

February 10, 2025

To: Texas Education Agency (Division of Performance Reporting)

Re: Preliminary 2025 Accountability Manual

Commissioner Morath and the Texas Education Agency,

The Commit Partnership and the 7 organizations below thank you for the opportunity to provide written comment on the [Preliminary 2025 Accountability Manual](#) as released in January 2025.

Texas boasts an accountability system that embraces high expectations for all students, aims to close achievement gaps, and promotes postsecondary success by incentivizing positive education system leader behaviors. Moreover, the system broadly reflects Texans’ desires to understand school performance with respect to academic indicators, with **78% of voters supporting the state giving A-F ratings to schools based on student growth or proficiency on core academic skills and achievements.**¹ Given this widespread support and the ability of the system to improve our state’s educational outcomes, the system’s strengths merit continued commitment.

The 2023 Accountability Refresh provided a meaningful opportunity to re-examine the strengths of our system and make modifications for its continuous improvement on behalf of the 5.5 million students in Texas. The adjustments made in the Refresh underscore the state’s dedication to data-driven decision-making on behalf of Texas students and their futures. Now moving into the second full year with adjusted cut points and scoring methodology, **we appreciate the Agency’s approach to the 2025 Accountability Manual as a re-adoption of the 2024 Accountability Manual. This consistency enables school systems to have the necessary time to continue adjusting to previously communicated updates—making strategic decisions to sunset programs or reallocate resources to better serve students—as well as implement required changes being phased in over time** that were forecasted in previous years’ manuals. Additionally, by not introducing new adjustments to the formula for this year’s scores, ratings **provide stakeholders a clearer picture of educational progress and offer data-driven insights via year-over-year comparisons** for consideration in an upcoming Refresh. This relative stability leverages the opportunity for school system leaders to focus on the important work of strengthening academic outcomes and district improvements.

I. CHANGES CONTINUE TO IMPROVE RIGOR OVER TIME, PHASING IN ALREADY COMMUNICATED ADJUSTMENTS

As the state continues to grapple with low academic proficiency and postsecondary attainment rates (currently only 47% of students are performing on grade-level across all grades and subjects and only 76% of the Class of 2023 graduated College, Career, or Military Ready),² we applaud the Agency’s commitment to improving the rigor and alignment of the system that we know spurs action to improve student outcomes.

¹ Ragnar Research Partners, Commit Statewide Poll, Nov. 2024.

² Texas Education Agency. TAPR 2024; Texas Education Agency. “Annual Report 2024.”

The targeted changes being phased in this year—all of which were outlined in previous manuals – **signal the Agency’s pursuit of continuous improvement** to further refine and align the definition of excellence in Texas education:

- **Maintaining a Data-Driven, Rigorous Bar for CCMR Indicators** – Although Texas has a four-year high school graduation rate of 90%,³ roughly just 1 in 4 students complete any kind of postsecondary degree (including an industry credential) within six years of graduation,⁴ causing Texas to rank 11th among its 12 peer states in terms of degree attainment for young adults aged 25-34.⁵ In light of these sobering statistics, we appreciate the Agency’s continued commitment to ensuring a more rigorous CCMR component that better reflects Texas’ workforce and economic needs through:
 - **The phase in of planned changes to IBCs and Programs of Study** which acknowledges that 1) not all IBCs are of equal value for students following high school graduation and school systems should be motivated to offer credential opportunities that lead to high-quality jobs, and 2) that a student’s completion of aligned coursework supports their postsecondary success and prospects of self-sustaining wage attainment. This latter Program of Study rollout begins with this upcoming accountability year while the former adjustment is already having a positive impact on student opportunities. The growth in IBCs attained since this change was introduced (a 6 ppt increase between 2023 and 2024), paired with the concurrent reduction in low-quality IBCs (a 2 ppt decrease between 2023 and 2024), reveals how strategic shifts in the A-F system positively influence school system decisions.
 - **Changes to the criteria to ensure rigorous and evidence-based college preparation courses** that respond to validity concerns and serve to improve quality of course offerings. High-quality college preparation courses play a critical role in college readiness for 12th grade students who would otherwise be unprepared for entry-level college coursework. However, far too often, courses lack the necessary rigor to support academic preparedness. Analysis from the April 2024 Texas Higher Education Coordinating Board report shows a substantial increase in the number of students utilizing a college-prep course waiver and performing dramatically worse in their completion of college-level reading, writing, and math courses.⁶ By developing a rigorous review and approval process, the Agency can ensure courses provide high-quality instruction and set students up for postsecondary success. We appreciate the Agency forecasting these changes to allow IHEs and LEAs to make the full necessary adjustments for the graduating Class of 2026. To ensure school systems have enough time to prepare and enroll students in approved programs, **we urge the Agency to adhere to the publicized release date for the list of approved college preparation courses of**

³ Ibid.

⁴ Texas Higher Education Coordinating Board. “THED: 8th Grade Cohorts Tracked through Higher Education.” <http://www.txhighereddata.org/index.cfm?objectId=4E600400-D970-11E8-BB650050560100A9>; Information for Class of 2012 Outcomes for this cohort were tracked for 11 years, including the last year of middle school, and six years for higher education.

⁵ Texas 2036. “Strategic Framework Dashboard, Goal #4: Postsecondary.” [https://texas2036.shinyapps.io/strategic-framework/?_inputs_&select_goal=%22Postsecondary%22#dashboard](https://texas2036.shinyapps.io/strategic-framework/?_inputs_&select_goal=%22Postsecondary%22#dashboard;); This data reflects 2022 rates of college completion within 6 years of first enrollment.

⁶ Texas Higher Education Coordinating Board. “College Preparatory Course Analysis Report.” <https://reportcenter.highered.texas.gov/reports/reports-and-studies-non-fiscal/college-preparatory-course-cpc-analysis-report-april-2024/>

March 2025 as well as to annually update the list, providing any changes in approved providers to school systems by December of each year (beginning December 2025).

II. FURTHER CONSIDERATIONS FOR CONTINUOUS IMPROVEMENT IN ENSURING THE ACCOUNTABILITY SYSTEM INCENTIVIZES POSITIVE SYSTEM LEADER DECISIONS ON BEHALF OF STUDENTS

The 2023 Refresh set forth a positive direction for the state’s accountability system, with the ongoing rollout of changes reflected in the 2025 Manual, yet there is still further work to ensure all students are on a path toward success. As the Agency gathers additional feedback for continuous improvement, we respectfully ask for consideration of the following:

- **CCMR Tiering** - Although we acknowledge and support the Agency’s efforts to improve the rigor of CCMR criteria in the Refresh and subsequent changes in this year’s Accountability Manual, we encourage the Agency to go further and tier CCMR indicators within the system, with greater weights for metrics linked to greater postsecondary success as determined by recent research, such as the study resourced through Rider 89 in Art. III of the 2024-25 biennium budget passed by the 88th Texas Legislature (HB 1). Placing greater weight on the most impactful CCMR indicators—for example, earning an associate degree versus fewer dual course credits or earning both a career and college ready indicator—would reward campuses that better prepare students for postsecondary success, incentivize education leaders to make the choices to get them there, and ultimately better reflect the desires of Texans. **76% of Texas voters support the A-F accountability system giving more points to schools that better prepare students for opportunities beyond high school graduation.**⁷
- **Lack of Recognition of Algebra 1 in Middle School** – Despite Texas’ nationally recognized effort to provide greater access to Algebra 1 in 8th grade (SB 2124, 88R), Texas’ accountability system does not yet fully recognize the implications of this shift in the current methodology. This is particularly important, as advanced math coursework is a known predictor of later academic outcomes. Undervaluing this in the A-F formula remains a missed opportunity to better ensure success of this data-driven policy, as we have heard from LEAs about the disincentive within the current accountability system regarding middle school advanced math coursework programs and the impact on accelerated testers in later years. Although the expanded reports on TPRS have been a valuable first step, we respectfully ask that the Agency consider strategies to ensure our state’s Accountability system is responsive to legislative requirements related to advanced academics and does not create misalignment in impact across Middle and High School campuses.

Overall, we are appreciative of the work TEA has put into the Accountability Manual—especially with this year’s release even earlier in the calendar year than in previous years and with the Preliminary 2026 Accountability Manual slated for an even more proactive preview in just a few months. **With the next Refresh cycle upcoming in 2027-28, we encourage the Agency to forecast projected changes with the new 5-year methodology as soon as possible to give school systems adequate time to provide feedback and prepare for anticipated adjustments.** Specifically, by exploring and committing now to the aforementioned additions in the 2025 Accountability Manual and the subsequent 2026 Manual, the Agency can provide school systems with the time

⁷ Ragnar Research Partners, Commit Statewide Poll, Nov. 2024.



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to take intentional measures for a successful transition. In turn, this action would allow the state to continue balancing changes happening on a predictable basis, while committing to meaningful adjustments that better support Texas in meeting our state’s educational goals.

We remain grateful for the opportunity to provide meaningful feedback on a system essential in ensuring educators provide the excellent education all Texas students deserve.

Gratefully,

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

Supporting Organizations

