June 15, 2026

Dear Chair Kinsey and Members of the Board of Education:

Thank you for your continued leadership in expanding access to high-quality personal financial literacy education for Texas students! I am the Co-founder and CEO of Next Gen Personal Finance (NGPF), a 12-year-old nonprofit that provides personal finance curriculum and teacher professional development (PD) at no cost to over 7,600 Texas teachers, who completed 18,400+ hours of PD. Since our founding, NGPF has been driven by a single goal: to guarantee that every student completes a standalone personal finance course before they graduate. It is the only outcome we measure ourselves against, and the sole reason we submit this comment.

Organizations that sell curriculum, training, and/or exams to schools or students have a clear financial interest in this Board's rulemaking. We want to be clear that NGPF does not sell anything to anyone, anywhere. The proposed rule will not affect us financially in any way.

Our interest in this Board's rulemaking is straightforward: we want Texas, the state with the most public school teachers in the country, to be a national leader in personal finance education. We want every Texas student to receive what HB 27 guarantees them: a standalone 0.5 credit Personal Financial Literacy course, not to be combined or embedded into other courses such as Economics, Business, Marketing, or Government.

After carefully reviewing the Proposed New 19 TAC Chapter 113, Subchapters A-D, and the June 2026 SBOE Agenda, we respectfully request that the Board consider and address the following concerns:

1. **The statutory condition for substitute designation cannot be met at this time.** TEC 28.025(b-24) permits a student to meet the 0.5 credit Personal Financial Literacy requirement either through a course aligned to all PFL TEKS or through an AP course, but only if the Board first designates that AP course as substantively similar in content and rigor. Because the PFL TEKS are not finalized, the Board is not yet able to independently verify whether any course, AP or non-AP, is substantively similar to a standard that does not yet exist. Statute calls for holding off on the following:

    a) updating the list of high school courses teaching personal financial literacy that align with the requirements of HB 27 via Proposed Amendment to 19 TAC Chapter 74, Curriculum Requirements, Subchapter A, Required Curriculum (Board agenda I-224) and,

    b) updating high school graduation requirements to align with HB 27 via Proposed Amendments to 19 TAC Chapter 74, Curriculum Requirements, Subchapter B, Graduation Requirements (Board agenda I-229; see Social Studies provision I-239).

    When PFL TEKS are finalized, any course considered for designation should be evaluated for alignment by independent Texas curriculum and education experts, not approved on the basis of a provider's assessment of its own course. No provider's self-evaluation can substitute for the Board's own independent, standards-based review.

2. **All three legislative authors have asked the Board not to take action at this time.** Rep. Ken King, the author of HB 27, wrote to the Board on March 30, 2026, urging it "to hold off on approving, listing, or designating any specific courses" until the PFL TEKS are finalized and published.

Rep. Linda Garcia, co-author, wrote on April 22, 2026, that the “shall allow” language only governs “once a qualifying course has been identified” and that the Board “may reasonably decline to designate any AP course at this time.”

Sen. Pete Flores, Senate sponsor, thanked the Board in writing on April 9, 2026, “for delaying the adoption of an Advanced Placement course until all courses are properly vetted and analyzed.” Finalizing curriculum requirements and graduation requirements without finalized TEKS, and approving proposed Section 113.127 (Board agenda I-202) would ignore these provisions that all three authors of the legislation have brought to the Board’s attention.

3. **Departure from the Board’s own precedent & outsourcing content standards to a private vendor.** As the proposal's preamble recounts, in 2015 the Board required students in AP and IB social studies courses to demonstrate proficiency in the corresponding TEKS, in addition to the AP or IB course requirements. Section 113.127 imposes no such requirement.

   In particular, Section 113.127(c) proposes to authorize the College Board to determine its own content standards for AP Business with Personal Finance. This would allow a single private vendor to define the content for a course that satisfies a statewide graduation requirement, with no Texas review of those content requirements and standards, which is a reversal of the very approach the Board adopted in 2015.

   The consequences of outsourcing this judgment are not hypothetical. When other states measured this very course against their own standards, the gap was stark. In a November 2025 bulletin to educators, the Kentucky Department of Education reported that, after a comprehensive review by secondary and postsecondary subject-matter experts, it determined AP Business with Personal Finance does not satisfy Kentucky's financial literacy graduation requirement. The review found that the course failed to adequately address 19 of the state's 26 financial literacy standards.

   Notably, Kentucky still welcomed the course as a business and marketing offering; it concluded only that AP Business is not a personal finance course and should not be approved as one. We would welcome the opportunity to provide the Board with this and similar documentation from three other states that added the course as an offering, but chose not to designate it for the financial literacy graduation requirement.

4. **One course is singled out above all others.** Section 113.127 (Board agenda I-202) would allow half of the one-credit AP Business with Personal Finance course to satisfy HB 27’s 0.5 credit PFL requirement beginning in 2026-2027. Yet the two items are at very different procedural stages. The Social Studies TEKS in Chapter 113 that contain Section 113.127 are up for second reading and final adoption (Item 4, Board agenda I-57), while the PFL TEKS in Section 113.26, the very standard this course is meant to satisfy, are presented only for first reading and filing authorization (Item 6, Board agenda I-215 to I-223).

   This is the heart of the problem: AP Business is being finalized as a substitute for HB 27's 0.5 credit PFL course requirement before the standard it must match even exists in its final form. Other courses have not yet been cross-checked for alignment to the new PFL TEKS, including Financial Mathematics, and the CTE Money Matters course. Therefore, Section 113.127 would leave AP Business as *the only named course recognized* to meet HB 27's PFL requirement entering 2026-2027. Students and schools are best served by open competition on a level playing field, but naming one course as satisfying HB 27's PFL requirement before any other course can be measured against the standards is the opposite of that.

Once the PFL TEKS are finalized and adopted, any course can be submitted and independently evaluated against the adopted standards by qualified curriculum experts, rather than on the basis of any given provider's assessment of its own course. Only then can the Board properly, and within its own rules, determine which course offerings meet the “substantively similar and rigorous” standard established in HB 27.

We respectfully ask the Board to follow the required process and strike Section 113.127 from the proposed new 19 TAC Chapter 113, TEKS for Social Studies.

Thank you for your consideration. We’re glad to provide source documentation for any statement in this comment upon request.

Respectfully submitted,

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