



# Texas Policies for Reconnecting Opportunity Youth in Back on Track Pathways

AUTHORS

SEPTEMBER 2021

**Lili Allen**

Associate Vice President, JFF

**Cheryl Almeida**

Research Director, JFF

**Aundrea Gregg**

Senior Program Manager, JFF

**Mike Sack**

Senior Fellow, JFF

## Acknowledgments

We are grateful to Greater Texas Foundation for its support of this research and publication. We are also grateful to the reengagement schools and programs with which we work under the auspices of Back on Track in Texas, which is also supported by the Greater Texas Foundation, for their input into this brief.

The opinions expressed in this report are those of the authors and do not necessarily reflect the views of Greater Texas Foundation or any director, officer, or employee thereof.

## About JFF

JFF is a national nonprofit that drives transformation in the American workforce and education systems. For nearly 40 years, JFF has led the way in designing innovative and scalable solutions that create access to economic advancement for all. [www.jff.org](http://www.jff.org)

# Table of Contents

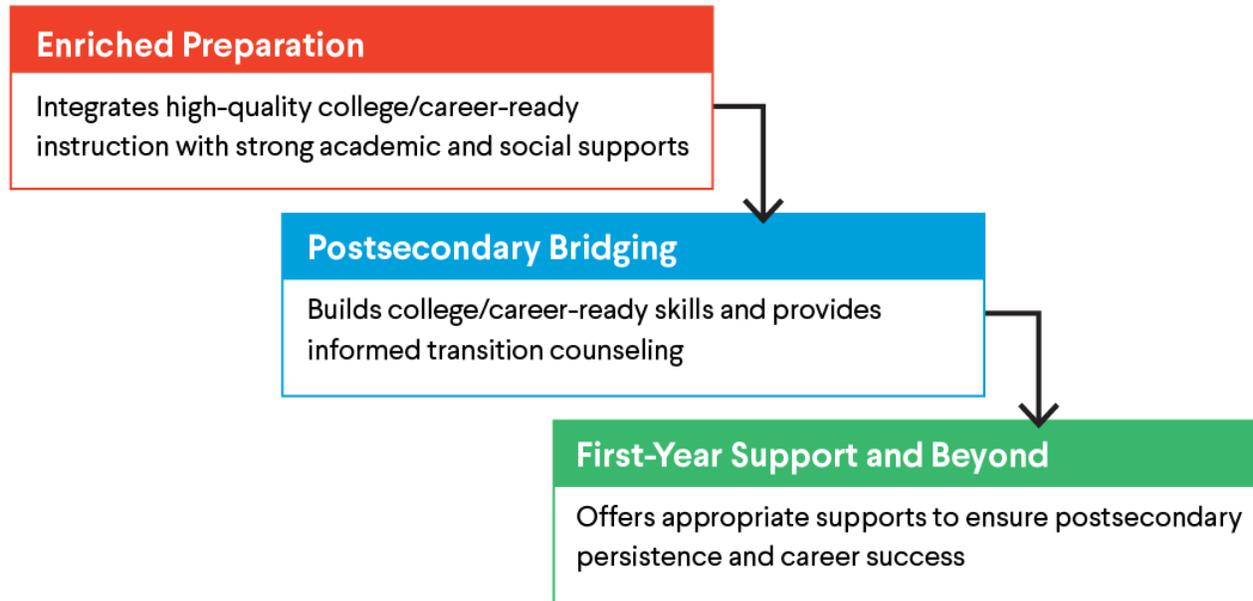
<b>Introduction</b> .....	<b>4</b>
<b>Opportunity Youth In Texas</b> .....	<b>6</b>
<b>Texas State Initiatives To Leverage</b> .....	<b>7</b>
<b>Policy Alignment And Gaps For Improving Outcomes For Opportunity Youth</b> .....	<b>8</b>
Enriched Preparation Policy Opportunities .....	8
Enriched Preparation Policy Gaps.....	12
Postsecondary Bridging Policy Opportunities .....	13
Postsecondary Bridging Policy Gaps .....	15
First-Year Support Policy Opportunities .....	16
First-Year Support Policy Gaps .....	20
<b>Conclusion</b> .....	<b>23</b>
<b>Appendix I: List Of Interviewees</b> .....	<b>24</b>
<b>Appendix II</b> .....	<b>25</b>
<b>Endnotes</b> .....	<b>29</b>

# Introduction

Texas has long been an innovator in policies, systems, and practices to ensure that young adults from low-income backgrounds are prepared for postsecondary education and careers. The state has launched college and [career readiness school models](#), which include early college high schools, early investments in dropout recovery through initiatives such as the Texas Dropout Recovery Pilot Program, a [Tri-Agency Workforce Initiative](#), and a Texas Regional Pathways Network. These programs have spurred partnerships among K-12 systems, postsecondary institutions, workforce boards, and community-based organizations to establish seamless pathways to and through college graduation.

Today, the COVID-19 pandemic and ensuing economic crisis have cast a harsh light on the importance of reengaging young adults who are disconnected from school and work and putting them on a path to success. This population, known as *opportunity youth*, is so named based on the promise they hold for society as a whole and for themselves and their families. Their numbers grew dramatically in 2020, and that rise calls for bold action. This paper provides a starting point for movement on Texas state policies that can be built upon, strengthened, and/or implemented.

Over the past 10 years, JFF—a national intermediary that drives change in our workforce and education systems to achieve economic advancement for all—has partnered with a range of entities in Texas to put into place Back on Track pathways to help this population graduate college and career-ready, transition to postsecondary education and training, and persist to credential attainment. JFF brings its evidence-based Back on Track model to this work, helping schools and programs implement these proven practices to boost the success of opportunity youth and to help the state meet its 60x30TX goal of 60 percent of Texans attaining a marketable credential by 2030. Evaluations have shown strong evidence that Back on Track improves postsecondary enrollment and completion by opportunity youth.<sup>1</sup>



In this paper, we share the results of an analysis of the Texas state policies that both support and hinder the Back on Track model. Our findings have been informed by interviews with practitioners and system leaders implementing Back on Track through an initiative supported by Greater Texas Foundation and state agency leaders (*see Appendix I for a list of interviewees*). We supplemented these interviews with research on the policies identified as most critical for the success and sustainability of the Back on Track model.

The paper provides background on statewide initiatives that are especially salient to Back on Track's aspiration to ensure all Texas young people attain a postsecondary credential and attain a family-sustaining career. We follow that with an analysis of the opportunities and gaps in policies for each of the three phases of the Back on Track model.

## Opportunity Youth in Texas

In 2018, the national estimate of young people out of school and out of work was 4.9 million. The National Conference of State Legislatures now estimates that roughly 10 million young people are out of school and out of work as a result of the pandemic.<sup>2</sup>

Both across the country and across the state, disconnection rates for opportunity youth vary widely.<sup>3</sup> In 2018, Texas data indicated that 12.8 percent of young adults were not in school or working, while the national rate was 11.2 percent. Due to the pandemic and the related economic crisis, this population has grown significantly. Among the six major metropolitan areas in Texas, the disconnection rate is lowest in Austin (8.3 percent) and highest in San Antonio (15.5 percent). Across counties with populations large enough for reliable estimates, disconnection rates are as low as 3.8 percent (Brazos County) or as high as 50.4 percent (Jones County). Like Brazos, most of the counties with low disconnection rates are home to four-year educational institutions.

Nationally, opportunity youth are twice as likely as connected young people to live in poverty, three times as likely to have a disability, twice as likely to live apart from both parents, and 20 times as likely to live in institutionalized group quarters such as a correctional facility or residential health facility. They are nine times as likely to have dropped out of high school and half as likely to hold a bachelor's degree.<sup>4</sup>

In Texas, the opportunity youth population also breaks down along the lines of class, race, and ethnicity, raising significant equity concerns in the state's attainment of its 60x30TX goals. Black and Hispanic youth are consistently overrepresented in the state's opportunity youth population due to structural inequities and policy gaps that have persisted over time.<sup>5</sup> In 2017, 28 percent of Texas's opportunity youth were white, 16 percent Black, 52 percent Hispanic, and 4 percent Asian, compared with 35 percent white, 13 percent Black, 46 percent Hispanic, and 6 percent Asian in the general population of 16-to-24-year-olds.<sup>6</sup> The implications for these young people, and for the health of Texas as a whole, are dire, given that the opportunity youth population has grown dramatically during the pandemic.

## Texas State Initiatives to Leverage

Texas has a longstanding statewide focus on postsecondary access and success, with a number of policies designed to prepare high school students for postsecondary education and provide early opportunities—such as early college high schools and other dual credit options—for young people to access college. Specific policies that align with the Back on Track model are described below, including recent state initiatives with the potential to drive improvements for opportunity youth.

Launched by the Texas Higher Education Coordinating Board (THECB) in 2015, 60x30TX has a bold vision for Texas: for 60 percent of Texans to have attained a marketable credential by 2030. As such, it can serve as a catalyst and driver for state policies that directly impact opportunity youth.

The state is currently making modest progress on meeting its targets, and the development of new targets is in progress.<sup>7</sup> Back on Track pathways and other strategies to improve postsecondary preparation, entry, and completion by opportunity youth can contribute to the achievement of the 60x30TX goals. State policies that apply an equity lens and create systems that serve the access and education needs of opportunity youth are critical to implementing the 60x30TX initiative so that it has a deep and lasting impact.

The COVID-19 pandemic has created a new sense of urgency around state goals aligned to the 60x30TX goals. State agencies have initiated new opportunities to aid workforce and education access for unemployed Texans through funding from federal COVID-19 relief packages such as the Governor's Emergency Education Relief (GEER) Fund.<sup>8</sup> Importantly, the state's education allocations have focused on remote learning and on engaging individuals who have credits but lack a credential. Texas's GEER application to the U.S. Department of Education indicates that the state will use its funds to support remote learning for students—for example, by ensuring that all students have broadband internet access and the necessary devices at home. GEER funds will also support access to higher education and reskilling efforts.<sup>9</sup>

Texas's Tri-Agency Workforce Initiative was launched in 2016 by Governor Greg Abbott to marshal the resources of the Texas Education Agency (TEA), THECB, and Texas Workforce Commission (TWC) to identify solutions for workforce needs across the state. In February 2020, a second round of the initiative was launched, and the Tri-Agency commissioners were charged with making recommendations across seven areas: readiness, completion, transitions, upskilling, the educator pipeline, partnerships, and infrastructure. The initiative identified priorities for cross-agency action, several of which would strengthen pathways to postsecondary credentials and careers for opportunity youth:

- Support efficient and flexible pathways to earning high-value credentials linked to high-wage, in-demand jobs.
- Ensure that students receive the supports necessary to succeed at all stages of their educations and in their transitions to the workforce.
- Create a robust infrastructure for agency collaboration around common goals, data, and processes to ensure improved student outcomes.

The Tri-Agency Workforce Initiative is currently developing work plans for specific strategies within each of the priority areas. Advocates for opportunity youth can weigh in on those strategies in a [survey on the initiative's website](#).

## Policy Alignment and Gaps for Improving Outcomes for Opportunity Youth

The Back on Track model comprises core features across three phases: Enriched Preparation, Postsecondary Bridging, and First-Year Support. In this section, we describe each phase of the model, outline the Texas policies that support robust implementation, and identify gaps.

### Enriched Preparation Policy Opportunities

The purpose of the Enriched Preparation phase is to ensure that opportunity youth are successfully reengaged in a high school completion school or program that offers college-going and career-ready culture, curriculum, and instruction, and that they receive the personalized guidance and support to graduate college-ready and to navigate to postsecondary education and training.

There are a number of state policies that support robust Enriched Preparation programming for opportunity youth in Texas.

#### *Policies for High School Diploma-Granting Schools*

Texas is unique in that, through [House Bill \(HB\) 1137](#), it allocates per-pupil funding based on average daily attendance for school districts to reengage young people up to age 25 who left high school without graduating so they can earn a diploma. School districts can draw down this average daily attendance funding immediately, without the one-year (or even two-year) delay

found in many other states. Texas also encourages school districts to reengage students by giving the districts credit in its state accountability system for recovering dropouts. If reengaged students recover credits quickly and graduate with their cohort, or if they remain enrolled and progressing toward a degree up until age 25, they count in the high school longitudinal completion rate for the district.

However, if a reengaged student does not graduate, they can be counted a second time in the district's longitudinal completion rate for the state's accountability system (and again, the following year, if they do not graduate). This serves as a disincentive for districts to reengage young people who left high school without a diploma. For this reason, district alternative-school leaders indicate that districts prioritize young people who almost have the credits required for graduation in their alternative schools (that is, those who can graduate within a year); those further behind can be referred to high school equivalency programs operated by the school district or outside of it.

[TEA policy](#) also allows school districts to provide flexible hours of attendance for students who are in danger of dropping out, have dropped out, or are behind in core subject courses. This policy enables districts to offer instruction to students who may have work or childcare commitments.

In addition, state policy supports charter schools, providing incentives for districts to contract with open-enrollment charter schools. Charter schools can be an important vehicle for alternative schooling because they are allowed flexibility in their curricula, instruction, and use of budget—all of which are important for targeting programming for young people who left high school, were reengaged, and need to accelerate their acquisition of a diploma. Important funding access for charter schools includes eligibility for the [Career and Technology Education Allotment](#) administered by TEA. This grant is also based on average daily attendance and allows school districts to receive weighted funding for students who enroll full-time in approved career and technical education courses.

Independent school districts (ISDs) can also apply for District of Innovation status, as long as they are in good standing regarding accountability measures. Under this status, districts have charter school-like flexibility in their curricula, instruction, budgets, and governance, among other measures; this status could be leveraged for schools serving opportunity youth.<sup>10</sup>

In addition to funding general education, Texas supports college and career readiness, and these funds are available to public alternative schools as well. With the passage of HB 3 in 2019, the legislature restructured how the state finances public P-12 education, infusing billions of dollars into new resources for Texas schools that provide the foundational education for college and

career readiness. Among the provisions passed in HB 3 are [college, career, and military readiness bonuses](#) for school districts that prepare students for those paths. Some alternative schools we contacted use this funding to pay for dual credit courses, workforce certifications, Texas Success Initiative (TSI) Assessment preparation, and ACT exam preparation.

HB 3 also requires students to complete and submit the Free Application for Federal Student Aid (FAFSA) or the Texas Application for State Financial Aid (TASFA), or have an approved exemption.

### ***Policies for High School Equivalency Programs***

There are two vehicles for high school equivalency programming in Texas: charter and district alternative schools funding, and adult education funding. The first is funded by TEA and the second by TWC.

Any school district or open-enrollment charter school can apply for authorization to operate a high school equivalency program (HSEP) in the state of Texas and draw down average daily attendance funding for this purpose. Students must be between the ages of 17 and 21 and have one-third or fewer of the credits required for graduation. Students ordered by the court to attend a high school equivalency program under [Texas Family Code Section 65.103](#) or directed by the Texas Juvenile Justice Department are automatically accepted into the program. Students in HSEPs must receive at least 45 minutes of instruction on a given day for instructional time to be recorded. The average daily attendance funding for students in HSEPs is approximately \$5,000 (compared with approximately \$8,000 for students in diploma-granting schools and programs).<sup>11</sup>

TWC administers federal funding for adult education and literacy (AEL). Through a competitive process, TWC awards multiyear grants to eligible AEL providers. These grants are funded with federal Adult Education and Family Literacy Act (AEFLA) funds, as authorized under Title II of the federal Workforce Innovation and Opportunity Act (WIOA), the state's general revenue, and Temporary Assistance for Needy Families (TANF). Funds awarded through the grant process are allocated to each of the 28 workforce areas in Texas and are based on the number of individuals at least 18 years of age residing in the area who lack a high school diploma or its equivalent.<sup>12</sup> In fiscal year 2020 / program year 2019, a total of \$73,733,468 was allocated to 33 AEL grantees.<sup>13</sup>

There appears to be variability in how workforce boards use the funding. Some put considerable funding toward contracts with organizations that provide adult education programming, while others appear to underspend, suggesting significant capacity gaps. In addition, there is great

variability in the extent to which adult education programs can integrate funding from other funding streams, as described below.

The WIOA defines the types of organizations eligible to apply for AEFLA grant funds. These grantees comprise sole and consortium entities and include colleges, education service centers, ISDs, local workforce development boards, and nonprofit organizations. AEL grantees must meet both federal and state performance and accountability measures related to education and training outcomes and enrollment targets, which are assigned each AEL program year (July to June). Enrollment targets, which are state measures, are linked to the types of AEL services provided to adult learners participating in the programs. These services include, but are not limited to, workplace literacy programs; transition to reentry and post-release services for justice-involved individuals; and integrated education and training services, which provide basic skills instruction in reading, writing, and math contextualized to support workforce training completions. Providers who deliver AEL services—which typically include basic skills support, workforce preparation activities, integrated education and training, and high school equivalency preparation—need to allot staff time to activities beyond those tied to milestones and gains. In order to get results and meet accountability standards, staff members indicated that they need time and money to support barrier removal, connect to resources in the community, and plan wraparound supports.

TWC also oversees a high school equivalency subsidy program. Conditions of HB 3 require TEA to transfer funds to TWC to subsidize the cost of HSE exams. This program allows Texas residents at least 21 years of age who lack a high school diploma or equivalent to access subsidies to take the GED or HiSET equivalency exams. The program directly supports the attainment of a Texas Certificate of High School Equivalency (TxCHSE).<sup>14</sup>

### ***Policies for Young People in Juvenile Facilities***

According to the Juvenile Law Foundation, youth under 18 years of age held in jail or prisons are entitled to and should be receiving a high school education comparable to their non-detained peers (that is, diploma-focused, full-day education, approximately 180 days per year).<sup>15</sup> Young adults under the age of 22 with Individualized Education Programs (IEPs) and special-education needs are entitled to and should be receiving the special education services identified in their IEPs. (The local educational agency and the custodial care agency are both responsible for ensuring compliance with the Individuals With Disabilities Education Act.<sup>16</sup>) According to advocates, the provision of educational services to this population is uneven across the state.

The Tri-Agency commission's responsibilities charges include one related to this population: to evaluate existing efforts to reintroduce formerly incarcerated individuals into the workforce with

skills and credentials for high-demand careers—particularly individuals in the Windham School District, which operates schools at facilities of the Texas Department of Criminal Justice.

## Enriched Preparation Policy Gaps

As stated above, if a reengaged student does not graduate, they can be counted a second time in the district's longitudinal completion rate for the state's accountability system (and again, the following year, if they do not graduate). Thus, ISDs are motivated to use this mechanism to reengage young people who are more than one year away from graduation.

One challenge for public schools (both district and charter) funded through average daily attendance dollars is the loss of funding if a student does not attend. If students have sporadic attendance, the school draws down less funding but must still pay staff members to be there full time. It would be ideal to have a funding mechanism that does not rely on daily attendance counts.

While WIOA requires workforce boards to prioritize out-of-school youth, there are two challenges that our interviews indicate boards are facing. First, workforce boards by and large do not have the expertise to recruit out-of-school youth and need guidance on doing so. Second, the cost-per-participant funding model does not support more robust services for participants such as young people who require intensive supports and interventions, so adult education programs are disincentivized to serve young people in adult education programs. Based on our interviews, it is possible that TWC could develop a more effective funding model to ensure that young people receive these supports. Possible funding sources for more effectively integrated services include the following:

- WIOA Title I funding that supports job training.
- Vocational rehabilitation funding, which can support young people with disabilities, including learning disabilities.
- Ability to Benefit (ATB) funding, in particular more robust use of the model by adult education providers to enable adult education students to take college courses (*see below for a description of the ABT model*). Interviews indicated that use of ATB can vary according to the willingness of colleges to partner with adult education providers to offer this opportunity.

Unlike ISDs, open-enrollment charter schools do not receive funds from local tax revenues. Charters must also pay property taxes for the buildings they lease. An estimated \$12 million worth of those taxes were paid last year.

Further research would indicate the extent to which young people held in residential programs (such as jails and prisons) are being educated adequately and, in particular, whether they are receiving the special education services up to age 22 to which they are entitled. The Tri-Agency commissioners' evaluation of the Windham School District could also inform efforts to build pathways for this population.

## Postsecondary Bridging Policy Opportunities

The Postsecondary Bridging phase of the Back on Track model engages young people towards the end of their high school program of study—or in a post-high school bridge program—in explicit college-readiness activities to ensure that they graduate fully prepared for postsecondary education and training and make a seamless transition. Specific features include dual credit and navigation supports. This phase is offered by the school or program from which the student is graduating, in collaboration with a postsecondary or training program.

### ***Dual Credit for High School Diploma-Granting Schools***

Texas has long been a leader in providing dual credit opportunities. The Texas Education Code requires the THECB and TEA to collaboratively develop statewide goals for dual credit programs in the state. These goals provide guidance to institutions of higher education and school districts on the components that must be in place to ensure that quality dual credit programs are provided to Texas high school students. These statewide goals address enrollment in and acceleration through postsecondary education, performance in college-level coursework, and strong academic advising.

All [dual credit programs](#) are required to establish a memorandum of understanding between the institution of higher education and the ISD that details the terms of the partnership, including the following:

- A course equivalency crosswalk that identifies the number of credits that may be earned for each course completed through the dual credit program.
- A description of the academic supports and guidance that will be provided to students participating in the dual credit program.
- A description of the school district's and college's roles and responsibilities in ensuring the quality and instructional rigor of the dual credit program.
- A description of the sources of funding for dual credit courses, including, at a minimum, the sources of funding for tuition and transportation, and any required fees or textbooks for students participating in the dual credit program.

Texas Education Code Section 39.234 requires school districts and campuses to use the high school per-pupil allotment to implement programs that encourage students to pursue advanced academic opportunities, such as dual credit and advanced placement. School districts may allocate these funds for dual credit courses in alternative schools and programs.

### ***Ability to Benefit Models***

ATB is a federal provision that enables students in high school equivalency programs to become Pell Grant-eligible and enroll in an eligible postsecondary career pathway while pursuing their HSE. As such, it serves as a dual credit opportunity for students pursuing their HSE.

To be eligible, a student must successfully complete one of the ATB alternatives, including passing an ATB test as approved by the U.S. secretary of education, and be enrolled in an eligible career pathway program pursuant to Section 484(d)(1) of the federal Higher Education Act of 1965, as amended.

TWC supports ATB through AEL grants that assist adult learners with TxCHSE attainment while enrolled in college credit courses. The TWC ATB model pays for a total of six credit hours, which is to be applauded, given that not all states financially support the attainment of these initial credits. Once those six credit hours are successfully earned, the postsecondary institution can use alternative options that allow students without their high school equivalency or diploma to access federal financial aid.

### ***Career Training Programs and Accelerate Texas***

Accelerate Texas is an integrated career pathway that provides basic skills instruction concurrently with workforce training. TWC uses WIOA dollars to fund career training programs at community colleges that are free to eligible students participating in adult education programs [launched under Accelerate Texas](#). These programs lead to industry-recognized certifications and include funding for textbooks, career and college advising, and academic supports. National evaluations of this model show strong evidence of success in credential attainment for underserved populations.<sup>17</sup>

Per WIOA guidelines for workforce boards to target high-opportunity occupations, TWC has assembled a list of [target occupations by board area](#). TWC requires that all training programs eligible for funding be aligned to a regional target occupation. Over 4,000 eligible training programs hosted by public and private operators are registered across the state.

### ***Navigation Supports***

TWC appropriates funding for AEL grantees to employ college and career navigators to support students transitioning into postsecondary education and training or employment. Whether at Workforce Solutions offices, higher education institutions, or community-based organizations, AEL career navigators serve an essential function by helping students identify resources to address persistent barriers and understand college and workforce systems. AEL grantees, such as Austin Community College, have adult education advisors who work with students in HSE programs to access financial aid, explore degree programs, and register for credit-bearing coursework. At Workforce Solutions offices, case managers support career services, and clients also have access to postsecondary specialists to support their transitions to college.

In addition, TWC supports career specialists under an initiative called the Workforce Career and Education Outreach Specialist Pilot Program, using TANF statewide reserve funds. The program is designed to ensure that Texas students have information about educational opportunities and local labor market demand, as well as information to help them make sound career decisions that lead to marketable skills after graduation. The pilot ends in August 2021, and TWC is [providing workforce development boards with an opportunity](#) to leverage TANF formula funding to support more outreach specialists across the state if a board's TANF program goals are being successfully met.

## **Postsecondary Bridging Policy Gaps**

### ***Dual Credit***

Funding for dual credit courses for students in alternative schools is up to the discretion of the school district. Further analysis would reveal whether districts are allocating these funds to alternative schools and whether there are ways to strengthen policy to ensure that alternative schools are able to offer these opportunities to their students in Texas.

### ***Use of Ability to Benefit Requirements***

Our interviews indicated that there is inconsistent use of the ATB provision that supports dual credit by students pursuing their HSE. For example, one site indicated that its college allows for ATB participation only if the student has one test remaining; the federal government does not have this requirement.

### ***Navigation Supports***

Supports for young people to transition to postsecondary education are core to the Back on Track model and have been critical to the outcomes the model has achieved; however, there is little public, sustained funding in Texas for transition counselors or other positions devoted to

helping young people in diploma-granting reengagement schools to make this transition. In many districts, “regular” high schools have college transition counselors to provide these supports. Diploma-granting reengagement schools, however, rely on philanthropic dollars to employ personnel who support transitioning students. As a result, once funding ends, schools and programs generally have to cut these positions.

Regarding navigation supports for youth in HSE programs, there are potential options for leveraging state policies to provide stronger supports. In particular, TWC could commit funds to continue and expand the use of state TANF funds for transition counselors.

Also, [Texas OnCourse](#) provides a free online platform for Texas students to chart their course to college and careers. THECB’s [ADVi](#) virtual college advising platform can also support opportunity youth.

## First-Year Support Policy Opportunities

The purpose of the First-Year Support phase is for high school graduates to build attachment to the postsecondary institution and earn the minimum number of credits predictive of postsecondary completion. This phase assumes the continued involvement of the program offering postsecondary bridging, such as through coaches or navigators who first develop a relationship with the young person in the Postsecondary Bridging phase. The First-Year Support phase also relies on streamlined handoffs for opportunity youth to transition and utilize supportive services offered by the postsecondary site. Unlike the other two Back on Track phases, this one is delivered primarily at the postsecondary site, so the question of which staff members provide the ongoing coaching and support, and what on-site supportive services are in place, is especially critical. Offerings like intensive supports for students who are struggling academically, as well as funding, such as scholarships and grants to help students cover school and living expenses, are just two hallmarks of quality implementation of this phase.

Texas higher education policy has placed a high priority on ensuring that students at different levels of preparedness enroll and persist through college. As state enrollment trends have revealed that a significant number of students entering two-year institutions are underprepared for college-level course work, community and technical colleges in particular are being viewed as focal sites for policy-driven student success interventions. In 2018, the THECB reported that 61 percent of first-time college students who entered two-year institutions were not prepared for college-level courses, compared with 17.7 percent of students entering four-year institutions. Notably, students who did not enter college directly from high school were more likely to be underprepared.<sup>18</sup>

A key priority of the 60x30TX plan is to increase the attainment of short-term credentials by ensuring that underprepared students enter and excel through education and training programs. Developmental education reforms and emerging funding opportunities that target career pathways are among the levers Texas is using to improve outcomes for populations that intersect with opportunity youth.

### ***Texas Success Initiative***

As discussed in the Postsecondary Bridging section in relation to the Texas dual credit model, the TSI Assessment is mandated as the test all public higher education institutions must use to determine the level of coursework students should take in core subjects upon enrollment.<sup>19</sup> How students perform on the TSI Assessment also determines the type of supports they will receive when entering college. Students who meet college-readiness benchmarks move directly into college-level coursework and may only access student services for academic advising.<sup>20</sup> Students who do not meet college-readiness benchmarks receive more intensive supports to help them meet readiness requirements. [Support interventions outlined by TSI policy](#) include enrollment in the corequisite model course, enrollment in an individualized intervention program known as a non-course competency-based option, and use of modular technology-based supports.

The TSI statute does offer allowances for students who meet set criteria before their college enrollment to be exempted from taking the assessment and be placed directly into college-level courses. Important exemptions include those for students pursuing a short-term certificate at a two-year institution and those who earn high scores on the ACT or SAT exam.<sup>21</sup>

### ***Developmental Education: The Corequisite Model***

For students who do not meet college-ready benchmarks in one or more of the core subjects, the state's leading developmental education policy is the corequisite model. Authorized by [HB 2223](#) in 2017, this model allows students who do not meet college-ready benchmarks in one or more core subjects to co-enroll in a developmental course and a freshman credit-bearing course in the same semester. Designers of the policy drew from national examples to endorse the corequisite model as a reform for traditional developmental education, which singularizes instruction and outcomes for all students enrolled in a course. Through the corequisite model, students are instead placed in courses or interventions based on their individual academic strengths and weaknesses identified during the TSI Assessment and holistic advising.

At the time of its original passing, HB 2223 required 75 percent of students enrolled in developmental education courses to be enrolled in a corequisite model. Texas will move to 100 percent implementation of corequisites in fall 2021. There are several funding opportunities to support institutions' expansion of corequisite offerings. In May 2020, the THECB opened a request for applications for College Readiness and Success Model (CRSM) grants. This grant

program follows CRSM-2018, which supported the initial rollout of HB 2223. Institutions that received a grant could put the funding toward strategies that improve participation experiences and outcomes for students, with a focus on the developmental support component of corequisite models.<sup>22</sup> The program stipulates that eligible projects must incorporate the use of supplemental instruction, technology-supported learning, and other non-course options as outlined in the [TSI statute](#). Grant recipients received an initial award up to \$75,000, with supplemental funding to be awarded mid-2021.

Other relevant funding sources include the Open Educational Resources Course Development and Implementation Grant Program. Through this program, institutions can apply for matching grants that support the development of open educational resources (also known as open-source or free-use resources) or the implementation of existing resources. Grant funding can be applied to dual credit courses, corequisite courses, and courses in the [Workforce Education Course Manual](#) (a statewide directory of workforce education courses), with an overall program objective to address the affordability of courses and online offerings. The program is supported by [GEER funds](#), as well as existing infrastructure from [OERTX](#), an online catalog of open-source materials.

### ***Guided Pathways***

Texas is implementing guided pathways at its community colleges that clarify the path—starting in the first year—to credentials with value in the labor market. The Texas Success Center, housed at the Texas Association of Community Colleges, leads the state’s efforts on guided pathways. Colleges are grouped into cohorts based on their readiness and capacity to implement pathways. Programs working with opportunity youth can seek out the guided pathways in their partner colleges to ensure that their young people participate in guided pathways so that they have a greater chance of persisting to completion. A 2019 report highlights the progress of Texas colleges in implementing guided pathways.<sup>23</sup>

### ***Texas Student Grants for College***

Texas offers various grant programs designed to increase access to higher education for economically disadvantaged students. [Federal Pell Grants](#) and [Federal Supplemental Educational Opportunity Grants](#) play vital funding roles for qualified applicants. These stalwart federally backed initiatives are augmented by state efforts. Due to the coronavirus pandemic and the threat of potential cuts to key state financial aid programs, Texas has designated a portion of its federal GEER allocation to maintain the state’s need-based financial aid programs. In the relief package, \$57 million will support grant programs that lift underfunded students into higher education. Important state-funded grant opportunities for opportunity youth are outlined below.

### ***Texas Education Opportunity Grant Program***

The Texas Education Opportunity Grant (TEOG) provides assistance to students enrolled in two-year community and technical colleges who demonstrate financial need. Like many of the state grant programs, annual funding is limited, and colleges are not able to assist all eligible students. To qualify for TEOG, students must demonstrate financial need, have applied for available financial aid assistance, and not have attempted more than 30 credit hours, among other requirements.<sup>24</sup> Students who meet the academic requirements of their programs and continue to demonstrate financial need are eligible to continue receiving funding. The amount of funding awarded is partially dependent on a student’s enrollment status and the type of institution they attend. Eligible students were able to receive awards up to the following amounts for the 2020-21 academic year: \$8,601 for students at technical institutes, \$5,961 for students at state colleges (Lamar State College-Orange and Lamar State College-Port Arthur), and \$4,965 for students enrolled at community colleges.<sup>25</sup>

### ***Texas Reskilling Support grant***

Through an additional designation of \$46.5 million in GEER funds, the Texas Reskilling Support Fund Grant Program was established to support students impacted by the COVID-19 pandemic. The program specially targets “workers who need to reskill or upskill to get back into the workforce and Texas students who have previously stopped out of higher education institutions.”<sup>26</sup> Reskilling grants were dispersed to state institutions in two rounds of funding—the first in January 2020 and the second in March 2021.

While institutions are given oversight of distribution of the funds, the THECB, the administering agency, is using the rollout of the grant program to emphasize state-targeted occupations, which TWC defines by region.<sup>27</sup> Institutions are encouraged to review labor market reports for the surrounding area and to use the funding to cover tuition and fees for students who are reenrolling or near completion of a credential in a “high-value industry.” Use of GEER funds for displaced workers may also be connected to [Texas Upskilling and Reskilling Through Education \(TRUE\)](#), an initiative led by the Texas Association of Community Colleges. The TRUE model is focused on building pathways and infrastructure for unemployed and underemployed Texans to accelerate through credential attainment and reenter the workforce.

### ***Resources for Young Adults Exiting the Foster Care System***

Young adults in foster care often represent a subpopulation of opportunity youth due to the barriers they face as they age out of state care systems. Texas offers two state-funded programs designed to encourage and support young adults transitioning out of foster care to pursue college and career pathways. The Texas [foster care exemption](#) covers tuition and fees for any program at a state higher education institution for youth currently or formerly involved in the

child welfare system. Determinations of eligibility are made by the Texas Department of Family and Protective Services after a foster youth is admitted to an institution. A second opportunity for these young people is [Education and Training Vouchers for Youths Aging Out of Foster Care](#). This grant awards up to \$5,000 annually to students 16 to 23 years old and may be used by students pursuing industry training certificates, associate's degrees, or bachelor's degrees.

### ***Toward Excellence, Access, and Success Grant***

The Toward Excellent, Access, and Success (TEXAS) grant is awarded to students pursuing a bachelor's degree at a public institution. To receive an initial award, a student must enroll through one of four pathways. The pathways that are particularly important for opportunity youth are the associate's degree pathway, which support students advancing into baccalaureate programs after earning their associate's degree; and the transfer pathway, which provides continuation funding for TEOG recipients who transfer to a four-year program.<sup>28</sup> Additional eligibility requirements for TEXAS funding stipulate that students must not have criminal convictions, including drug offenses, and must demonstrate financial need by having an expected family contribution of less than \$4,000. Eligible students may receive up to \$5,000 per semester.

## **First-Year Support Policy Gaps**

Ideally, higher education and workforce systems work in tandem so that individuals experience seamless transitions between systems as they move into and through postsecondary education and career training. The Tri-Agency Workforce Initiative is designed to address this. An examination of Texas policies exposes the need for even deeper commitments to learners with diverse needs and backgrounds who are starting or restarting training and postsecondary courses. Gaps in key reform efforts leave open questions of access and equity for college-goers entering postsecondary program through nontraditional on-ramps.

### ***Cooperation Between AEL Sites and Postsecondary Institutions***

Community-based organizations that support opportunity youth to help them persist in postsecondary education and training are filling a gap in services that is not incentivized or funded through state programs. Community colleges receive incentive funding for student skills progression through the performance-based [Student Success Points](#) model, with points given to colleges for students' successful completion of developmental courses, completion of freshman-level college courses in core subjects, and completion of a course of study.<sup>29</sup> However, colleges also directly benefit from navigation supports and mentoring that community-based organizations deliver, but these organizations are not adequately compensated for such vital efforts or considered when funding policies are created.

In addition to supporting funding needs, state policies should guide the development of stronger connections between AEL sites and college-based advisors. In reporting from 2014-18, plans were referenced for TWC (the body overseeing AEL) and the THECB (the body overseeing developmental education and the corequisites expansion), to work together to build better infrastructure for students transitioning to postsecondary courses. Initiatives that were recommended during this period include ensuring that all community and technical colleges offer AEL on site or through partnerships.<sup>30</sup> A state-level cross-referral system was also recommended to formalize the connection between AEL programs and colleges in a relationship more similar to the system that exists between high schools and colleges.<sup>31</sup> The most recent THECB report on developmental education, released in January 2021, pivots away from these recommendations without offering any updates on AEL students and transition interventions. It is unclear whether TWC and the THECB have maintained their commitments to build out the systems that were recommended in previous years or whether the increased momentum behind the expansion of the corequisite model has eclipsed these initiatives.

### ***TSI Assessment Exemptions and Advising***

Texas state agencies have placed heavy emphasis and resources on the TSI Assessment exemption for students who complete a college placement course (CPC). As outlined by the THECB, CPCs are high school-based programs designed to help students achieve college readiness and avoid developmental education. In consideration of opportunity youth who may not transition from traditional high schools, state policies should also address access to a TSI Assessment preparatory curriculum for students entering college through alternative schools and AEL sites, both community- and campus-based. Policies regarding TSI Assessment exemptions could also guide analysis of exemptions that are more likely to support nontraditional students, such as the exemption for short-term credentials. Outcome tracking and update reporting are required of CPC courses in order to measure the impact of the program. Similar studies for students who utilize the short-term credential exemption could provide insight into higher education attainment for this population and the efficacy of short-term credentials to prepare students for high-value industries.

[Section 51.335 of the TSI statute](#) mandates that higher education institutions must work with students who do not meet TSI Assessment benchmarks to create an individualized plan to meet readiness requirements. Advisors and students select the appropriate developmental education intervention through a process called holistic advising. Ensuring that colleges have resources to offer robust advising services and maintain multiple options for developmental education interventions will be essential during the shift to 100 percent implementation of corequisite courses, particularly for students who test the furthest behind on the TSI Assessment. Where

keen understanding or partnerships exist with AEL programs, college-based navigators will be better prepared to make referrals if students test at a basic academic skills education level or to support transitions for students moving from AEL to postsecondary education.<sup>32</sup>

During the COVID-19 pandemic, state policy directives related to the TSI Assessment have shifted due to closures of campus test sites and other factors limiting students' ability to access the exam. Current THCEB guidance directs institutions to use a combination of indicators, such as high school transcripts and “non-cognitive factors,” to place students in developmental education models or freshman-level coursework, with a formal assessment to take place later.<sup>33</sup> Postsecondary institutions will be granted this autonomy during the 2020-21 and 2021-22 school years. Use of the COVID waivers offers an opportunity to study the impact of greater institutional discretion to make placements based on factors outside of TSI Assessment benchmarks, and to consider possible implications for postsecondary access and strategies for opportunity youth.

### ***Financial Supports for Young People With Criminal Convictions***

TEXAS grants are not available to young people with criminal convictions. This is an important gap to address for young people who may have been involved in the criminal justice system—particularly given the overrepresentation of young people of color in the criminal justice system and the equity issues that it raises.

## Conclusion

We have found that Texas policies provide a promising foundation for Back on Track pathways to reengage opportunity youth, but there is work yet to be done to create the robust portfolio of options for the full range of opportunity youth—which is especially critical in this time of significant disconnection and upheaval of young people’s education and training trajectories.

In particular, TWC can address the funding gap for young people without a high school credential who are further behind in credits and skills than those young people who are positioned to benefit from the state’s alternative-schools funding model. Guidance on implementing a more robust funding model for adult education, described herein, would be an important step.

In addition, alternative-education schools lack the funding for transition counselors, or navigators, who are critical for ensuring that young people not only graduate prepared for postsecondary education and training but can make the transition.

And finally, community-based organizations and alternative schools play a critical role in ensuring that young people attach to their postsecondary institution and persist. This role could be supported through a dedicated funding stream to integrate community-based supports with college supports.

We also suggest that further research into policies supporting particular populations, such as young parents or young people involved in the juvenile or adult justice systems, would be of great value in highlighting opportunities and challenges for those groups. Research could also be undertaken to extensively map schools and programs across the state that could be strengthened through better use of existing state policies, such as braided funding models, to improve outcomes for opportunity youth. For example, it might be useful to assess the degree to which opportunity youth-serving programs are accessing Accelerate Texas programs (and, conversely, the extent to which Accelerate Texas programs are successfully serving young adults).

Fortunately, the state’s 60x30TX goals provide an impetus to take these important steps to improve outcomes for opportunity youth. Achieving the initiative’s goals will not be possible without addressing the needs of this population. We hope that this report has provided some clarity on the types of steps that will be necessary to ensure that this population succeeds and that inequities no longer persist in who attains credentials of value in the labor market.

# Appendix I: List of Interviewees

Mahalia Baldini  
*Texas Workforce Commission*

Traci Berry  
*The Goodwill Excel Center*

Ronny Cabrera  
*La Joya ISD College and Career Center*

Charlotte Cahill  
*JFF*

David Clauss  
*American YouthWorks*

Kristina Flores  
*Texas Success Center, Texas Association of Community Colleges*

Anson Green  
*Tyson Foods (formerly of the Texas Workforce Commission)*

Kumasi Lewis  
*Fort Worth Can Academy*

Ashley Bliss Lima  
*JFF*

Kelli Rhodes  
*Restore Education*

Kerri Rhodes  
*Restore Education*

## Appendix II

### Back on Track Site Profiles

Below are profiles of the five sites supported in the Back on Track in Texas initiative from 2018-21. A second cohort of sites joined the initiative in 2020.

#### ***American YouthWorks***

American YouthWorks (AYW) was founded in Austin in 1975 as an HSE and literacy program for incarcerated youth. Today, AYW operates two anchoring programs: YouthBuild Austin and the Texas Conservation Corps. Over the years, YouthBuild Austin has implemented many of the foundational elements of JFF's Back on Track model.

As part of Back on Track in Texas, AYW restructured and bolstered its postsecondary transition program. It hired a postsecondary education transitions specialist to work in unison with its career pathways coordinator and relaunched a college bridge program called Mental Toughness II for students interested in going on to college after graduation. It also bolstered its partnership with Austin Community College and established a new partnership with Peloton University, strengthening and extending the supports provided to students transitioning to the colleges. When programming moved to a solely virtual delivery model, the college and career team continued to support students in the application, admissions/enrollment, advising, and registration process through Google Hangouts. As a result of this work, AYW's college and career team has merged its college and employment pathway work into one seamless approach, the Postsecondary Success program. In fact, all staff members now participate in building postsecondary readiness and providing other supports. This includes the academic and skills training instructors who have been trained on JFF's Common Instructional Framework, a postsecondary academic readiness model that is an anchor strategy JFF provides to ensure that students gain college-readiness skills.

#### ***Goodwill Excel Center, Norwood Campus***

Goodwill Excel Center in Norwood is a second-chance public charter high school serving over 500 youth and adults annually in Central Texas. It provides a standards-based high school curriculum and host of wraparound supports intended to provide a clear path to next-step postsecondary opportunities.

Through Back on Track in Texas, the Goodwill Excel Center strengthened its college-ready academic curriculum and enhanced its career pathways programming. It added a college- and career-readiness coach to its Career Education Department and strategically integrated JFF's

Common Instructional Framework model into its core academic delivery system. It strengthened student supports with more intentional data-informed teaming, increased one-on-one coaching, and enhanced wraparound supports. At the same time, over the course of the initiative, the leadership team expanded certification options for students, forging new partnerships with industry-based training providers. It now has a direct pipeline to more than 15 certification / higher education opportunities, including those in the solar energy, construction, and health fields. As a complement, the team incorporated JFF's MyBestBets career planning platform, a guided approach to career pathway exploration and decision-making that puts students front and center in identifying their best bet postsecondary training programs and associated occupations. Finally, the onset of the COVID-19 pandemic and its resultant impact on educational delivery pushed staff members to identify virtual learning activities that would be the most meaningful to students and most likely to increase student engagement. At the same time, the pandemic showed the need for access to technology and connectivity and the importance of ensuring that students develop basic computer literacy skills.

### ***La Joya ISD College and Career Center***

La Joya ISD College and Career Center (CCC) serves fifth-year seniors between the ages of 18 and 26 who were unable to complete high school graduation requirements with their cohort. The CCC offers a standards-based academic curriculum, a broad array of social-emotional supports, flexible schedules, extended hours, industry certification opportunities, and dual enrollment. Since 2007, the school has graduated over 2,300 students.

The CCC used the Back on Track model to establish a schoolwide culture in which all students graduate college-ready and prepared to succeed in a postsecondary program of their choosing. Major activities under Back on Track in Texas include reshaping its academic program to ensure a college academic readiness focus, providing personalized postsecondary guidance and supports to all students, and laying the groundwork for a strong First-Year Support initiative. Over the past two years, La Joya ISD CCC has trained all staff members on JFF's Common Instructional Framework, provided personalized postsecondary supports, and expanded the variety of postsecondary training options for students through new partnerships with postsecondary education institutions and businesses. The CCC's college-ready culture shift is noticeable in its schoolwide implementation of the Common Instructional Framework and the increased eagerness of students to obtain career and college information, attain careers and industry certifications, and prepare for college entrance exams.

The CCC has worked hard to sustain its Back on Track advances despite the unprecedented hardships caused by the pandemic. Its staff pivoted to online instruction, applying the Common Instructional Framework in its virtual lessons; provided electronic devices and internet hot

spots for every student; and created a virtual advisory period to support students and parents. Its persistence seems to have paid off: Forty-five students graduated during a restructured summer program, with 12 either working in area hospitals and clinics as medical assistants or having enrolled at South Texas College to pursue registered nursing degrees.

### ***Restore Education***

Restore Education, a nonprofit community-based organization located in San Antonio, offers a continuum of services—from basic literacy and high school equivalency to workforce training and college supports—to more than 500 youth and adults annually.

Through Back on Track in Texas, Restore Education strengthened its existing postsecondary bridge programming and created a new dual enrollment pathway for students interested in degree programs immediately upon receiving their HSE. It also made structural changes, merging two previously distinct programs—college readiness and career success—into one unified postsecondary pathways department and added staff members to support bridging and first-year retention support. Restore Education now has an expanded team that includes a program manager, an associate manager, two student success specialists (one focused on college, and one on workforce training), and two postsecondary readiness instructors. It also brought on a second postsecondary readiness instructor to support the workforce training students as that population increased dramatically over the initiative.

Despite the pandemic, Restore Education continued to strengthen and expand its innovative bridging program. Its dual enrollment partnership with San Antonio College (through ATB) continued remotely, with students participating in HSE math instruction and two credit-bearing college classes. Restore Education continued to evolve its college-ready academics program, offering an innovative college preparation class and adding a digital literacy component as a complement to its postsecondary success skills workshop series, aimed at strengthening students' readiness for a virtual learning environment. Staff members adapted to support students via remote instruction and tutoring via video webinars, online workshops, and supportive follow-up. As a result, Restore Education managed to see increased attainment of GEDs, workforce certifications, and college success. Remarkably, students remained engaged despite having to homeschool and care for children or younger siblings, work extra hours to support themselves, and cope with food and housing insecurity.

### ***Texans Can Academy—Fort Worth Westcreek***

Texans Can Academies is a longstanding network of 14 open enrollment public charter schools for 14-to-21-year-old students who struggled in a traditional high school setting. Students are accepted throughout the academic year. All schools in the network emphasize reading, writing,

and critical thinking; use a case management support structure; and provide essential services, such as eyeglass provision, immunizations, and child care for student parents.

Texans Can Academies' Fort Worth Westcreek school developed a bridge program for graduates continuing on to college. Its goal is to graduate all students with a postsecondary plan and a credential that they can use when they are ready. The school's bridge program is provided during a student's senior year on campus and includes a dual credit class with Richland College, a financial literacy course, individual support for college and FAFSA/TASFA applications, and the option to enroll in one of the school's industry-specific partnerships leading to an industry-recognized certificate and next-step training opportunity. As a result of its participation in Back on Track in Texas, the campus is more intentional about developing opportunities that provide immediate career pathway opportunities for all students. Despite having to shift to virtual learning, Fort Worth Westcreek maintained high student participation rates across its three occupational training pathways in health, construction, and business communications; sustained its pre-apprenticeship partnership with Trio Electric; and just recently added a TEA-approved Optical Technician course as part of an innovative state-approved apprenticeship program, Eye Tech Academy ([www.eyetechacademy.com](http://www.eyetechacademy.com)).

## Endnotes

---

- <sup>1</sup> “Opportunity Works,” JFF, accessed May 19, 2021, [https://jfforg-prod-new.s3.amazonaws.com/media/documents/Impact\\_Infographic-02-01-21-MB.pdf](https://jfforg-prod-new.s3.amazonaws.com/media/documents/Impact_Infographic-02-01-21-MB.pdf).
- <sup>2</sup> Richard Fry and Amanda Barroso, “Amid Coronavirus Outbreak, Nearly 3 in 10 Young People Are ‘Disconnected,’” *State Legislatures Magazine*, August 6, 2020, <https://www.ncsl.org/bookstore/state-legislatures-magazine/covid-19-nearly-3-in-10-young-people-are-disconnected-magazine2020.aspx>.
- <sup>3</sup> “Youth Disconnection in America: Youth Disconnection Nationally,” Measure of America, accessed May 19, 2021, <http://www.measureofamerica.org/DYinteractive/#National>.
- <sup>4</sup> <https://ssrc-static.s3.amazonaws.com/moa/ADecadeUndone.pdf>
- <sup>5</sup> See, for example, Anna Crockett, Emily Ryder Perlmeter, and Molly Hubbert Doyle, *Opportunity Youth in Texas: Identifying and Reengaging the State’s Disconnected Young People* (Dallas: Federal Reserve Bank of Dallas, October 2019), <https://www.dallasfed.org/-/media/documents/cd/pubs/19youth.pdf>.
- <sup>6</sup> Crockett, Perlmeter, and Doyle, *Opportunity Youth in Texas*, p. 4, <https://www.dallasfed.org/-/media/documents/cd/pubs/19youth.pdf>.
- <sup>7</sup> *60x30TX Progress Report* (Austin, Texas: Texas Higher Education Coordinating Board, July 2019), <http://reportcenter.highered.texas.gov/reports/data/60x30tx-progress-report-july-2019/>.
- <sup>8</sup> GEER dollars originate from the U.S. Department of Education’s administration of the Education Stabilization Fund in the Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020. The CARES Act was signed into law March 27, 2020.
- <sup>9</sup> “COVID-19 GEER Fund Utilization,” The Hunt Institute, accessed May 19, 2021, <https://hunt-institute.org/covid-19-resources/geer-fund-utilization/>.
- <sup>10</sup> “Innovation Districts,” Texas Education Agency, accessed May 19, 2021, <https://tea.texas.gov/sites/default/files/Innovation%20District%20Overview.pdf>.
- <sup>11</sup> Ronny Cabrera, email message to authors on April 9, 2021.
- <sup>12</sup> [40 Tex. Admin. Code § 800.68](#).
- <sup>13</sup> “Program Summary for FY2021/PY2020 Allocations and Funding Distributions,” Texas Workforce Commission, accessed May 19, 2021, <https://twc.texas.gov/files/agency/fy21-py20-funding-allocations-twc.pdf>.

---

<sup>14</sup> Courtney Arbour, “Adult Education and Literacy Letter: High School Equivalency Subsidy Program,” Texas Workforce Commission, January 4, 2021, [https://www.twc.texas.gov/files/policy\\_letters/ael-01-21-twc.pdf](https://www.twc.texas.gov/files/policy_letters/ael-01-21-twc.pdf).

<sup>15</sup> Under 2 Tex. Educ. Code §§ [25.085-25.086](#), students who are at least 17 may opt to enroll in a course of instruction to prepare for a high school equivalency exam with parental permission or by court order. Students who are 16 may also attend a course of instruction to prepare for the high school equivalency if “the child is recommended to take the course of instruction by a public agency that has supervision or custody of the child under a court order,” or if the child is enrolled in a Job Corps program.

<sup>16</sup> 20 USC § 1400 et seq. See also Melody Musgrove and Michael K. Yudin, “Dear Colleague” (letter, U.S. Department of Education, Office of Special Education and Rehabilitative Services, December 5, 2014), <https://sites.ed.gov/idea/files/idea-letter.pdf>.

<sup>17</sup> Theresa Anderson, et al., *New Evidence on Integrated Career Pathways* (Washington, DC: Urban Institute, June 28, 2017), <https://www.urban.org/research/publication/new-evidence-integrated-career-pathways>.

<sup>18</sup> “Overview: Developmental Education,” Texas Higher Education Coordinating Board, August 2018, <https://reportcenter.highered.texas.gov/reports/data/crs-developmental-education-overview/>.

<sup>19</sup> For core subjects, see [51 Tex. Educ. Code Subch. F-1](#); regarding demonstrating college readiness through other measures, including high school college preparatory courses, see [2 Tex. Educ. Code § 28.014](#).

<sup>20</sup> [19 Tex. Admin. Code § 4.57](#).

<sup>21</sup> For a full list of TSI exemptions, visit <https://reportcenter.highered.texas.gov/reports/data/overview-texas-success-initiative/>.

<sup>22</sup> Rider 33 as stated in *Legislative Appropriations Request for Fiscal Years 2020 and 2021* (Austin, Texas: Texas Higher Education Coordinating Board, September 11, 2020), <https://web.archive.org/web/20200906124246/http://www.highered.texas.gov/state-required-links/legislative-appropriations-request/>: “Developmental Education. Funds appropriated above in Strategy D.1.2, Developmental Education Program, \$1,325,000 in General Revenue for fiscal year 2020 and \$1,325,000 in General Revenue for fiscal year 2021 shall be used to continued scaling effective strategies that promote systemic reforms, to improve student outcomes and provide professional development opportunities for faculty and staff focused on improving advising, acceleration strategies and completion of underprepared students. Out of funds appropriated to this strategy, the Higher Education Coordinating Board will analyze and compare information collected annually from all Texas public institutions on the annual Developmental Education Program Survey and other TSI data to determine the most effective and efficient interventions.”

---

<sup>23</sup> Kristina Flores and Jo-Carol Fabianke, *Progress Implementing Guided Pathways in Texas Community Colleges* (Austin, Texas: Texas Success Center, December 2019), [https://tacc.org/sites/default/files/2020-01/SOAA%20Report%202019\\_o.pdf](https://tacc.org/sites/default/files/2020-01/SOAA%20Report%202019_o.pdf).

<sup>24</sup> [19 Tex. Admin. Code § 22.256](#).

<sup>25</sup> “2020-21 Program Guidelines Texas Educational Opportunity Grant (TEOG),” Texas Higher Ed Report Center, accessed May 25, 2021, <https://reportcenter.highered.texas.gov/agency-publication/guidelines-manuals/teog-fy-2021-guidelines/>

<sup>26</sup> “Texas Reskilling Support Fund Grant Program,” Texas Higher Education Coordinating Board, accessed May 19, 2021, <https://www.highered.texas.gov/institutional-resources-programs/institutional-grant-opportunities/texas-reskilling-support-fund-grant-program/>.

<sup>27</sup> For more information on target occupations, the spreadsheet “Target Occupations by Board Area as of October 6, 2020” can be accessed at <https://www.twc.texas.gov/partners/target-occupations#targetOccupationsByBoardArea>.

<sup>28</sup> For more information, visit <http://www.collegeforalltexas.com/apps/financialaid/tofa2.cfm?ID=458>.

<sup>29</sup> For more information visit, <https://reportcenter.highered.texas.gov/agency-publication/miscellaneous/theccb-formula-funding-recommendations-for-the-86th-texas-legislature/>.

<sup>30</sup> *Developmental Education Update and 2018-2023 Statewide Plan for Supporting Underprepared Students* (Austin, Texas: Texas Higher Education Coordinating Board, 2018), <https://reportcenter.highered.texas.gov/agency-publication/miscellaneous/developmental-education-update-and-2018-2023-statewide-plan-for-supporting-underprepared-students/>.

<sup>31</sup> *Accelerating Pathways to College and Careers for Students in Adult Education* (Austin, Texas: Texas Higher Education Coordinating Board, Division of College Readiness and Success, May 1, 2016), <http://www.theccb.state.tx.us/DocID/PDF/7612.PDF>.

<sup>32</sup> Students who test at the basic academic skills education level are exempt from the requirement for developmental education offerings at institutions of higher education. For more information, see [3 Tex. Educ. Code § 51.336](#).

<sup>33</sup> “General Frequently Asked Questions (FAQs),” Texas Higher Education Coordinating Board, accessed May 19, 2021, <https://www.highered.texas.gov/misc/coronavirus-update-for-higher-education/frequently-asked-questions/>.