

AGENDA ITEM VII-B (Revised)

Consideration of adopting the staff's recommendation relating to new Sections 5.8 through 5.10 of Board rules, concerning Uniform Grade Point Average

RECOMMENDATION: Postpone consideration until next quarterly or special called Board Meeting, as determined by the Board.

Background Information:

New Sections 5.8 through 5.10 of Board rules concerning Uniform Grade Point Average Calculation are proposed.

Commissioner Paredes proposed these rules in the *Texas Register* on November 17, 2008. Staff recommends that the Board adopt the proposed rules.

Date Approved by the Commissioner for Publication in the *Texas Register*:

November 17, 2008

Date Published in the *Texas Register*:

November 28, 2008

The public comment period ended December 29, 2008 and the following comments were received.

Summary of comments received:

Comment: Texas Association of School Administrators and Texas Association of School Boards recommend clarification of the roles and responsibilities of the GPA Advisory Committee.

Response: As a result of this comment, changes were made to Section 5.10. The Coordinating Board will establish a 15 member GPA Advisory Committee according to Board rules (§1.6), which will include representatives from public education, higher education and the workforce sectors, to oversee implementation of the GPA standards, to develop a GPA conversion model, and to monitor the courses counted in the GPA calculation as curricula in high schools and universities change. Additionally, the GPA Advisory Committee will be responsible for ensuring institutional compliance with Coordinating Board rules (§4.85) which specify requirements for dual credit courses. The GPA Advisory Committee will advise the Board on each of the referenced areas so that appropriate action may be taken when necessary.

Comment: Career and Technology Association of Texas agrees with the Coordinating Board recommendation to appoint a GPA Advisory Committee.

Response: As a result of this comment, no changes were made. THECB appreciates the support of the Career and Technology Association of Texas as it relates to the appointment of a GPA Advisory Committee.

Comment: Texas Association of School Administrators are concerned that the proposed rules do not define the term "natural precursors" to identify the Pre-AP and Pre-IB courses that will receive credit. They are also concerned that Honors courses are not being given enough credit. Their members are concerned whether courses taken at the Texas Governor's Schools will be given any weight. Their member school districts that serve a migrant population are also concerned that the proposed rules will make it difficult for migrant farmworkers to receive credit for courses taken out of state. Some of our members have raised concerns about how special education and gifted and talented classes will be weighted. Finally, TASA members are concerned that the proposed rules do not clearly specify what future actions the GPA Advisory Committee will take regarding Pre-AP, Honors, and Pre-IB courses.

Response: As a result of this comment, no changes were made. Staff will provide all of these concerns to the appointed GPA Advisory Committee as items to review and address as a part of their charge.

Plano ISD expressed concerns relating to the following issues:

- Whether students who take courses from the Recommended Program but graduate on the Minimum Program receive grade points. Plano ISD feels that all students should receive a grade point average and class rank regardless of the plan on which they graduate.
- Students in modified or applied/fundamental classes will receive the same grade points as on level classes.
- Uniform GPA should be calculated by adding the total grade points received and dividing by the courses attempted. All courses attempted, whether students pass or fail, should be included in determining the uniform grade point average.
- No state approved innovative courses will receive grade points." Courses such as AVID, Peer Assistance Leadership, and certain career and technology courses are state approved innovative courses.
- Exclusion of courses which receive a physical education waiver.

Response: As a result of this comment, no changes were made. The GPA Advisory Committee will review and consider these concerns as a part of their ongoing oversight of Uniform GPA rules.

Comment: Plano ISD expressed concerns about whether approved courses taken in alternative formats (online, correspondence, etc) would count in the Uniform GPA calculation.

Response: As a result of this comment, no changes were made. These courses would count in the Uniform GPA calculation.

Comment: Mary Alice Wills of Houston Community College-NW recommends revising SUBCHAPTER A. GENERAL PROVISIONS—so that it excludes Dual Credit courses from the requirement to include TEKS. Dual Credit courses are college courses that should follow the college curricula. Dual Credit courses should continue to comply with the existing THECB Dual Credit Rules and Regulations.

Response: As a result of this comment, no changes were made. The GPA Advisory Committee will consider this recommendation as a part of their ongoing review of dual credit courses included in the Uniform GPA calculation.

Comment: Grapevine-Colleyville ISD opposes the implementation of the Uniform GPA because of the differences in course offerings in school districts across Texas. Many districts have robust offerings in Advanced Placement (AP) courses, others are known for Career and Technical Education (CTE) classes, some are closely connected with colleges and offer an abundance of dual credit courses, a few offer early college programs with students receiving college credits beginning in 9th grade, and a significant number of schools have none of these provisions.

Response: As a result of this comment, no changes were made. Coordinating Board staff disagrees because HB 3851 passed by the 80th Texas Legislature requires the Texas Higher Education Coordinating Board to create a standard method of determining high school student grade point averages (GPA) for admission to a Texas public university.

Comment: Austin ISD PTA expressed concern that the proposed weight of .5 for Honors, Pre-IB, and Pre-AP courses is lower than the current 1.0 that Austin ISD students receive for these courses and the rules should be revised to raise the proposed weight to 1.0.

Response: As a result of this comment, no changes were made. Coordinating Board staff disagrees and Pre-AP, Honors, and Pre-IB courses that are natural precursors to AP and IB courses shall be weighted with an additional weighting of .50 if begun prior to May 1, 2013. If begun on or after May 1, 2013, all Pre-AP and Honors courses will be expected to meet Laying the Foundation, or comparable standards. Pre-IB courses will be expected to be part of an approved IB program. In addition, continued weighting for Pre-AP, Honors, and Pre-IB courses will be reviewed by the Grade-Point Average (GPA) Advisory Committee as appropriate.

Comment: Texas Association of Workforce Boards recommends adoption of the proposed rules to the extent that under the proposed rules CTE courses that are not included in the calculation of the Uniform Grade - Point Average and/or that do not qualify for additional weighing, may still be considered in calculating the Uniform Grade - Point Average and may qualify for additional weighing, upon the review and determination of the GPA Advisory Panel. One of the considerations to be made by the GPA Advisory Panel in making such determinations is the findings and recommendations of the current or a reconstituted CTE Review Panel. In addition, such determinations shall also consider the needs of Texas' Industry Cluster Initiative sectors and the necessity of promoting the growth of a highly skilled and prepared workforce to meet the demands of Texas employers.

Response: As a result of this comment, changes were made to Sections 5.8 and 5.10. Coordinating Board staff agrees to work with the Texas Education Agency to determine which CTE courses will be included in the Uniform GPA calculation. In addition, the GPA Advisory Committee will continue to review which CTE courses meet the rigorous standards required for inclusion in the Uniform GPA calculation.

Comment: Bruce Walker, UT-Austin Vice Provost and Director of Admissions on behalf of UT-Austin and UT-System expressed concerns regarding Chapter 5 Section 5.8 (a) (1) "Only official high school transcripts shall be accepted by the general academic teaching institution for evaluation and grade point calculation" Recommends that THECB change rule language to:

"The only official grade point calculation for purposes of admissions to general academic teaching institutions is the one that is calculated using the uniform method approved by the Coordinating Board which must appear on the official high school transcript sent to these institutions". This would allow institutions to accept faxed copies of transcripts. In addition, UT Austin and UT System expressed concerns that there must be a stated rule that the uniform GPA is the only GPA calculation that can be used to determine rank-in-class. Most general teaching institutions do not use GPA in admission decisions but rather use class rank.

Response: As a result of this comment, no changes were made. Coordinating Board staff believes the current rules address this concern.

Comment: Texas School Alliance expressed concerns regarding the implementation date beginning with students entering 9th Grade May 1, 2009. the preliminary versions of proposed modifications do not appear to sufficiently address the concerns of the TSA;

- the rule will create modifications to the calculation of the GPA in ways that members of the TSA believe are detrimental to district efforts to prepare students for success in post-secondary education and the workforce;
- the proposed rule would implement the new calculation for 2009-10 entering freshman;

- the proposed calculation would include certain courses currently being taken at the middle school level creating insufficient notice for those students;
- the Attorney General has indicated that HB 3851 is not to be applied retroactively.

TSA requests that the THECB delay the adoption of the GPA rule until the Legislature has had the opportunity to clarify its intent regarding the implementation of this legislation.

Response: As a result of this comment, no changes were made. THECB staff will forward to the Coordinating Board members for their review because a formal response to this request must be made by Board members.

Comment: Texas Association of College Technical Educators (TACTE) expresses concern regarding the proposal to limit weighting of high school CTE courses to only those that are aligned with university programs of study for calculation of GPA for secondary students. Recommend a two tier GPA. The first tier would be a calculation that includes all high school courses, including all CTE. The second tier would be a calculation of only AP, IB, and dual credit courses. The second tier GPA could be used by universities to determine which students are in the top 10% of their class while allowing other colleges, including community & technical colleges, to use the first tier GPA.

Response: As a result of this comment, no changes were made. Coordinating Board staff disagrees because this would be contrary to the intent of the law to provide a Uniform GPA for Texas public university admissions. Community and technical colleges are not included in the law and are open admissions institutions.

Comment: Troy Johnson, Associate Vice President for Enrollment Management, University of North Texas recommends language that clarifies which entity will calculate the GPA and how special education courses will be counted.

Response: As a result of this comment, no changes were made. The Attorney General's Opinion states that due to the nature of the uniform admission policies in sections 51.803 and 51.804, the school districts are the only entities with all of the information necessary to determine class rank because they are the only entities that possess grades for all their students. To determine which students fall within the top ten or twenty-five percent, the school districts will have to rank the senior class by grade point averages computed according to the THECB's standard method for admissions." school districts will be required to use the THECB's method for admissions in order to achieve the Legislature's intent."

Special education courses will continue to receive the same grade calculation as in regular course work.

Comment: Spring Branch ISD Board of Trustees recommends the following:

- THECB withdraw the current proposed rule, and create a formal committee with broad representation of K-12 stakeholders to determine appropriate rules for the implementation of House Bill 3851;
- Pre-AP and Pre-IB courses should be given additional weighting of 1.0, rather than the .50 proposed, in the calculation of the student's grade point average;
- Career & Technology courses that are Articulated Credit CTE courses, should be included in the student's grade point average;
- THECB should permit school districts to exercise local control to determine student grade point average and the letter grade associated with that student grade point average;
- All courses included in the Recommended High School curriculum should be included in the grade point average calculation; and
- Consistent with the Attorney General's opinion, the implementation date should be later than the 2009-10 school year in order to avoid retroactive application to students currently in grades 6, 7 and 8 who have made course selection decisions based on the current grade point average calculation methodology.

Response: As a result of this comment, no changes were made. THECB staff will forward to the Coordinating Board members for their review because a formal response to this request must be made by Board members.

Legal Review:

Approved by the Office of General Counsel _____ Date: _____

The proposed amendments have been prepared in the following format:

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