

SUPPLEMENTAL MATERIALS

AGENDA ITEM IX-P (4)

Consideration of adopting the proposed amendments for Chapter 4, Subchapter C, Sections 4.56, 4.57, and 4.62 of Board Rules, concerning the Texas Success Initiative

RECOMMENDATION: Approval

Background Information:

The Texas Higher Education Coordinating Board (Coordinating Board) proposes amendments to the Texas Administrative Code, Title 19, Part 1, Chapter 4, Subchapter C, Sections 4.56, 4.57, and 4.62, concerning the Texas Success Initiative. Specifically, these amendments will provide college readiness benchmarks for the revised assessment approved by the Board under this title and provide the final phase for implementation of Corequisite models supporting underprepared students.

The amendment to Section 4.56 replaces the TSI Assessment, which expires in January 2021, with the TSI Assessment, Version 2.0 (TSIA2), as the Board-approved assessment instrument under this title. The amendment to Section 4.57 adds the college readiness benchmarks, based on faculty-driven, psychometric standard setting processes, for the TSIA2 and clarifies that results from both assessment instruments remain valid for the purposes of this title for five (5) years from date of testing. With regard to Section 4.62(8)(A)(iv), statewide developmental education (DE) outcomes data continue to demonstrate that underprepared students enrolled in corequisite models consistently and significantly outperform students in traditional stand-alone DE with regard to meeting college readiness and first college-level course completions. The amendment to Section 4.62 provides the final phase of corequisite implementation for 2021 and thereafter, ensuring eligible underprepared students are afforded the best opportunity in building momentum towards important milestones leading to certificate/degree completions and transfers.

Dr. Luz Bay, College Board, will present a brief overview of the standard setting process used to inform the proposed TSIA2 college readiness benchmarks. In addition, Jerel Booker, J.D., Assistant Commissioner for College Readiness and Success, will be available to answer questions.

Date Published in the *Texas Register*: September 4, 2020

Summary of comments received:

Comment: South Texas College raised concerns about the January 11, 2021 implementation date for the Texas Success Initiative Assessment, Version 2.0 (TSIA2) being during a peak enrollment period for this institution. A request was made to postpone the TSIA2 implementation date for three weeks to February 1, 2021 to enact a workable timeline or be provided a waiver due to a number of factors including testing restrictions, additional staff time, and fiscal implications that require Governing Board approval. Concerns about extended downtimes and negative impact on dual credit students were also raised.

THECB Response: The Coordinating Board appreciate this comment. Due to COVID-19 restrictions and resulting delays in the test development process for the TSIA2, the implementation date had been delayed two prior times. The final January implementation date was provided by the test vendor based on several factors, including postsecondary enrollment periods that vary by institution, as well as contractual considerations. We understand many local processes and practices have been, and continue to be, modified because of the pandemic and its impact. To this point, THECB has provided TSI COVID waivers applicable through AY2020-21 allowing institutions to use a number of indicators not involving TSIA/TSIA2 testing, such as GPA and course-taking patterns that can be used to place both undergraduate and dual credit students with unknown TSI status. Given these alternative placement options, we do not anticipate the test launch date to be a barrier for students. Unfortunately, test platform limitations do not provide for variations with regard to the implementation date. THECB staff is available to consult with institutions to explore various options for consideration to help ensure least impact on students and institutions.

Comment: Waco Independent School District raised concern about the proposed change in the WritePlacer essay score from a 4 to a 5 (on a 1-8 scale) and requested that it be kept at 4, the benchmark for the current TSIA.

THECB Response: The THECB appreciates this comment. The proposed college readiness benchmarks added to §4.56 are based on the standard setting and psychometric processes conducted by the College Board, the TSIA/TSIA2 test vendor. One of the major changes to the TSIA2 is the reduction from three subject areas of reading, writing, and mathematics to two, with the reading and writing sections being integrated to an English Language Arts Reading (ELAR) section. This change is in alignment with other assessments, including the SAT and STAAR EOCs. The ELAR college readiness benchmark is based on a student's performance in both the College Readiness Classification test (CRC) comprising computer-adaptive multiple-choice items and the WritePlacer essay. The essay cannot be used as a sole indicator of readiness. Because the new ELAR section has fewer overall multiple-choice items, the determination was made to place greater weighting on the WritePlacer essay component in order to support a reliable and valid ELAR standard. The College Board is scheduled to conduct its study after one year of implementation to confirm the reliability and validity of the college-readiness benchmarks and will make recommended modifications, if needed, as indicated by the findings. Furthermore, THECB has provided TSI COVID waivers applicable for both undergraduate and high school students through AY2020-21 allowing institutions to use a number of indicators that do not include, or can complement, TSIA testing that can be used to place students interested in qualifying for dual credit. It should also be noted that TSI applies

only to those courses designated by the offering institution as ELAR- or math-intensive; non-designated core curriculum courses are not subject to TSI.

Comment: One comment received from the Texas Federation of Teachers/AFL-CIO, one comment from South Plains College, and one joint comment from Victoria College raised concerns about the proposal to increase from 75% to 100% “all developmental education students to be enrolled in a corequisite course” and that a “one-size-fits-all” approach will negatively impact students.

THECB Response: While the THECB appreciates this comment, the concern raised that all developmental education students be enrolled in a corequisite course is not accurately citing TSI statute. Effective fall 2018, TSI statute (Texas Education Code, Subsection F-1, 51.336(c)) requires that at least 75% of students not in adult education and basic academic skills education (i.e., those assessed on the TSIA at levels 5 and 6 on a scale of 1-6) and enrolled in developmental education be placed in corequisite models. Authority to implement rules to address this statutory requirement is provided in 51.344(b)(d).

Such models allow the student to co-enroll in the entry-level college course and an intervention designed to provide just-in-time, aligned support to help ensure students’ successful completion of the college-level course. It is important to note that TSI statute is applicable only to those students who enroll in developmental education, not to the general developmental education population. Statute also provided exemptions from this requirement, including students enrolled in adult education and basic academic skills education (i.e., those assessed on the TSIA/TSIA2 at levels 1-4), and gave authority to enact rules for implementation (TEC, Subsection F-1, 51.336(d)). Based in data-informed decision-making, this proposal takes into account Texas outcomes data when comparing student performance pre-fall 2018 implementation and post-implementation, which confirm that students enrolled in corequisite models consistently and significantly outperform students who are enrolled in non-corequisite models (i.e., traditional, stand-alone developmental education courses). In the first year of implementation alone, over 11,500 more students successfully completed their entry-level college courses, including over 1,800 more Black students and 5,800 more Hispanic students, when compared to the previous pre-implementation year (Source: CBM002 and CBM00S). Providing equitable access and accelerating student success are key goals that are especially important in this COVID impacted environment.

The THECB clarified in 2018 that it does interpret the Education Code to require students who are not required to take college-level mathematics as part of their degree plan, to be TSI complete. THECB’s understanding and application of the Code is that while non-exempt students are still required to be assessed in order to provide them with information regarding their knowledge and skills levels, they do not need to be TSI complete in order to enroll in or graduate from such programs.

The concern that placing students in corequisite models results in a “one-size-fits-all” approach may be reflective of a misunderstanding with how corequisite models are implemented in Texas. Each institution has autonomy to select from a wide range of instructional and delivery options to individualize each student’s intervention and may include in this decision additional factors selected by the institution, such as student’s high school GPA, course-taking patterns, and non-cognitive factors (e.g., career goals, job, childcare, transportation, etc.). Intervention

options include a range from 4 to 96 hours; single or shared instruction; hybrid, online, or in-person delivery; modular/Emporium and/or computer labs; supplemental instruction; structured/open lab tutoring or course, among many others. Since 2011, THECB has provided comprehensive, statewide professional development and grant-funding opportunities to support institutions in research based and data-driven best practices related to the development, implementation, evaluation, enhancement, and scaling of their corequisite options.

Comment: In response to the proposed amendments to Texas Administrative Code (TAC), Title 19, Part 1, Chapter 4, Subchapter C, Sections 4.56, 4.57, and 4.62, the Texas Association of Community Colleges (TACC) commented that “advancing the proposed TSIA2 policy changes should only be done based on transparently shared information and evidence that the changes will improve equitable access and outcomes for students.”

THECB Response: The proposed amendments provide the college readiness benchmarks based on Item Review and Standard Setting processes driven by faculty content-expert input, as outlined in the publicly-posted RFA for the Texas Success Initiative Assessment, version 2.0 (TSIA2) test vendor, and closely aligned with the Texas Success Initiative Assessment (TSIA) test development process described in the TSIA technical manual. Dr. Luz Bay, lead psychometrician at the College Board, will provide additional information on these processes at the THECB Committee on Academic and Workforce Success (CAWS) meeting on October 21, 2020. As with the implementation of the TSIA and in alignment with test implementation standard practices, the College Board will be conducting a study to verify validity and reliability of benchmarks based on authentic test data after one year of implementation and will proposed changes, if any, based on findings. Benchmarks related to TSIA are not changed and test results remain valid up to five years from date of testing, as do those for TSIA2.

The proposed amendments do include a policy change related to corequisite implementation. Data regarding the impact of corequisite implementation and how it has improved equitable access and outcomes for students has been shared in a number of meetings, presentations, and webinars hosted by the Texas Higher Education Coordinating Board (THECB) since 2019. Student placements into college-level courses with or without support that were informed through the TSIA and other multiple measures factors, including TSI waivers in place through AY 2020-21, coupled with the scaling of corequisite model course enrollments (HB2223), have yielded positive results for both African American and Hispanic students statewide. When comparing corequisite course outcomes in fall 2019 (phase II, HB2223 implementation) to fall 2017 (pre-HB2223 implementation), there were 19,560 more first college-level course completions statewide. This number is nearly double the number of first college-level course completions in fall 2018, the first year of HB2223 implementation, although the percentage of required corequisite enrollments increased by only 25%. Of those 19,560 completions, 14,115, or 72 percent, were completions by African American or Hispanic students who completed their first college-level reading and/or writing or mathematics course in one semester. Furthermore, the newly proposed TSIA2 second-chance benchmark for mathematics will provide students with an additional opportunity to demonstrate college readiness based on diagnostic test performance. When considering developmental education reform efforts underway in Texas since 2012, no impact has been greater in a shorter time period than that resulting from these targeted interventions.

Below is the THECB response to summary statements included in joint comments received from The Charles Dana Center, E3 Alliance, and TACC regarding the proposed amendments to TAC, Title 19, Part 1, Chapter 4, Subchapter C, Sections 4.56, 4.57, and 4.62. The complete comments are provided as an addendum to this document.

Comment: The Charles Dana Center, E3 Alliance, and the TACC submitted joint comments. Among other comments, the group asserted that the THECB should not adopt new rules until the THECB and the College Board provide evidence that the TSIA2 will result in more equitable outcomes for students than a multiple measures approach.

THECB Response: The THECB appreciates this comment; however, the THECB disagrees. The proposed rules provide the college readiness benchmarks for the revised TSIA2 and continue the support of co-requisite. The proposed rules have no impact on use of multiple measures (i.e., holistic placement), as provided in TAC, Rule 4.55(c), and use of such measures by institutions when making placement decisions is not impacted by the proposed amendments. Furthermore, Texas Success Initiative (TSI) waivers enabling use of multiple measures assessment (MMA) for determining placements for students whose TSI status is unknown remain effective through AY 2020-21. The THECB is open to extending these waivers through AY 2021-22.

Comment: The Charles Dana Center, E3 Alliance, and TACC submitted joint comments. Among other comments, the group asserted that the THECB should not adopt new rules until the THECB and the College Board demonstrate that the TSIA2 will result in more accurate and reliable course placement for students than a multiple measures approach.

THECB Response: The THECB appreciates this comment. As part of the TSIA2 RFA development process, THECB contracted with a third-party expert consultant group to help ensure the processes outlined in the RFA met or exceeded the industry standard for computer-adaptive test development and implementation. Spearheaded by the competitively-selected TSIA/TSIA2 test vendor, the College Board, and as outlined in its application in response to the RFA and the publicly-posted RFA (781-9-21432), the development of the TSIA2 includes alignment to the most updated and revised standards (CCRS, TEKS, Adult Education, NRS EFLDs). The Item Review process, described in the application and the RFA and conducted in February 2020, requires TSIA2 items to be in alignment with current standards and college readiness expectations of secondary and post-secondary faculty, a process also used for the establishment and revision of the College and Career Readiness Standards (Texas Education Code, Section 28.008). This development process makes the TSIA2 more likely than the current TSIA to provide the most appropriate information to institutions as they make their placement decisions. In addition, the Standard Setting process and psychometric and statistical modeling outlined in their application ensure that the TSIA2 results are reliable and valid. Furthermore, the proposed amendments also outline a new "second chance" opportunity for students to demonstrate college readiness in math via diagnostic testing, thus aligning with the second-chance opportunity available in ELAR and allowing more students with demonstrated knowledge and skills to place directly in entry-level college coursework. Finally, the College Board will conduct, after one year of implementation, a study using authentic test results to verify validity of its benchmarks and will recommend modifications as findings dictate. These processes were similar to those implemented during the development of the current TSIA, where its validity

study findings resulted in only one adjustment to the writing standards. As required in TAC, Rule 4.55(c), assessment results, including diagnostic information provided for students not meeting the college readiness benchmark, should be used *in addition to* information provided through other indicators used in holistic placement decision-making. In support of this recommendation, THECB co-hosted with the Community College Research Center and MDRC in June 2020 a webinar (available on THECB's YouTube site) that focused on multiple measures assessment. THECB continues to provide technical assistance to institutions as they engage in their continuous improvement processes for assessment and placement of their students.

The TSIA/TSIA2-related information outlined above, as well as use of multiple measures and TSI waivers, have been provided at various levels of detail during a number of presentations, meetings, and webinars, including but not limited to the following:

Austin CC Coreq Conf	January 25, 2019
TCCTA Conference	March 1, 2019
TABPHE 2019 Conference	March 13, 2019
N TX Consort of CCs	March 29, 2019
College & Career Readiness Summit	April 15, 2019
Catch The Next (TTT)	April 18, 2019
TX Oncourse TSI Webinar	May 7, 2019
CCR-School Models Conference	June 18, 2019
HCC Corequisite Conference	June 21, 2019
THECB P-16 Conference	June 24, 2019
NOSS McCabe Conference	June 28, 2019
TACRAO Summer Conference (4-yr)	July 16, 2019
TACRAO Summer Conference (2-yr)	July 18, 2019
TEXAAN Fall Update	August 13, 2019
T3AMS Fall Update	October 12, 2019
CASP Conference Townhall	October 21, 2019
ACC Advising Conference	October 24, 2019
Catch The Next (TTT)	October 25, 2019
TSIA2 K-12 Webinar	October 28, 2019
Region 8 TSIA2 Update	October 29, 2020
TSIA2 IHE Webinar	October 30, 2019
TACRAO Fall Meeting	November 4, 2019
Region 17 TSIA2 Update	December 3, 2019
Region 3 TSIA2 Training (CB)	January 27, 2020
Region 2 TSIA2 Training (CB)	January 28, 2020
Region 1 TSIA2 Training (CB)	January 29, 2020
Region 4 TSIA2 Training (CB) 1-4	February 11, 2020
Region 4 TSIA2 Training (CB) 2-4	February 12, 2020
Region 4 TSIA2 Training (CB) 3-4	February 12, 2020
Region 4 TSIA2 Training (CB) 4-4	February 12, 2020
Region 15 TSIA2 Training (CB)	February 26, 2020
Region 18 TSIA2 Training (CB)	February 27, 2020
TEXAAN Annual Conference	February 27, 2020
TCCTA Annual Conference	February 28, 2020
Region 19 TSIA2 Training (CB)	February 28, 2020

Region 9 TSIA2 Training (CB)	March 2, 2020
Region 10 TSIA2 Training (CB)	March 4, 2020
Region 11 TSIA2 Training (CB) 1-2	March 5, 2020
Region 11 TSIA2 Training (CB) 2-2	March 6, 2020
TABPHE Conference	March 6, 2020
Catch The Next (TTT)	March 27, 2020
Texas Library Association	March 27, 2020
TEXAAN Fall Update	August 6, 2020
AEL Institute	September 15, 2020
TSIA2 Training: Part 1 (CB)	September 21, 2020
TSIA2 Training: Part 2 (CB)	September 22, 2020
TSIA2 Training: Part 3 (CB)	September 23, 2020
TSIA2 Training: Part 1 (CB)	September 28, 2020
TSIA2 Training: Part 2 (CB)	September 29, 2020
TSIA2 Training: Part 3 (CB)	September 30, 2020
HCC Corequisite Conference	October 2, 2020
T3AMS Fall Update	October 9, 2020
TSIA2 Training: Part 1 (CB)	October 12, 2020
TSIA2 Training: Part 2 (CB)	October 13, 2020
TX Oncourse TSIA2 Webinar	October 13, 2020
TSIA2 Training: Part 3 (CB)	October 14, 2020

Upcoming Events:

CASP Conference	October 20, 2020
TSIA2 Training: Part 1 (CB)	October 26, 2020
TSIA2 Training: Part 2 (CB)	October 27, 2020
TSIA2 Training: Part 3 (CB)	October 28, 2020
TSIA2 Training: Part 1 (CB)	November 2, 2020
TSIA2 Training: Part 2 (CB)	November 3, 2020
TSIA2 Training: Part 3 (CB)	November 4, 2020
TSIA2 Training: Part 1 (CB)	November 16, 2020
TSIA2 Training: Part 2 (CB)	November 17, 2020
TSIA2 Training: Part 3 (CB)	November 18, 2020
Statewide TSIA2 Launch Webinar	November 18, 2020

Meetings:

E3 Alliance (@ THECB)	December 19, 2019
Dana Center (@Dana Center)	February 18, 2020

Comment: The Charles Dana Center, E3 Alliance, and TACC jointly commented that the THECB should not adopt new rules until the THECB and the College Board provide thorough and transparent documentation about the standard-setting process, the scale and cut score development, and any variation between the requirements of the RFP and the final version of the TSIA2.

THECB Response: The THECB appreciates this comment; however, the agency respectfully disagrees. The THECB has been fully transparent with TSIA2 development process (see previous response), including inviting participation in the Item Review and Standard Setting processes of subject matter experts at the secondary, postsecondary (community college,

university), and adult education levels and those faculty members affiliated with The Charles Dana Center, E3 Alliance, and TACC. The THECB also outlined the test development process in detail in the publicly posted RFA, the test manual shared by THECB with The Charles Dana Center, E3 Alliance, and TACC, test blueprint, and test specifications documents already released to the public or currently undergoing final review. The THECB will make all materials available prior to test launch. Dr. Luz Bay, lead psychometrician from the College Board, will provide a briefing at the THECB CAWS meeting on October 21, 2020, to further explain the Standard Setting and Item Review processes, including modifications resulting from COVID-related restrictions.

Comment: The Charles Dana Center, E3 Alliance, and TACC jointly commented that the THECB should not adopt new rules until the THECB and the College Board publish multiple cut scores for use in mathematics pathways placement. In addition, THECB and the College Board should share documentation on how the mathematics component measures were developed and provide guidance on how the scores support placing students into multiple mathematics pathways. Finally, the THECB should establish a plan for communicating with institutions about implementing the existing rule requiring that a student's transcript reflect TSI readiness for multiple math pathways.

THECB Response: The THECB appreciates this comment; however, the agency respectfully disagrees. TSI statute (Texas Education Code, Section 51, Subsection F-1, 51.333) requires that the assessment instrument designated by the Board is used to determine readiness for students to enter freshman-level academic coursework. Rule 4.59 outlines a number of ways institutions can determine a student's readiness and includes the option for institutions to determine that mathematics students, upon complete of their plan for academic success (Rule 4.58), may be designated as ready for any entry-level college math course or ready only the non-Algebra-based math courses. These rules were established through the negotiated rule-making process and included participation and feedback from the Dana Center. Because use of mathematics pathways is not a required component of developmental education delivery, THECB rules must consider all options that Texas institutions offer for their students, including those institutions that do not participate in mathematics pathways programs.

During many discussions with staff from THECB, the Dana Center, E3 Alliance, and TACC, we agree that advising continues to be an area requiring improvement in the assessment and placement process, and underrepresented students often have the least access to the type of robust and high-quality advising needed to ensure students not only select the appropriate mathematics course needed for their degree plan but also ensure that students fully understand the consequences, including in time and money, of selecting the "wrong" mathematics course or changing majors. Some state that students rarely change from a degree plan requiring a non-algebra-based course to an algebra-based course. However, many students, for a variety of reasons, change from other majors to business (the most popular major) or teaching, both of which generally result in a move to algebra-based mathematics.

The THECB has provided a number of webinars and presentations, including at TACRAO and specifically for those responsible for reporting, to provide guidance for those institutions that participate in mathematics pathways programs and choose to designate college readiness based on students' preparation.

Comment: The Charles Dana Center, E3 Alliance, and TACC jointly commented that the THECB should not adopt new rules until the institutions of higher education and the THECB conclude existing placement studies.

THECB Response: Placement decision-making, including use of assessment results and multiple measures, is part of each institution's ongoing, continuous improvement process. The THECB has, and will continue, to provide guidance, data, technical assistance, and other resources to aid in this process. Findings from formal studies will be shared with all stakeholders to further inform this process.

Comment: No new rules should be adopted until the THECB and the College Board provide equitable and remote access to beta testing opportunities for the TSIA2.

THECB Response: Beta testing for the new TSIA2 is provided by the THECB and the test vendor to allow faculty members to experience the assessment process. Because of test security, including use of live items, staffing, and capacity limitations with the test vendor to address potential requests from over 1200 school districts, this process unfortunately had to be limited to current faculty at Texas institutions of higher education. Test administrators also continue to report limited capacity with online remote proctoring, compelling a decision to prioritize limited online spaces for students rather than for beta testing. We feel assured that faculty affiliated with the Dana Center, E3 Alliance, and TACC have access to Beta testing and can share information about their experiences with those interested.

Comment: The Charles Dana Center, E3 Alliance, and TACC jointly commented that any rule that requires colleges to use cut scores to place students into entry-level courses should include multiple measures to assign students to entry-level courses with or without corequisite support. The THECB and College Board should be required to provide guidance on how the TSIA2 can be used to assess varied levels of student readiness for entry-level courses and improve the targeting of corequisite.

THECB Response: The THECB has allowed colleges and IHEs to implement TSI waivers through AY 2020-21, to permit the use of multiple measures assessment for student placement into entry-level courses with or without corequisite support. The THECB recommends these waivers to be extended through AY 2021-22 to allow for use of multiple measures also during a time when the pandemic and its impact may be minimal. During the TSI waiver period(s), the THECB is working with MDRC and CCRC to further study multiple measures assessment (MMA) and provide technical assistance directly to institutions, with findings used to inform future policy recommendations beyond the waiver period. Use of MMA is not contingent upon, or in conflict with, the launch of TSIA2 and should be considered on its own merits, independent of the TSIA2.

Comment: Finally, the Charles Dana Center, E3 Alliance, and TACC jointly commented that in reviewing the final version of HB 2223 approved by the 85th Texas Legislature, the THECB lacks authority to require an increase in the corequisite mandate beyond 75% of non-exempt students.

THECB Response: Effective fall 2018, TSI statute (Texas Education Code, Subsection F-1, 51.336(c)) requires that "***at least*** 75% of students not in adult education and basic academic skills education" (i.e., those assessed on the TSIA at levels 5 and 6 on a scale of 1-6) and enrolled in developmental education be placed in corequisite models. Authority to implement rules to address this statutory requirement is provided in 51.344(b)(d).

The amendments have been prepared in the following format:

- New language is in lowercase, underlined, and shaded.
- Deleted language is bracketed and struck through.
- When new language replaces deleted language, the new language precedes the deleted language.

Chapter 4 - Rules Applying To All Public Institutions Of Higher Education In Texas

Subchapter C – Texas Success Initiative

§4.51	Purpose
§4.52	Authority
§4.53	Definitions
§4.54	Exemptions, Exceptions, and Waivers
§4.55	Assessment and Placement
§4.56	Assessment Instrument
§4.57	College Ready Standards
§4.58	Advisement and Plan for Academic Success
§4.59	Determination of Readiness to Perform Entry-Level Freshman Coursework
§4.60	Evaluation and Reporting
§4.61	Limited Waiver of Rules
§4.62	Required Components of Developmental Education Programs
§4.63	Privacy of Student Information

§§4.51 – 4.55 No changes

§4.56 Assessment Instrument

Effective fall 2013, the Texas Success Initiative Assessment (TSIA) is the only Board-approved assessment instrument used under this title. The TSIA, Version 2.0 (TSIA2) will replace the TSIA on January 11, 2021, at which time the TSIA2 will be the only Board-approved assessment instrument offered under this title. ~~[Beginning with the institution's first class day of Academic Year (fall) 2013, an institution of higher education shall use the TSI Assessment offered by the College Board as the only Board-approved assessment instrument under this title. Any previously employed assessments (ACCUPLACER, Compass, THEA, Asset, Compass-ESL, ACCUPLACER-ESL) can no longer be used under this title for entering students who initially enroll in any course on or after the institution's first class day in fall 2013 or for any students retesting for TSI purposes.]~~ Test administrators of the TSI Assessment must follow the requirements and processes for test administration as set forth by the THECB and the test vendor.

4.57 College Ready Standards

(a) Effective the institution's first class day of fall 2017, the following minimum college readiness ~~[passing]~~ standards (also known as "cut scores") for reading, mathematics, and writing on the TSI Assessment (TSIA) shall be used by an institution to determine a student's readiness to enroll in entry-level freshman coursework:

- (1) Reading 351;
- (2) Mathematics 350; and
- (3) Writing:

(A) a placement score of at least 340, and an essay score of at least 4; or

(B) a placement score of less than 340 and an ABE Diagnostic level of at least 4 and an essay score of at least 5.

(b) Effective January 11, 2021, the following minimum college readiness standards (also known as "cut scores") for English Language Arts Reading (ELAR) and mathematics on the TSI Assessment, Version 2.0 (TSIA2) shall be used by an institution to determine a student's readiness to enroll in entry-level freshman coursework:

(1) Mathematics (for college-level coursework with mathematics-intensive designation by the offering institution):

(A) a College Readiness Classification (CRC) score of at least 950; or

(B) a CRC score below 950 and a Diagnostic level of 6.

(2) ELAR (for college-level coursework with reading, writing, or reading and writing-intensive designation by the offering institution):

(A) a College Readiness Classification (CRC) score of at least 945 and an essay score of at least 5; or

(B) a CRC score below 945 and a Diagnostic level of 5 or 6 and an essay score of at least 5.

(c) ~~[(b)]~~ Institutions must use the TSI Assessment ~~(TSIA or TSIA2)~~ diagnostic results, along with other holistic factors, in their consideration of courses and/or interventions addressing the educational and training needs of undergraduate students not meeting the college readiness standards as defined in subsection (a) ~~or (b)~~ of this section.

(d) ~~[(e)]~~ An institution shall not require higher or lower college readiness standards on any or all portions of the TSI Assessment ~~(TSIA or TSIA2)~~ to determine a student's readiness to enroll in entry-level freshman coursework.

(e) ~~[(d)]~~ For a student with an existing plan for academic success as required in §4.58 ~~of this title (relating to Advisement and Plan for Academic Success)~~, the institution must revise the plan as needed to align with the college readiness standards as defined in subsections (a) ~~or (b)~~, ~~as applicable~~, of this section.

(f) ~~[(e)]~~ Both TSI Assessment ~~(TSIA and TSIA2)~~ results are valid ~~for the purposes of this title~~ for five (5) years from date of testing.

§§4.58 – 4.61 No changes

§4.62 Required Components of Developmental Education Programs

(a) an institution of higher education must base developmental coursework on research-based best practices that include all of the following components:

- (1) assessment;
- (2) differentiated placement and instruction;
- (3) faculty development;
- (4) support services;
- (5) program evaluation;
- (6) integration of technology with an emphasis on instructional support programs;
- (7) non-course-based developmental education interventions; and
- (8) Each institution of higher education shall develop and implement corequisite model(s) as defined in §4.53(7) of this title (relating to Definitions) for developmental mathematics and integrated reading/writing (IRW) courses and interventions, and each institution must ensure that a minimum percentage of its undergraduate students other than those exempt as outlined in subparagraph (B) of this paragraph must be enrolled in such corequisite model(s).
 - (A) Each public institution of higher education must ensure that the institution's developmental courses and interventions comply with the requirements of this section according to the following schedule:
 - (i) for the 2018-2019 academic year, at least 25 percent of the institution's non-exempt students enrolled by subject area in developmental education must be enrolled in corequisite model(s);
 - (ii) for the 2019-2020 academic year, at least 50 percent of the institution's non-exempt students enrolled by subject area in developmental education must be enrolled in corequisite model(s);
 - (iii) for the 2020-2021 academic year, at least 75 percent of the institution's non-exempt students enrolled by subject area in developmental education must be enrolled in corequisite model(s);
 - (iv) for the 2021-2022 academic year and thereafter, 100 percent of the institution's non-exempt students enrolled by subject area in developmental education must be enrolled in corequisite model(s).

(B) The following students are exempt by subject area(s) from this requirement:

- (i) students assessed at ABE Diagnostic levels 1-4 on the TSI Assessment;
 - (ii) students who are college ready;
 - (iii) students enrolled in adult education;
 - (iv) students enrolled in degree plans not requiring a freshman-level academic mathematics course;
 - (v) students who meet one or more of the exemptions as outlined in §4.54 (relating to Exemptions, Exceptions, and Waivers);
- (C) Institutions of higher education must adhere to developmental education funding limitations per TAC §13.107 (relating to Limitation on Formula Funding for Remedial and Developmental Courses and Interventions).
- (b) As part of subsection (a)(2) of this section, institutions shall offer Integrated Reading and Writing (IRW) course/intervention at the highest level (just below college-readiness as determined by the institution) by spring 2015.
- (c) As part of subsection (a)(7) of this section, institutions shall offer at least one section of non-course competency-based intervention (NCBO) per developmental education subject area by spring 2015.

§4.63 No changes

Coordinating Board staff received five (6) public comments on the proposed amendments to Texas Administrative Code, Title 19, Part 1, Chapter 4, Subchapter C, Sections 4.56, 4.57, and 4.62. The comments were summarized on the previous pages. The comments are provided in full below.

1. Matthew S. Hebbard
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Received 09.10.20

Dear Dr. Booker,

I would like to submit to you my concerns regarding the January 11th, 2021 implementation date for the new timeline for the TSI 2.0 exam. The month of January is traditionally our peak enrollment period and for Community Colleges that serve a high percentage of minority students, the proposed date falls right during the height of the peak enrollment period which is two weeks prior to the start of the Spring 2021 semester.

I am very concerned that this proposed date does not consider the enrollment cycle at the Community College and will create an additional barrier for our students. It will take time for students to understand the new test structure. We are already testing students for the Spring and have a full schedule 6 days each week to accommodate students under our County social distancing requirements. We have offered the remote option since May; however, many students still seek the in-person option. It will take additional staff hours to prepare for this rapid transition. The proposed rules indicate that "...there will not be any fiscal implications to state or local governments as a result of enforcing or administering the rules," however there will be fiscal implications for our institution. I do not recall any survey or instrument that was sent out to our institutions in consultation with this proposed timeline and we were not given the opportunity to review the potential financial impact prior to the public comment period. It would have been helpful to have this avenue rather than the public comment period.

All fee changes for FY20-21 have already been approved by our Governing Board. We had already submitted a motion for our Board months ago to adopt the new TSI 2.0 fee structure and then received very late notification from the THECB that the implementation would be delayed until 2021 with no further information or details. This was an emergency motion for our full Board in August as the notification was past our timeline for Board Committee review. Now, once again we will need to go back to the Board in order to submit yet another motion for the new fee structure. Because these are proposed and not final rule changes, we cannot move forward with our Board until we receive the final notification. Should we receive the notification in October, this will once again give us a very short timeline for our Board to approve and we will need to rush an emergency motion so we are legally authorized to move forward. This will give us very little time to restructure our testing reservation system and may involve overtime hours to comply. Our system cannot be modified to operate from now until January 10th, 2021 and then switch over at midnight on January 11th, 2021 with a new test structure. We would

need to schedule downtime to handle the switchover and would need to cancel test sessions until we can reboot and we would not be able to help students to finalize enrollment. Also, there are additional costs of time and effort for programming changes required for our Student Information System. This operation requires end user staff support and testing as well as internal IT support. Testing and production modifications during a high usage period are inherently risky. Any issues experienced with automatic data transfer of test scores from the vendor will require staff time and investigation as well as support from our SIS vendor. We simply need time to adequately test and ensure that students receive timely and accurate information and are able to register for classes without any perquisite errors. If we are required to comply with the 1/11 date, we could possibly risk extended downtimes and our students, who are mostly studying online and off-campus, will not have system access for extended periods. All major IT projects have been set and staff schedules as well from now through January. We would need to revise these schedules and project timelines which may incur additional costs and expenses to the College.

We have experienced a severe drop in enrollment and are operating under strict guidelines on-campus due to our regional issue with the COVID-19 positivity rate which is the highest in the state and the population most impacted. We have been offering in-person TSI sessions with social distancing since April and remote proctored sessions since May and it is still a huge challenge for us to be able to help students test. School districts have been on lockdown since Spring Break in our region and are still not open and accessible for student TSI testing. The greatest enrollment drop we experienced this Fall is with our 2020 high school graduates/FTIC population. We have one of the largest dual credit populations in Texas and the proposed date will impact thousands of new dual students attempting to register for Spring. Since we do not yet know when our high schools will re-open and test students, we expect to see high levels of testing in January due to the current COVID-19 cases in the region. The impact on dual students will be high.

It is absolutely critical that we are free of any additional barriers from now until the start of the Spring 2021 semester if we are going to reverse our regional decline in the college going rate. We have a long road ahead of us. Last night, we just completed our fall Census and we are ready to start Spring registration on September 28th and the ability to have a smooth testing period is essential to both dual and traditional enrollments because of the state TSI College Readiness and Dual Credit permissions standards.

I respectfully request that the start date for the TSI 2.0 exam be moved to a later date after the start of the Spring semester as the current proposed date seems to be arbitrary in my view. **I would like propose a new start date of 2/1/20 which is only three weeks later than the proposed date.**

If there are any contractual obligations that require the CB to comply with the 1/11/21 date, then I respectfully request a waiver for our institution and all community colleges so that we can continue to support students without any undue additional burden. It is simply not best practice in Enrollment Management to have such a drastic change when we are at the height of our registration volume at the very end of our Spring enrollment cycle. The new proposed start date takes into consideration the reality we experience and that of our students. The new date would allow us to close out the registration cycle for Spring cleanly and then ensure we make the switch over to the new test successfully during a much lower demand period with a few

weeks before we begin the Summer and Fall registration cycle in March. Finally, the new date would still ensure a timely transition to respect the need and goal for the THECB vision for the new test and new test capabilities. Once we transition, the new test will be much better for our students, however we just need a workable timeline for implementation.

Thank you for your consideration and understanding. I am available at your convenience for further information upon request.

2. Scott McClanahan, Ed.D.
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Received 09.22.20

While I appreciate the agency's desire to integrate the areas of Reading and Writing, a best practice says that all educators should, I am disturbed about the proposed passing score on the writing section.

Sitting in the TSIA 2.0 training today, I discovered that neither the essay prompts nor the writing scoring rubrics are changing for the TSIA2, yet the passing essay score has miraculously been raised back to a 5 from the 4 the TSI currently requires.

The College Board's TSI Validation study of 2016 and 2017 found no appreciable difference between those students who had earned a 4 on the WritePlacer essay and 340 points on the multiple choice section of the TSI and those that had a 5 on the WritePlacer essay and 340 points on the multiple choice when examining the percentage of students completing their English Composition courses successfully. Therefore, the TSIA passing score for the writing test was lowered. Since then I have seen numerous students allowed entry into ENGL 1301 who also finished the course successfully.

Given that the WritePlacer isn't changing in content or scoring, I would ask why

From the K-12 point of view, this is a detrimental move, as it will disallow many students, especially those who are English Learners, from taking credit-earning English courses. Since the Institute of Education Science at the National Center for Education Statistics reported in 2016 that only 25% of those students required to take a developmental course eventually graduate, this raising of the passing writing score seems in direct opposition to the state's 60x30 goal of completion. As a K-12 Dual Credit program Director and the Past President of the Heart of Texas P-20 Council, I am confident this decision threatens to not only stop our progress toward the completion goal but also send us tumbling backwards.

Therefore, I would ask that you reconsider moving the Essay passing score from a score of 4 on the TSI Writing Test to a score of 5 on the TSIA2 ELAR test.

3. Gail Malone, Ph.D.
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Received 09.30.20

To whom it may concern,

I am writing you regarding the extension and expansion of HB 2223 as follows, item iv:

(i) for the 2018-2019 academic year, at least 25 percent of the institution's non-exempt students enrolled by subject area in developmental education must be enrolled in corequisite model(s);

(ii) for the 2019-2020 academic year, at least 50 percent of the institution's non-exempt students enrolled by subject area in developmental education must be enrolled in corequisite model(s);

(iii) for the 2020-2021 academic year, at least 75 percent of the institution's non-exempt students enrolled by subject area in developmental education must be enrolled in corequisite model(s);

(iv) for the **2021-2022 academic year and thereafter, 100 percent of the institution's non-exempt students enrolled by subject area in developmental education must be enrolled in corequisite model(s).**

I question the expansion of the corequisite developmental education mandate as it a) lacks legislative authority and, b) while laudable in theory, is, in practice, unrealistic. Although my institution has a **recommendation** for 100 percent corequisite developmental education (and has had this policy in effect since fall 2018 when HB 2223 was first implemented), we have yet to achieve this goal in practice. We have come as close as 89 percent (corequisite integrated reading/writing and college-level English in summer 2019); however, we also take very seriously our commitment to meeting individual student needs, meaning we make exceptions as necessary to accommodate and effectively serve our student body. To explain further, we serve a majority-minority student body of first-generation, low-income students; and, as you realize, many community college students face the demands of balancing work, child and elder care responsibilities, and even food and housing insecurities. The COVID-19 pandemic only has exacerbated their struggles to achieve a college education. We want all of our students to succeed, and that simply prohibits the use of a cookie-cutter, "one-size fits all" rigid approach and plan for all students.

I urge you to adhere to the original legislation and support the 75 percent mandate. I think Representative Giddings had a sound rationale for her original legislation. Moreover, I am old enough to remember a time when 100 percent of students entering Texas higher education were given one plan and, if that plan didn't work out, the consolation was the slogan: "The student has a right to fail." I reject a return to those *not-so-good-old-days* because I believe all Texas students deserve not a right to fail, but an opportunity to succeed.

Thank you for your consideration of my request.

4. Dena Donaldson
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Texas AFT Comments on Proposed Amendments to Texas Administrative Code, Title 19, Part 1, Chapter 4, Subchapter C, §§4.56, 4.57, and 4.62

The Texas Higher Education Coordinating Board (THECB) proposes amendments to the Texas Administrative Code, Title 19, Part 1, Chapter 4, Subchapter C, §§4.56, 4.57, and 4.62, concerning the Texas Success Initiative. The proposed rule change that would require 100% corequisite implementation in Fall 2021 could create barriers for non-traditional students seeking higher education.

THECB currently requires that 75% of all developmental education students be enrolled in a corequisite course. This approach has shown promise in helping students complete college gateway courses successfully, but it is still new, and the research is unclear on the benefits of such a policy for all student populations. The corequisite model has not been studied thoroughly enough to justify its level of implementation in the nation. In fact, even the Community College Research Center (CCRC), which is the single-most cited research institution undergirding the corequisite reform movement, in their latest paper on a state-wide corequisite initiative in Tennessee, admitted that the "corequisite model has not yet been subjected to rigorous evaluation" (Belfield et al., 2016, p. 8) (Gudas, 2017).

Given that not every student enters college with the same needs or resources, a one-size-fits-all corequisite requirement is not sensitive to the circumstances of individual students and may have the unintended consequence of limiting access or alienating certain student populations.

Nearly 74% of students who enroll in college are considered non-traditional students who are not recent high school students, ages 18-24. Community colleges often serve students who have not been in formal educational settings for many years: veterans, parents, second career seekers, etc. For these students, having an opportunity to brush up on their math or writing skills through developmental classes prior to taking credit-bearing courses can give them the foundation that they need to feel confident in moving on to more advanced course work. Developmental courses are also taught by faculty with experience in helping students transfer their work skills and life experience to the classroom. It is not uncommon for non-traditional students to also be working full or part-time, having family responsibilities, and other considerations that may limit the number of courses that can be taken at one time.

For this reason, we advise against the adoption of the proposed rule change that will require 100% of students to enroll in corequisite education courses. Leaving the requirement at 75% allows the state to work toward improved degree acquisition, but it also allows individual students the right to choose their own preferred method of instruction. Texas students should

have the right to determine their own futures so having choices as they enter college is imperative.

Thank you for considering our comments on the proposed rule change.

Resources:

Belfield, C. R., Jenkins, D., & Lahr, H. (2016). *Is corequisite remediation cost effective? Early findings from Tennessee* (CCRC Research Brief No. 62). Community College Research Center, Teachers College, Columbia University.

<https://ccrc.tc.columbia.edu/media/k2/attachments/corequisite-remediation-cost-effective-tennessee.pdf>

Goudas, A. (2017, updated 2020). THE COREQUISITE REFORM MOVEMENT: A HIGHER EDUCATION BAIT AND SWITCH. Community College Data, Core requisite Reform Movement, <http://communitycollegedata.com/articles/the-corequisite-reform-movement/>

5. Melanie Yosko
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Received Jointly 10.02.20

To whom it may concern,

We are writing to express concern about the proposal in Texas Education Code Chapter 4, Subchapter C, Rule 4.57 that says "for the year 2021-2022 academic year and thereafter, 100% of the institution's non-exempt students enrolled by subject area in developmental education must be enrolled in co-requisite model(s)."

At Victoria College, 75% of our incoming first-time-in-college students are not TSI complete in mathematics. While we have made great strides in encouraging low-performing math students to choose a non-algebraic math pathway, we still have many students who need College Algebra and potentially subsequent courses for their degree. These students need a thorough understanding of math if they hope to be successful.

Victoria College understands the goal of giving students an opportunity to achieve success in a college-level math course more quickly. The co-requisite model works well for some students, on some pathways. We have seen success with this model for students on a non-algebraic path. However, 100% co-requisite enrollment in a college-level course is a barrier to success for less prepared students who need College Algebra or other algebraic-intensive courses. Students with STEM majors who score an ABE score of 5 might be more likely to achieve success by completing an intermediate algebra course (with co-requisite support) in one semester, followed by College Algebra the following semester. Victoria College has made every effort to accelerate developmental mathematics students more quickly through math courses by streamlining pathways and using co-enrollment strategies.

As we increase our co-requisite percentages, we are concerned with how this will impact our students, particularly on the algebraic side. Our primary goal is for them to achieve success as early as possible. Putting them in courses for which they are not prepared does not move them any closer to their goals of a college degree.

For students on an algebraic path who score an ABE 5 on the TSIA, to potentially earn 3 credit hours for College Algebra will require taking 8-10 contact hours of math per week per semester, until success. Most of our students have families and other commitments. Use of NCBO instruction makes it difficult for students to be eligible for financial aid and/or full-time status. We cannot simply add more hours of instruction in a week and expect content mastery. It will undoubtedly lead to student burnout and lead to increased dropout rates.

Additionally, in our community, a large number of our incoming freshmen do not need a credit-level math course for their programs. However, they do need to be TSI complete. Going to 100% would require these students to take a college-level mathematics course. It seems counterproductive to require a student to take a course they do not need for their chosen program. Students and their backgrounds must be considered. These students have great anxiety related to mathematics and will be reluctant to enroll in 10 hours of math per week. Many of them select an educational program based on the math requirements. Requiring them to take a mathematics course that is not specifically part of their program may kill their aspiration to try college.

We have individualized advising for every student; the purpose is to find the best options for students, taking many factors into consideration, and finding what works best for them. Telling all students they must follow the same path is contradictory to best practices. This would eliminate the possibility of us providing best solution for individual students.

“One-size fits all” models seldom produce the best solutions.

Respectfully submitted by the Victoria College Mathematics department.

6. Martha Ellis
Interim Managing Director
The Charles A. Dana Center
The University of Texas at Austin

Susan Dawson
President
E3 Alliance

Jacob Fraire
President and CEO
Texas Association of Community Colleges

Cynthia Ferrell
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Received Jointly 10.02.20

Introduction

Our organizations have carefully reviewed [the proposed rule changes for the Texas Success Initiative Assessment, Version 2.0 \(TSIA2\)](#) and, in consultation with our staff, members, and partners, have reached consensus on the recommendations included in this memo.

First and foremost, we strongly urge the Committee on Academic and Workforce Success (CAWS) to delay the adoption of the proposed rules associated with the TSIA2. We understand that TSIA2 development has been long in the making, and we commend the THECB for starting the process of aligning the TSIA2 with the state's College and Career Readiness Standards. Nonetheless, we believe that advancing the proposed TSIA2 policy changes should only be done based on transparently shared information and evidence that the changes will improve equitable access and outcomes for students.

Instead of the proposed rule changes, we support extending and expanding on the Commissioner's guidance around the ["exceptional circumstances" provision of TSI](#) to allow institutions to place students using multiple measures of college readiness, including measures (e.g., high school GPA) that have been shown in research to be more accurate and reliable predictors of preparedness for entry-level college courses than standardized exams.

The COVID-19 pandemic and the ensuing disruption in testing reliability and in college operations have required the state to adopt evidence-based policies that assess student readiness for college using multiple measures. Approving the TSIA2 without allowing multiple measures of college readiness represents a step backwards from this significant progress and risks continually undermining the state's ongoing efforts to improve equitable access and outcomes in postsecondary education.

The two sections below outline the conditions that our organizations believe must be met prior to the approval of the TSIA2. The first section of comments refers to the TSIA2 testing instrument and related changes for placement policy. The second section refers to the proposed rule to increase the HB 2223 mandate from 75% to 100% of underprepared students in corequisite courses beginning in AY 2021–2022.

We request that the committee consider each comment separately and respond to the specific action areas or requests for documentation for each area. We believe that all affected

stakeholders should be able to review and respond to the requested information prior to the approval of the proposed rules.

Section 1: TSIA2 Testing Instrument and Placement Policy

1. Equity

The COVID-19 pandemic has exacerbated existing inequities in access and outcomes to postsecondary education for students who are Black, Latinx, Indigenous, and from low-income households, including the basic ability to access testing services. At the same time, a large body of empirical research has shown that traditional placement policies based solely on standardized tests and cut scores, much like the proposed placement policy supported by the TSIA2, disproportionately limit access to college-level courses for students who are Black, Latinx, Indigenous, and from low-income households. The state will not achieve its 60x30TX strategic goals if it continues to rely on policies that disproportionately limit access to college courses for large numbers of students, especially those from the state's marginalized and minoritized populations.

No new rules should be adopted until the THECB and the College Board provide evidence that the TSIA2 will result in more equitable outcomes for students than a multiple measures approach.

2. Evidence

The [THECB understands these inequities](#) and, when describing the rationale for the "exceptional circumstances" policy, offered multiple webinars detailing the overwhelming evidence in favor of placement using high school GPA instead of, or in addition to, standardized tests. This approach aligns with [the College Board's own policy guidance](#) recommending the use of multiple measures for placement.

No new rules should be adopted until the THECB and the College Board provide evidence that the TSIA2 will result in more accurate and reliable course placement for students than a multiple measures approach.

3. Documentation

Existing documentation about the TSIA2 instrument is insufficient for stakeholders to make informed comments about the proposed rules. Upon the publication of the proposed rules, we sent a request to the THECB to share documentation about the standard-setting process and validity studies associated with the TSIA2. We were told that none were available. We submitted an additional request for *any* documentation about the TSIA2 that was developed after the RFP and were told that the College Board will offer a presentation at the CAWS meeting on 10/21/20, weeks after the public comment period closes. The proposed rules indicate that a new scale and new cut scores have been developed. Stakeholders have no way of interpreting those new scores, nor of offering informed public comments, without additional documentation.

No new rules should be adopted until the THECB and the College Board provide thorough and transparent documentation about the standard-setting process, the scale and cut score development, and any variation between the requirements of the RFP and the final version of the TSIA2.

4. Mathematics Pathways

[The RFP for TSIA2](#) states that mathematics component of the exam “must” measure content associated with two math pathways: “algebra-based entry-level math courses (MATH 1314/1414: College Algebra; MATH 1324: Mathematics for Business and Social Science) and non-algebra-based entry-level math courses (MATH 1332: Contemporary Mathematics (Quantitative Reasoning); MATH 1342: Elementary Statistical Methods)” (p. 10). Placing students into a mathematics pathway aligned to their programs of study is a key student success strategy at practically every public institution of higher education in the state. [District and postsecondary leaders have clearly and consistently requested changes in placement policy](#) to align with multiple mathematics pathways and enhanced information from the TSIA to improve placement decisions. The proposed rules offer no guidance on how institutions can determine readiness for multiple math pathways using a single instrument and cut score.

No new rules should be adopted until the THECB and the College Board publish multiple cut scores for use in mathematics pathways placement. In addition, THECB and the College Board should share documentation on how the mathematics component measures were developed and provide guidance on how the scores support placing students into multiple mathematics pathways. Finally, the THECB should establish a plan for communicating with institutions about [implementing the existing rule requiring that a student’s transcript reflect TSI readiness for multiple math pathways](#).

5. Existing research and grant projects

The THECB is currently [managing a grant program](#) and encouraging institutions to participate in research studies on the impact of multiple measures for placement on student outcomes. Switching to a new placement instrument while these studies are in progress could complicate and confound results. The THECB should continue to prioritize these studies throughout the 2020–2021 academic year to determine the impact of the exceptional circumstances policy compared to the traditional placement policy using the TSIA.

No new rules should be adopted until the institutions of higher education and the THECB conclude existing placement studies.

6. Beta testing access

On October 1, 2020, we received an email from the THECB inviting faculty members to participate in beta testing for the TSIA2 until November 15, 2020. The invitation, however, is limited only to select faculty and to institutions that will have a face-to-face testing center open in the allotted timeframe. Many, if not most, of the faculty that need to participate in beta testing are currently serving at institutions that are not offering in-person testing services due to the COVID-19 pandemic.

No new rules should be adopted until THECB and the College Board provide equitable and remote access to beta testing opportunities for the TSIA2.

Section 2: Increasing the HB 2223 Corequisite Mandate to 100%

We agree with the principle that all students who would benefit from corequisite models should be placed into entry-level courses with appropriate and aligned supports. However, we do not believe that the proposed rules would achieve this goal in large part because there is no evidence on the validity of the TSIA or TSIA2 for *placement into corequisite courses*. In other

words, TSIA2 placement policy is at odds with the state's corequisite goals because there is no reliable way to assess *which students* need *what types* of supports using a single cut score as the determining factor.

We recognize that the rules do permit institutions to use multiple measures to place students into different levels of developmental education. However, the rules do not allow institutions to use multiple measures to assign students to college-level courses with no developmental support.

Any rule changes that require colleges to use cut scores to place students into entry-level courses should include multiple measures to assign students to entry-level courses with or without corequisite support. The THECB and College Board should be required to provide guidance on how the TSIA2 can be used to assess varied levels of student readiness for entry-level courses and improve the targeting of corequisite supports.

Prior to any rule changes, the THECB should also provide evidence on the current scale and success of the implementation of HB 2223. These data should include information on the proportion of eligible students enrolled in and completing corequisite courses, disaggregated by race, sex, Pell eligibility, age, sector, institution, and TSIA score. We recommend that institutions use this evidence to scale corequisites beyond 75% to reach as many students as possible, while allowing flexibility for colleges to serve students who may not succeed in corequisites with other evidence-based models.

Finally, in reviewing [the final version of HB 2223 approved by the 85th Texas Legislature](#), we do not identify any evidence that the THECB has the statutory authority to require an increase in the corequisite mandate beyond 75% of non-exempt students.