May 27, 2026

Commissioner Mike Morath
Texas Education Agency
1701 N. Congress Ave.
Austin, TX 78701
Delivered via email: commissioner@tea.texas.gov and hunter.thompson@tea.texas.gov

Re: Implementation Timeline for Differential Weighting of Industry-Based Certifications

Dear Commissioner Morath:

On behalf of the Texas Association of School Boards (TASB) and our member districts, we respectfully ask the Texas Education Agency (TEA) to consider applying the differential weighting of Industry-Based Certifications (IBCs) under the 2028 A–F Accountability Refresh beginning with students entering 9th grade in fall 2028, rather than students entering 9th grade this fall.

This proposed timeline better reflects the intent of HB 8, which included explicit advance-notice requirements under the five-year refresh cycle for the A–F accountability system. The goal was to clearly give districts, campuses, students, and families time to prepare before rules shift. The timeline we are proposing for the new weighting of IBCs meets that intent.

We've heard concerns from our members about the accelerated timeline that was announced by the TEA earlier this spring. Specifically, districts providing Career and Technology Education (CTE) programs of study will be significantly challenged in trying to meet that accelerated schedule as there is insufficient lead time to make the staffing, programmatic, and academic advising adjustments that a change of this magnitude requires.

The challenges we're hearing about are not unique to small or rural districts but rather all districts across Texas. As you know, building or realigning a CTE program of study, hiring or reassigning teachers, securing industry partnerships, updating four-year academic plans, and counseling students and families on certification pathways are multi-year undertakings.

Districts cannot responsibly carry out those steps for students entering 9^{th} grade this fall when the new framework that will determine the accountability value of their pathways will not be finalized until after they have already begun high school.

Here's a more detailed look at the specific issues we're hearing from our members:

1. The current trajectory does not provide the advance notice HB 8 contemplates. Section 39.02301(i) requires the Agency to provide assessment schedules to districts two years before the school year to which they apply. Section 39.053(f-3) requires two-year advance reporting before the commissioner increases performance-standard scores on indicators. Section 39.0531(d) requires two-year notice before an industry certification is removed from the eligibility list. Each of these provisions points to the same baseline: <u>changes that impact accountability outcomes carry a two-year notice period before they take effect on students.</u>

2. Differential weighting functions as a de facto partial removal of an IBC. An IBC that previously earned a student full CCMR credit will, under the new framework, earn fractional credit based on tier. The economic and practical effect on a student's pathway and on a campus's CCMR calculation is equivalent to a partial removal. Section 39.0531(e) provides a hold-harmless for students already participating in a program of study aligned to a certification when its eligibility changes. Reading Chapter 39 to protect students against 100 percent removal but to leave them unprotected against, for example, a 60 percent devaluation mid-sequence is inconsistent with the structure the Legislature enacted.

3. The framework is not yet defined enough to support informed enrollment decisions. The 2028 Manual has not been published in final form, the actual point values have not been specified, and the Tier methodology continues to evolve. Students entering 9th grade this fall, their families, and their counselors cannot currently determine what CCMR credit a given certification will generate under the 2031 framework. Districts are nevertheless being asked to commit to programs of study — multi-year sequences of CTE coursework — for the 2026–27 school year on the basis of an unfinished framework. This is precisely the planning instability HB 8's advance-notice provisions were designed to prevent.

4. The Agency's own preliminary framework treated this as a 2028 change. The framework proposed in the fall of 2025 stated that full implementation of differential weighting would begin with the Class of 2032 and be fully implemented in the 2033 Refresh. The acceleration to the Class of 2030 occurred without public explanation and without the meaningful two-year notice that HB 8 contemplates.

Please know we are not asking the Agency to abandon differential weighting. Rather, we respectfully ask that TEA:

- Apply differential weighting of IBCs beginning with students entering 9th grade in fall 2028 (the Class of 2032); and
- Publish, as part of the proposed-rule package and description of the computational methodology, the actual point values (which we presume to be .33, .67, and 1) that will determine CCMR credit under differential weighting for IBCs.

This adjustment would align the rollout with HB 8's advance-notice framework, preserve the planning stability districts need to advise students and families in good faith, and protect the students whose CTE enrollment decisions for the 2026–27 school year are being made right now - and are in many cases already completed - under the existing accountability structure.

We are happy to discuss this in greater detail. Please do not hesitate to contact me at kelly.rasti@tasb.org or 210-875-1031.

Respectfully,

Kelly Rasti

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Texas Association of School Boards