

February 10, 2025

To: Texas Education Agency

Re: Proposed Amendment to 19 TAC Chapter 74, Curriculum Requirements, Subchapter AA, Commissioner's Rules on College and Career Readiness, §74.1003, Industry-Based Certifications for Public School Accountability

Commissioner Morath and the Texas Education Agency,

The Commit Partnership and the 7 organizations below thank you for the opportunity to provide written comment concerning the proposed rules updating the criteria used to identify the industry-based certifications to be used for public school accountability as published in the Texas Register on January 10, 2025.

In the recent A-F refresh, Texas began phasing out low-quality industry-based certifications (IBCs) not aligned with workforce readiness. The growth in industry-based certifications offered by schools (6 percentage points increase between 2023 and 2024), paired with the concurrent reduction in low-quality IBCs phased out by the refresh (2 percentage points decrease between the same period), reveals how our accountability system ultimately influences the decisions of our school systems to the benefit of students. This trend reinforces the power of the accountability system to drive meaningful College, Career, and Military Readiness (CCMR) attainment and transform students' postsecondary opportunities.

Texas' commitment to aligning IBCs with workforce needs is essential to ensuring that students graduate with meaningful credentials that lead to high-demand careers that offer living wages. As the Agency continues refining its approach to IBCs and their role in CCMR accountability, we respectfully offer the following considerations to strengthen the impact of these proposed changes.

I. RECOGNIZING THE VALUE OF INDUSTRY-BASED CERTIFICATIONS WHILE MAINTAINING RIGOR

We commend the Agency for implementing a structured evaluation process for the approved list of IBCs, ensuring that students earn certifications that are valued, attainable, and aligned with workforce needs. We support the proposed rules to remove IBCs that are unattainable for adults and exist solely to check a career readiness box for high school students. Floral design is a key example—despite tens of thousands of high school students taking these courses, the Texas economy saw only 329 annual job openings for floral designers in 2023.¹ To ensure true career readiness, credentials must align with meaningful workforce opportunities. The introduction of a

¹ Texas Education Agency, Public Education Information Management System; Texas Workforce Commission, Labor Market and Career Information.

tiered IBC system beginning in 2025-2026 represents a significant positive step in differentiating the value of different certifications.

Yet, increased clarity on key aspects of the proposed framework will help bring positive change to fruition. As the Agency gathers additional feedback for continuous improvement, we respectfully ask for consideration of the following:

- Tier 1 and Tier 2 Distinctions – Under the proposed rules, a Tier 1 IBC can also qualify as a Tier 2 IBC. Tier 1 IBCs are defined as being in-demand and aligned to high-wage occupations. Tier 2 certifications can be either in-demand and aligned to high-wage occupations or aligned to high-skill occupations. To avoid confusion, consider limiting Tier 2 IBCs to certifications for high-skill occupations only.
- Easily Accessible and Aligned Definitions – For increased transparency to help school leaders target resources, publicly list the definitions of “in-demand,” “high-wage,” and “high skill,” in informational resources about the three tiers. We also encourage common terminology and alignment with similar definitions across the Tri-Agency Initiative.
- Timely Approved IBC List – Following adoption of any rule changes, we recommend the Agency provide system leaders with a timely list of approved IBCs by each tier. Given the significant impact of these changes on school systems and students to go in effect for the 2025-2026 school year, we urge the Agency to provide additional transparency in the criteria and evaluation process, particularly regarding currently approved IBCs that may be removed from the approved list under the new structure. To prevent abrupt changes for school system leaders, consider gradually phasing out currently approved IBCs that fall out of the three tiers.

II. CONSIDERING THE IMPACT OF IBC TIERING ON CCMR ACCOUNTABILITY SCORES

Public reporting of IBC attainment by tier is a critical step to improving rigor. It is our hope that the Agency will also weight these tiers accordingly in the next A-F refresh. As noted in previous public comments submitted for the 2023 Accountability manual, rewarding school systems with more points for more work can spur greater postsecondary success aligned with the original intent of Texas' current accountability system.

The Agency's decision to tier IBCs raises important considerations regarding other metrics within the College, Career, and Military Readiness (CCMR) domain and their respective impacts on postsecondary success. Establishing a tiered framework for these broader indicators represents a crucial next step. Just as the Agency has provided tier recommendations for IBCs, we encourage TEA to publicly report guidance on aligned tiering for other key indicators. Prioritizing high-impact CCMR indicators—such as earning an associate degree over a single dual credit course or achieving both career and college readiness—would more accurately reflect student

preparedness. This approach would also incentivize effective decision-making by education leaders and align with public sentiment. Notably, 76% of Texas voters support awarding more points to schools that better prepare students for postsecondary opportunities.²

III. ENSURING SMOOTH POSTSECONDARY PATHWAYS FOR STUDENTS

Texas school systems have invested significant resources in developing CTE pathways aligned with current IBC requirements. In addition to pointing school leaders to additional resources like the Jobs & Education for Texans (JET) grant program, we respectfully ask for consideration of the following as proposed changes take effect:

- **Five Year Review Cycle** – We recognize the proposed change to evaluate IBCs every 5 years starting in 2028 can promote stability with the A-F refresh and provide more consistency and less confusion for education leaders. However, the proposed five-year review cycle may not be responsive enough to shifting industry demands. An exception process within the five-year cycle could allow for adding emerging, high-value IBCs while maintaining workforce alignment.
- **Tri-Agency Alignment** – House Bill 8 (88R) funds community colleges based on student outcomes, including earning certificates and third-party credentials. As part of the Tri-Agency initiative, we encourage collaboration with the Texas Higher Education Coordinating Board to align approved IBCs with fundable credentials of value. Because IBCs are intended to be portable and seamlessly transferrable to postsecondary education, a crosswalk between approved IBCs and fundable credentials of value available at community colleges could enhance outcomes-based funding for both public schools and community colleges.
- **Advising** – Any changes to CCMR require additional support to help education leaders effectively guide students on postsecondary pathways. Counselors, advisors, and CTE staff should have thorough knowledge of the skills, deliverables, and timelines needed to navigate enrolling in higher education or gaining employment in careers that pay self-sustaining wages. Additional resources to communicate the value of different tiers of IBCs—through personalized, year-round advising grounded in data-driven accountability—will ensure Texas students are prepared for success beyond high school, benefitting both their financial future and the state’s continued economic growth.

The proposed tiering of IBCs presents a valuable opportunity to enhance the rigor and relevance of industry-based certifications in Texas. Providing additional clarity can ensure this system equitably reflects the value of different certifications while supporting school systems in their mission to prepare students for meaningful careers. We appreciate the Agency’s continued commitment to

² Ragnar Research Partners, Commit Partnership Statewide Education Poll, November 2024.



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strengthening Texas' accountability framework and look forward to ongoing dialogue to ensure these changes support students, educators, and employers alike.

Thank you for the opportunity to provide feedback on a system essential in ensuring Texas students are set up for postsecondary success.

Gratefully,

Kate Greer
Managing Director, Policy & State Coalition
The Commit Partnership

Supporting Organizations



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