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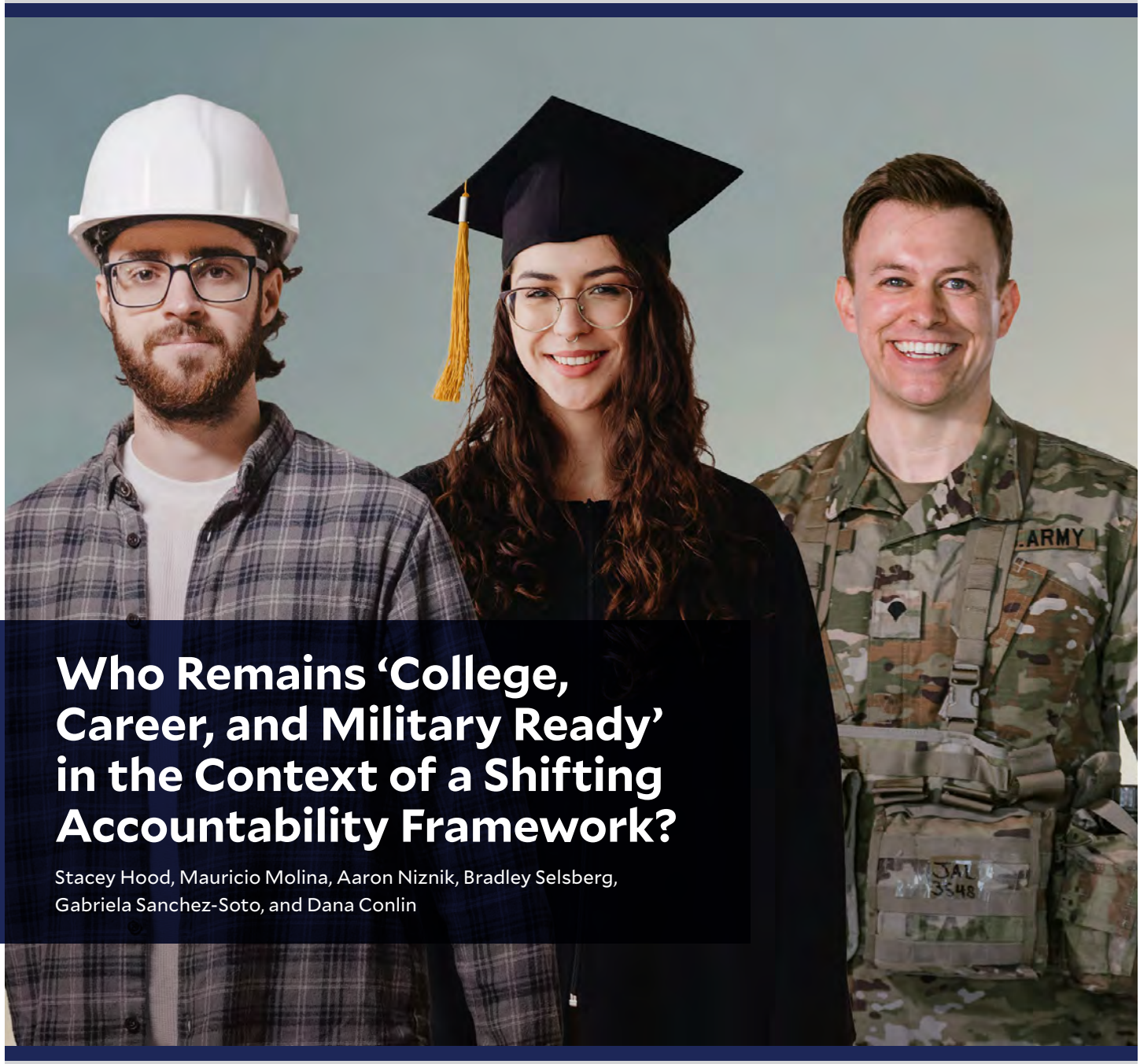

Who Remains 'College, Career, and Military Ready' in the Context of a Shifting Accountability Framework?

Stacey Hood, Mauricio Molina, Aaron Niznik, Bradley Selsberg, Gabriela Sanchez-Soto, and Dana Conlin

Research Report

October 2025

Acknowledgments. This report is part of a series of research on innovative assessment approaches and alternative accountability models coordinated under The K12 Research for Equity Hub (www.edudream.org/thehub). The Hub is managed by EduDream and funded by the Gates Foundation and the Walton Family Foundation. No personnel from the Gates Foundation or the Walton Family Foundation participated in the creation of Hub research. The findings and conclusions contained in this report are those of the authors and do not necessarily reflect the positions and/or policies of the Gates Foundation or the Walton Family Foundation.

Suggested citation: Hood, S., Molina, M., Niznik, A., Selsberg, B., Sanchez-Soto, G., & Conlin, D. (2025). *Who remains 'college, career, and military ready' in the context of a shifting accountability framework?* Houston, TX: Houston Education Research Consortium, Kinder Institute for Urban Research, Rice University. DOI: https://doi.org/10.62137/BSBL7148

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Executive Summary

Over the past two decades, U.S. states have developed education accountability frameworks to ensure students have access to opportunities for success after graduation. These efforts vary; some states emphasize academic indicators like test scores, while others focus on career and technical education or work-based learning. Texas policymakers developed the A-F Accountability System with an emphasis on preparing students for the future through new College, Career, and Military Readiness (CCMR) indicators. What began in 2013 with a flexible graduation structure and reduced testing has evolved into a multifaceted rating system shaped by legislative directives, ongoing input from advisory committees, shifting workforce demands, and a changing understanding of postsecondary success. While the system has been refined, its evolution has not been linear; it has faced disruptions such as the COVID-19 pandemic and misalignments between policy vision and implementation.

Understanding these frameworks is crucial for policymakers, advocacy groups, school districts, and community organizations, as they shape educational priorities and resource allocation and define readiness for college and careers. These metrics also help identify disparities in opportunities and achievements across student populations, targeting efforts to promote equity in access to CCMR opportunities and postsecondary outcomes. This study investigates Texas' accountability landscape, focusing on the development and impact of the state's CCMR standards—a key component of the A-F Accountability System. We employed a mixed-methods approach to examine how the CCMR accountability system has evolved and the resulting changes for school districts and students.

Key Findings

The findings are organized into three parts corresponding to our research questions:

Part 1. How the accountability system, and specifically the CCMR framework, were developed

1. The development of Texas' accountability system was driven by federal mandates and implemented by the Texas Legislature, the Texas Education Agency (TEA), and advisory committees. However, there was a disconnect between the TEA and its advisory committees regarding the integration of feedback, leading to perceptions that stakeholder input was overlooked.

2. The state mandated transparency in the development process; however, complexities often hindered clarity, particularly for CCMR.
3. Continuous disruptions occurred during the implementation and refinement of the accountability system, especially with evolving CCMR indicators.

Part 2. Whether the system considered equity

1. The new system aimed to identify metrics recognizing various postsecondary pathways, creating a broader definition of readiness.
2. Equity discussions were present during policy development, but achieving targeted equity goals was not a primary concern in the finalized policy.

Part 3. How changes affected school districts and students

1. The percentage of students deemed College, Career, and Military (CCM) ready (CCMR rates) immediately declined after the A-F Accountability System was implemented in 2017, then increased from 2018 to 2023. However, statewide CCMR rates remain at or below pre-2017 levels.
2. Urban/suburban and non-metro/rural districts were affected differently by accountability policy changes, with non-metro/rural districts showing more variation but higher overall readiness rates.
3. Differences in CCMR rates across demographic groups remained consistent, with emergent bilingual students and those receiving special education services experiencing the greatest gains after policy changes.

Recommendations

Based on these findings, we propose evidence-based recommendations for policymakers and stakeholders:

Strengthen and formalize the process for development and refinement of accountability systems.

Our research highlighted the need for a system that is accessible and transparent while supporting various stakeholders. The design and implementation process included frequent indicator changes and setbacks that could have been avoided.

1. **For policymakers:**
   a. *Create guardrails to guide the design and refinement of the accountability system, providing clarity while allowing flexibility.*
2. **For TEA/CCMR advisory committees:**
   a. *Define and formalize the decision-making process, ensuring communication and engagement with all stakeholders.*
   b. *Support research to evaluate how effectively current CCMR indicators connect to postsecondary outcomes.*

Close persistent equity gaps.

While there has been a commitment to equity, this focus has often been sidelined by concerns about simplicity and compliance. Addressing the needs of specific student groups in new systems or metrics can help reduce disparities.

1. **For policymakers:**
   a. *Embed equity and opportunity into accountability by addressing disparities in CCMR access, aiming to close gaps that remain after 10 years of the A-F system.*
2. **For TEA/CCMR advisory committees:**
   a. *Include all opportunities for readiness at the local level, such as work-based learning and dual-credit options already available in districts.*
   b. *Support research on effective strategies for creating inclusive systems for students needing extra support.*
   c. *Invest in targeted postsecondary supports for historically underserved students.*

Introduction

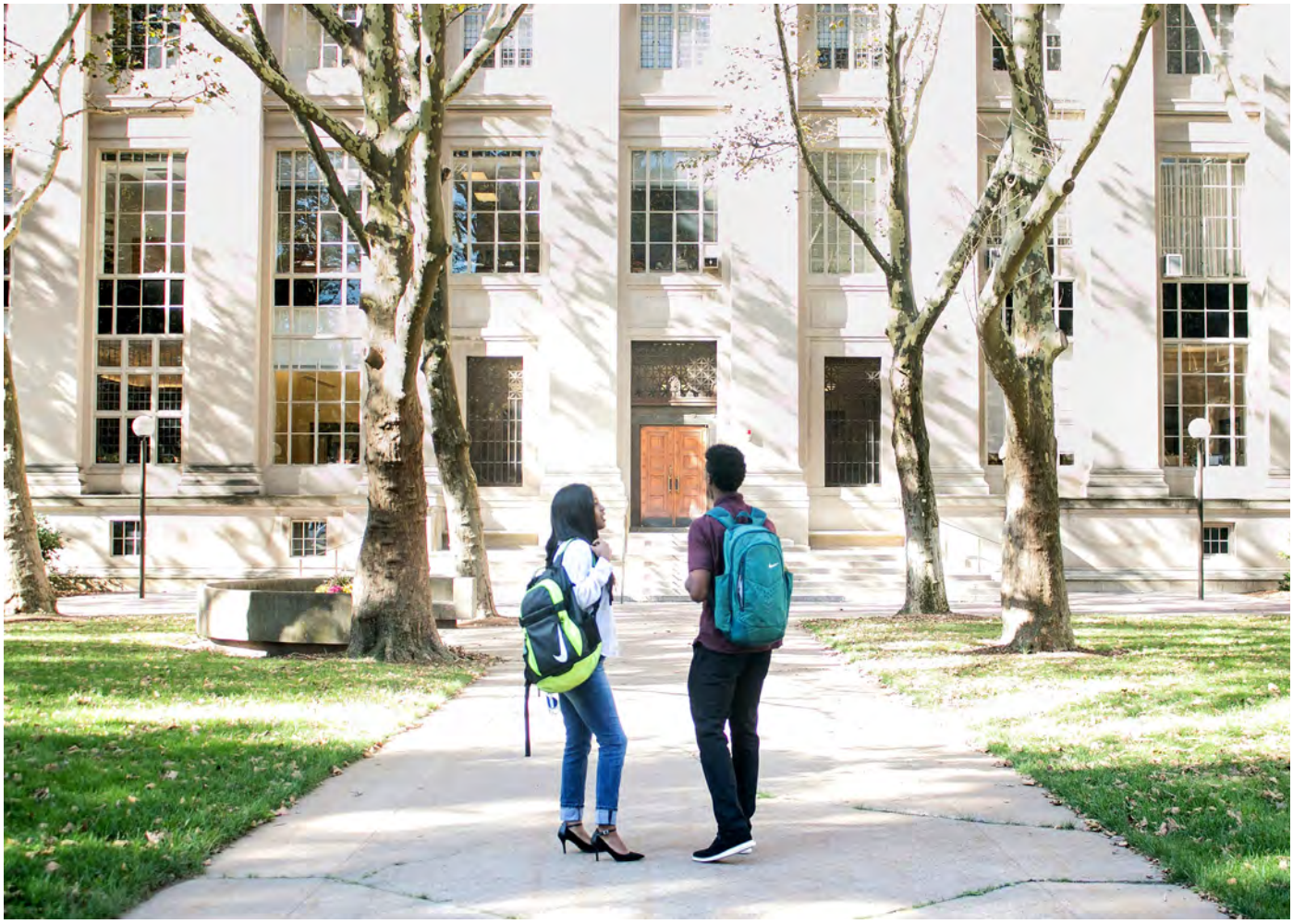
States have been defining and implementing accountability frameworks for postsecondary readiness to ensure students are prepared for life after graduation. Some states focus on academic indicators, while others include career and technical education and work-based learning. These frameworks shape educational priorities, influence resource allocation, and signal to students what it means to be "ready" for college or careers. Additionally, these frameworks help identify gaps in opportunities, making them essential tools for promoting educational equity and guiding systemic improvement. Accountability frameworks are not static; they evolve in response to changing workforce and labor market needs.

In this study, we investigated Texas' evolving accountability landscape, which incorporates multiple measurement areas (i.e., *Student Achievement*, *School Progress*, and *Closing the Gaps*[1]), that reflect aspects of school or district performance. These measures ultimately set the campus and district ratings that comprise the A-F Accountability System, established in 2017. Texas' evolving college, career, and military readiness (CCMR) standards—a key component of the accountability system—have had implications for school districts' and students' readiness rates across the state.

What is College, Career, and Military Readiness (CCMR)?

In Texas, CCMR refers to efforts to ensure high school graduates are prepared to either attend college, enter the workforce, or serve in the military. CCMR is also a key component of the state's accountability system and is an important determinant of how schools and school districts are graded.

1 The Student Achievement domain evaluates performance across all subjects for all students, CCMR indicators, and graduation rates. The School Progress domain shows how students perform over time and how a school's performance compares to other schools with similar economically disadvantaged student populations. The Closing the Gaps domain focuses on how well a school or district is ensuring that all student groups are successful.



Over the last decade, CCMR has become a critical part of Texas' education landscape, influencing students' postsecondary paths and school preparation (Barton et al., 2022). However, minimal research exists on the system's development, its effects on students and schools, and whether equity implications were considered during policy changes. Using a mixed-method approach, our study examined the system's evolution and how it related to CCMR rates for Texas students and districts. We combined qualitative analyses of legislative documents and TEA meeting minutes with quantitative analyses of TEA data on CCMR trends across school districts and student demographics to answer the following questions:

1. What guided the development and shift to Texas' new accountability system (i.e., new domains and the A-F Accountability System)? Specifically, how did the CCMR component evolve over time?
2. How were equity considerations discussed and incorporated into the new accountability system and its CCMR components?
3. How were changes in CCMR policy associated with the number and proportion of students deemed "prepared" for postsecondary life? Did these changes affect students equitably across school districts and demographics?

By examining the evolution and impact of Texas' accountability framework and embedded CCMR indicators, this study offers insights for policymakers, educators, and stakeholders striving to design more equitable and effective systems.

Background

The History of Texas' Postsecondary Accountability Frameworks

Over the past couple of decades, a series of federal educational policies, including No Child Left Behind (2002), Race to the Top (2009), and the Every Student Succeeds Act (2015), significantly influenced the education culture in the United States, shaping practices and attitudes toward teaching, learning, and accountability in schools (Cawelti, 2006; Douglass et al., 2018). These laws sparked national movements to build accountability systems that tracked student performance, disaggregated data based on race, gender, and socioeconomic backgrounds, and incentivized improvements (Henig, 2013; McDermott, 2011). The No Child Left Behind (NCLB) era established a test-centric culture, with standardized tests becoming the dominant measure of school success, a legacy that still impacts education systems (Douglass et al., 2018; Guilfoyle, 2006). NCLB is crucial for comprehending states' accountability frameworks, as it was the first policy to set specific benchmarks and require demographic breakdowns of performance data, making disparities in educational opportunities and outcomes more visible (Lee & Orfield, 2006).

In 2015, the Every Student Succeeds Act (ESSA) aimed to address the punitive nature and "teaching to the test" culture created by NCLB. ESSA reduced federal oversight, granting states more autonomy in setting goals and determining accountability measures (Weiss & McGuinn, 2016). Although Texas had established its own accountability mechanisms prior to NCLB and ESSA, these federal laws introduced new requirements and pressures that reshaped state policies. In the 1990s, Texas' first accountability system began with the Academic Excellence Indicator System (AEIS), which assigned letter grades to schools and districts based on standardized test scores, and utilized the Texas Assessment of Academic Skills (TAAS) to evaluate student performance (Alford, 2001). This early system focused on testing without considering factors like student demographics or socioeconomic status.

To expand beyond standardized testing, the AEIS was reintroduced in 2004 with new metrics to measure achievement gaps across diverse student groups. This system included graduation rates, attendance rates, and yearly progress in academic achievement. The TAAS test was replaced by the Texas Assessment of Knowledge and Skills (TAKS) standardized test around this time as well (Alford, 2001). In 2012, Texas aligned its assessments with federal requirements and transitioned to the State of Texas Assessments of Academic Readiness (STAAR), a standardized test tied to federal benchmarks.

Over the last decade, as ESSA allowed states more flexibility in designing accountability measures, Texas rapidly expanded and refined its systems for capturing students' postsecondary readiness. Texas' CCMR initiatives significantly transformed the landscape with new laws, frameworks, and measures that emphasized college and career readiness metrics, offering students multiple options to demonstrate CCMR.

As we discuss the development of the new accountability system and its focus on CCMR, we will cover several key indicators used in the accountability system. Table 1 provides definitions for these indicators.

TABLE 1 **Key indicators for CCMR in Texas**

ACT/SAT
The two most widely recognized standardized tests for college admissions in the United States. These tests are often used to assess readiness for college coursework, gain entrance to four-year institutions, and/or obtain scholarships.

AP (Advanced Placement)
A program administered by the College Board that offers students the opportunity to take advanced-level courses and examinations in six academic areas: arts, English, history and social sciences, mathematics and computer science, sciences, and world language. Students can earn college credit by completing these courses.

CTE (career and technical education)
High school courses that focus on the skills and knowledge required for specific jobs or fields. CTE programs combine academic learning with career-oriented skills essential for connecting students to the labor market.

IB (International Baccalaureate)
A nonprofit educational foundation that provides three programs for students aged 3 to 19, aimed at developing the intellectual, personal, emotional, and social skills needed to thrive in a rapidly globalizing world.

IBC (industry-based certification)
A third-party credential that verifies an individual's knowledge and skills in a specific industry based on established standards. It serves as a formal, standardized method for employers to assess the qualifications of potential hires, demonstrating that a person possesses the practical skills and knowledge required for a specific job.

IEP (individualized education program)
For children eligible for special education services, an IEP includes information identifying the student's disability, strengths, areas of need, goals, and the special education and related services necessary for success. Schools must implement the IEP once completed.

OnRamps
Offers college credit opportunities through dual-enrollment courses designed by faculty at the University of Texas at Austin. Students can enroll through a partnered school or district to earn credit on a UT Austin transcript.

State standardized assessments
Criterion-referenced achievement tests that measure how well a student has learned and can apply defined knowledge and skills at each tested grade level. The Texas Assessment of Knowledge and Skills (TAKS) program was used until 2011 and was replaced by the State of Texas Assessment of Academic Readiness (STAAR) program in 2012 to measure academic achievement, although TAKS scores continued to be used to assess postsecondary readiness until 2017.

TSIA (Texas Success Initiative Assessment)
Designed to help Texas public institutions of higher education determine whether students are ready for entry-level college coursework in English Language Arts and Reading (ELAR) and mathematics. Students scoring at or above the benchmarks are considered "college ready" and eligible to enroll in any entry-level college course without remediation.

TABLE 2 **Shifts in Texas' accountability system**

Index Accountability System (before 2018)	A-F Accountability System (2018–present)
Indexes: ■ Student achievement: whether students approach grade-level performance ■ Student progress: measures progress from year to year ■ Closing performance gaps: emphasizes high achievement among economically disadvantaged students and the lowest-performing students ■ Postsecondary readiness: measures how well campuses prepare students for postsecondary success Performance ratings: ■ Met standard ■ Improvement required	Domains: ■ Student achievement: evaluates performance across all subjects for all students, CCMR indicators, and graduation rates ■ School progress: shows how students perform over time and how the school's performance compares to other schools with similar economically disadvantaged populations — Part A - Academic growth — Part B - Relative performance ■ Closing performance gaps: assesses how well a school or district ensures success for all student groups Performance ratings: ■ A - Exemplary performance ■ B - Recognized performance ■ C - Acceptable performance ■ D - Needs improvement ■ F - Unacceptable performance

Building Their Own System: The A-F Accountability System and CCMR Initiatives

Beginning in 2013, Texas developed its accountability system, reflecting broader shifts in educational priorities. Initially focused on standardized test scores and academic achievement, the system evolved with the introduction of the A-F Accountability Rating System, which takes a more holistic view of student success beyond academics. The system currently evaluates schools and districts within three domains: Student Achievement, School Progress, and Closing the Gaps. Schools and districts receive a letter grade from A-F, indicating their performance across all domains. This policy took effect during the 2018–2019 school year, though it had been conceived and developed since 2013. Legislation required the TEA to report what performance would have been for the 2017–2018 school year if the A-F rating system had been in place. See Table 2 for marked shifts in this system before and after policy changes.

While "Postsecondary Readiness" was removed as a core domain, postsecondary indicators, particularly through CCMR initiatives, were expanded and became part of all three domains. Unlike the larger system, CCMR indicators have been continually added, dropped, refined, and updated to align with workforce needs. As the A-F system evolved, it prioritized specific indicators of college and career readiness and expanded the ways students can be deemed CCM ready. In 2023, the A-F Refresh[2] updated the domains with new cut scores, refined methodologies for measuring academic growth, and an expanded list of CCMR indicators based on feedback from discussions with school district administrators, regional education service centers, legislative offices, and community members. This refresh aimed to maintain and enhance the system's rigor, fairness, and transparency in evaluating performance.

2 The A-F Accountability System intended to keep the same calculations and cut scores in place for up to 5 consecutive years, without annual adjustments, to support more consistent year-over-year performance comparisons. The 2023 A-F Refresh is the first iteration of the A-F Accountability System refreshes scheduled to happen every 5 years.

Methodology

To answer the research questions, we used a mixed-methods approach for data collection and analysis. By conducting extensive document analysis of Texas Legislature and TEA records, combined with statistical analyses of district and individual-level data from the TEA, we gained deeper insights into 1) the development of the accountability system, with specific attention to CCMR standards over time; 2) how equity considerations influenced the system's development; and 3) how changes affected CCMR rates across districts and among different student groups.

Our analyses focused on the period from 2014 to 2024, capturing the development and implementation of the A-F Accountability System. We included the most recent publicly available CCMR rates for students (the 2023 graduating cohort) to calculate A-F accountability for the 2023–2024 school year, reflecting the 2023 accountability refresh.

Qualitative Data Sources and Analysis

In the first phase, we conducted document and narrative analyses to understand how the CCMR system developed over time and whether equity considerations were made. Documents for this analysis were selected from 2014 to 2024 to align with major accountability change implementation years.[3] These documents included state government reports, TEA advisory committee meeting summaries, legislative bill summaries, and legislative reports. We also collected legislative bills related to CCMR and the accountability system to triangulate data sources during the 2014–2024 period.

To analyze these documents, we employed an inductive research approach using a two-cycle coding method. Two researchers coded all relevant documents and grouped them by accountability year. First, coders identified relevant topics or discussions related to changes in the accountability system. Second, researchers mapped considerations around major accountability domains (e.g., Student Achievement, Closing the Gaps)

3 A note regarding accountability metrics and legislative sessions by year: Each accountability year (and respective TEA accountability manual) aligns with the end of each school year. For example, the 2018 accountability year uses metrics from July 2017 to June 2018. The Texas Legislature meets every 2 years on odd-numbered years for 140 days. Typically, a law that has passed during the session becomes law 90 days after the end of the session, or on the effective date stated within the bill's text. If a bill is signed by the governor before the end of the legislative session, it can become law immediately. For the time covered in this study, five legislative sessions occurred: the 84th in 2015, the 85th in 2017, the 86th in 2019, the 87th in 2021, and the 88th in 2023.

by accountability year. This refined coding highlighted shifts in the system and the growing prevalence of CCMR. After identifying patterns and categories, researchers produced memos to organize findings and build a narrative.

Quantitative Data Sources and Analysis

To understand how changes in the accountability system related to CCMR rates across Texas, we collected data from the Texas Academic Performance Reports (TAPR) for 2014–2022 by district. We also used individual-level data from TEA's Public Education Information Management System (PEIMS) for the same period.

The first step in the quantitative analysis involved a descriptive analysis of state, district, and individual-level data. We calculated overall and subgroup summary statistics of CCMR rates; these helped identify trends over time and differences across districts and student subgroups. Researchers then estimated a discontinuous growth model to examine how changes in the accountability system and the COVID-19 pandemic were associated with CCMR rates. The analysis included 980 districts with complete information over 9 years, totaling 8,678 observations. Results from this model helped identify how CCMR policy changes over time relate to CCMR rates, independent of district characteristics or demographic composition.

Bridging the Qualitative and Quantitative Analyses

We integrated the qualitative and quantitative components of our study to explore what changed in the CCMR framework and how those changes mattered. Research team meetings served as structured analytic spaces to compare findings across methods, interrogate contradictions, and refine insights. We mapped policy developments over time against evident shifts in CCMR rates from our descriptive analyses. This triangulation allowed us to consider changes in CCMR rate trends within broader policy developments and decision-making processes by the TEA. Our collaborative mixed-methods approach deepened our understanding of how system-level shifts translated into real changes for students.

The key findings from this study were organized into three distinct parts corresponding to the research questions guiding this research:

Part 1. Development of the accountability system and CCMR framework: This section summarizes findings regarding the motivations behind the development of the new accountability standards, particularly TEA's response to legislative changes while maintaining simplicity and transparency.

Part 2. Consideration of equity: This section examines whether the system considered multiple pathways to CCMR and their implications for equity among different student demographic groups.

Part 3. Impact on school districts and students: This section analyzes trends in CCMR rates to understand how accountability changes affected school districts and various student groups across Texas.

Part 1: What Guided the Development of the A-F Accountability System and its CCMR Indicators?

In mapping the development of the A-F Accountability System, we reviewed the last decade of CCMR-related bills that became law and analyzed how the TEA and advisory committees responded. Our analyses showed that Texas' accountability system and its CCMR indicators were influenced by federal mandates (i.e., NCLB and ESSA), shaped by the goal of maintaining transparency and fairness, and adjusted in response to major disruptions like the COVID-19 pandemic.

Key Finding 1

The development of Texas' new accountability system was driven by state legislation in response to federal mandates and was implemented by the Texas Legislature, the Texas Education Agency (TEA), and TEA advisory committees; however, there was an evident disconnect between the TEA and its advisory committees, reflecting an erosion of trust and collaboration.

Drafting a new Texas accountability system through legislation

The changes to Texas' accountability system and CCMR indicators were driven by federal expectations from the transition between NCLB and ESSA and actions taken by the Texas Legislature. The signing of ESSA in 2015 intensified efforts to revamp the state's accountability system, granting states more control over changes within expected parameters. Beginning in 2013, House Bill 5 (HB 5)[4] laid the groundwork for the accountability system and caused a pivotal shift in Texas high school education by introducing a flexible graduation structure with multiple endorsement pathways,[5] reducing the number of required state assessments, replacing the existing curriculum with the Foundation High School Program (FHSP),[6] and emphasizing postsecondary readiness. This plan allowed students to tailor coursework to their career or academic interests, highlighting CCMR, contrasting with the previous system that prioritized uniform academic rigor and standardized test scores. HB 5 expanded the definition of postsecondary readiness by recognizing multiple pathways besides

4 House Bill 5, passed by the 83rd Texas Legislature in 2013, restructured high school graduation requirements by introducing the Foundation High School Program (FHSP) with career-focused endorsements, reduced the number of required end-of-course exams, and revised the state accountability system to include postsecondary readiness and expanded Career and Technical Education (CTE) pathways.

5 Endorsements are course pathways that allow students to focus on specialized areas. In Texas, students can choose from five endorsement pathways: STEM, Business and Industry, Public Service, Arts and Humanities, or Multidisciplinary Studies.

6 The FHSP is Texas' default graduation plan that requires 22 core credits and allows students to earn endorsements to graduate with a total of 26 credits. It also offers flexible pathways aligned with college and career readiness.

college and embedding these into graduation plans and accountability. It also reformed the accountability system structure, introducing measures for student achievement, school progress, and closing performance gaps for underserved students, laying the foundation for Texas' current A-F Accountability System.

Subsequent legislation from 2015 to 2017 refined accountability measures and restructured CCMR placement within the system (Figure 1). The main legislation establishing the A-F Accountability System was HB 2804,[7] but other laws introduced key changes, including enhancing counselor training programs to improve CCMR outcomes (HB 18)[8] and embedding CCMR indicators within the new system's measure of student achievement (HB 22).[9] Legislative efforts also increased flexibility for low-rated school districts to adopt innovative strategies in designing and submitting their turnaround or rating-improvement plans and expanded eligibility for blended learning and dual-credit programs.

Efforts from 2019 to 2023 included linking funding to CCMR outcomes to incentivize schools to enhance postsecondary readiness (HB 3 and HB 4545).[10] Interventions like the Strong Foundations Grant Program and permanent Individual Graduation Committees[11] offered tailored support for struggling students, while updates to performance metrics, including Texas National Guard enlistments and dropout recovery, further refined accountability measures. Collectively, these policies emphasized strengthening and equalizing various postsecondary pathways and providing greater flexibility and targeted support for schools to prepare students while meeting accountability standards.

An emerging disconnect between the TEA and its advisory committees

Our analyses identified three interconnected groups involved in developing and transitioning to the new accountability system:

- The Texas Legislature
- The TEA
- The TEA's advisory committees.[12]

While the Texas Legislature meets biennially to consider and pass bills, the TEA assembles advisory groups annually[13] to help develop essential components of the state's accountability system (Figure 2). Although these groups have had various titles, they have been pivotal in providing recommendations toward the ongoing refinement and implementation of the accountability system.

7 House Bill 2804, enacted by the 84th Texas Legislature in 2015, adopted a new accountability system for evaluating public school districts and campuses that included additional performance indicators unrelated to state standardized testing, and required the TEA to assign A-F performance ratings beginning in the 2017–2018 school year.

8 House Bill 18 (2015) aimed to strengthen college and career advising by requiring school districts to integrate postsecondary education and career planning into the curriculum. It mandated training for counselors and emphasized informing students and parents about endorsements, college readiness, and financial aid options.

9 House Bill 22 (2017) simplified the proposed Texas accountability system by reducing it to three domains (Student Achievement, School Progress, and Closing the Gaps) and delayed the implementation of the A-F rating system for districts and schools until the 2018–2019 school year.

10 House Bill 3 tied financial incentives to CCMR outcomes, and House Bill 4545 provided funding and support for students not performing at grade level.

11 The Strong Foundations Grant Program provides funding and resources for schools to implement effective instructional strategies. Individual Graduation Committees allow eligible students who fail one or two required end-of-course exams to be considered for graduation based on a holistic review.

12 The TEA advisory committees included the:

- Accountability Technical Advisory Committee (ATAC): composed of representatives from districts and regional education service centers.
- Accountability Policy Advisory Committee (APAC): composed of representatives from legislative offices, school districts, parent groups, and the business community.
- Texas Accountability Advisory Group (TAAG): composed of representatives from school districts, legislative offices, and the business community.

From fall 2014 to spring 2020, the ATAC and APAC met separately. They began meeting jointly in spring 2021 through spring 2022 as the Accountability Advisory Committees (AAC), then merged into the TAAG in fall 2022. These groups advise the commissioner of education on accountability policy and technical matters and provide feedback on major policy and accountability system issues.

13 Under Texas Administrative Code Title 19, Chapter 161, the commissioner of education is authorized to establish and appoint members to advisory committees, which may be created by law, state board recommendation, or at the commissioner's discretion. TEA's accountability system has relied on the advisory groups (i.e., ATAC, APAC, and TAAG). By 2024, TAAG members were selected through a nomination and appointment process based on expertise in education, assessment, and data analysis. Members serve 3-year terms, with limits, and lobbyists or vendor-affiliated individuals are ineligible.

FIGURE 1 **Legislation shaping the evolution of the A-F Accountability System and CCMR**

= Legislative session

— = Start of school year

Other related CCMR bills

Supporting students

SB 149 | SB 463 | HB 1603

- Established individual graduation committees as alternative graduation route

HB 18

- Established systems to improve school counselors' CCMR guidance

HB 4545

- Provided tailored support/increased funding to students not performing at grade level

Interventions & Sanctions

HB 1842 | HB 1553 | HB 2263 | HB 4205

- Enhanced/streamlined interventions by TEA
- Required more detailed turnaround plans
- Encouraged partnerships
- Provided proven model to accelerate turnaround plans

Themes across CCMR legislation

- Established & refined new accountability system
- Increased transparency for parents and public
- Ensured fair CCMR calculations for schools
- Created interventions & sanctions for underperforming schools
- Aligned systems under new CCMR standards
- Built support systems to help students meet requirements

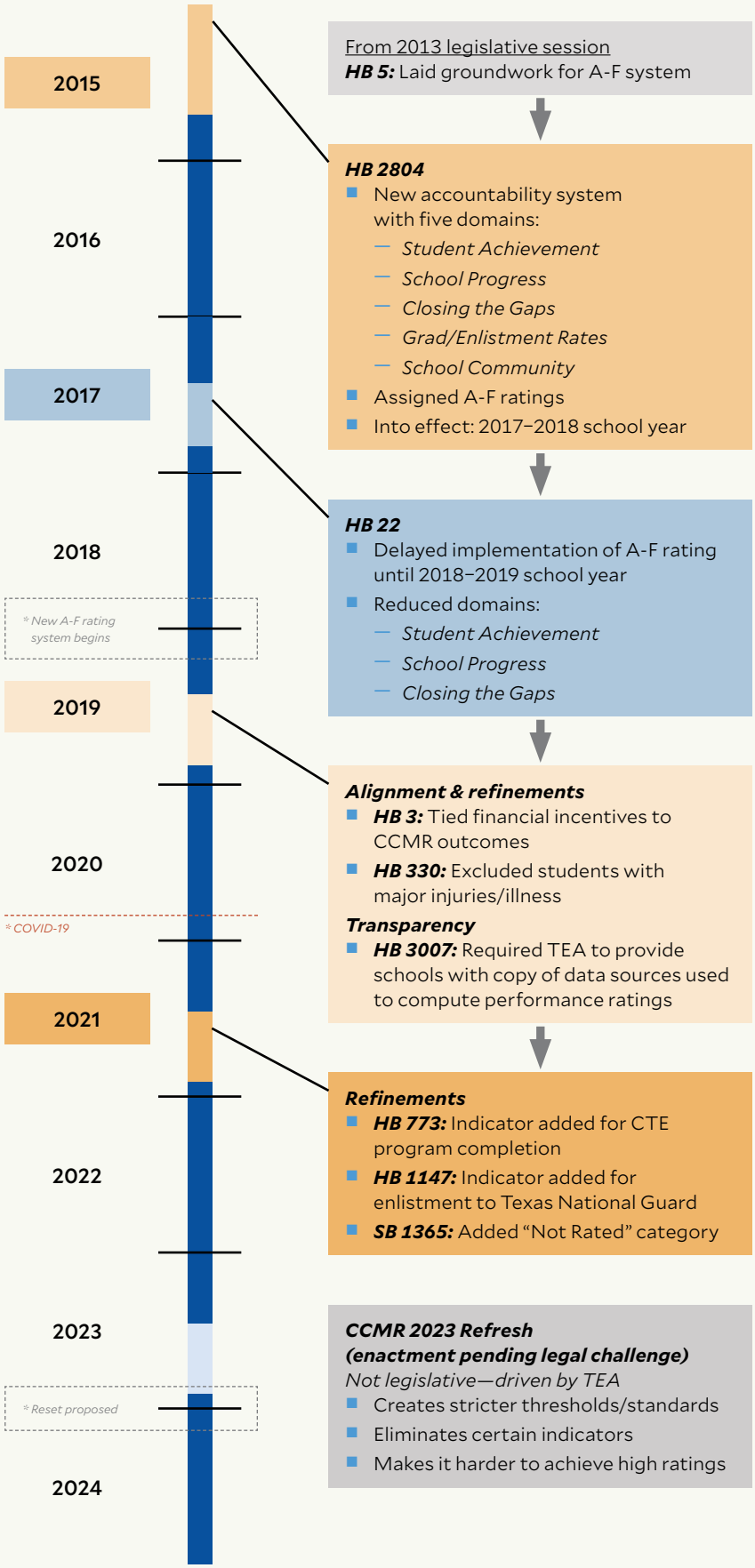
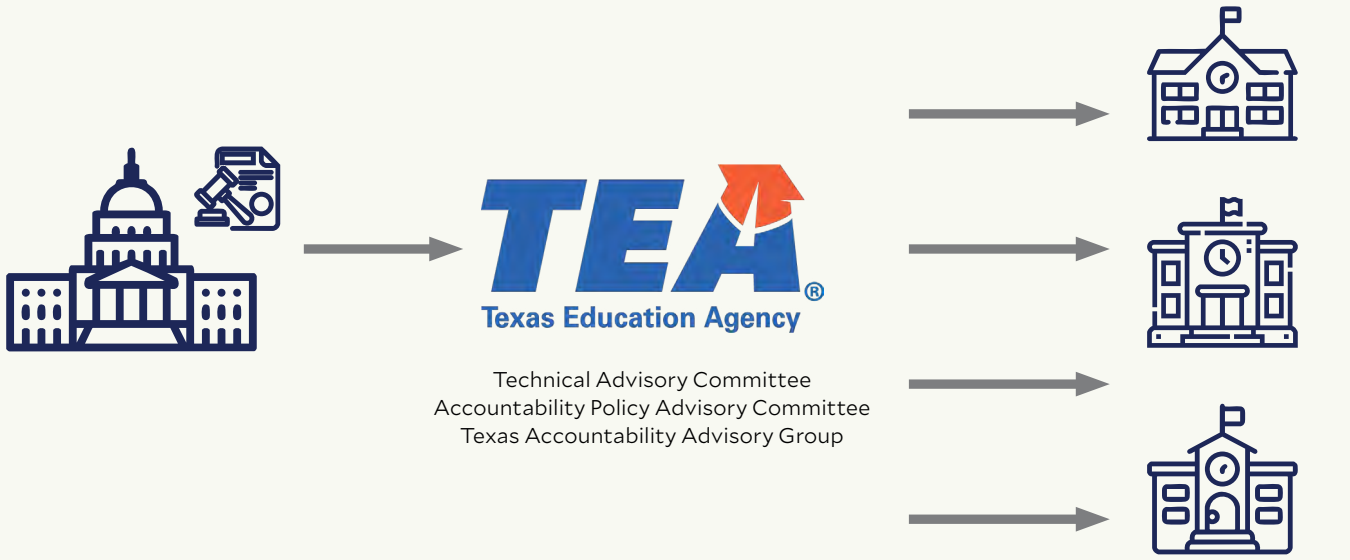


FIGURE 2 **Step-by-step process of developing and implementing guidelines and support**



While legislation provided general policy direction, many details depended on decisions made by the TEA in partnership with its advisory committees. The TEA advisory committees represented the public in the accountability system development process, meeting regularly to discuss recommendations. From 2014 to 2017, there were several instances of the commissioner providing the committees with direct guidance, such as aligning new domain thresholds with the state's 60x30 Texas Higher Education Strategic Plan[14] (TEA ATAC, 2016, May 18) and facilitating committee-to-committee (ATAC with APAC) voting and agreement on design decisions.

By spring 2018, just prior to the new system's implementation, committee members began to express concerns about a disconnect between their guidance and the TEA's decisions. They felt the TEA "was not considering the committee's recommendations" (TEA APAC, 2018, February 13) or was being "unresponsive to ATAC concerns in general," (TEA ATAC, 2018, February 1–2) along with frustration at the lack of impact ATAC was having on the accountability system's development (TEA ATAC, 2018, February 1–2).

The committee voiced more specific concerns regarding certain decisions "not [aligning] with the messaging from the commissioner" (TEA ATAC, 2019, November 19–20), and that TEA decisions would "be made without ATAC and APAC feedback" (TEA AAC, 2021, April 26). The TEA responded that it would solicit committee feedback. Nonetheless, the exchanges revealed a decline in trust and collaboration at the post-legislative level of system development. The lack of clarity on how the TEA's decision-making process involved the committees' feedback contradicted transparency, one of the three main goals of the new system emphasized by both the Texas Legislature and TEA commissioner.

14 The 60x30TX Strategic Plan for Higher Education was launched by the Texas Higher Education Coordinating Board in 2015, and aimed to ensure that by 2030, 60% of Texans aged 25–34 would hold a certificate or degree. The plan also set goals related to credential completion, marketable skills, and student debt control (Texas Higher Education Coordinating Board, 2015).

Key Finding 2

Transparency and public understanding were mandated and emphasized throughout the development of the new accountability system; however, the complexities of developing a system that worked across various contexts often challenged how clear and straightforward ratings could be, especially for CCMR.

A commitment to transparency

The primary task of the TEA Advisory Committees was to respond to state legislative mandates and ensure alignment with federal oversight. However, with the creation of HB 2804 in 2015—marking the beginning of changes to Texas' accountability system—legislators emphasized transparency for public understanding. While not federally required, transparency became crucial for policymakers and advisory committees designing the accountability system. Thus, ensuring transparency and accessibility became a key task for the TEA Advisory Committees starting in 2015-2016.

> **"The three guiding principles of the new accountability system [were] transparency, fairness, and rigor."**

In fact, "the [Education] commissioner reiterated that the three guiding principles of the new accountability system [were] transparency, fairness, and rigor" (TEA ATAC, 2016, November 14, p. 1) to the advisory committees. This emphasized that transparency was as important as meeting legislative requirements. The A-F rating system was seen as a means for continuous improvement and greater transparency (TEA ATAC, 2016, November 14, p. 1). In the former Index Accountability System, schools were rated as "Met Standard" or "Improvement Required," but A-F ratings were embraced for reflecting varying degrees of success (TEA ATAC, 2016, November 14, p. 1). Using familiar grades as indicators of school quality was viewed as an accessible way to support parent and public understanding.

This commitment to transparency alongside the committees' legislative responses was evident throughout the accountability years. From the early phases of the committees developing the new system's domain calculations with "hopes of maintaining transparency and meeting legislative intent" (TEA ATAC, 2016, November 14, p. 3) in 2016, to later committees in 2022 seeking clarification on whether the "legislative intent to make the A-F system" was "to be just like a letter grade," the TEA clarified that per HB 22 (2017), it was merely intended to "inform the public" (TEA TAAG, 2022, October 19, p. 2). Committee members frequently asked questions to clarify standards, ensure clear communication, and challenge rating calculations lacking transparency.

A significant effort to support transparency was seen in discussions between the TEA and advisory committees comparing Texas' evolving system with those of other states, which became more prominent starting in the 2020 accountability year. For example, when discussing ESSA requirements, officials indicated they tried to be comprehensive in their comparisons to other states: "We have looked at every state's ESSA plan. When considering a graduated point system for Closing the Gaps, we specifically referenced Oregon and Washington (TEA AAC, 2021, April 26, p. 2)."

From the adoption of A-F ratings to continuous comparisons with other states, the focus on public understanding remained central. However, it was challenging to design a system tailored to diverse schools while maintaining accessibility and clarity.

Balancing simplicity with a complex system

Transparency for the public was a recurring focus, but committee members recognized the tension between accurately evaluating the complexities of diverse school types while maintaining simplicity. This became evident in discussions about the new system not being suitable for rating every school in Texas, given that some rural schools, alternative education models, and special education programs required different evaluation approaches. Committees worried that the public would not understand the tailored rating systems created. For instance, in discussions with the TEA concerning accountability

ratings for Alternative Education Campuses (AECs)[15] meant for students at risk of dropping out, the 2020 Accountability Policy Advisory Committee stated:

> The A-F system was built to be easy to understand, but the public does not understand that there's a subset of schools that have a different system. We need to communicate the issue of rating these schools differently because they have special provisions (TEA APAC, 2019, October 16, p. 3).

The TEA acknowledged the challenge of fitting these campus types within the A-F system:

> These campuses exist for special purposes, so how do we establish a set of criteria that measure them against the purpose for which they exist? The current accountability system does not meet all the needs of AECs. It's difficult to distinguish a high-performing AEC versus a low-performing AEC ... Also, this is a national issue. Texas has a long, well-established [Alternative Education Accountability (AEA)] history and has many more AECs than other states (TEA APAC, 2019, October 16, p. 3).

In addition to specialized schools like AECs, HB 22 (2017) allowed Local Educational Agencies (LEAs), including public school districts and state-recognized open-enrollment charter school networks, to develop and submit their own Local Accountability System (LAS)[16] for evaluating local campus performance, pending TEA approval. The TEA emphasized the challenge of maintaining public transparency with a complex accountability system: "Like California, [Texas is] very large and unique [...] We give local control to districts" (TEA APAC, 2019, October 16, 2019, p. 4).

TEA repeatedly emphasized to advisory committees the challenge of maintaining public transparency when Texas has "a complex accountability system."

As accountability years progressed toward the 2023 A-F Refresh, and legislation focused more on system refinements than major changes (see Figure 1), transparency concerns shifted from creating a publicly understandable accountability rating system to ensuring a straightforward transition into the new standards. Committees discussed worries about small elements of the system that might confuse the public, such as domain names differing from public perceptions (TEA AAC, 2022, February 8, p. 2) or whether the public understood the difference between a "distinction" and a "badge" (TEA AAC, 2022, February 8, p. 5).

The transition to the 2023 A-F Refresh raised concerns about making too many changes and reducing transparency. Committees worried about "confusing the public if we have so many metrics" (TEA AAC, 2021, October 27, p. 4) and that "the more complex [they] make this system, the harder it is going to be to keep teachers" (TEA AAC, 2022, February 9, p. 3). The ongoing development of the CCMR indicator within the accountability system similarly raised concerns about public clarity, with committees noting that "CCMR is challenging because it changes every year" (TEA TAAG, 2023, January 18, p. 3), and frequent changes made the system "even more complex, making it difficult for [officials] to communicate how [they] get to the final [CCMR] score" (TEA TAAG, 2023, March 29, p. 3). Although the system refresh was intended to occur every five years, its arrival seemed disruptive, especially during the COVID-19 recovery years.

15 An Alternative Education Campus (AEC), as defined by the TEA, is a campus serving grades 6–12 where at least 75% of students are considered at risk of dropping out, and which meets specific operational and instructional criteria to be evaluated under a separate set of Alternative Education Accountability (AEA) provisions (TEA, 2023b).

16 While HB 22 (2017) restructured the state's public school accountability system by introducing an A-F rating system, it also included a provision establishing Local Accountability Systems (LAS) that allowed districts and open-enrollment charter schools to develop TEA-approved local plans that included locally designed domains in addition to the three in the state A-F rating system. Participation in a LAS is voluntary, plans last 3 to 5 years, and combined ratings are allowed for campuses rated A-C, provided the state rating comprises at least 50% of the total.

Key Finding 3

The implementation and refinement of the accountability system encountered continuous disruptions, particularly the ongoing evolution of CCMR indicators and the upheaval caused by the COVID-19 pandemic.

Ongoing uncertainty in CCMR development

The development and implementation of the new accountability system faced significant disruptions. Committees noted that "much more work [would] need to be done to develop the new rating system" (TEA ATAC, 2014, December 8–9, p. 4) as early as fall 2014. Even after HB 22 in 2017 delayed the A-F system's implementation to the 2018–2019 school year, developing CCMR indicators remained unresolved well into 2017, with the committee questioning whether to "reset cut points annually as CCMR develops" (TEA ATAC, 2017, November 16, p. 1) and suggesting a "5-year transition period for the CCMR component to allow districts to realign their programs" (TEA ATAC, 2017, November 16, p. 2). One member reiterated that the "system is supposed to be static for 5 years, but we enter the first year with CCMR indicators still in development. This is a problem" (TEA ATAC, 2017, November 16, p. 2). The lack of consistent definitions for measuring CCMR contributed to the development delays. An advisory committee even suggested that the Commissioner of Education apply "his authority in areas not defined by statute, particularly in the case of CTE CCMR credit" (TEA ATAC, 2017, November 16, p. 2).

The COVID-19 pandemic and system disruption

The first year of the A-F system was followed by the COVID-19 pandemic in spring 2020, further delaying progress and shifting priorities. Advisory committee meeting minutes were not recorded from March 2020 until April 2021; it was unclear whether this gap was due to canceled meetings or a failure to record minutes. The initial meetings in April 2021 immediately addressed the COVID-19 impact on accountability ratings, including CCMR and graduation rates for the classes of 2020 and 2021. The committees sought clarification on whether they would "have an opportunity to provide their opinion on [TEA's] response to COVID-19" (TEA AAC, 2021, April 26, pp. 1–2), to which the agency responded: "Yes. The Commissioner has requested [the advisory committees'] feedback on how districts have been impacted by COVID-19. The Commissioner has also requested [the advisory committees'] feedback on the [2023 A-F Refresh]."

Many subsequent conversations reflected the tension between navigating COVID-19 and the 2023 A-F Refresh, with one committee member asking the TEA: "Why are we resetting the targets now? My concern is we are acting like COVID never happened" (TEA AAC, 2022, February 8, p. 2). Another member expressed concerns about COVID-19's long-term impact, stating that "the 60x30 plan is the 'north star' for guiding standards in Texas. Given COVID, that 2030 timeline may need to be adjusted, and if so, we need to adjust our long-term targets" (TEA AAC, 2022, February 8, p. 3).

Post-pandemic tensions with the 2023 A-F Refresh

Managing the COVID-19 recovery period created additional challenges in refining the A-F Refresh as the 2022–2023 school year approached. Maintaining the intended refresh standards at the 5-year mark of the A-F system raised questions about "the validity of the cut scores since they were set before COVID … baselines were set on 2016–17" (TEA AAC, 2021, September 29, p. 3). Initial expectations set by state and federal legislation pressured TEA officials to move forward, with them informing the advisory committees:

> We have to set long-term and interim targets per the USDE [U.S. Department of Education]. With everything going on with COVID and the STAAR redesign we are trying to make sure that we consider fairness while meeting the USDE requirements. We cannot have the targets set to where we were 5 years ago. We can consider them as interim targets, but we need to have an aspirational target per the commissioner and legislature. Targets should be reasonable and aspirational. (TEA AAC, 2022, February 8, pp. 2–3).

The ongoing development of the A-F Accountability System, its refresh, and the CCMR indicators reflect a complex interplay of legislative mandates, agency-led design, advisory committee input, and the desire for public transparency. While federal legislation such as ESSA catalyzed a reimagining of the system, Texas lawmakers, the TEA, and its advisory committees ultimately shaped its structure to meet state-specific needs. The dialogue among the Texas Legislature, TEA, and its advisory groups yielded a nuanced framework that moved beyond single summative ratings toward improved alignment between school performance and various forms of postsecondary preparedness.

Part 2: How Did the New Accountability System Consider Multiple Pathways to Postsecondary Success and Equity?

In the 2023–2024 school year, half of public school students in Texas were Hispanic, one-quarter were White, 13% were Black, and 5% were Asian. Additionally, 1 in 3 students were classified as economically disadvantaged, and about 1 in 4 were classified as emergent bilingual (TEA, 2024). In the context of increasing diversity and changing postsecondary opportunities, a key narrative in developing the accountability system is how stakeholders aimed to create equitable postsecondary opportunities and various pathways to success—whether college or career—for students across the state.

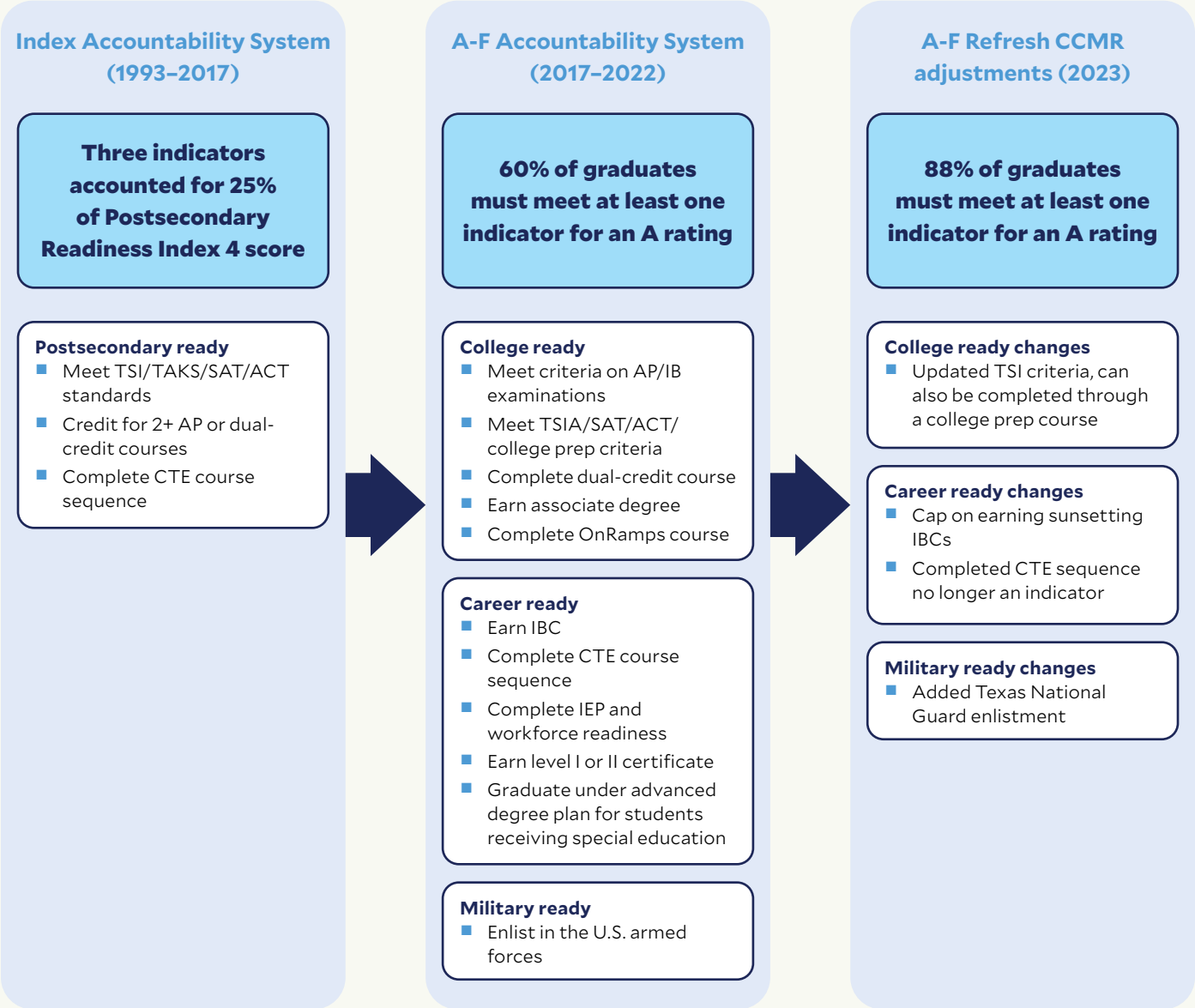
Key Finding 4

The new system aimed to identify metrics that recognized the variety of postsecondary pathways available to students and created a broader definition of postsecondary readiness.

A significant aspect of the A-F Accountability System was the ongoing development of the CCMR indicators and their evolution toward offering students multiple pathways for postsecondary success. Defining CCMR with a fixed set of indicators raised concerns about accurately measuring each one and when postsecondary preparedness should begin. As early as 2015, committee members discussed the challenges of identifying college and career readiness indicators for elementary and middle school students (TEA ATAC, 2015, December 2–3, p. 6). In addition to discussions about when CCMR should begin, committee members addressed the complexity of measuring readiness at different grades (TEA TAAG, 2023, March 29, p. 2) and the need to develop a system that recognized a variety of metrics.

CCMR indicators expanded over time to reflect the diverse ways students can be deemed postsecondary ready, regardless of their chosen path. This is illustrated in Figure 3, which shows how the number and type of CCMR indicators have greatly expanded as the state transitioned from the index system to the A-F system and, more recently, the A-F refresh. The goal of both the new accountability system and its evolving CCMR indicators was to ensure "students be ready for a meaningful life" (TEA TAAG, 2022, October 19, p. 2). This meant recognizing various ways to be prepared for life after high school as equally important. The expansive process of developing CCMR indicators was crucial in meeting workforce demands. One committee member even asked, "should 'acquire gainful employment' be on the CCMR indicator list?" (TEA APAC, 2017, December 4, p. 1).

FIGURE 3 **CCMR indicators of postsecondary preparedness before and after the A-F Accountability System implementation**



Only graduates meeting at least one of the listed criteria were considered college, career, or military ready.

Criticism of the accountability system awarding CCMR points equally across an expanding list of indicators revealed tension among advisory committee members. One member questioned how "a student can earn a full [CCMR] point by completing a college prep course, which requires far less effort than an IBC" (TEA AAC, 2021, July 29, p. 3), while another called it "inconsistent" for a student to "earn a full [CCMR] point by simply testing for AP/IB" while requiring the completion of "the program of study [which involves the completion of multiple courses,] *and* an IBC" to receive the same point (TEA AAC, 2021, July 29, p. 3). Another member pointed out a misalignment with the postsecondary space, stating:

> Many AP/IB courses aren't accepted by colleges while dual-credit courses are widely accepted, yet the accountability system awards credit for meeting the criteria on any one subject area AP/IB examination but may require 9 credits of dual credit in any subject area (TEA APAC, 2018, February 13, p. 2).[17]

17 TEA provides a tool for students to explore credit policies by course and by college.

Since 2005, Texas colleges and universities have been required to adopt and implement a policy to grant undergraduate course credit for incoming freshmen who have completed the IB Diploma or achieved required scores on one or more AP examinations (TEA, 2023c). Regardless of the accuracy of this member's statement, it reflects the kinds of conversations the committee was having about the different CCMR indicators. In response to these concerns, committee members suggested awarding "a full [CCMR] point to those that earn an [IBC] without completing a program of study" (TEA AAC, 2021, July 29, p. 2) or awarding "half a [CCMR] point for completing the program of study and a full [CCMR] point for the IBC." IBCs frequently arose in discussions regarding postsecondary readiness due to their ties to existing CTE curriculums and ongoing workforce demand.

The connection of CCMR to immediate workforce demands was primarily driven by efforts to strengthen this link between IBCs and CTE programs of study, with an emphasis on expanding the availability of IBCs. This expansion and the determination of which IBCs are considered valuable credentials resulted from collaboration among multiple actors, such as the Texas Workforce Commission (TWC), the Texas Higher Education Coordinating Board (THECB), and the College, Career, and Military Prep (CCMP) division at the TEA. In response to a question about how an IBC's "value" was determined, TEA indicated that they were "working with the [TWC] and THECB. CCMP works closely with both agencies. The IBC list is updated every two years, with the rigor evaluated each cycle" (TEA TAAG, 2022, November 16, p. 3).

Despite this clear focus on developing IBCs, the messaging from the advisory committees consistently returned to the notion of "all students [being] ready for CCMR regardless of which component they fall into" (TEA TAAG, 2022, October 7, p. 4). This objective of treating the various postsecondary opportunities as equally important remained central even in conversations about adjusting the CCMR methodology due to the CCMR outcomes bonus.[18] Committee members insisted that they "should use a CCMR system that is equally weighted or adjust the indicators" regardless of the outcomes bonus; failing to do so would make the system appear to prioritize college readiness over career or military readiness (TEA TAAG, 2022, October 7, p. 4).

Key Finding 5

Equity discussions were present throughout the policy development process, but achieving a targeted equity goal was ultimately not a predominant concern of the final policy.

While equity-related discussions were present throughout TEA and committee meetings, the conversations were limited and centered on system-level fairness than student-level disparities (i.e., a system that supported all students generally vs. one that created specific aims for individual demographic groups). The following section explores how equity-related topics emerged in these policy discussions, what was emphasized or omitted, and how systemic constraints shaped the final accountability system design.

Even considering their limitations, state accountability systems have been key in addressing racial and socioeconomic inequities in education, holding policymakers and educators responsible for promoting equity (Scheurich & Skrla, 2004). Additionally, state accountability policies are often the most effective means for tackling disparities in educational access and achievement (Wong, 2020). However, discussions about equity were limited, appearing explicitly only 10 times in TEA and TEA advisory meeting minutes from 2015 to 2022. Early discussions on system development focused on incorporating varying STAAR scores for specific subgroups, such as STAAR L,[19] but did not address the unique needs or disadvantages experienced by individual students across demographic groups. For instance, they overlooked students who are economically disadvantaged and non-emergent bilingual Hispanic or those in special education who are Black. Instead, committee members concentrated on broader student categories. This was evident in their concerns about "counting some students more than once" (TEA ATAC, 2016, September 26–27, p. 3) when developing Domain

18 The CCMR outcomes bonus is meant to reward school districts for preparing students for college, career, or the military, as well as for students enrolling in postsecondary institutions, completing a credential and/or enlisting in the military. Bonuses are paid annually for the accomplishments of graduates above a certain percentage threshold for each of the three groups measured: economically disadvantaged, non-economically disadvantaged, and students served in special education programs (TEA, 2024).

19 STAAR L was an online version of the STAAR test designed for emergent bilingual students who required linguistic accommodations; STAAR L was phased out after the 2016–2017 school year, followed by linguistic accommodations being integrated into the general STAAR assessment for eligible emergent bilingual students.

III, later named the Closing the Gaps domain in the A-F Accountability System. They also expressed worries about districts with "a higher proportion of [testers requiring linguistic accommodations]" being "negatively impacted by the inclusion of [those students'] tests" (TEA APAC, 2017, January 24, p. 1), and debated the "equitability of applying a new A-F rating system that rated campuses of choice" against "campuses that are required to accept students who live in their attendance zones" (TEA ATAC, 2016, September 26–27, p. 2).

Efforts to address equity for specific student subgroups were primarily concentrated in the Closing the Gaps domain, which accounts for 30% of a school or district's overall rating and is directly linked to federal ESSA metrics. However, a desire to simplify the system made targeted equity discussions challenging for committee members. One member noted, "It does look bad that we have different [Closing the Gaps] targets for different races/ethnicities, but taking into consideration the limited resources for economically disadvantaged students seems reasonable" (TEA AAC, 2022, February 9, p. 3), while another added:

> The more complex we make this system, the harder it is going to be to keep teachers. If we can keep this simple so we can easily explain it to teachers and stakeholders, we can better recover from some of these struggles and the more engagement we will have (TEA AAC, 2022, February 9, p. 3).

In this discussion, even the TEA agreed that having different Closing the Gaps targets by race/ethnicity was undesirable, stating, "the simpler the system is, the better" (TEA AAC, 2022, February 9, p. 3).

Conversations about targeted support for specific groups—mainly emergent bilingual students, students receiving special education services, or economically disadvantaged students—did occur, but they were often countered by discussions that emphasized a "maintenance for all" approach. This tension was evident early on, as illustrated in the following exchange between committee members and the TEA commissioner:

> ... committee members expressed reservations toward weighting advanced level of achievement so heavily, as many low-income districts may not have a large number of students reach the advanced level. Ultimately, the majority of the committee voted to either adjust the weight for the levels of achievement to put less emphasis on the advanced level or completely exclude the advanced level from Domain I (TEA ATAC, 2016, November 14, pp. 1–2).

In response, the commissioner:

> ... spoke about the Texas Higher Education Coordinating Board's goal of 60% of Texans ages 25–34 holding a postsecondary credential or degree by the year 2030 and encouraged committee members to recognize this goal while considering the 60% target for Domain I (TEA ATAC, 2016, November 14, p. 2).

This exchange underscored the emphasis on supporting all students generally, aligning with the state's higher education strategic plan, rather than making specific exceptions for subgroups in low-income districts. This perspective led to discussions that tiered demographic characteristics, particularly regarding domain calculations. "Subdividing student groups by their economically disadvantaged status," for example, was "preferred" because "economically disadvantaged status is more important than student group or race" (TEA AAC, 2021, April 26, p. 2). Socioeconomic, special education, and emergent bilingual statuses received the most attention across all advisory council meetings.

Another significant tension arose when addressing equity through compliance with federal subgroup requirements. Strategies like "supergrouping" were contentious. Supergrouping involves combining subgroups such as emergent bilingual students, students with disabilities, and economically disadvantaged students into one larger group for evaluation purposes. While this can address small sample sizes and data privacy, it may obscure disparities between subgroups, complicating the identification of specific student needs (Ushomirsky et al., 2017). Efforts to differentiate economically disadvantaged and non-economically disadvantaged students for the Closing the Gaps domain faced resistance from the U.S. Department of Education. When a committee member inquired about "consider[ing] sliding scale targets that adjust for low and high economically disadvantaged," the TEA responded that "the USDE has not approved a state plan with targets such as this" (TEA AAC, 2021, July 29, p. 1). In a separate meeting, a committee member asked, "Is the student group design also up for discussion? Specifically, breaking each student group into economically disadvantaged and non-economically disadvantaged?" to which the TEA replied that this had "not been well-received by the [USDE]" (TEA AAC, 2021, July 29, p. 2).

Concerns about subgroup fit were highlighted when a committee member stated: "In the supergroup it makes sense to group the economically disadvantaged and emergent bilingual students, but it does not make as much sense to include special education students. They're such a different population of students" (TEA AAC, 2022, February 9, p. 4). In discussing targets for the Closing the Gap domain ahead of the A-F Refresh, committee members questioned whether supergrouping combines "[emergent bilinguals], special education, and economically disadvantaged, but does it also remove them from race/ethnicity groups?" (TEA AAC, 2022, February 9, p. 2). TEA officials cited Connecticut as an example of overlapping characteristics to illustrate:

> [Connecticut] only evaluates two groups of students which are the All Students group and High Needs Group (ELs, special education, and economically disadvantaged). Connecticut reports race/ethnicity data where the students are duplicated but they chose to remove race/ethnicity groups, except for all students, and focus on those two groups for school improvement … reducing the evaluation focus down to just these two groups would undoubtedly have an impact on [Texas] campuses (TEA AAC, 2022, February 9, p. 2).

Overlapping characteristics complicated discussions and decisions for officials. The location of students was another factor, given Texas's many rural areas. Concerns arose about rural or smaller districts being overlooked in various accountability features. For example, in refining IBC and CTE offerings as CCMR indicators, committee members expressed concerns about rural districts' ability to provide sufficient opportunities: "Committee member shared concerns about smaller districts being disproportionately impacted by staffing implications and being able to deliver course instruction" (TEA TAAG, 2024, April 2, p. 1). Another committee member stressed the importance of localized context, stating: "The [IBC] list is incomplete. It doesn't reflect the needs of the local communities … the commissioner should remain cognizant about the local needs of districts" (TEA APAC, 2018, February 13, p. 2). Conversely, supergrouping was viewed as beneficial for "rural campuses that have the same students who meet multiple indicators" (TEA AAC, 2022, February 9, p. 2).

The balance between targeted equity for underserved populations and a more generalized approach produced several caveats from officials. Federal requirements that fit Texas' educational context also introduced challenges that both legislation and advisory committees aimed to address. The TEA made it clear that it wants to champion equity while pursuing goals like transparency and meeting strategic objectives. Supergroups appear to be a pathway to achieve these goals, as discussions about their use continued into the 2023 accountability year. When asked if "the reason [TEA is] proposing super groups [was] to have less calculations?", the TEA responded: "The reason is to have more students evaluated statewide. You currently need 25 tests (or graduates) to be evaluated. This would narrow focus on equity in all our campuses, making sure underserved students are evaluated" (TEA TAAG, 2022, October 19, p. 4). Nonetheless, the numerous constraints and differing viewpoints may stem from the complex nature of the accountability system's design, as suggested by a committee member who stated that "perhaps the problem for aligning state and federal is a flawed Closing the Gaps design" (TEA ATAC APAC, 2021, October 28, p. 1).

In sum, the development of Texas' A-F Accountability System, particularly through the evolution of CCMR indicators, reflected competing goals: a deliberate effort to expand postsecondary readiness measures that align with students' varied aspirations while maintaining systemwide simplicity and compliance. While equity remained a recurring theme—especially regarding rural access, subgroup representation, and resource disparities—the final policy leaned more toward a uniform, simplified system rather than one explicitly tailored to address historical inequities. The ongoing negotiation between state objectives, legislative requirements, and committee feedback underscores the system's balancing act between broad inclusivity and operational feasibility, all while emphasizing transparency. This background offers critical insight into what the system aimed to achieve and what it overlooked by not centering equity more intentionally, which research shows is essential for meaningful accountability.

Part 3: How Were Changes in CCMR Policy Related to District and Student CCMR Rates Over Time?

The analysis of the Texas accountability system reveals a complex policy evolution shaped by legislative mandates, transparency needs, and ongoing disruption, primarily due to the COVID-19 pandemic and the 2023 A-F system refresh. While Part 1 of our analysis examined how state legislation responding to federal mandates drove these changes, Part 2 highlighted the system's attempt to incorporate diverse postsecondary pathways while navigating equity considerations that were ultimately secondary to other policy priorities.

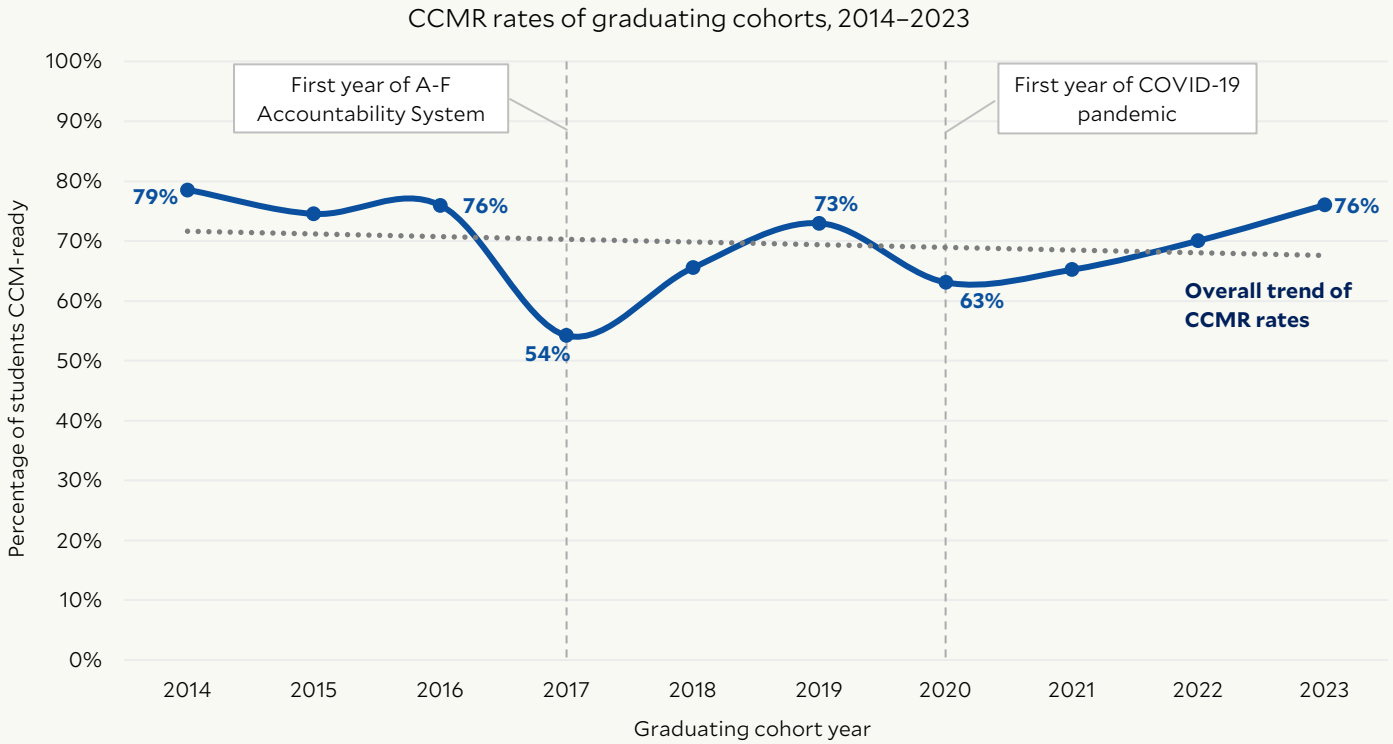
These insights provide essential context for understanding the observed results from these policy shifts on the student population. To complete this picture, we examined how policy changes manifested in observed CCMR outcomes over time. Our findings help identify school districts and student groups disproportionately affected by changes to the accountability system, as well as those better prepared to adapt to the changes implemented by the TEA over the past decade.

Key Finding 6

While there was an immediate decline in the percentage of students deemed CCM ready (CCMR rates) when the A-F Accountability System was implemented in 2017, and an overall increase between 2018 and 2023—except for 2019–2020 due to the COVID-19 pandemic—statewide CCMR rates remain at or below pre-2017 levels.

To understand how accountability policy changes related to CCMR rates over time, we examined CCMR rates across Texas using graduate cohort data from 2014 to 2023. Figure 4 shows the percentage of students in the graduating cohorts from 2014 to 2023 statewide deemed college, career, and military ready based on the CCMR indicators for the accountability system in place that year, as shown in Figure 2. Graduating cohort CCMR rates for a specific year factor into the accountability ratings for the following year. For example, the CCMR rates for the graduating cohort of 2017 would be used to calculate the ratings for the 2017–2018 school year. While the new A-F Accountability System and expanded CCMR indicators were officially implemented for the 2018–2019 school year, legislation required TEA to report to the Texas Legislature what the performance would have been for the 2017–2018 school year if the A-F rating system had been in place. For the 2017–2018 school year, districts were rated on the A-F rating system, and campuses were rated using the previous index rating system.

FIGURE 4 **Policy changes led to a decline in CCMR rates and then a recovery, though rates remain at or below levels achieved before the changes in CCMR policy.**



From the previous Index Accountability System to the first year of A-F implementation (2014–2017)

For the graduating cohort of 2017, CCMR rates dropped significantly from the previous year, declining from 79% for the cohort of 2014 to 54% for 2017, a 24-percentage-point decrease (Figure 4). Students across various racial and ethnic backgrounds, socioeconomic statuses, and emergent bilingual statuses all experienced lower CCMR rates during the A-F Accountability System's implementation. Our analysis confirmed these trends persisted even after accounting for demographic and district characteristics.

Concerns about this decrease were raised in committee meetings, potentially leading to the delay of implementation until the 2018–2019 school year to mitigate policy shock and retroactive standards. Several factors may explain these trends. In the prior Index Accountability System, advanced and dual-credit courses contributed to postsecondary readiness. Under the new A-F system, only dual-credit courses counted towards CCMR.

In the previous system, 48% of students were considered postsecondary ready based on advanced/dual-credit courses, while only 21% met readiness criteria in 2017 based solely on dual-credit courses, a decrease of 27 percentage points (see Figure 5).

The decline in CCMR rates does not imply that districts failed to meet student needs but rather that adapting to the removal of advanced courses as indicators took time.

Analysis of individual student data indicates that the percentage of students graduating with dual-credit coursework increased by 5 percentage points in the first year of the A-F system, as shown in Figure 6, suggesting districts were adjusting to the new requirements.

A-F implementation (2017) to pre-COVID-19 pandemic (2019)

After the transition year and before the COVID-19 pandemic, CCMR rates increased by 19 percentage points as districts adapted to the new framework, allowing students to be considered CCM ready in more ways. In 2019, the state passed HB3, introducing the CCMR Outcomes Bonus, which provides financial incentives to districts whose graduates meet specific CCMR standards, including earning industry-based certifications, completing college-level coursework, or enlisting in the military. This bonus incentivized districts to ensure

FIGURE 5

The percentage of students deemed CCM ready by dual credit decreased between the previous accountability system and the A-F Accountability System.

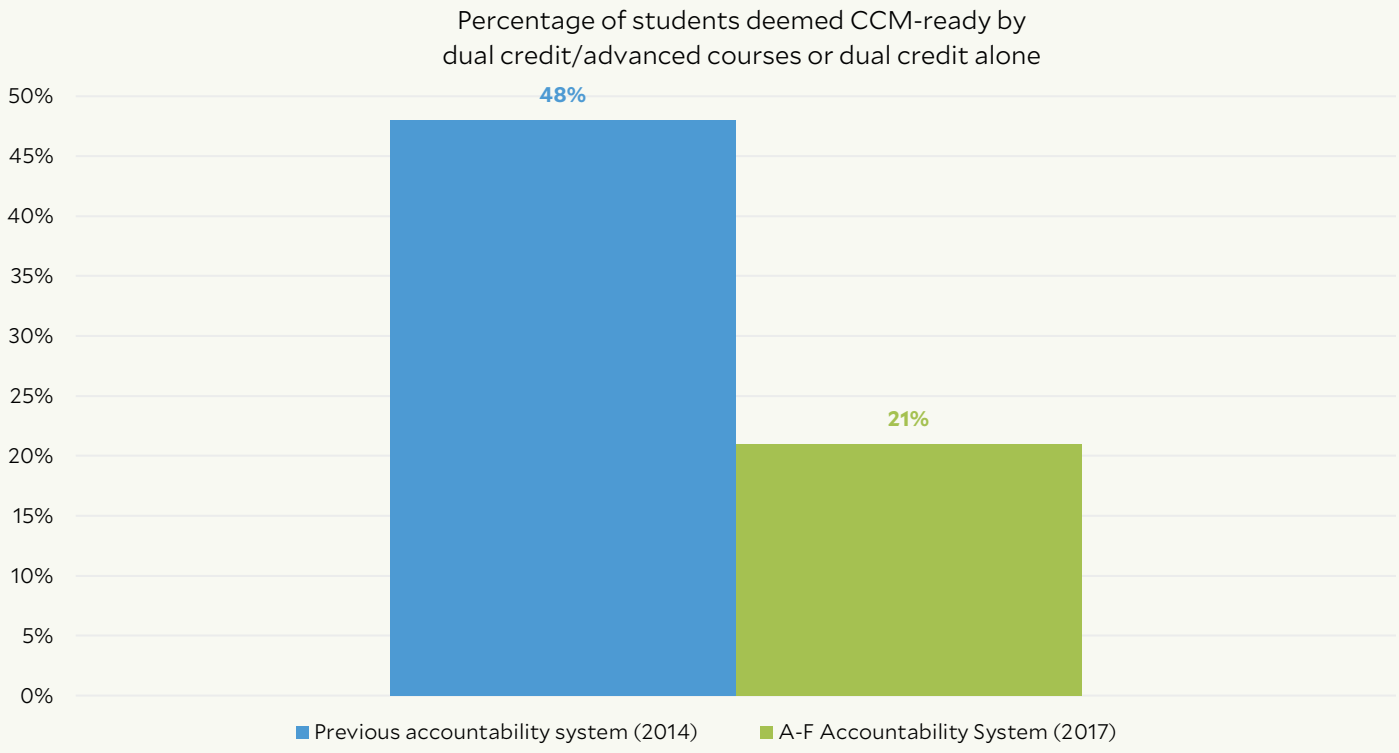
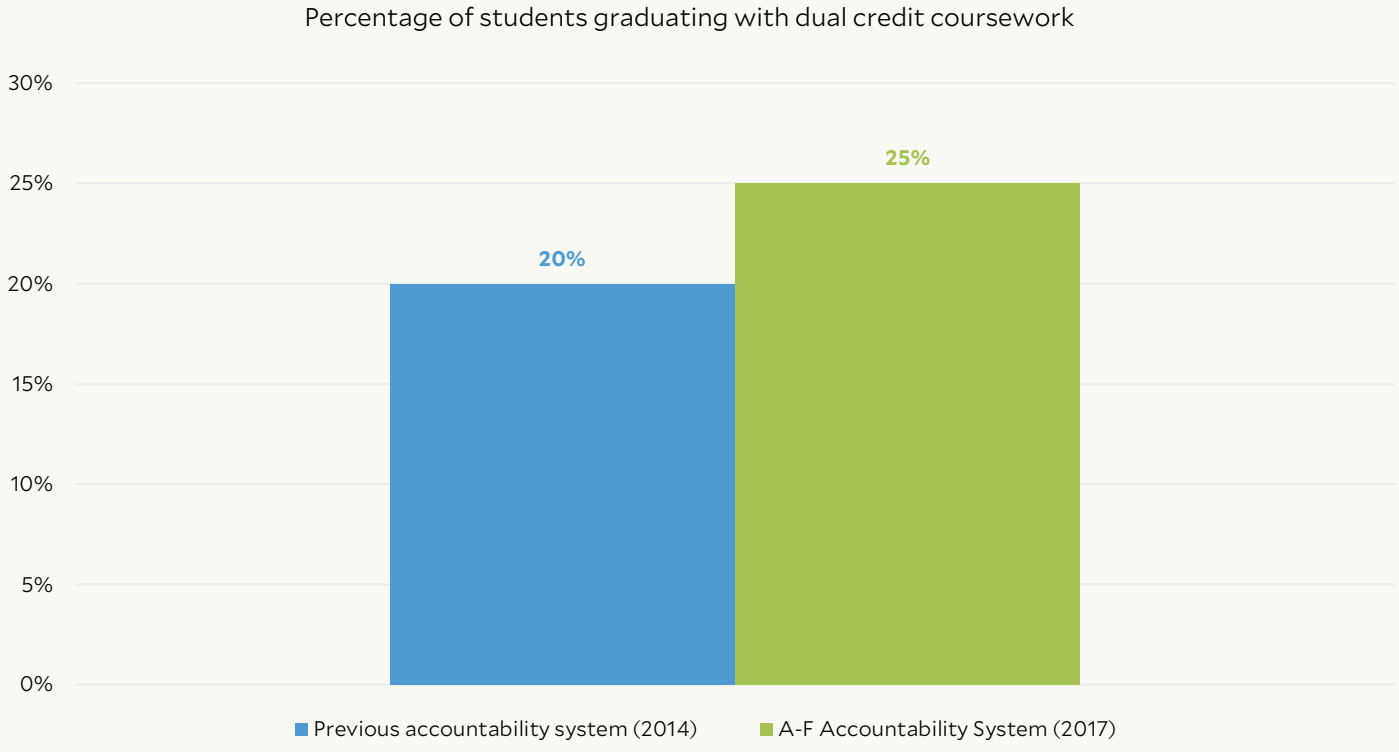


FIGURE 6

The percentage of students taking dual-credit courses increased between the previous accountability system and the A-F Accountability System.



students graduated with the necessary skills for post-secondary education or the workforce.

First year of the COVID-19 pandemic (2020)

The upward trend in CCMR rates observed from 2017 to 2019 reversed sharply due to the COVID-19 pandemic. For the graduating cohort of 2020, CCMR rates fell by 10 percentage points, despite the CCMR Outcomes Bonus, which began in the 2019–2020 school year. Research indicates that fewer students took AP, SAT, and ACT tests, and those who did had lower scores on AP tests in that cohort, potentially contributing to the decline in CCMR rates (Hill et al., 2025; TEA, 2022).

The analysis showed that after accounting for time and district characteristics, the average decrease was 16 percentage points between 2019 and 2020, isolating changes related to the pandemic from those related to other factors.

COVID-19 pandemic and after (2020–2023)

Between 2020 and 2023, CCMR rates increased by 13 percentage points, rising from 63% for the 2020 graduating cohort to 76% for the 2023 cohort. These increases may be attributed to the A-F Accountability System's implementation and recovery from educational disruptions caused by the pandemic. In 2021, the state enacted legislation refining the accountability system, including a new CTE indicator for evaluating CCM readiness, improving guidelines and processes, and increasing support for underperforming schools (HB 773, HB 1147, SB 1365, HB 4545).[20]

Pre- and post-A-F implementation (2014–2023)

The total increase in CCMR rates from the A-F Accountability System's implementation in 2017 to 2023 was 22 percentage points. Despite this upward trend, the percentage of students deemed CCM ready statewide in 2023 (76%) was two percentage points lower than in 2014 (78%). The nearly flat trendline of CCMR rates indicates they have not fully recovered from the disruptions of the A-F Accountability System and the COVID-19 pandemic.

20 HB 773 created an indicator in Student Achievement to account for students who completed a program of study in CTE. HB 1147 extended the indicator for military enlistment to include students who enlist in the Texas National Guard. SB 1365 improved accountability mechanisms and increased support for underperforming schools. HB 4545 provided funding and support for students not performing at grade level.

Key Finding 7

Urban/suburban and non-metro/rural districts were affected differently by accountability policy changes. CCMR rates over time vary by district type, with non-metro/rural districts showing more variation but overall higher readiness rates.

When assessing how policy changes relate to CCMR rates, considering the district's location or type is crucial. The TEA classifies public school districts based on enrollment, growth, economic status, and proximity to urban areas. Definitions are provided in Table 3 below. For this research, some categories were combined to simplify analysis while preserving data integrity.

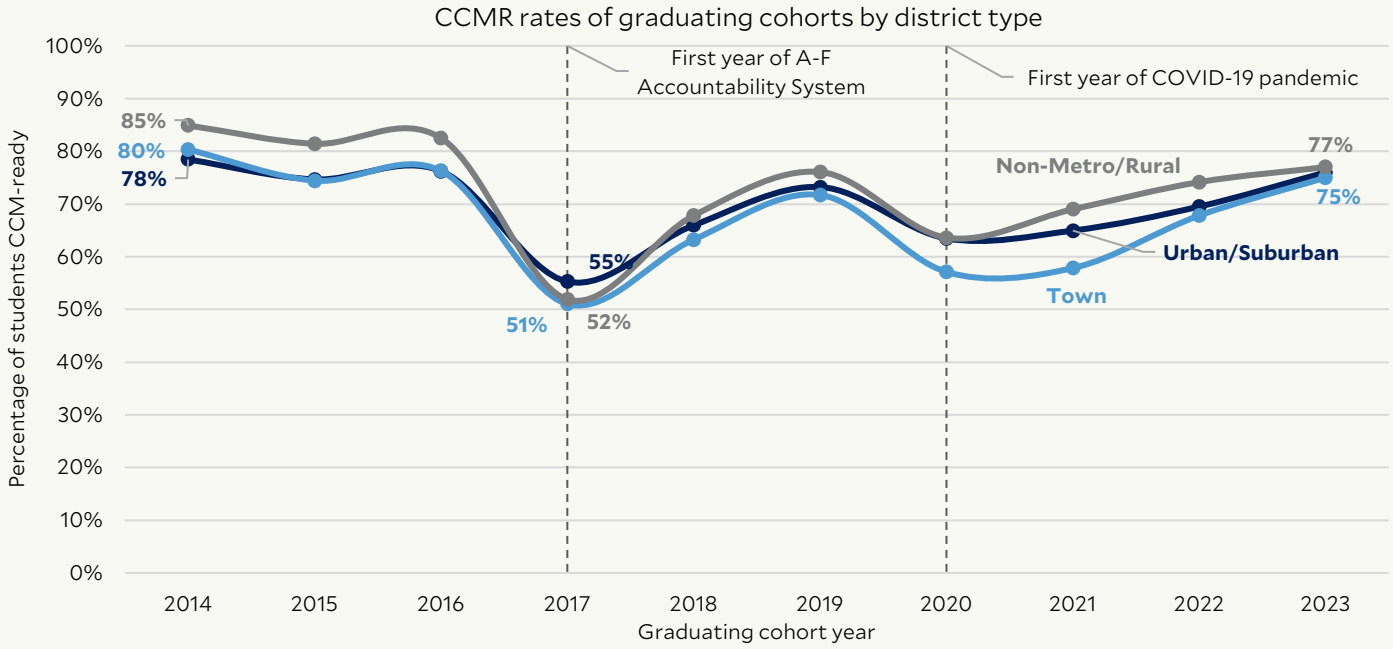
All district types saw lower CCMR rates during the first year of the A-F system (2016–2017), with non-metro/rural districts experiencing the largest decline, a decrease of 33 percentage points compared to a 23-percentage-point decrease for urban districts (see Figure 7). After controlling for district characteristics and time trends, non-metro/rural districts showed a 5-percentage-point larger decrease in CCMR rates compared to urban/suburban districts.

However, non-metro/rural districts demonstrated the strongest improvement after implementing the A-F Accountability System, with a 25-percentage-point increase compared to a 21-percentage-point increase for urban/suburban districts between the 2017 and 2023

TABLE 3 **District type classifications in Texas**

District type (HERC)	District type (TEA)	Number of districts (2021)	Classification (2021)
Urban/ Suburban	Major Urban	11	(a) located in a county with a population of at least 1,070,000; (b) has the largest enrollment in the county or at least 70% of the largest district enrollment; and (c) at least 35% of enrolled students are economically disadvantaged
	Other Central City	75	(a) does not meet the criteria for any of the other subcategories; (b) not contiguous to a Major Urban district; (c) located in a county with a population of between 100,000 and 1,069,999; and (d) has the largest enrollment in the county or at least 70% of the largest district enrollment
	Major Suburban	32	(a) does not meet the criteria for Major Urban classification; (b) contiguous to a Major Urban district; and (c) enrollment is at least 3% of the largest contiguous Major Urban district or at least 4,500 students A district is also classified as Major Suburban if: (a) it does not meet the criteria for Major Urban; (b) not contiguous to a Major Urban district; (c) located in the same county as a Major Urban district; and (d) enrollment is at least 15% of the largest Major Urban district in the county or at least 4,500 students.
	Other Central City Suburban	150	(a) does not meet the criteria for any previous subcategories; (b) in a county with a population of between 100,000 and 1,069,999; and (c) enrollment is at least 15% of the largest district enrollment in the county A district also is Other Central City Suburban if: (a) it does not meet the criteria for any previous subcategories; (b) contiguous to another central city district; (c) enrollment is at least 3% of the largest contiguous other central city district; and (d) enrollment is equal to or greater than the median district enrollment for the state (879 students).
Town	Independent Town	54	(a) does not meet the criteria for any previous subcategories; (b) in a county with a population of 25,000 to 99,999; and (c) has the largest enrollment in the county or is at least 70% of the largest district enrollment in the county
Non-Metro/ Rural	Non-Metropolitan Fast Growing	26	(a) does not meet the criteria for any previous subcategories; (b) has an enrollment of at least 300 students; and (c) enrollment has increased by at least 20% over the past 5 years
	Non-Metropolitan Stable	200	(a) does not meet the criteria for any previous subcategories; and (b) enrollment is equal to or greater than the median district enrollment for the state
	Rural	473	(a) has an enrollment of between 300 and the median district enrollment for the state with a growth rate of less than 20% over the past 5 years; or (b) an enrollment of less than 300 students

FIGURE 7 **Non-metro/rural school districts were more sensitive to policy changes than urban/suburban districts, yet non-metro/rural districts still had the highest CCMR rates of all district types.**

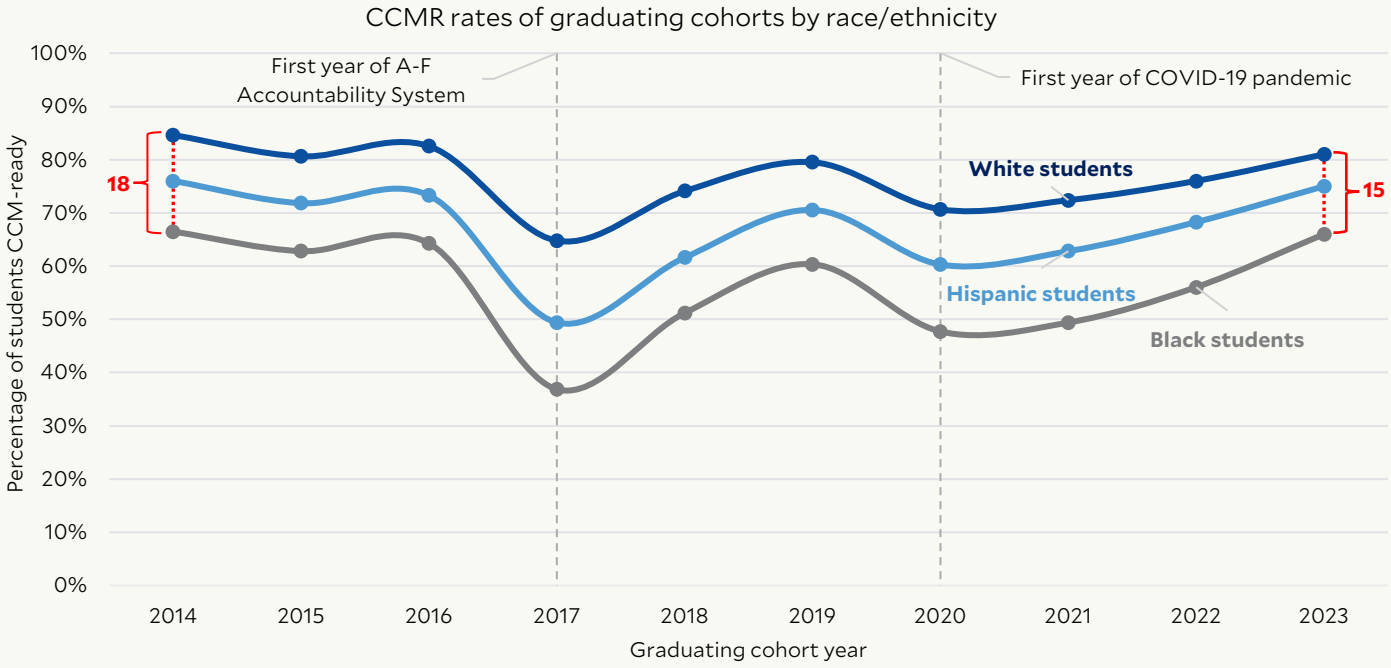


graduating cohorts, despite the drop in CCMR rates due to the COVID-19 pandemic. Non-metro/rural districts increased CCMR rates by 25 percentage points between 2017 and 2023, yet their rates remained eight percentage points below 2014 levels.

Non-metro/rural districts may have been more sensitive to policy shifts than urban and suburban districts due to staffing limitations and challenges in providing sufficient course instruction in a short time, as noted by advisory committee members (TEA TAAG, 2024, April 2, p. 1). However, since the A-F accountability framework's implementation, rural communities have developed innovative methods to enhance access to postsecondary college and career pathways, supported by legislative action. The Rural Pathway Excellence Partnerships (R-PEP), established by HB 2209 in 2019, incentivizes rural school districts to collaborate with neighboring districts to expand access to postsecondary pathways. R-PEP was initiated in response to the success of the Rural Schools Innovation Zone (RSIZ) in South Texas, which comprises three districts partnering with postsecondary institutions and industry to create CTE academies that offer high-quality postsecondary opportunities. The Pathways in Technology Early College High School (P-TECH) program is a statewide initiative that partners schools with postsecondary institutions, enabling students to earn both high school and college credit simultaneously. Seventy-two rural schools have a P-TECH designation (Texas 2036, 2025). These programs, along with others like the Rural CCMR Accelerator (Texas Impact Network, n.d.), run by the nonprofit Texas Impact Network, demonstrate how rural districts are adapting to new standards and may have contributed to the significant rebound and resilience in CCMR rates since the new accountability framework's implementation.

In contrast, urban and suburban districts did not experience as much fluctuation in CCMR rates as non-metro/rural districts (Figure 7). Between 2014 and the first year of the A-F rating system (2017), urban/suburban districts' CCMR rates decreased by 23 percentage points but increased by 21 percentage points between 2017 and 2023, resulting in an overall decrease of 2 percentage points from the 2014 cohort to the 2023 cohort, the smallest decline among all district types during that time. While urban/suburban districts may not have faced as much volatility in CCMR rates, non-metro/rural districts had the highest CCMR rates among all district types before and after the A-F Accountability System's implementation.

FIGURE 8 **Differences in CCMR rates between ethnic groups remained consistent before and after the accountability policy changes.**



Key Finding 8

CCMR rate differences across student demographic groups remained mostly consistent before and after the A-F Accountability System's implementation, with emergent bilingual students and those receiving special education services showing the greatest gains in CCMR rates after the policy change.

The decline in CCMR rates following the A-F Accountability System's implementation was widespread across socioeconomic and demographic characteristics, but specific student groups exhibited different recovery patterns between 2017 and 2023.

Black, Hispanic, and White students[21]

In 2014, CCMR rates for White students were 9 percentage points higher than for Hispanic students and 18 percentage points higher than for Black students (Figure 8). During the transition year, the gap widened to 15 points between White and Hispanic students and 28 points between White and Black students. Black and Hispanic students experienced the steepest declines in the transition year (30 and 27 percentage points, respectively). After the transition year, all groups saw increases in CCMR rates, with students of color experiencing higher rates of increase, narrowing the gaps and returning closer to pre-policy change levels, though White students continued to have higher CCMR rates than other groups.

With the shift from the index rating system to the A-F accountability system, college, career, and military readiness is reported as one collective measure and as two separate components: (1) college readiness and (2) career and military readiness (see Table 1 for reference). Between 2017 and 2023, college readiness rates for Black and Hispanic students increased by an average of 16 percentage points, while rates for White students increased by 8 percentage points during the same period. Additionally, career and military readiness rates for Black and Hispanic students rose by 6 percentage points, whereas they declined by 4 points for White students in the same timeframe (Texas Education Agency, 2017–2023). Black and Hispanic students also outperformed White students in specific CCMR components; for instance, the proportion of students of color meeting the TSI criteria increased by 9 percentage points from

21 Only Black, Hispanic, and White students were included to simplify analysis and presentation. These groups represent 79% of the total student population in the state. Other racial groups had very small numbers, especially in rural districts, which skewed the statistical analysis.

TABLE 4 **CCMR subcomponent readiness change from 2017 to 2023, by race/ethnicity**

CCMR subcomponent	Black & Hispanic students	White students
College readiness	+16 points	+8 points
TSI criteria met*	***+9 points***	***+2.5 points***
Career & military readiness	+6 points	-4 points

*TSI criteria met is a subcomponent of college readiness

2017 to 2023, compared to a 2.5-percentage-point increase for White students (see Table 4).

Gaps between ethnic groups may have remained consistent due to a lack of focus on equity in the system specifically targeting these groups.

Economically disadvantaged students

Economically disadvantaged students had CCMR rates that were 9 percentage points lower than their non-economically disadvantaged peers in both 2014 and 2023, despite fluctuations following major accountability shifts in the intervening years (Figure 9). Economically disadvantaged students experienced a larger decrease in CCMR rates during the first year of the A-F system (29%) compared to non-economically disadvantaged students (20%), but also a greater increase between 2017 and 2023 (27% vs. 18%). The rise in rates for economically disadvantaged students after the first year of the A-F accountability system was mainly driven by an increase in being deemed CCM ready by IBC, which rose by 24 percentage points between 2017 and 2023 (Texas Education Agency, 2017-2023).

Economically disadvantaged students were frequently mentioned in discussions about targeted support in TEA advisory committee meetings. Committee members advocated for subdividing student groups by economically disadvantaged status, asserting it was "more

FIGURE 9 **Differences in CCMR rates between economically disadvantaged students and non-economically disadvantaged students remained consistent before and after the changes in CCMR accountability policy.**

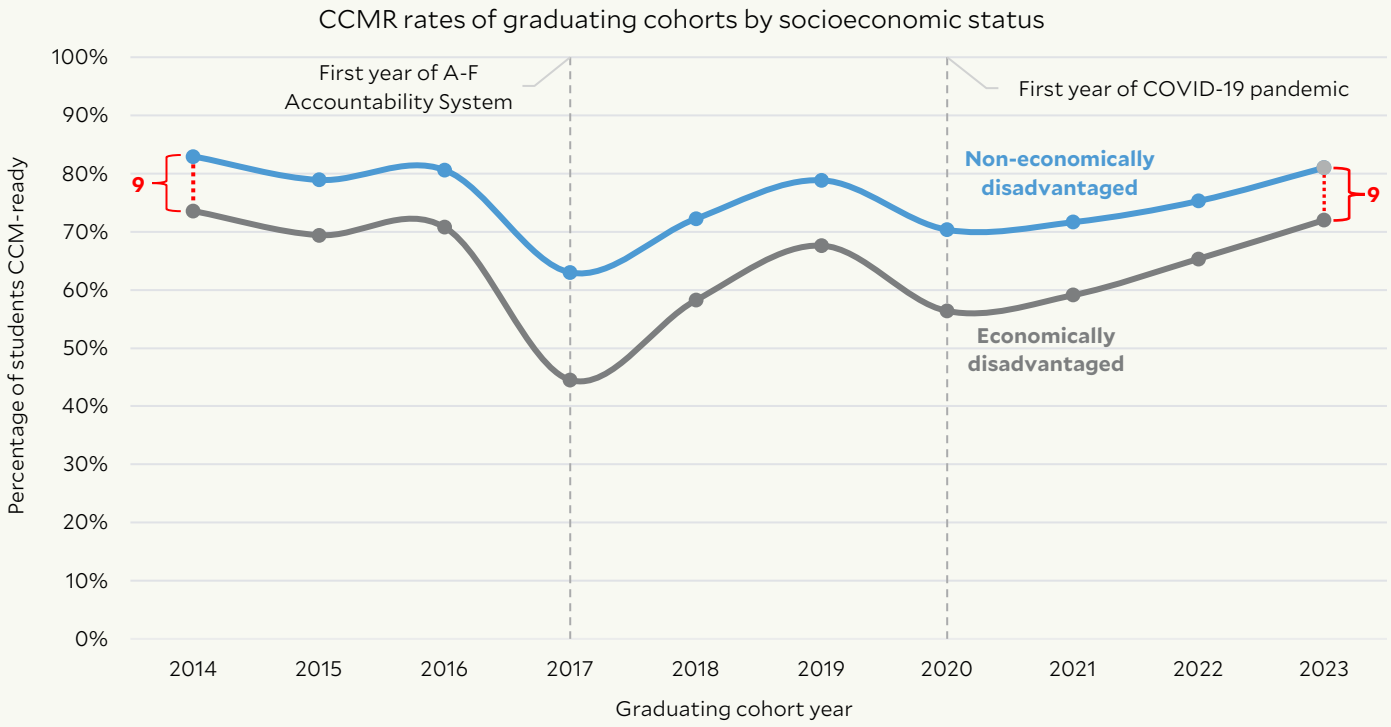
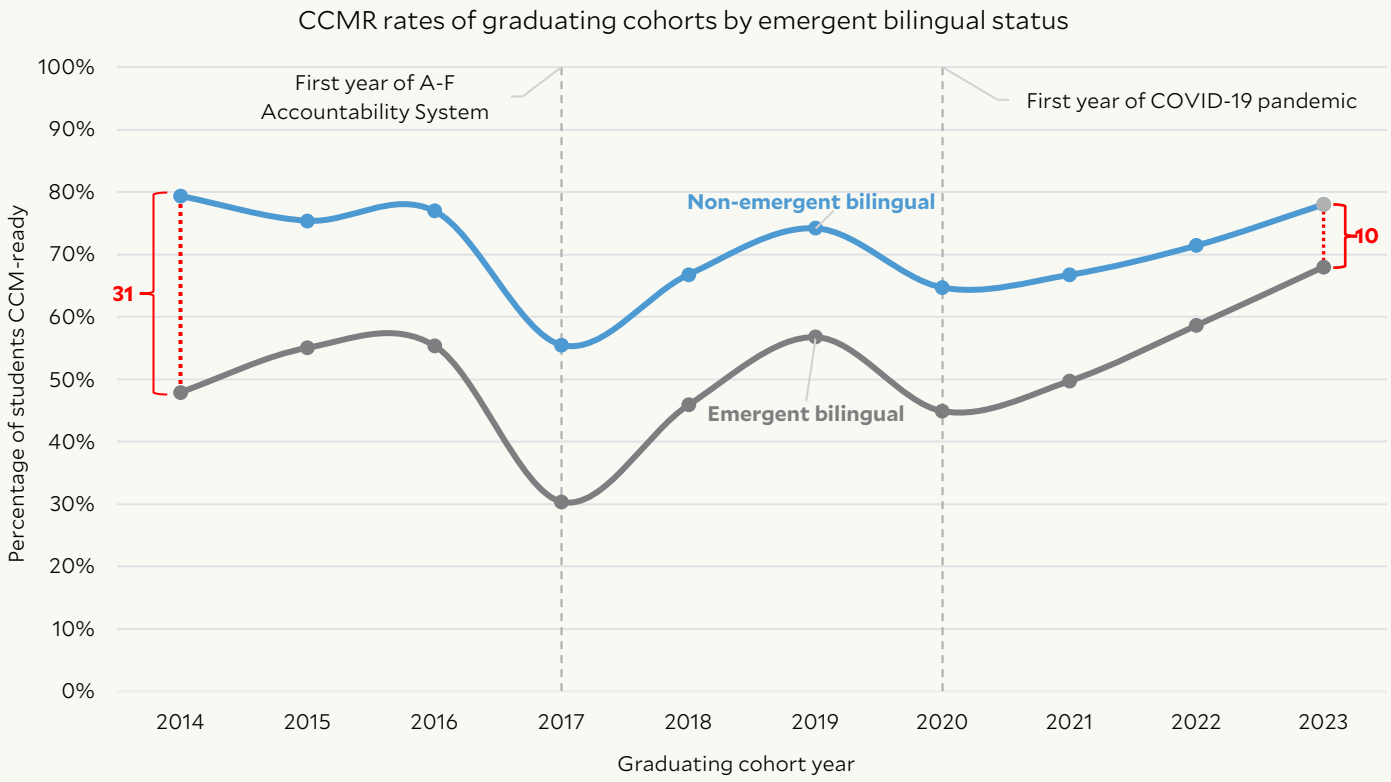


FIGURE 10 **Emergent bilingual students have made substantial gains in CCMR rates even as the number of students classified as such has increased over time.**



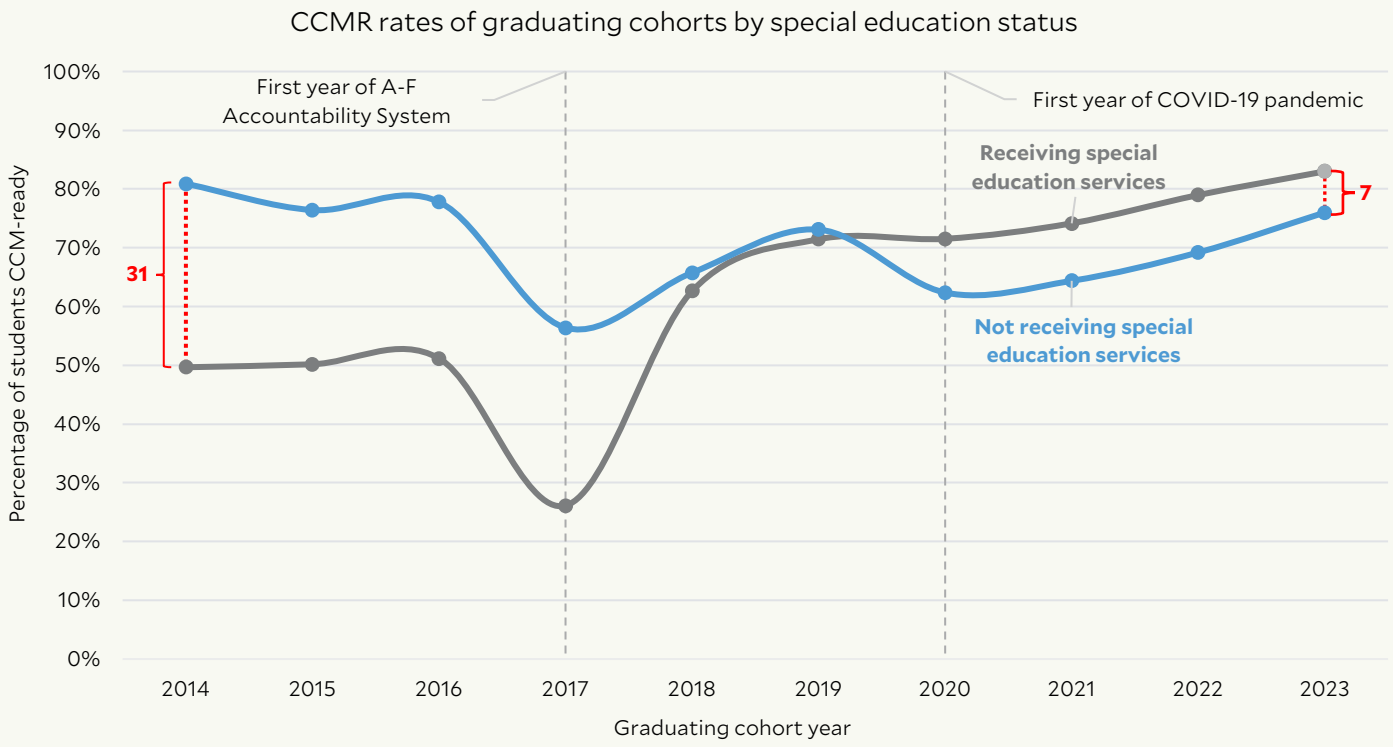
important than student group or race" (TEA AAC, 2021, April 26, p. 2). However, efforts to include groups based on socioeconomic status in the Closing the Gaps domain faced resistance from the U.S. Department of Education. The TEA informed the advisory committee that "the USDE has not approved a state plan with targets such as this" when asked if they could "consider sliding scale targets that adjust for low and high economically disadvantaged" (TEA AAC, 2021, July 29, p. 1). The TEA also conveyed that a design breaking student groups into economically disadvantaged and non-economically disadvantaged had "not been well-received by the [USDE]" (TEA AAC, 2021, July 29, p. 2). The absence of specific accountability targets for this student subgroup may help explain the persistent gaps in CCMR scores.

Emergent bilingual students

Students classified as emergent bilingual in their senior year saw a 20-percentage-point increase in CCMR rates between 2014 and 2023 (Figure 10), even as the overall percentage of emergent bilingual students increased from 3% to 13% statewide. These trends remained consistent, even after accounting for district characteristics and time trends in our statistical analysis. The increase in CCMR rates for emergent bilingual students helped narrow the gap between emergent bilingual and non-emergent bilingual students from 31 percentage points in 2014 to 10 percentage points in 2023.

These results may reflect policymakers' emphasis on this critical subgroup during committee discussions when designing new accountability measures. Committee members specifically discussed how to include these students in measuring readiness while considering ESSA requirements. Although equity was often mentioned in general terms, emergent bilingual students were one of the few subgroups to receive sustained attention across multiple TEA advisory committee meetings. Conversations addressed the challenges emergent bilingual students face but often struggled to balance fairness, simplicity, and the need for targeted supports, particularly as Texas aimed to meet federal subgroup expectations within its diverse student populations.

FIGURE 11 **Students receiving special education services had the greatest gains in CCMR rates after the changes to the accountability system.**



Students receiving special education services

Students receiving special education services showed a 33-percentage-point increase in CCMR rates between the 2014 and 2023 graduating cohorts (Figure 11). While these students experienced a 24-percentage-point decrease in rates during the transition year, they saw a significant increase of 57 percentage points between 2017 and 2023. CCMR rates among students receiving special education services were 31 percentage points lower than those who weren't in 2014, but by 2023 they were 7 points higher.

As part of implementing the A-F Accountability System, students receiving special education services were considered CCMR-ready with a completed IEP and Workforce Readiness designation, which may have contributed to the increase in statewide CCMR rates. This substantial increase aligns with broader efforts to expand the definition of CCMR and better align indicators with diverse postsecondary pathways for all students, including those in special education. Although the previous index system included students in special education as one of the subgroups compared across indicators, the postsecondary readiness indicators did not have specific metrics for these students. One committee emphasized that this was fairly represented in the system by stating that "all students [should be] ready for CCMR regardless of which component they fall into" (TEA TAAG, 2022, October 7, p. 4), underscoring a systemwide shift toward inclusivity. However, while these gains reflect positive movement for a historically underserved group, they also highlight the broader tension within the accountability system between achieving targeted equity and maintaining systemwide consistency. Students receiving special education services were discussed as part of the broader supergroups, which could obscure the specific needs and progress of this subgroup. As one committee member noted, "In the supergroup it makes sense to group the economically disadvantaged and emergent bilingual students ... but it does not make as much sense to include special education students. They're such a different population" (TEA AAC, 2022, February 9, p. 4). This reflects the ongoing struggle to recognize progress without losing sight of the unique challenges certain student groups face.

Implications

Overall, the findings from this study reveal that the last decade of accountability system change in Texas was both ambitious and turbulent. Policymakers aimed to build a system that was transparent, rigorous, and continuously aligned with evolving understandings of college, career, and military readiness. Yet, in practice, translating these goals into a coherent, equity-focused, and functional accountability framework proved challenging. Legislative mandates and advisory committee input shaped the system's design, but implementation was marked by frequent disruptions, including COVID-19 and the subsequent move to the A-F Refresh without a pandemic-related pause, shifting metrics, and inconsistent support for districts. A decade later, the system remains in flux as it grapples with balancing precision and public comprehensibility, standardization with localized flexibility, and ambitious breadth with inclusivity in the Texas context.

The findings also revealed concerns in developing and implementing the new accountability system and CCMR indicators. A major concern was the periodic disconnect between the TEA and its advisory committees, undermining trust and weakening public stakeholders' roles in shaping policy decisions. There was notable tension between simplifying metrics for public understanding and maintaining the integrity of complex educational realities in Texas, which includes a diverse student body, specialized campuses, and districts with varied resources. While equity was discussed, it was not integrated into the policy development process with necessary depth or intentionality. Supports for historically underserved students were inconsistent and sometimes deprioritized in favor of broader or less-targeted goals. Frequent changes to CCMR indicators created ongoing instability, complicating efforts to plan and support students, campuses, and districts effectively. These issues suggest that the system could have been improved by centering equity more explicitly, investing in long-term capacity building at the campus and district levels, and slowing the pace of reform to allow for deliberate, inclusive, and well-supported transitions.

Recommendations

Strengthen and formalize the process for developing and refining accountability systems.

Our research highlighted how legislators and policymakers aim to create a system that is accessible and transparent to the public and can fairly support the needs of various stakeholders across the state. Providing multiple pathways to postsecondary readiness has been a positive development in the creation of the latest CCMR indicators. However, frequent indicator changes, delays, setbacks, and miscalculations could have been avoided in a system that anticipated and addressed those obstacles. Though transparency, rigor, and fairness were goals, these aims were not always achieved, and stakeholder participation at different stages could have better supported these goals.

1. **For policymakers:**
   a. *Establish policy-level guardrails for designing, creating, and refining accountability systems.*

      Policymakers and legislators should create guardrails to guide the design and refinement of the accountability system, providing clarity and direction while allowing for flexibility and innovation. As adjustments are made, a degree of stability should also be maintained. Carefully coordinating system revisions and growth can preserve foundational objectives of transparency, rigor, and fairness while allowing responsible evolution over time. Without such protections, the system risks compromising its transparency and effectiveness, leaving local actors without clear direction and potentially undermining public trust in the metrics used to measure school and student success. This could include lengthier formalized pilot periods before full implementation, with more in the future if significant changes occur; transparent timelines for system updates and stakeholder feedback (i.e., community members, district staff); and dedicated funding or training to support transitions (i.e., for schools to train educators, build programs, etc.).

2. **For TEA/CCMR advisory committees:**
   a. *Better define and formalize the decision-making process, including communication and engagement with all stakeholders.*

      A well-defined system of accessible participation rooted in transparency is essential as the state develops its CCMR indicators. Improving communication channels and stakeholder engagement should be a priority to maintain transparency, foster trust, and gather feedback. This could include user-friendly resources and regular public forums to allow stakeholders to contribute to the evolving accountability system, with more forums leading up to the next system refresh.

   b. *Support research to identify how effectively current CCMR indicators connect to postsecondary outcomes.*

      Improved readiness rates are a positive outcome of the accountability redesign; however, their impact depends on better postsecondary outcomes for students. Stakeholders must analyze how CCMR changes relate to postsecondary readiness, access, and success.

Close persistent equity gaps.

While policymakers have committed to equity, this has often been overshadowed by concerns about simplicity and compliance. Consequently, students from historically marginalized groups, particularly Black, Hispanic, and economically disadvantaged students, have lacked the support that can help them succeed. By addressing the needs of specific student groups in developing new systems or metrics—similar to the support provided for students receiving special education services—gaps in CCMR across groups can be addressed.

1. **For policymakers:**
   a. *Embed equity and opportunity into accountability to close the gaps that remain 10 years after the implementation of the A-F system.*

      Future accountability policies must include sustained, data-informed support tailored to specific student populations. This may involve funding schools to provide robust college and career counseling, fostering inclusive school cultures geared toward future readiness, and developing targeted interventions during major transitions to ensure no group is left behind. Equity requires intentionality, responsiveness, and targeted resource allocation.

2. **For TEA/CCMR advisory committees:**
   a. *Ensure the system includes all opportunities for college and career readiness at the local level.*

      Policymakers need to identify relevant offerings, programs, and workforce demands at the local level. To create a flexible system, they must engage local districts and community organizations. When determining which IBCs make the state-approved list for CCMR points, TEA should also identify locally focused IBCs that meet important local workforce needs. Collaborating with districts and local industry will strengthen the connection between earning a certification and securing a job in the community.

   b. *Support research on what works best to create inclusive systems for students needing extra support.*

      Further work is needed to understand how students receiving special education services met CCMR requirements and how this supported their postsecondary success. Stakeholders must reflect on what an equitable CCMR system looks like and what incentives and support foster student success. Policymakers can build a supportive system by focusing on evidence-based strategies, effective supports, and successful examples statewide. Continuously assessing the system's effectiveness is essential for creating sustainable accountability.

   c. *Invest in targeted postsecondary supports for historically underserved students.*

      Districts should invest in comprehensive postsecondary planning, especially in schools serving marginalized communities. This includes expanding access to high-quality advising, career counseling, and partnerships with local industry, higher education, and military branches. Ensuring all students have access to supports needed to meet readiness indicators is essential for equity.

Conclusion

In response to federal mandates and state legislation, Texas policymakers developed the A-F Accountability System with an emphasis on preparing students for the future through new CCMR indicators. What began in 2013 with a flexible graduation structure and reduced testing has evolved into a multifaceted rating system shaped by legislative directives, ongoing input from advisory committees, shifting workforce demands, and a changing understanding of postsecondary success. While the system has been refined, its evolution has not been linear; it has faced disruptions such as the COVID-19 pandemic and misalignments between policy vision and implementation.

Three overarching issues emerge. First, large system shifts driven by legislative and federal forces introduced complexities that proved difficult to manage for stakeholders, often at the cost of clarity and accessibility. Advisory committees balanced the need for transparency with legislative imperatives, adapting the system to remain clear to the public. Second, while advisory committees provided feedback rooted in transparency, fairness, and responsiveness, their influence was sometimes diminished by opaque decision-making and top-down implementation by the TEA. Third, targeted equity was not fully embedded in the system's design, despite being referenced in the development process. This was evident in the extensive embedding of CCMR indicators. Gaps in CCMR outcomes persisted, rural and small districts struggled with limited access, and a desire for simplicity often superseded targeted support for marginalized students.

These changes resulted in significant declines in CCMR rates upon implementation, followed by a slow and uneven recovery as districts adjusted to new standards. Rates are still not at pre-2017 levels, and some demographic groups have seen slower recovery, illustrating the fragility of the accountability system. While the framework can incorporate changing legislative requirements and refined readiness measures, targeted equity within CCMR attainment remains a concern. By collaborating with stakeholders and policymakers, the goal should be to sustain a system that is transparent, rigorous, and inclusive of all student populations' needs. The accountability system should value local contexts, strengthen support for underserved communities, and foster stakeholder trust, ensuring an effective framework that prepares every Texas graduate for success beyond high school.

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Appendix: Data and Methodology

Qualitative Analysis

Source materials and selection process

The research team selected documents from 2014 to 2024 to align with major accountability system change implementation years (2017–2018) and the system refresh (2022–2023). All documents were public records produced by TEA and the TEA Advisory Committees: the Accountability Policy Advisory Committee (APAC), the Accountability Technical Advisory Committee (ATAC), and the Texas Accountability Advisory Group (TAAG). We established validity of these documents during the retrieval process from official government websites:

- Legislative documents via Texas Legislature Online
- Meeting summaries and accountability manuals via the TEA

The bulk of documents used in this analysis were produced by the TEA, particularly the meeting minutes produced from the ATAC, APAC, AAC, and TAAG. We used 47 meeting summaries to lay the groundwork for this study, as they capture the conversations, considerations, and decisions surrounding accountability changes in the years of interest. Researchers considered other TEA and legislative reports during the initial stages of analysis, and those were used to provide context where appropriate.

Secondary source collection

As a form of data source triangulation, we conducted a secondary document collection consisting of legislative bills related to CCMR and the accountability system for the same 2014–2024 period. Conducting this secondary data collection helped bolster understanding of the changes in CCMR and development of the accountability system recorded in the meeting summaries.

Thematic analysis methodology

For our analyses, we employed an inductive research approach that followed a two-cycle coding method as outlined by Saldaña (2021). All relevant documents were coded simultaneously by two researchers and grouped according to accountability year. We used the computer-assisted qualitative data analysis software MAXQDA to conduct all coding.

For the first cycle of coding, we utilized an eclectic coding approach that incorporated descriptive, structural, and values coding methods. We then used a descriptive coding technique to construct an inventory of relevant topics of discussion related to changes in accountability systems and CCMR. This broad coding procedure captured the most common concepts that emerged to gain an understanding of the relative importance of certain topics regarding accountability and CCMR development. Secondly, researchers coded all documents using a structural coding lens to map considerations around each of the research question topics (i.e., the system evolution process and equity considerations) as well as grouped them according to accountability year. We then used values coding to identify the attitudes and concerns of those participating in the committees and the TEA. We conducted specific coding to highlight the diverse set of expressed attitudes and sentiments toward suggested and implemented accountability and CCMR changes.

For the second cycle of coding, we applied a pattern coding approach to refine broader codes into a set of dominant and interrelated categories that highlight the developmental shifts in accountability system design, the new system's intentions, equity considerations, and the growing prevalence of CCMR within accountability. Researchers used three iterations that gradually narrowed down the data to five main categories to construct these categories. Throughout the pattern coding process, we produced a series of analytic memos

to organize thoughts and map out the relations among categories and build a theory of explanation. From these analytic memos, we developed a series of themes that inform this report.

Quantitative Analysis

To understand how changes in the accountability system affected CCMR rates across the state of Texas, we collected data at the district and state levels from the Texas Academic Performance Reports (TAPR) for the school years 2014–2015 through 2023–2024, which included CCMR data for cohorts of students that graduated for each year between 2014–2023. Supplemental data included individual-level data from the Public Education Information Management System (PEIMS) obtained through the University of Houston's Education Research Center (ERC) for high school graduating cohorts representing the same period.

Descriptive analysis

We conducted descriptive statistical analyses using both TAPR's statewide data and TEA's individual-level data to look at changes in CCMR rates for the state, by district type, and by demographic characteristics over the time frame in consideration. This information helped us understand how CCMR rates and other CCMR-related indicators have changed over time across the state, school districts, and specific student subgroups.

Discontinuous growth model

For a deeper understanding of the mechanisms influencing the changes prevalent across the state, we employed a multilevel discontinuous growth model (DGM) to further examine both the immediate and longer-term effects of the accountability system transition and the COVID-19 disruptions on overall and group-specific CCMR rates. After excluding charter districts, we looked at TAPR data from 1,021 districts over our period of analysis. We then excluded records

TABLE A **List of variables used in analyses**

Variable	Definition
CCMR rate	Indicates the percentage of students deemed college, career, and military ready in the district each year. Models predicting CCMR rates for specific student groups use the respective percentages for each of those.
Year	Indicates the corresponding year for each observation between 2014–2023
Change to A-F system	Binary indicator that equals 1 on the year they system was implemented and 0 otherwise
COVID-19 disruption	Binary indicator that equals 1 in 2020, and 0 otherwise
Economically disadvantaged students in the district	Percentage of students classified as economically disadvantaged in the district each year
Students receiving special education in the district	Percentage of students receiving special education services in the district each year
Race and ethnicity for students in the district	Percentage of Black, Hispanic, or White students in the district each year
Emergent bilingual students in the district	Percentage of emergent bilingual students in the district each year
Size of graduating cohort	Number of high school graduates per 100 in the district each year

with missing information for individual years due to district openings, closings, and other data issues. After applying these exclusion criteria, our longitudinal sample includes 980 districts. The models we estimated included two moments of discontinuity in the DGM: the A-F Accountability System implementation in 2017 and the COVID-19 pandemic in 2020. The DGM predicted CCMR rates over time accounting for a variety of district characteristics (see Table A below). To aid in interpretation, variables are centered at their values in 2017. We accounted for time and the percentage of students identified as economically disadvantaged, receiving special education services, emergent bilingual, Black, Hispanic, and White. After testing several model specifications, the best-fitting model included random intercepts at the district level, controlling for district demographics, and with an interaction for the type of district. This approach allowed us to isolate the effect of the policy change by district type while accounting for the makeup of the district and its baseline CCMR rates.

Bridging Qualitative and Quantitative Components

The research team bridged the quantitative and qualitative analyses to understand not only what changed in the CCMR framework, but also how and for whom those changes mattered. Research team meetings were used as structured analytic spaces to compare findings across methods, interrogate contradictions, and refine emerging insights. We further mapped policy developments over time with evident shifts in CCMR rates that appeared in our descriptive analyses. This process of triangulation allowed us to consider changes in CCMR rates and contextualize quantitative trends within broader policy developments and decision-making processes made by the TEA. As such, our collaborative and mixed-methods approach deepened our understanding of how system-level shifts translated into on-the-ground results for students.

Mission

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About

The Houston Education Research Consortium (HERC) is a research-practice partnership between the Kinder Institute for Urban Research and 11 Houston-area school districts. HERC aims to improve the connection between education research and decision making for the purpose of equalizing outcomes by race, ethnicity, economic status, and other factors associated with inequitable educational opportunities.

RICE UNIVERSITY
Kinder Institute for Urban Research

6100 Main Street MS-208 • Houston, TX 77005
713-348-4132 • kinder@rice.edu
kinder.rice.edu