



Jan 29, 2024

To: State Board of Education

Re: Item 1: **Proposed New 19 TAC Chapter 67**

Dear Members of the Texas State Board of Education,

We sincerely thank the Board for your incredible dedication to the rapid implementation timeline of House Bill 1605. We know that you all are working incredibly hard to address issues, craft rules and guidance, and get instructional materials approved for districts as soon as possible. We are grateful for each one of you and your commitment to improving the academic outcomes of Texas students.

As partner organizations interested in making Texas a national leader in the high-quality instructional materials space, we have one piece of specific feedback regarding the proposed rules on House Bill 1605 that we wanted to bring to your attention.

Specifically, we encourage the board to clarify the provisions of the rules related to the standardization of contract term lengths. The current rules in proposed TAC 67.81(c)(1) read:

(c) The publisher of instructional materials approved by the SBOE shall:

(1) enter into a contract with the SBOE for a term not to exceed an initial term of eight years; and

(2) commit to provide the instructional materials in the manner specified by the publisher in the official bid specified in §67.23 of this title (relating to Requirements for Publisher Participation in Instructional Materials Review and Approval (IMRA)).

Within the section above, it is not specified who will determine the contract length and what criteria will be used to determine contract length. We encourage the TEA and SBOE to clarify this provision. ***Our recommendation is to maintain a standard contract duration for all SBOE approved curricula, unless the SBOE anticipates making substantive TEKS changes in the related subject area/grade level.***

Instead, we recommend changing the language to read:

(1) enter into a contract with the SBOE for a term **not to exceed the IMRA cycle review for the applicable subject and grade;** and

Given the changes that are ongoing in the instructional materials space, we believe this revision will ensure districts maintain the flexibility needed to update their instructional materials to align with current guidance on what is a high quality instructional materials, while also ensuring a long enough timeline for publishers.



While we are thankful for the great progress made so far on implementation of House Bill 1605, we urge you all to continue to stay on track with the outlined timeline for policy implementation. Texas students and teachers deserve timely access to high-quality instructional materials. While the proposed rules certainly go a long way to codifying a complex process, it is essential that you continue to adhere to the established timeline and work to prevent unnecessary delays. A sustained commitment to the outlined schedule will contribute to a smoother transition and ensure that students and educators have access to the resources they need in a timely manner.

Thank you for your time and attention to these important matters. We are grateful for the Board's hard work and we stand ready to support your efforts as you continue to implement this historic legislation.

Sincerely,

Kate Greer  
MD, Policy & State Coalition  
The Commit Partnership

**Additional Supporters:**

