

Written Comment Submitted on Senate Bill 1786 Rulemaking

July 13, 2025

Honorable Commissioner Rosser, Vice Chair Hock, and members of the Board,

Educate Texas submits this public comment in response to Texas Higher Education Coordinating Board (THECB) rulemaking on Senate Bill 1786 (SB 1786), published on June 13, 2025. We applaud the proactive measures to implement Senator Creighton and Representative VanDeaver's efforts in SB 1786. The Coordinating Board's proposed code revisions strengthen the landmark community college finance reforms established under House Bill 8 (88R) and represent a critical step forward for performance-based funding in Texas. This regulatory effort advances Educate Texas' commitment to ensuring Texas students earn a degree or credential that leads to a living wage and thriving communities, at all levels of education.

Given the complexity and importance of implementation, Educate Texas proudly partners with the Coordinating Board and remains committed to supporting each phase of the process. We offer the following feedback and recommendations that relate directly to our work in the spirit of continued collaboration for Building a Talent Strong Texas.

Section 1 – FAST Funding in 19 TAC §13.503:

Educate Texas affirms the Coordinating Board's dual credit expansion through the refinement of the Financial Aid for Swift Transfer (FAST) program. Research finds that disadvantaged students enroll in dual credit at lower rates than their peers, largely due to cost or program accessibility.¹ Fortunately, this statistic is changing as Texas leads the way in public investment towards early college academic opportunity for all students, including the recently proposed changes in SB 1786.²

We applaud the Coordinating Board's faithful expansion of FAST eligibility to include:

- (1) *Currently categorized educationally disadvantaged students in addition to the previous four years;* recognizing that a student's financial situation can change and should not limit access to academic opportunity.
- (2) *Extends eligibility to Windham School District high school students;* ensuring various student populations obtain dual credit opportunities, regardless of school setting.
- (3) *Pathways in Technology Early College High Schools (P-TECH) and Rural Pathway Excellence Partnership (R-PEP) students who are actively working to complete their programs post high school graduation;* acknowledging the significant value of College and Career Readiness School Models (CCRSM) and that the path to a credential is not always linear, but critical.

We reinforce the FAST expansion as a integral investment in educational attainment, social mobility, and the long-term prosperity of Texas.

¹Downs, L. & Phillips, L. (2024). Unpacking dual enrollment: Benefits, barriers, and opportunities for expansion. *New America*. <https://www.newamerica.org/education-policy/edcentral/unpacking-dual-enrollment-benefits-barriers-and-opportunities-for-expansion/>

²Senate Higher Education Subcommittee. (2025, January). Interim Report. *The State of Texas*. https://senate.texas.gov/cmtes/89/c532/c535_InterimReport_2024.pdf

Section 2 – Performance Tier Funding Updates in 19 TAC §13.643 & 19 TAC §13.646:

Educate Texas values the Coordinating Board’s efforts to refine the Credential of Value (COV) methodology and align Performance Tier Funding with SB 1786, as these changes strengthen student success and institutional progress.

We would like to highlight:

- **19 TAC §13.643(16)(B)** formally designates P-TECH as an eligible dual credit fundable outcome. Though subtle, this change carries significant weight for our work. The added acknowledgment affirms the essential role P-TECH plays in equipping students with credentials aligned to workforce demands. Educate Texas has been a longstanding advocate for P-TECH, delivering technical assistance to more than 302 P-TECH programs for 27,594 students in 183 districts, with consistent growth each year. These code revisions will support the growth and expansion of P-TECH programs in the coming years.
- **19 TAC §13.646(e)** expands the scope of performance tier funding to include the matriculation of community college credit earners to private or independent universities. This provision acknowledges the full range of successful transfer pathways and rightly values student mobility. Through initiatives like the Texas Transfer Alliance and the Texas Student Success Council (TSSC), Educate Texas brings together leaders from public and private universities, as well as community colleges, to improve credit mobility and student outcomes. We firmly champion all efforts to ensure credits earned at community colleges effectively transfer across the broader higher education landscape.

Section 3 – Additional Considerations

Tri-Agency Collaboration: While recent progress encourages us, the most critical work lies ahead. Achieving a truly effective education-to-career pipeline for all Texas students demands urgent, coordinated action from the Tri-Agency. SB 1786 outlines three additional pillars for success that require enhanced and intentional Tri-Agency coordination.

Educate Texas provides recommendations for applicable Tri-Agency regulatory efforts, including:

- (1) *Intentional coordination of Career and Technical Education (CTE) grants;* Found in Sec. 2308A.0115 of SB 1786, the bill calls for Tri-Agency alignment on CTE grants. The Tri-Agency must place emphasis on the coordination of CTE programs—particularly P-TECH and other workforce learning models—in forthcoming rulemaking. As the law calls for increased oversight and efficiency, we urge the Tri-Agency to approach this work with a spirit of intentional collaboration that prioritizes smart, strategic alignment, to best uplift CTE programs.
- (2) *Increased Wage Data Reporting;* Sec. 204.0025 of SB 1786 mandates enhanced wage reporting from employers to the Texas Workforce Commission (TWC), including detailed information such as industry, occupation, full- or part-time status, county of employment, and remote work designation. These strengthened data systems are essential for accurately assessing workforce outcomes and upholding the state’s Credential of Value (COV) priorities. Achieving this vision will require thoughtful implementation and active collaboration among all stakeholders, including employers and agencies.



- *(3) More Extensive Workforce Data:* Sec. 302.0205 establishes a new, formal labor market assessment process led by the TWC to better align higher education programs with regional workforce needs. This expands TWC's responsibility to collect and report detailed labor market data—including wages, occupation, and location—used to inform program planning at colleges and universities. While the bill enables collaboration with the Coordinating Board and Texas Education Agency (TEA), we recognize a valuable opportunity for the Tri-Agency to take a more proactive role in upholding data alignment and program design, ensuring workforce relevance across postsecondary offerings.

Educate Texas extends gratitude to the Coordinating Board for the opportunity to provide feedback during the regulatory process. We value our continued partnership with the Coordinating Board and look forward to the next steps in reinforcing postsecondary pathways to advance Building a Talent Strong Texas.

Sincerely,

Educate Texas Policy & Advocacy Team

1303 San Antonio Street

Austin, Texas 78701

737-708-8150

For more information, contact Kcarpenter@cftexas.org