

The Texas Education Agency (TEA) adopts new §74.3001, concerning computation of high school grade point average (GPA). The new rule is adopted with changes to the proposed text as published in the March 20, 2026 issue of the *Texas Register* (51 TexReg 1787) and will be republished. The adopted new rule reflects requirements made by Senate Bill (SB) 1191, 89th Texas Legislature, Regular Session, 2025, and identifies minimum requirements for school districts when computing a student's high school GPA.

REASONED JUSTIFICATION: Texas Education Code (TEC), §28.0252, as amended by SB 1191, 89th Texas Legislature, Regular Session, 2025, requires the commissioner of education to develop a standard method of computing a student's high school GPA. The standard computation method must grant equal weight to non-career and technical education (CTE) advanced placement (AP) courses, international baccalaureate (IB) courses, OnRamps dual enrollment courses, and dual credit courses completed by a student. The standard method must grant a different amount of weight to dual credit CTE courses. School districts must use the standard method developed by the commissioner to compute students' high school GPAs.

Prior to the adoption of SB 1191, TEC, §28.0252, was permissive, allowing the commissioner to develop a standard method of computing a student's high school GPA that provided for additional weight to be given to each honors, AP, IB, or dual credit course completed by a student. However, a standard method for computing high school GPAs was not established at any time; therefore, school districts were permitted to implement local high school GPA computation methods.

The adopted new rule establishes minimum requirements for calculating high school GPA to identify the types of courses that are required to be weighted; ensures that non-CTE AP courses, IB courses, OnRamps dual enrollment courses, and dual credit courses are weighted equally; and weighs dual credit CTE courses and non-CTE courses differently.

The following change was made to the rule since published as proposed.

In response to public comment, new §74.3001(b) was added to clarify that a student who does not graduate with their original cohort should have their GPA calculated using the same grade point average policy and computation method that apply to students in the graduating class with which the student graduates.

SUMMARY OF COMMENTS AND AGENCY RESPONSES: The public comment period on the proposal began March 20, 2026, and ended April 20, 2026. Following is a summary of the public comments received and agency responses.

Comment: A counselor and the Texas Association of School Boards recommended adding language to address calculation of GPA for students who graduate early.

Response: The agency agrees that the rule should include clarification regarding students who graduate early and has added new §74.3001(b) at adoption to specify that if a student graduates in a school year other than the student's original cohort, the student's grade point average will be calculated using the same grade point average policy and computation method as the graduating class with which the student graduates.

Comment: Three teachers, five administrators, a parent, two counselors, and a community member expressed concerns regarding the proposed rule's negative impact on CTE programs and students who take CTE courses.

Response: The agency disagrees that the rule will have a negative impact on CTE programs. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the Workforce Education Course Manual (WECM) or its successor adopted by the Texas Higher Education Coordinating Board (THECB) to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: Two counselors suggested reconsidering assigning lower GPA weight to WECM CTE dual credit courses under the proposed rule because these courses are rigorous, transcribed, college-level classes that support student

engagement, mental health, and workforce readiness. The commenters stated that lower weighting would force students to choose between GPA competitiveness and pathways aligned to their strengths and career goals.

Response: The agency disagrees that lowering the GPA weight is necessary. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: An administrator expressed concern that not allowing students who are taking dual credit CTE courses full weight on their GPA could be dismissing the importance of students earning career certifications through college courses.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: Three teachers, two administrators, a parent, and a community member stated that the proposal unfairly disadvantages CTE students.

Response: The agency disagrees that the rule unfairly disadvantages CTE students. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: Four administrators, a counselor, and a parent stated that the proposed GPA weighting may undervalue dual credit CTE courses despite comparable rigor to other advanced coursework, potentially disadvantaging students pursuing CTE pathways.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: Three teachers, four administrators, a counselor, and four parents expressed concern regarding the weight assigned to dual credit CTE courses and cautioned that assigning lower GPA weight may discourage students from participating in high demand pathways.

Response: The agency disagrees that the rule may discourage students from participating in high demand pathways. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: An administrator raised concern about the lower weighting of dual credit CTE and the inclusion of non-core courses, warning that these approaches could disadvantage students and undermine statewide consistency.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses receive an additional weight. The statute also requires CTE dual credit courses to receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB

to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: An administrator stated that the proposed language excludes CTE AP courses from equal AP weighting despite their rigor and stated that these AP CTE courses should be weighted the same as all other AP courses to accurately reflect their academic demands.

Response: The agency disagrees that AP CTE courses are excluded from weighted funding. Section 74.3001(b)(1) requires all AP courses for all subjects, including AP CTE courses, to receive the additional weight.

Comment: A parent stated that devaluing CTE courses would unfairly decrease class rank for students pursuing career-focused pathways and could lead to increased segregation in high school.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: A counselor requested that advanced, non-dual credit CTE coursework--particularly Level 3 and 4 courses--be recognized with GPA weighting comparable to honors courses due to their rigor and industry alignment.

Response: The agency disagrees that Level 3 and Level 4 CTE courses should be included in the administrative rule related to additional weights because identification of honors courses occurs at the local school district level rather than at the state level.

Comment: A counselor expressed concerns about weighting dual credit CTE courses, noting that only a small number of pathways at their school offer dual credit opportunities and students could be incentivized to select programs based on GPA outcomes rather than genuine career interests.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: Two administrators stated that assigning unequal weight undermines both the rigor of CTE courses and the students who choose these pathways.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: A counselor expressed concern that the proposal unfairly assigns lower value to CTE dual credit courses compared to AP, IB, OnRamps, and non-CTE dual credit courses and creates a two-tiered system that could overlook the rigor, real-world application, and workforce alignment of CTE pathways. The commenter noted the rule could negatively affect GPA, class rank, scholarships, and postsecondary opportunities for students choosing CTE.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: Two teachers, a counselor, and an administrator expressed concern that the proposal creates inequity by assigning less GPA weight to dual credit CTE courses, citing varied course availability among districts and the risk of inconsistent implementation across the state.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: An administrator asked where CTE courses that are not dual credit fall into the new hierarchy and if local education agencies (LEAs) still have discretion over courses that are not explicitly named in the proposed rule.

Response: The agency offers the following clarification. CTE courses that are not dual credit courses should be treated the same as other courses that are not identified as AP, IB, OnRamps, dual credit, or honors courses.

Comment: An administrator expressed support for a standardized GPA system for fairness. The commenter stated that CTE should be valued equally with advanced academic courses.

Response: The agency agrees that standardizing calculation of GPA is valuable but disagrees that the rule should weight CTE courses equally with advanced academic courses. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses receive an additional weight. The statute also requires CTE dual credit courses to receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: An administrator stated that the proposed rule could unfairly restrict local flexibility by requiring WECM dual credit courses to be weighted lower despite wide variation in rigor.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: A counselor stated that all college courses, whether degree- or certificate-focused, should be weighted equally and that lowering weights for trade certifications could unfairly penalize students and result in shortages of specially trained trade workers.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses receive an additional weight. The statute also requires CTE dual credit courses to receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: An administrator, two parents, and a community member expressed concern with the use of the term CTE rather than WECM status and stated that many courses within CTE programs are offered as Academic Course Guide Manual academic/transfer dual credit and should receive equal GPA weight to AP, IB, OnRamps, and other non-WECM courses. The commenters further stated the current language could lead to misapplication and inconsistent and inequitable GPA weighting across districts.

Response: The agency offers the following clarification. The proposed rule addresses dual credit courses that are included in the WECM and does not use the term CTE.

Comment: Two commenters expressed concern that the rule may create inequities due to inconsistent access to weighted courses across districts and suggested that revisions be made to ensure equitable GPA weighting across all programs, preserve GPA as a fair measure of student achievement, and promote equitable academic opportunities statewide.

Response: The agency disagrees that revisions should be made to the rule. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses receive an additional weight. The statute also requires CTE dual credit courses to receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: A counselor expressed concern that calculating high school GPA beginning in seventh grade undermines the purpose of a high school GPA and may disproportionately benefit already high-achieving families. The commenter stated that this approach could pressure students to make transcript-driven decisions before they are developmentally ready and potentially disadvantage students who are not prepared for the long-term impact of GPA calculations at such an early age.

Response: The agency offers the following clarification. The reference in the proposed rule to applicability beginning with students who enter Grade 7 in the 2027-2028 school year or later is intended to identify the cohort of students for whom the new high school GPA requirements will apply. The rule is not intended to communicate that GPA requirements should apply to courses that students take in Grade 7. The rule is intended to apply to a future group of high school students to give school districts adequate time to adjust local policies, as needed.

Comment: An administrator asked how the proposed rule would affect students who take courses for high school credit in Grade 8. The commenter asked if the honors classes mentioned in the rule were limited to core courses (math, English, science, and social studies) or apply to elective classes as well.

Response: The agency offers the following clarification. The proposed rule would only affect a course taken by a student in Grade 8 if the course taken for high school credit is an AP, IB, dual credit, or honors course. Any such course would be required to generate the additional weight. Honors courses are established locally and not at the state level.

Comment: An administrator noted that students earning associate degrees through different pathways can receive the same CCMR outcome but different GPA, resulting in a mixed message between the new accountability system and GPA requirements.

Response: The agency disagrees that the state accountability system and GP requirements result in mixed messages. Both implement distinct statutory requirements and each serves a different purpose.

Comment: One parent requested that a clear determination be made by the state about how the Grade 8 Algebra I course is treated with respect to calculation of GPA because that decision directly impacts fairness, GPA, and class rank.

Response: The agency disagrees that the rule should address Algebra I taken by Grade 8 students because this is not a course that is statutorily required to be weighted.

Comment: One parent expressed concerns that while the proposed rule would standardize course weighting across programs like AP and dual credit, it would not standardize GPA calculations across districts. The commenter expressed concern that differences in weighting and course inclusion could disadvantage students in competitive college admissions, even though the proposal is a step in the right direction.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that different weights be assigned to different types of courses and that all AP, IB, OnRamps, and dual credit courses receive an additional weight. The statute also requires CTE dual credit courses to receive different weight than non-

CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: An administrator stated that equal weighting may unintentionally incentivize students to choose dual credit over AP due to the absence of a standardized exam. The commenter emphasized that course selection should align with postsecondary goals and cautioned against GPA or class rank becoming the primary driver of these decisions.

Response: The agency agrees that course selection should align with a student's postsecondary goals. The agency offers the following clarification. The rule as proposed implements the statutory requirement that different weights be assigned to different types of courses. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses receive an additional weight. The statute also requires CTE dual credit courses to receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: While expressing support for a statewide standardized GPA system, an administrator stated that the proposed changes may unintentionally discourage student participation in CTE and other elective programs as students prioritize GPA over genuine interests. The commenter cited local policy changes that increased CTE and fine arts participation and expressed concern that the proposed rule could reverse those positive outcomes, urging further reconsideration of its statewide impact.

Response: The agency agrees with the support for a more standardized GPA system. The agency disagrees that the rule will discourage student participation in CTE and other elective programs. The rule as proposed implements the statutory requirement that CTE dual credit courses receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: A commenter stated that while supportive of the goal of statewide GPA standardization, the commenter opposes equal weighting of IB, AP, and dual credit courses and stated that more rigorous coursework should be weighted more heavily to better prepare students for college and to incentivize academic challenge rather than discourage students from pushing themselves.

Response: The agency agrees with the support for a more standardized GPA system but disagrees with the opposition to equal weighting of IB, AP, and dual credit courses. The rule as proposed implements the statutory requirement that different weights be assigned to different types of courses. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses receive an additional weight. The statute also requires CTE dual credit courses to receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: A parent stated that while the goal of statewide GPA consistency is understandable, the proposed policy raises concerns about fairness, rigor, and student opportunity. The parent argued that equal weighting across AP, IB, OnRamps, and dual credit courses fails to account for meaningful differences in academic demands and could disadvantage students who pursue more rigorous pathways. The commenter urged reconsideration to allow districts greater flexibility to ensure GPA calculations accurately reflect course rigor and student achievement.

Response: The agency disagrees that the rule should be reconsidered. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses that are not included in the WECM receive an additional equal weight. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: A commenter stated that dual credit courses are not the same rigor as AP courses and suggested they should not count as the same weight.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that different weights be assigned to different types of courses and that all AP, IB, OnRamps, and dual credit courses not included in the WECM receive the same additional weight.

Comment: A commenter stated that dual credit and AP/IB courses should be weighted equally to allow students to choose courses based on learning needs rather than class rank considerations. The commenter noted that equal weighting would reduce GPA-driven course selection and create a more level playing field for students competing for top rankings.

Response: The agency agrees that dual credit and AP/IB courses should be weighted equally and maintained the language regarding weighting of these courses as proposed. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses that are not included in the WECM receive an additional equal weight. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: A commenter stated that the proposed rule reduces local control by limiting LEAs' ability to determine GPA weighting based on local honors courses and dual credit partnerships.

Response: The agency offers the following clarification. The rule as proposed implements the statutory requirement that different weights be assigned to different types of courses and that all AP, IB, OnRamps, and dual credit courses receive an additional weight. The statute also requires CTE dual credit courses to receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: An administrator stated that the proposed rule should consider including a weighted GPA for the third and fourth year fine arts and athletic courses because students who participate in fine arts courses work hard to improve their skills to be able to compete at the top level, and thus this change would encourage students to continue to participate in these challenging activities with dedication and hard work without worrying about GPA penalties.

Response: The agency disagrees that the rule should consider including a weighted GPA for third and fourth year fine arts and athletic courses, as this is outside the scope of this rulemaking. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, dual credit, and honors courses receive an additional weight.

Comment: An administrator expressed concern that the proposed GPA weighting changes and scheduling requirements could unintentionally disadvantage fine arts programs statewide. The commenter further expressed concern that expanding required courses at the middle school level without schedule flexibility could force campuses to cut electives like fine arts. The commenter suggested reassessing GPA weighting, providing scheduling relief, and including fine arts stakeholders in policy discussions to ensure equitable education.

Response: The agency disagrees that the proposed rule should be reassessed. The agency further disagrees that the proposed rule would expand required courses at the middle school level, as the rule does not create any new requirements for middle school.

Comment: One counselor and two administrators expressed concerns regarding the weighting of courses. The commenters suggested that equal weighting among all courses would better reflect the rigor and importance of these programs and support state education and workforce priorities.

Response: The agency disagrees that all courses should be weighted equally. The rule as proposed implements the statutory requirement that different weights be assigned to different types of courses. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses receive an additional

weight. The statute also requires CTE dual credit courses to receive different weight than non-CTE dual credit courses. TEC, §28.0252, requires the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor.

Comment: A community member stated that the proposal ensures equity in funding rates across dual credit, AP/IB/OnRamps, and CTE dual credit pathways. The commenter expressed that the goal should be a funding framework that reflects both rigor and workforce relevance while maintaining fairness across all pathways.

Response: This comment is outside the scope of the proposed rulemaking.

Comment: One counselor expressed concern over equal weighting, expressing that the proposed rule could lead to GPA inflation. The commenter stated that GPA weighting should maintain a clear distinction between AP/IB/OnRamps and dual credit due to differences in standardization, assessment structure, and rigor.

Response: The agency disagrees that GPA weighting should maintain a clear distinction among AP/IB/OnRamps and dual credit courses. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses that are not included in the WECM receive an additional equal weight.

Comment: One administrator stated that the proposed rule is unnecessary and would be best handled locally. The commenter stated that Texas school districts already have established GPA policies tailored to their communities and student needs and that statewide minimum requirements reduce needed flexibility. The commenter expressed concerns about standardizing practices that may not serve all students equitably and suggested limiting rulemaking and preserving local control.

Response: The agency disagrees that the rule is unnecessary. The rule as proposed implements the statutory requirement that different weights be assigned to different types of courses.

Comment: An administrator stated that it was unclear whether the additional weight for honors courses can be equal to the weight given to an AP/IB/OnRamps course or if that weight must be less.

Response: The agency provides the following clarification. Honors courses are established locally and not at the state level. Consequently, the determination regarding the amount of weight to award to honors courses, if adopted locally, has been left to local district discretion.

Comment: A counselor expressed support for the state's issuance of a standardized GPA policy but expressed concern over inequities related to student transfers between districts with differing course offerings. The counselor stated that transfer students may appear more competitive due to access to a greater number of weighted courses at prior schools, which disadvantages students in smaller or less-resourced districts, and that limiting weighted course opportunities for transfer students could be unfair because transfers are typically driven by family circumstances. The commenter suggested that removing GPA weight for courses not offered by the receiving district could be a fairer approach to leveling academic comparisons.

Response: The agency disagrees that the rule should require districts to remove GPA weight for courses not offered by the receiving district. Determinations regarding how to address GPA for transfer students are made by school districts based on local circumstances.

Comment: A teacher suggested adding a requirement for districts to honor the original weights of transfer courses.

Response: The agency disagrees that the rule should require receiving districts to honor GPA weights earned by transfer students. Determinations regarding how to address GPA for transfer students are made by school districts based on local circumstances.

Comment: Two counselors, eight administrators, and two parents expressed their support for the proposed rule. The commenters stated they supported a statewide, standardized GPA calculation to ensure consistency and equity for students across districts.

Response: The agency agrees that standardizing policies for the calculation of GPA will support better consistency across school districts.

Comment: A teacher, a counselor, three administrators, one parent, and two community members stated the proposed rule was too vague and suggested clarifying the language. The commenters expressed the need for clearer guidance, stating that districts may inconsistently assign honors weight across a wide range of courses, which would undermine statewide standardization and potentially inflate GPA calculations.

Response: The agency disagrees that clearer guidance is necessary. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses receive an additional equal weight; the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor; and an additional unspecified weight be required for honors courses.

Comment: An administrator, a counselor, and a parent stated that the proposed rule deviates from legislative intent by not establishing a single, statewide GPA calculation method and instead preserving district-level variability, which does not achieve the goal of a completely uniform statewide policy.

Response: The agency disagrees that the proposed rule deviates from the statutory requirement. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses receive an additional equal weight; the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor; and an additional unspecified weight be required for honors courses.

Comment: An administrator and a teacher expressed concern that the proposed language related to honors courses is too broad and lacks clarity. The commenters expressed concern that, without clearer guidance, districts may inconsistently assign honors weight across a wide range of courses, undermining statewide standardization and potentially inflating GPA calculations.

Response: The agency disagrees that the proposed language related to honors courses is too broad. Honors courses are established locally and not at the state level. Consequently, the determination regarding the amount of weight to award to honors courses, if adopted locally, has been left to local district discretion.

Comment: One counselor asked whether online or virtual courses should be considered in GPA weighting and raised concerns about equity for schools that do not offer honors, AP, or dual credit courses, asking whether LEAs would have discretion to assign weight.

Response: The agency offers the following clarification. Online or virtual courses that are also AP, IB, OnRamps, dual credit, or honors courses should receive the appropriate additional equal weight as specified in the rule.

Comment: An administrator sought clarification regarding whether school districts are permitted to limit which courses are included in GPA calculations and/or cap the number of courses that receive weighted credit each year. The commenter stated that currently, they exclude high school credit courses taken in middle school from GPA calculations and cap the number of high school courses that can be weighted, even when a student completes more advanced courses than the allowable maximum in a given year.

Response: The agency offers the following clarification. While school districts retain the ability to make determinations about inclusion in GPA calculations of courses not explicitly identified in the rule, school districts are not permitted to limit the number of course that receive weighted credit each year.

Comment: A commenter asked what impact the proposed rule would have on districts of innovation and on students in special education programs such as Alternative Learning Environment or Life Skills, whose GPAs tend to fall in the top 10%. The commenter also asked if there would be any guidance on how much weight to place on each level of advanced academics and how the rule would differ from what LEAs were previously doing.

Response: The comment regarding districts of innovation is outside the scope of the proposed rulemaking. The agency offers the following clarification. The rule has no impact on courses that are not AP, IB, dual credit, OnRamps, or honors. The extent to which the rule might differ from existing policies will vary and will depend on each school district's existing policy.

Comment: An administrator asked if SB 1191 established a statutory maximum for honors course weights relative to the weights assigned to AP, IB, and dual credit courses or whether the specific point-value of the additional weight would be left to the discretion of the local board of trustees. The administrator also asked if an honors course must be explicitly titled "Honors" in the Texas Data Standards or if the weight would apply to any course locally designated as Advanced or Accelerated by the school district.

Response: The agency offers the following clarification. SB 1191 does not establish a statutory maximum for weighting of honors courses relative to weights assigned to AP, IB, and dual credit courses. Consequently, the amount of weight for honors courses will be left to local discretion. The honors weight should be assigned to any course identified by a school district as honors. There are no courses explicitly titled "Honors" in the Texas Data Standards.

Comment: An administrator expressed concerns regarding lack of equity in GPA-related practices and stated that factors that should be considered include timing of grade calculations and determining graduation honors, discrepancies between courses that earn college credit but not high school credit, and courses that align to National Collegiate Athletic Association GPA requirements.

Response: This comment is outside the scope of the proposed rulemaking.

Comment: An administrator asked whether adding extra weight for a passing AP score would be permissible under the proposed new rule, given that AP and dual credit courses began with the same base weight.

Response: The agency offers the following clarification. TEC, §28.0252, requires that all AP, IB, OnRamps, and dual credit courses receive an additional equal weight. Consequently, it would not be permissible to assign an additional weight for a passing AP score.

Comment: An administrator suggested clarifying the proposed weighting language to include pre-AP courses that do not have an AP equivalent.

Response: The agency disagrees that the rule should address pre-AP courses because they are not courses that are statutorily required to be weighted.

Comment: A counselor proposed a three-tiered weighted GPA system that differentiates course rigor using a linear point-for-point scale to more accurately reflect student achievement and discourage course selection driven solely by GPA protection. The commenter also recommended excluding non-required electives from GPA calculations to promote participation in CTE, fine arts, and extracurricular programs while maintaining academic rigor and equity.

Response: The agency disagrees that introduction of a three-tiered weighted GPA system should be included in the rule. The rule addresses the weighting structure that is required by state statute. The agency offers the following clarification concerning whether non-required electives should be excluded from GPA calculations. School districts retain the ability to make determinations about inclusion in GPA calculations of courses not explicitly identified in the rule.

Comment: A teacher recommended expanding GPA weighting to include varsity and advanced fine arts courses that demonstrate rigor comparable to advanced academic coursework because excluding these courses creates inequities for students pursuing rigorous fine arts pathways.

Response: The agency disagrees that the rule should include additional weights for varsity and advanced fine arts courses because they are not courses that are statutorily required to be weighted.

Comment: An administrator expressed a preference for only weighting dual credit courses in core subject areas (math, science, social studies, and English).

Response: The agency disagrees that the additional weight for dual credit courses should only apply to core subjects. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, dual credit, and honors courses receive an additional weight regardless of the subject.

Comment: An administrator stated that if the rule does not specify weighting for pre-AP coursework, these courses could fall in the unweighted category or cause inconsistencies in the way districts weight pre-AP courses.

Response: The agency disagrees that the rule should address pre-AP courses because they are not courses that are statutorily required to be weighted.

Comment: A parent stated that the rule should take effect and apply to all students immediately beginning with the class of 2027. The commenter stated that limiting calculation of GPA to only core classes disadvantages students compared to students in other school districts and other states. The parent suggested either calculating an unweighted GPA including all high school courses or weighting only courses required for graduation using the best grade from each category.

Response: The agency disagrees that the rule should apply with the class of 2027 because school districts will need adequate time to prepare for changes to existing policies. The agency also disagrees that the rule should require calculation of an unweighted GPA including all high school courses or weight only course required for graduation using the best grade from each category. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses receive an additional equal weight; the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor; and an additional unspecified weight be required for honors courses.

Comment: An administrator suggested a tiered GPA weighting system aligned to core courses required for state graduation, with the highest weight given to AP/IB, followed by OnRamps, dual credit, and dual enrollment. The commenter raised concerns about OnRamps being weighted more, regardless of graduation requirements, and noted that similar university models are not being recognized. The commenter also recommended clear GPA rules, including counting courses only the first time taken, setting a minimum grade threshold, and avoiding limits on dual credit that could restrict science, technology, engineering, and mathematics pathways.

Response: The agency disagrees that the rule should include a tiered weighting system that assigns a lesser weight to OnRamps courses and with the commenter's recommendations concerning clear GPA rules around first-time courses, minimum grade thresholds, and limits on dual credit. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses receive an additional equal weight; the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor; and an additional unspecified weight be required for honors courses.

Comment: A parent questioned whether the proposed rule meets statutory requirements and whether it truly establishes a standard GPA calculation method. The commenter proposed an alternative 100-point GPA system, stating its greater granularity and fairness under Texas automatic admission policies.

Response: The agency disagrees that the proposed rule deviates from the statutory requirement or that the rule should establish an alternative 100-point GPA system. The rule as proposed implements the statutory requirement that all AP, IB, OnRamps, and dual credit courses receive an additional equal weight; the amount of additional weight to be given to dual credit courses included in the WECM or its successor adopted by the THECB to be different from the amount of additional weight to be given to a dual credit course that is not included in the WECM or its successor; and an additional unspecified weight be required for honors courses.

STATUTORY AUTHORITY. The new section is adopted under TEC, §28.0252, as amended by SB 1191, 89th Texas Legislature, Regular Session, 2025, which requires the commissioner of education to develop a standard method of computing a student's high school grade point average that school districts must use.

CROSS REFERENCE TO STATUTE. The new section implements TEC, §28.0252, as amended by SB 1191, 89th Texas Legislature, Regular Session, 2025.

<rule>

§74.3001. Computation of High School Grade Point Average.

- (a) Effective beginning with students who enter Grade 7 in the 2027-2028 school year or later, in accordance with Texas Education Code (TEC), §28.0252, the board of trustees of each school district shall adopt a grade point average policy in accordance with subsection (c) of this section.
- (b) If a student graduates in a school year other than the student's original cohort, the student's grade point average shall be calculated using the same grade point average policy and computation method that apply to students in the graduating class with which the student graduates.
- (c) A school district grade point average policy shall provide for additional weight to be given certain courses as follows:
 - (1) an additional equal weight for each dual credit course not included in the Workforce Education Course Manual (WECM) or its successor adopted by the Texas Higher Education Coordinating Board (THECB), advanced placement course, international baccalaureate course, and OnRamps dual enrollment course completed by a student;
 - (2) an additional weight that is less than the weight given to a course listed in paragraph (1) of this subsection for each dual credit course included in the WECM or its successor adopted by the THECB completed by a student; and
 - (3) an additional weight for each honors course completed by a student if a school district offers honors courses.
- (d) A school district shall use the standard method of computing a student's high school grade point average adopted by the district to compute each applicable student's high school grade point average.
- (e) An adopted grade point average policy that applies to a cohort of students shall remain unchanged for that cohort through high school graduation.