34,817)	4	37,529	3,420	Above Threshold	(34,109)

Appendix A: Matrix Comparing WIOA Self-Sufficient Wage Levels and State Public Assistance Eligibility Thresholds

Texas Non-Metro (South Plains, Middle Rio Grande, and Deep East WDAs)

Workforce Area: Texas Non-Metro (South Plains, Middle Rio Grande, Deep East)									
Program: Free Lunch					**Program: TANF Cash (2-Parent)**				
Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold	Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold
1	13,737	16,744	Eligible	3,007	1	13,737	-	Above Threshold	(13,737)
2	22,504	22,646	Eligible	142	2	22,504	1,500	Above Threshold	(21,004)
3	30,886	28,548	Above Threshold	(2,338)	3	30,886	2,472	Above Threshold	(28,414)
4	38,128	34,540	Above Threshold	(3,588)	4	38,128	2,772	Above Threshold	(35,356)
Program: Reduced Lunch					**Program: Children's Medicaid**				
Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold	Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold
1	13,737	23,828	Eligible	10,091	1	13,737	17,136	Eligible	3,399
2	22,504	32,227	Eligible	9,723	2	22,504	23,172	Eligible	668
3	30,886	40,626	Eligible	9,740	3	30,886	29,208	Above Threshold	(1,678)
4	38,128	49,025	Eligible	10,897	4	38,128	35,256	Above Threshold	(2,872)
Program: WIC					**Program: CHIP**				
Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold	Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold
1	13,737	23,832	Eligible	10,095	1	13,737	25,896	Eligible	12,159
2	22,504	32,232	Eligible	9,728	2	22,504	35,016	Eligible	12,512
3	30,886	40,632	Eligible	9,746	3	30,886	44,148	Eligible	13,262
4	38,128	49,032	Eligible	10,904	4	38,128	53,268	Eligible	15,140
Program: SNAP					**Program: Caretaker's Medicaid (1-Parent)**				
Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold	Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold
1	13,737	21,300	Eligible	7,563	1	13,737	1,236	Above Threshold	(12,501)
2	22,504	28,752	Eligible	6,248	2	22,504	2,352	Above Threshold	(20,152)
3	30,886	36,240	Eligible	5,354	3	30,886	2,760	Above Threshold	(28,126)
4	38,128	43,728	Eligible	5,600	4	38,128	3,324	Above Threshold	(34,804)
Program: TANF Cash (1-Parent)					**Program: Caretaker's Medicaid (2-Parent)**				
Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold	Family Size	LLSIL	Eligibility Threshold	Qualification	LLSIL vs. Threshold
1	13,737	936	Above Threshold	(12,801)	1	13,737	-	Above Threshold	(13,737)
2	22,504	1,956	Above Threshold	(20,548)	2	22,504	1,932	Above Threshold	(20,572)
3	30,886	2,256	Above Threshold	(28,630)	3	30,886	3,012	Above Threshold	(27,874)
4	38,128	2,712	Above Threshold	(35,416)	4	38,128	3,420	Above Threshold	(34,708)

Appendix A: Matrix Comparing WIOA Self-Sufficient Wage Levels and State Public Assistance Eligibility Thresholds

Texas Metro (All Other Areas)

Workforce Area: Texas Metro (All other areas)									
Program: Free Lunch					**Program:** TANF Cash (2-Parent)				
Family Size	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**	**Family Size**	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**
1	14,139	16,744	Eligible	2,605	1	14,139	-	Above Threshold	(14,139)
2	23,167	22,646	Above Threshold	(521)	2	23,167	1,500	Above Threshold	(21,667)
3	31,797	28,548	Above Threshold	(3,249)	3	31,797	2,472	Above Threshold	(29,325)
4	39,256	34,540	Above Threshold	(4,716)	4	39,256	2,772	Above Threshold	(36,484)
Program: Reduced Lunch					**Program:** Children's Medicaid				
Family Size	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**	**Family Size**	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**
1	14,139	23,828	Eligible	9,689	1	14,139	17,136	Eligible	2,997
2	23,167	32,227	Eligible	9,060	2	23,167	23,172	Eligible	5
3	31,797	40,626	Eligible	8,829	3	31,797	29,208	Above Threshold	(2,589)
4	39,256	49,025	Eligible	9,769	4	39,256	35,256	Above Threshold	(4,000)
Program: WIC					**Program:** CHIP				
Family Size	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**	**Family Size**	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**
1	14,139	23,832	Eligible	9,693	1	14,139	25,896	Eligible	11,757
2	23,167	32,232	Eligible	9,065	2	23,167	35,016	Eligible	11,849
3	31,797	40,632	Eligible	8,835	3	31,797	44,148	Eligible	12,351
4	39,256	49,032	Eligible	9,776	4	39,256	53,268	Eligible	14,012
Program: SNAP					**Program:** Caretaker's Medicaid (1-Parent)				
Family Size	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**	**Family Size**	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**
1	14,139	21,300	Eligible	7,161	1	14,139	1,236	Above Threshold	(12,903)
2	23,167	28,752	Eligible	5,585	2	23,167	2,352	Above Threshold	(20,815)
3	31,797	36,240	Eligible	4,443	3	31,797	2,760	Above Threshold	(29,037)
4	39,256	43,728	Eligible	4,472	4	39,256	3,324	Above Threshold	(35,932)
Program: TANF Cash (1-Parent)					**Program:** Caretaker's Medicaid (2-Parent)				
Family Size	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**	**Family Size**	**LLSIL**	**Eligibility Threshold**	**Qualification**	**LLSIL vs. Threshold**
1	14,139	936	Above Threshold	(13,203)	1	14,139	-	Above Threshold	(14,139)
2	23,167	1,956	Above Threshold	(21,211)	2	23,167	1,932	Above Threshold	(21,235)
3	31,797	2,256	Above Threshold	(29,541)	3	31,797	3,012	Above Threshold	(28,785)
4	39,256	2,712	Above Threshold	(36,544)	4	39,256	3,420	Above Threshold	(35,836)

Appendix B: 3rd-grade and 8th-grade Reading and Mathematics Proficiency Targets

This section contains proposed proficiency targets for the 3rd- and 8th-grade metrics listed under Priority 2, Goal 2 of the proposed Tri-Agency Workforce Development Goals. The 2019 column sets the baseline for improvement using TEA's STAAR Statewide Summary Reports for 2018-2019. The percentage in the 2019 column is the percentage of the associated student population reaching the "Meets" standard as listed in the 2018-2019 Summary Reports. The 2030 column reflects the proficiency target for each benchmark to be reached by 2030, and it is calculated by adding 25 percentage points to the proficiency baseline in the 2019 column.

3rd Grade Reading	2019	2030 Goal
State	44%	69%
Hispanic	37%	62%
Black	30%	55%
EcoDis	33%	58%
ELL	32%	57%
SpEd	17%	42%
3rd Grade Math	2019	2030 Goal
State	48%	73%
Hispanic	42%	67%
Black	31%	56%
EcoDis	38%	63%
ELL	40%	65%
SpEd	20%	45%
8th Grade Reading		
State	53%	78%
Hispanic	45%	70%
Black	39%	56%
EcoDis	41%	66%
ELL	17%	42%
SpEd	11%	36%
8th Grade Math		
State	55%	80%
Hispanic	50%	75%
Black	41%	66%
EcoDis	46%	71%
ELL	34%	60%
SpEd	17%	42%

EcoDis = Economically Disadvantaged
ELL - English Language Learner
SpEd - Special Education

Appendix C: Career, College, and Military Readiness Proficiency Targets

This section contains proposed proficiency targets for the CCMR metric listed under Priority 2, Goal 2 of the proposed Tri-Agency Workforce Development Goals. The 2019 column sets the baseline for improvement primarily using TEA's 2018-2019 Texas Academic Performance Report (TAPR). There are two tables in this section, each containing proposed proficiency targets for the Top Tier and Secondary Tier CCMR metrics. Unless noted otherwise, the 2019 column reflects the percentage of the associated student population achieving this metric for the most recent years included in the 2018-2019 TAPR. The 2030 column reflects the proficiency target for each benchmark to be reached by 2030, and it is calculated by adding 25 percentage points to the baseline in the 2019 column.

CCMR Top Tier		
Top Tier 1: Associate Degrees*		
	2019	**2030 Goal**
State	**1.4%**	**26.4%**
Hispanic	2.0%	27.0%
Black	1.0%	26.0%
EcoDis	1.8%	26.8%
ELL	0.2%	25.2%
SpEd	0.1%	25.1%
Top Tier 2: Industry-Based Certifications*		
	2019	**2030 Goal**
State	**4.8%**	**29.8%**
Hispanic	5.4%	30.4%
Black	2.7%	27.7%
EcoDis	5.0%	30.0%
ELL	3.8%	28.8%
SpEd	3.0%	28.0%
Top Tier 3: Level I or II Certificates*		
	2019	**2030 Goal**
State	**0.6%**	**25.6%**
Hispanic	0.9%	25.9%
Black	0.3%	25.3%
EcoDis	0.8%	25.8%
ELL	0.6%	25.6%
SpEd	0.4%	25.4%
Top Tier 4: CCMR (All Metrics)		
	2019	**2030 Goal**
State	**65.5%**	**90.5%**
Hispanic	61.8%	86.6%
Black	51.1%	76.1%
EcoDis	58.1%	83.1%
ELL	45.8%	70.8%
SpEd	62.7%	87.7%

* The 2019 baseline and 2030 goal for Top Tier metrics 1 through 3 will have to be adjusted to reflect only credentials that are identified as a credential of value

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Appendix C: Career, College, and Military Readiness Proficiency Targets

CCMR Secondary Tier		
Second Tier 1: 8th Grade Algebra I or Above *		
	2019	**2030 Goal**
State	**28%**	**53%**
Hispanic	Not Available	Not Available
Black	Not Available	Not Available
EcoDis	19%	44%
ELL	Not Available	Not Available
SpEd	Not Available	Not Available
Second Tier 2a: AP or IB in High School		
	2019	**2030 Goal**
State	**25.8%**	**50.8%**
Hispanic	23.5%	48.5%
Black	17.0%	42.0%
EcoDis	20.2%	45.2%
ELL	Not Available	Not Available
SpEd	Not Available	Not Available
Second Tier 2b: Dual Credit in High School		
State	**20.7%**	**45.7%**
Hispanic	18.7%	43.7%
Black	12.2%	37.2%
EcoDis	16.3%	41.3%
ELL	4.3%	29.3%
SpEd	2.3%	27.3%
Second Tier 3: P-TECH or Early College High School Enrollment **		
Second Tier 4: CTE Coherent Sequence ***		
	2019	**2030 Goal**
State	58.4%	83.4%
Hispanic	61.2%	86.2%
Black	54.3%	79.3%
EcoDis	61.6%	86.6%
ELL	51.9%	76.9%
SpEd	53.2%	78.2%

* The TAPR does not contain data on this indicator. 8th Grade Algebra I enrollment is found using PEIMS course enrollment data.

** The TAPR does not contain data listing the percentage of Texas students enrolled in P-TECH or an early college high school model.

*** The 2019 baseline and 2030 goal for CTE coherent sequences are based on the number of annual graduates completing a CTE coherent sequence for the most recent years listed in the 2018-2019 TAPR. These will have to be adjusted to reflect only annual graduates who complete a CTE coherent sequence in a high-wage, high-demand field

This section contains analysis from the E3 Alliance using student-level data from the Texas Education Research Center in Austin.

MATH PIPELINE - HIGHER LEVELS OF MATH LINKED TO STRONGER HIGHER ED COMPLETION (TEXAS, 2014 COHORT)

Outcomes of Students Enrolled in HS for 4 Years by Highest High School Math, Texas Class of 2014
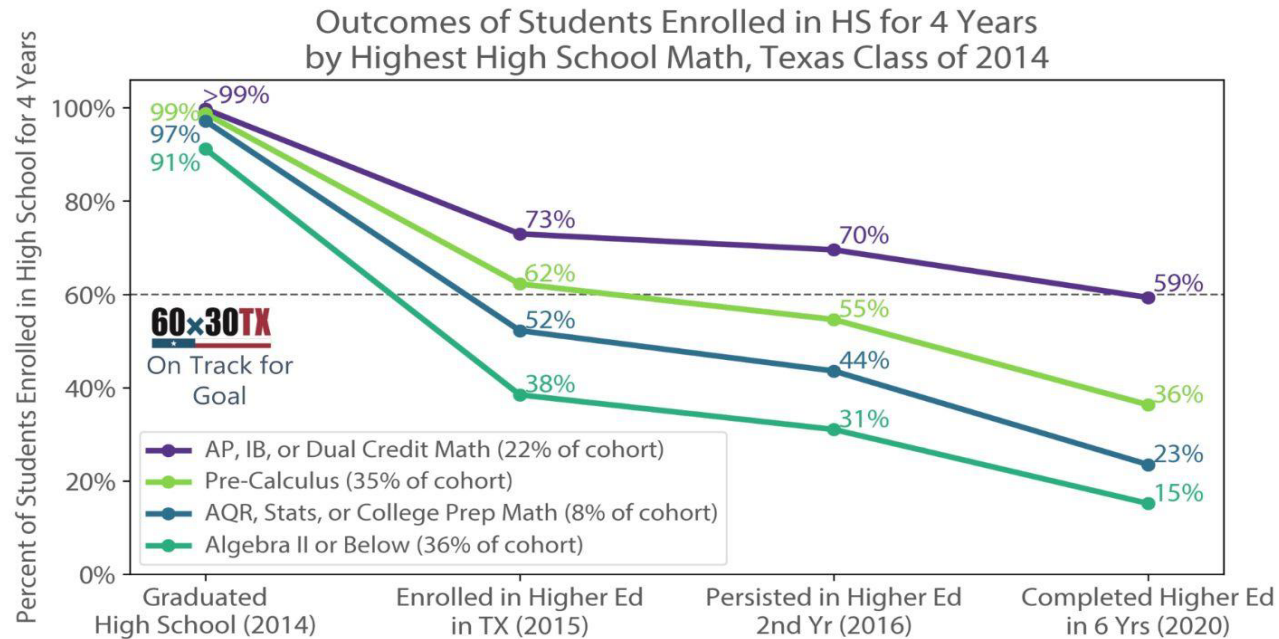
Source: E3 Alliance analysis of PEIMS data at the UT Austin Education Research Center

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The graph reflects stronger higher education completion rates for students who take advanced math courses in high school.