Feasibility Analysis and Recommendations for a Texas Centralized Nursing School Application Service

Prepared for Texas Health Education Service

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Executive Summary

House Bill 2851 directed the Texas Health Education Service (TXHES) to evaluate incorporating nursing education programs into a centralized application service. The legislation builds upon Recommendation 8 of the Governor's Healthcare Workforce Task Force, which identified fragmented nursing school application pathways and limited visibility into the nursing education pipeline as barriers to maximizing existing training capacity. Together, the statutory directive and the Task Force recommendation call for a model capable of improving transparency for applicants while enabling the State to better understand demand, capacity, and outcomes.

To support this charge, TXHES engaged Sophos Strategies LLC to conduct an independent feasibility assessment. Sophos Strategies is a public sector consulting firm with experience in government policy and program development, implementation, procurement, and evaluation, including work in highly regulated service delivery environments. TXHES engaged Sophos to provide independent analytic support, stakeholder facilitation, and comparative evaluation of options consistent with legislative direction.

The purpose of the study was to identify an approach that offers a strong foundation for implementation within Texas' legal, institutional, operational, and fiscal environment. The study identified four potential options for meeting the legislative objective and assessed each using a structured analytic framework to determine which could most feasibly be implemented at scale while preserving institutional authority, supporting applicants, and remaining sustainable over time.

Study Structure. Four potential models were evaluated across five domains derived from the analytical framework used by the Governor's Task Force: Governance, Stakeholder, Technical, Operational, and Financial. Within each domain, specific criteria translated broad objectives into concrete tests of feasibility. Ratings were assigned using a common High–Medium–Low scale and then synthesized to identify patterns of strength, risk, and tradeoff.

The study incorporated engagement with institutions and applicants, including advisory committee meetings, statewide roundtables, surveys, and direct feedback. Draft frameworks and results were also reviewed with individuals familiar with the development of Recommendation 8 and the legislative direction to ensure alignment with state policy intent.

What the Analysis Shows. The findings demonstrate that multiple paths could theoretically satisfy elements of the legislative directive. However, feasibility is not evenly distributed. Options that preserve current institutional practice often produce weaker statewide coordination and limited improvement to the applicant experience. Options that maximize state control tend to concentrate development, operational, and financial risk within TXHES. Across domains, only one option performs consistently at or near the top without introducing critical barriers.

Recommended Path Forward. Option 1, implementation of a Texas-configured and Texas-governed version of Liaison's CAS platform (TexNCAS), represents the highest-feasibility approach. Option 1 combines:

- Established, operating technology
- Demonstrated ability to function in diverse institutional environments
- Near-term launch practicality
- Preservation of institutional admissions authority
- Strong potential to improve nursing education pipeline data quality, ability to maximize utilization of training capacity, and streamline the applicant experience
- A cost profile that avoids major upfront development appropriation
- The ability for TXHES to direct policy, participation expectations, and configuration through governance and contract mechanisms

Because institutions can already observe versions of the model in practice, uncertainty about usability, workflow, and applicant behavior is substantially reduced. Transition work remains necessary, but it is work toward a visible and proven operating state.

Why Not the Alternatives. **Option 2** (TXHES-Built System) offers maximum state ownership but requires Texas to assume the full burden and cost of design, build, security, and ongoing enhancement of a complex enterprise platform while simultaneously managing change across hundreds of programs. This concentration of execution risk reduces feasibility despite its conceptual appeal. **Option 3** (Hybrid) preserves institution choice but weakens the very network effects that make centralization valuable. Fragmentation would continue for applicants and statewide insight would remain incomplete. **Option 4** (Data Warehouse) can enhance reporting but does not simplify how students apply or how institutions process applications. It improves information for policymakers more than experience for users.

Implementation Risks and Considerations. Success in implementing Option 1 will require clear, transparent, inclusive governance; structured, ongoing stakeholder engagement; readiness-based onboarding; continuous improvement; and active financial monitoring.

These are not unique risks. They are the standard obligations of any statewide shared service. The feasibility analysis indicates that these responsibilities are manageable within existing authority and institutional expectations.

Conclusion. Option 1 provides the strongest and most practical pathway for TXHES to move from analysis to execution while delivering meaningful improvement in applicant experience, system coordination, and statewide workforce insight.

Organization of Supporting Materials

This report presents the analytic framework, rating and scoring approach, and conclusions regarding the feasibility of four options for establishing a centralized application service for Texas nursing schools. Supporting documentation that provides additional detail regarding ratings, stakeholder input, and advisory committee feedback is provided in appendices to this report to provide transparency of methods.

Appendix A. Detailed Feasibility Ratings by Domain. Provides the complete criterion-level ratings for each option across governance, stakeholder, technical, operational, and financial domains. This appendix documents the analytic basis for the domain scores and cross-domain synthesis presented in the body of the report.

Appendices B, C, and D. Stakeholder Engagement Inputs. Includes results of the stakeholder roundtable sessions, student survey, and community college nursing program survey.

Appendix E. Advisory Committee Feedback on Feasibility Study Results. Documents feedback provided by the HB 2851 advisory committee on the feasibility ratings and interpretation of findings.

1 Legislative Direction and Feasibility Study Objectives

House Bill 2851 (89th Texas Legislative Session) directed Texas Health Education Service (TXHES) to evaluate incorporation of nursing education programs into a centralized application service. The legislation builds on the work of the Governor's Task Force on Healthcare Workforce Shortages, which identified fragmented admissions pathways, limited statewide visibility into qualified applicants, and uneven information for students as barriers to maximizing Texas's existing nursing education capacity. The Task Force determined that a coordinated application approach could support more efficient use of available seats while improving transparency and access for prospective students.

The legislation required TXHES to establish an advisory committee, charging the committee with developing recommendations and an implementation plan. In response to this directive, TXHES contracted with Sophos Strategies LLC to conduct a structured feasibility assessment to identify a feasible model for implementing a centralized nursing application service aligned with legislative directive and Recommendation 8. The intent of the study was to identify an approach that can meet state policy objectives while remaining operationally practical and financially sustainable within Texas's fiscal and institutional environment.

The feasibility study is designed to inform decision makers by clarifying tradeoffs, identifying risks, and evaluating the conditions necessary for success. It provides the analytical foundation for selecting a path forward and for shaping effective implementation strategies. While the study recognizes that any statewide service will require continued refinement over time, its purpose is to determine whether a viable starting point exists and which option offers the strongest basis for moving from analysis into execution.

2 Study Approach and Methodology

The feasibility study was designed to provide a structured, transparent assessment of viable pathways for implementing a centralized application service for Texas nursing programs. The objective was not to identify a perfect or risk-free model, but to determine whether a practical, defensible starting point exists and which approach offers the strongest foundation for responsible execution within Texas' policy, fiscal, institutional, and operational environment.

The analytical framework used in this study builds on the framework developed and used by the Governor's Healthcare Workforce Task Force. Five domains were used to evaluate feasibility: governance, stakeholder, technical, operational, and financial.

Together, these domains capture the authorities, institutional readiness, technology implications, implementation practicality, and fiscal sustainability necessary for statewide adoption.

Within each domain, specific criteria were developed to translate broad policy objectives into concrete, observable conditions for success. The criteria were designed to be clear enough to support consistent evaluation while flexible enough to accommodate the diversity of Texas nursing programs.

2.1 Development of Options

The alternatives evaluated in this report evolved through iterative dialogue with TXHES leadership, advisory committee discussions, and recurring themes identified through stakeholder engagement. Options were refined over time to ensure they represented realistic policy and operational pathways rather than theoretical constructs. This iterative approach allowed the study team to test how different structures might address institutional concerns, legislative objectives, and implementation constraints.

2.2 Stakeholder Engagement and Evidence Base

The feasibility analysis was informed by multiple sources of input, including:

- Three meetings of the HB 2851 advisory committee
- Six stakeholder roundtable sessions, including deans and admissions personnel
- A statewide student survey and small group forum
- A survey of community colleges which also received responses from other institution types
- Direct institutional feedback
- Consultation with TXHES operational and information technology staff
- Consultation with information technology experts on the HB 2851 advisory committee
- Discussions with the CAS vendor regarding technical, operational, and financial considerations

These sources provided insight into the practical realities institutions face, applicant experience priorities, and areas where implementation risk may be elevated.

Detailed results of engagement activities are provided in *Appendix B. Feasibility of a Centralized Application Service for Texas Nursing Schools: Feedback from Stakeholders; Appendix C. Texas Nursing Program Application Experience Survey Report; and Appendix D. Texas Community College Nursing Programs Survey Report.*

2.3 Research Activities

In addition to stakeholder engagement, the study incorporated research into:

- Applicable statutes, regulations, and accreditation considerations
- Existing TXHES governance structures
- Operational practices associated with centralized application services, including current TMDSAS processes
- Technical and integration implications
- Financial modeling inputs, including vendor information and state infrastructure considerations.

During the study, TXHES technical staff advised that the agency is evaluating modernization of its current application infrastructure, including potential migration toward a cloud-based environment. Under such a scenario, expansion to additional disciplines could occur as part of development of a new platform rather than modification of existing legacy systems. This information informed the study team's understanding of the operational and sequencing considerations associated with a TXHES-owned CAS.

The study team also reviewed draft contractual materials and observed ongoing discussions between TXHES and Liaison, the vendor whose technology underlies NursingCAS, in order to understand potential cost drivers, implementation sequencing, and system capabilities.

2.4 Feasibility Rating Development

2.4.1 Framework Development and Validation

Draft criteria and rating structures were reviewed through multiple channels to ensure alignment with legislative intent and the issues raised through stakeholder engagement. The analytic framework, including domain-specific criteria, was presented to the advisory committee for review and comment. In addition, a small group of individuals involved in development of Recommendation 8 and related legislative direction reviewed the approach to confirm that it appropriately reflected state policy objectives. Feedback from these discussions resulted in refinement of selected criteria to strengthen clarity and alignment.

2.4.2 Rating and Scoring Approach

Because the domains evaluated in this study include both quantitative and qualitative considerations, the study team applied a three-level feasibility scale of High, Medium, and Low. This approach supports consistent comparison across diverse criteria while recognizing that not all evidence can be reduced to numerical precision.

For purposes of synthesis, ratings were assigned numeric values (High = 3, Medium = 2, Low = 1). Scores were aggregated within each domain and then compared across domains to identify relative performance patterns across the options. Numeric scoring is used to promote transparency and comparability. It is not intended to create artificial precision or substitute for judgment about where risks concentrate and whether those risks are manageable.

The study did not apply differential weighting to criteria or domains. Stakeholders may reasonably hold different views regarding relative priority among governance, operational, financial, or technical considerations. Assigning weights would therefore require policy determinations beyond the scope of the feasibility mandate. By presenting unweighted results and full underlying ratings, the analysis allows TXHES or other decision makers to apply alternative priority assumptions if desired.

2.4.3 Development of Ratings

Ratings were developed by domain leads and the feasibility study lead based on research findings, stakeholder input, operational precedent, and professional judgment. Results were presented to a small group comprised of stakeholders involved in the Task Force and HB 2851 passage, including representatives of the House and Senate sponsors of the bill and the Governor's office. No feedback indicating misalignment with legislative directive or state policy objectives was received. Results were also presented to the advisory committee, which was given the opportunity to provide feedback. Advisory committee feedback on feasibility results is provided in *Appendix E. Advisory Committee Feedback on Feasibility Results*. While stakeholder perspectives informed the evaluation, final analytic responsibility for the ratings and conclusions presented in this report rests with the study team.

2.5 Limitations

As with any forward-looking analysis, conclusions are based on currently available information, existing participation assumptions, and evolving vendor and policy environments. Actual implementation experience may surface new information requiring adjustment. The purpose of this study is to determine whether a viable path forward exists, not to eliminate the need for future governance decisions or refinement.

3 Description of Options Considered

The study team evaluated four approaches for implementing a statewide centralized application service (CAS) for nursing programs. These options surfaced during initial research and through stakeholder input.

The options differ in terms of system ownership, responsibility for operations, needed investment, degree of application process standardization, and the pace and complexity of implementation. Each model is capable of advancing at least some subset of the legislative and state policy objectives driving this study. The feasibility analysis focused on identifying strengths, tradeoffs, and risks of each option.

3.1 Option 1: Vendor-Supported TexNCAS

Option 1 establishes a Texas-governed, Texas-configured version of Liaison's centralized application service technology, branded for statewide use as TexNCAS. At system maturity, all nursing programs statewide participate.

Under this model, TXHES establishes participation expectations and defines and implements policy parameters, data standards, and configuration choices through a contract with the vendor. Institutions would use a common application infrastructure while maintaining control over admissions criteria, review processes, and final selection decisions. Both in- and out-of-state applicants would interact with a unified system that enables submission of materials to multiple participating Texas nursing programs through standardized workflows defined by TXHES through the vendor contract.

Table 3.1. Option 1 Overview

Dimension	Option 1: Vendor-Supported TexNCAS
System ownership	Technology owned by the vendor. TXHES controls policy, configuration, oversight for the TexNCAS version through a contract with the vendor.
System operator	Vendor operates and maintains the platform in accordance with contract requirements and TXHES direction.
Role of TXHES	Establishes and leads governance structure, participation expectations, statewide policies. Defines configuration standards and provides system oversight through vendor contract.
Role of institutions	Establish admissions requirements, review applications, make selection decisions, and participate in TexNCAS governance input processes.

Dimension	Option 1: Vendor-Supported TexNCAS
Applicant experience	Applicants create a single application profile for use across all Texas nursing programs to which they apply using standardized submission steps. TXHES can configure the CAS to present applicants with program-specific quality data (e.g., graduation rates, NCLEX pass rates) to support their enrollment decisions.
Statewide standardization	Core application data elements, workflow stages, and reporting structures are standardized across all programs.
How program-level variation is handled	Program-specific requirements, prerequisites, and evaluation processes are accommodated through configurable elements within the common platform.
Existing technology vs new build	Built on an established, operational CAS platform adapted to Texas requirements.
Data collection and reporting	The system collects and reports desired data across all programs.

3.1.1 Governance Characteristics

Under Option 1, governance authority rests clearly with TXHES while operational responsibilities for maintaining the technology environment reside with the vendor. TXHES establishes participation expectations, defines statewide policies, sets configuration parameters, and determines how institutional input is incorporated into decision-making. These responsibilities are exercised through contract management, formal governance bodies, and structured processes for prioritizing enhancements and resolving disputes.

Institutions retain authority over admissions standards, evaluation practices, and final selection decisions. Program variation is accommodated within parameters established by TXHES, allowing local control where required while maintaining statewide consistency in areas such as data definitions, reporting, and workflow structure.

Because the platform already exists and is operating in other contexts, governance under this model focuses less on building core functionality and more on directing how the system is adapted for Texas. Decision rights, accountability structures, and escalation pathways are therefore oriented toward policy leadership, vendor oversight, and coordinated evolution of the statewide environment.

3.1.2 Stakeholder Characteristics

Under Option 1, institutions operate within a type of platform already familiar to many Texas programs, reducing uncertainty about how applications are submitted, reviewed, and managed. At the same time, the model preserves institutional authority over admissions judgments and allows configuration of program-specific requirements, maintaining institutional distinctiveness in how candidates are evaluated and selected.

Applicants encounter a unified experience across programs, with consistent steps, shared terminology, and the potential for standardized program quality information to support informed decision-making.

Stakeholder input under this model is structured through advisory mechanisms that inform TXHES decisions regarding configuration, timelines, and improvement priorities. While not every preference can be implemented simultaneously, the model provides predictable channels through which institutions and students can influence refinement.

3.1.3 Technical Characteristics

Option 1 relies on an established application platform with existing functionality for applicant intake, document management, workflow routing, and communication. Technical effort centers on configuring the environment to Texas policy requirements, defining data standards, and establishing necessary integration with institutional systems.

Because the architecture is already operational, foundational elements such as hosting, security practices, user authentication, and system maintenance follow proven patterns. The primary technical work involves adaptation, interface development, and alignment with Texas reporting needs rather than invention of new capabilities.

This structure allows TXHES to focus technical governance on interoperability, data quality, and change management while relying on the vendor for platform stability and lifecycle maintenance.

3.1.4 Operational Characteristics

Option 1 is a shared service model in which application intake and many routine processes occur within a common environment. Institutions transition from locally-managed intake mechanisms toward standardized workflows, while continuing to manage evaluation, communication with applicants, and admissions decisions.

TXHES assumes responsibility for statewide coordination, policy communication, and oversight of vendor performance. Operational maturity develops through phased participation, institutional training, and iterative refinement as programs and applicants gain experience with the system.

Because comparable implementations exist elsewhere, operational planning can draw upon established practices related to onboarding, cycle management, and support structures. The emphasis is on managing change and promoting consistent usage rather than inventing new operating models.

3.1.5 Financial Characteristics

Option 1 avoids the need for TXHES to finance large-scale system development through a model based on contracted services and defined fee structures. Expenditures are associated primarily with vendor payments, configuration activities, support resources, and oversight functions carried out by TXHES.

Financial performance is influenced by phased institutional onboarding and resulting pacing of application volumes. As adoption increases, revenue and cost relationships change, affecting the trajectory toward sustainability.

Because the underlying platform is already in operation, financial risk related to technology creation is reduced. The principal financial responsibilities for TXHES involve contract management, monitoring

utilization patterns, and ensuring that policy choices remain aligned with long-term affordability objectives.

3.2 Option 2: TXHES-Built CAS

Option 2 establishes a Texas-built, Texas-operated centralized application service. This model represents the most direct structural alignment with the legislative direction and Task Force recommendation to include nursing programs within a consolidated application environment under TXHES ownership and control.

Under this model, TXHES would develop a new technology platform and assume responsibility for its ongoing operation, maintenance, enhancement, and support. At system maturity, all nursing programs statewide participate.

TXHES would establish participation expectations and directly define and implement policy parameters, data standards, and configuration choices. Institutions would use a common application infrastructure while maintaining control over admissions criteria, review processes, and final selection decisions. Both in- and out-of-state applicants would interact with a unified system that enables submission of materials to multiple participating Texas nursing programs through standardized workflows defined by TXHES.

Table 3.2. Option 2 Overview

Dimension	Option 2: TXHES-Built CAS
System ownership	Technology owned by the State of Texas.
System operator	TXHES or its designated technology partner operates and maintains the platform.
Role of TXHES	Establishes and leads governance structure, participation expectations, statewide policies. Directly defines and implements configuration standards and accomplishes system oversight through internal mechanism.
Role of institutions	Establish admissions requirements, review applications, make selection decisions, and participate in TexNCAS governance input processes.
Applicant experience	Applicants create a single application profile for use across all Texas nursing programs to which they apply using standardized submission steps. TXHES can directly configure the system to present applicants with program-specific quality data (e.g., graduation rates, NCLEX pass rates) to support their enrollment decisions.
Statewide standardization	Core application data elements, workflow stages, and reporting structures are standardized across all programs.
How program-level variation is handled	Program-specific requirements, prerequisites, and evaluation processes are accommodated through configurable elements within the state platform.
Existing technology vs new build	Requires development of a new CAS.

Dimension	Option 2: TXHES-Built CAS
Data collection and reporting	The system collects and reports desired data across all programs.

3.2.1 Governance Characteristics

Under Option 2, governance authority and operational responsibility are both centered within TXHES. The State owns the platform and is accountable for establishing participation expectations, defining statewide policy, setting configuration parameters, and determining how institutional input is incorporated into decision-making. These responsibilities are exercised through formal governance bodies, internal management processes, and established state oversight mechanisms.

Institutions retain authority over admissions standards, evaluation practices, and final selection decisions. Program variation is accommodated within the boundaries established by TXHES, allowing institutional control where necessary to preserve admissions autonomy.

Because the system is developed and operated by TXHES, governance under this model encompasses both policy direction and responsibility for prioritizing system enhancements, allocating resources, and maintaining alignment between institutional needs and statewide objectives.

3.2.2 Stakeholder Characteristics

Under Option 2, institutions participate in a centralized environment designed, operated, and supported by TXHES. The model preserves institutional authority over admissions judgments while creating a uniform infrastructure for application submission and management.

Applicants encounter a unified statewide experience with common terminology, standardized steps, and the potential for consistent presentation of program quality information. Because the platform is TXHES-operated, changes to applicant-facing features are directed through TXHES governance processes.

Stakeholder engagement occurs through structured advisory mechanisms that inform TXHES regarding configuration priorities, operational challenges, and improvement opportunities. Institutions and students contribute input to decision-making, while TXHES retains responsibility for final determinations regarding timing, scope, and implementation of changes.

3.2.3 Technical Characteristics

Option 2 requires TXHES to design, build, or procure a new centralized application system and to assume responsibility for its ongoing technical operation. Foundational components such as hosting, security architecture, authentication, maintenance, and lifecycle management fall under state authority or its designated technology partners.

Technical effort includes development of application intake capabilities, document handling, workflow management, communications functionality, and reporting tools. Integration with institutional systems is designed, implemented, and supported within the state-managed environment.

Because the platform is purpose-built for Texas, technical governance focuses on ensuring interoperability, maintaining data integrity, managing system releases, and aligning development priorities with policy direction established through the governance structure.

3.2.4 Operational Characteristics

Option 2 functions as a state-operated shared service model. Application intake occurs through a common environment managed by TXHES, while institutions continue to conduct application review, applicant communication, and admissions decision-making.

TXHES is responsible for statewide coordination of operating schedules, system updates, user support frameworks, and vendor or contractor performance where external partners are involved. Operational maturity develops through phased participation, training, and refinement as institutions and applicants gain experience with the platform.

Because the operating model is newly established, procedures, documentation, and support structures are developed by TXHES and evolve through ongoing management and oversight.

3.2.5 Financial Characteristics

Under Option 2, TXHES retains full financial responsibility for system development, infrastructure, staffing, and ongoing operations. Expenditures include technology creation or acquisition, enhancement activities, maintenance, and user support functions necessary to sustain statewide service delivery.

Financial performance depends on participation levels, application volumes, and policy choices regarding funding structures. TXHES manages budgeting, monitors utilization, and determines how resources are allocated across development, operations, and future improvements.

Because the platform is state owned, financial governance emphasizes long-term sustainability, predictable operating commitments, and alignment between system investment and statewide workforce objectives.

3.3 Option 3: Hybrid Model

Option 3 establishes a framework that allows nursing programs to choose whether to participate in the TXHES-built CAS or to maintain their existing application pathways and instead deliver defined reporting on unique number of applicants, qualified applicants denied admission due to limited program capacity, and number of open seats. Under this model, TXHES would define participation expectations, application data standards, and transparency requirements only for nursing programs choosing to participate in the CAS. At system maturity, not all nursing programs statewide necessarily use the same application system but all provide data to TXHES (either via CAS participation or via standardized reporting) support visibility into the nursing education pipeline and maximization of capacity.

Institutions choosing the CAS operate under a common application infrastructure governed by TXHES, while those maintaining local processes are responsible only for transmitting required information to TXHES. Across both pathways, institutions would retain control over admissions criteria, review

processes, and final selection decisions. Applicants encounter different application environments and availability of program quality data depending on the program to which they apply.

Table 3.3. Option 3 Overview

Dimension	Option 3: Hybrid Model
System ownership	TXHES-built CAS and a data warehouse owned by the State of Texas; some institutions retain their own application systems.
System operator	TXHES and institutions operate their respective systems within applicable rules.
Role of TXHES	Defines governance framework, participation expectations, data requirements, and oversight mechanism for TXHES CAS. Establishes and oversees data reporting standards and timeframes.
Role of institutions	Establish admissions requirements, review applications, make selection decisions, and either use the centralized system or maintain their own application pathway and report required data.
Applicant experience	Applicants may use different systems depending on where they apply and have access to standardized program-specific quality data only for those programs that participate in the CAS.
Statewide standardization	Application processes may differ by institution. Reporting standards and required data elements are standardized.
How program-level variation is handled	Configurable elements within the TXHES platform enable customization for program-specific requirements, prerequisites, and evaluation processes for participating programs. Non-participating institutions maintain their own application pathways.
Existing technology vs new build	Requires development of a new CAS as well as a data warehouse and dashboards for data collection from non-participating programs and aggregation with data from CAS participants.
Data collection and reporting	Data for participating programs is extracted automatically from the CAS and aggregated in a data warehouse along with data reported by non-participating institutions.

3.3.1 Governance Characteristics

Under Option 3, TXHES establishes statewide expectations for participation, data reporting, and coordination while operating both a state-developed CAS and a statewide data warehouse. Institutions may elect to participate in the CAS or maintain their existing application environments, but all programs are subject to common reporting requirements defined by TXHES.

TXHES defines policy objectives, establishes data standards, and creates formal mechanisms for institutional input into priorities and future development. Institutions retain authority over admissions standards, evaluation practices, and final selection decisions regardless of participation status.

Because participation in the CAS is optional, governance under this model must address both the operation of the shared application environment and the parallel responsibility to ensure comparable statewide reporting across participating and non-participating programs.

3.3.2 Stakeholder Characteristics

Option 3 gives institutions the choice of whether to participate in a shared application environment or maintain their own. CAS participants have the opportunity to shape many operational features within the platform, consistent with capabilities and expectations defined by TXHES. Non-participants have the opportunity for input into data definitions and reporting requirements.

Applicants may experience variation in application processes depending on whether they apply to participating or non-participating programs or both, maintaining potential for navigation complexity. Those who apply through the CAS may be presented with standardized program quality data, but ensuring that applicants to non-participating institutions have access to the same type of data would require development of a separate solution.

Stakeholder engagement occurs through advisory processes that inform TXHES regarding emerging needs and areas where additional alignment may be desirable. TXHES uses this input to guide evolution of statewide expectations over time.

3.3.3 Technical Characteristics

Option 3 requires TXHES to develop and operate a centralized application platform while also establishing a data warehouse capable of aggregating information from institutions that do not use the CAS. TXHES is responsible for hosting, security architecture, authentication, maintenance, and lifecycle management for both environments.

Technical effort includes building applicant intake functionality, workflow management tools, communications features, and reporting capabilities within the CAS, while separately designing submission interfaces and validation processes for external data contributors.

Because multiple pathways exist for how information enters the statewide environment, technical governance focuses on interoperability, data consistency, and reconciliation of reporting across systems.

3.3.4 Operational Characteristics

From an operational perspective, Option 3 functions as a hybrid model. Participating institutions utilize a common intake and processing environment managed by TXHES, while non-participating institutions continue to operate independent admissions workflows. TXHES is responsible for coordinating statewide reporting cycles, managing CAS operations, and maintaining processes through which non-participants submit required information. Operational practices therefore differ depending on institutional participation choices.

Over time, alignment opportunities may emerge as institutions evaluate the relative efficiencies of participation, but variability in process execution is inherent in the structure of the model.

3.3.5 Financial Characteristics

Option 3 places financial responsibility for development and operation of the CAS and the statewide data warehouse with TXHES. Expenditures include system creation, infrastructure, staffing, maintenance, and support for participating institutions, as well as mechanisms to collect and validate data from non-participants.

Costs are influenced by the proportion of institutions choosing to join the CAS versus maintaining independent systems. Broader participation may shift resource needs, while limited participation increases the importance of sustaining dual pathways for data collection.

Financial governance under this model therefore includes budgeting for platform operation, monitoring utilization, and managing long-term sustainability across both centralized and distributed environments.

3.4 Option 4: Data Warehouse

Option 4 establishes a statewide data aggregation and reporting environment without implementing a centralized application service. Under this model, nursing programs would continue to use their existing application systems while providing standardized data to TXHES to support visibility into the nursing education pipeline and efforts to maximize capacity utilization. At system maturity, application processes remain institution-specific but all programs participate in reporting.

TXHES would establish participation expectations and define data standards, reporting formats, and submission timelines. Institutions would maintain control over admissions criteria, review processes, and final selection decisions and would be responsible for transmitting required information to TXHES. Applicants would continue to interact with individual institutional application environments rather than a unified statewide platform.

Table 3.4 Option 4 Overview

Dimension	Option 4: Data Warehouse
System ownership	Data warehouse and reporting infrastructure owned by the State of Texas. Institutional application systems remain locally owned or supported by a vendor of each institution's choice.
System operator	TXHES or its designated technology partner operates the data warehouse. Institutions operate their own application systems.
Role of TXHES	Establishes data reporting participation expectations, statewide data definitions, reporting standards, and oversight mechanisms.
Role of institutions	Establish admissions requirements, review applications, make selection decisions, and transmit required data to TXHES.
Applicant experience	Applicants use institution-specific application systems. Access to standardized program quality data would require development of an alternate solution.
Statewide standardization	Data definitions and reporting requirements are standardized. Application workflows vary by institution.

Dimension	Option 4: Data Warehouse
How program-level variation is handled	Institutions maintain their own processes. Variation exists across application environments.
Existing technology vs new build	Requires development of a statewide data warehouse, reporting interfaces, and submission mechanisms.
Data collection and reporting	Institutions submit required data to TXHES for aggregation and statewide reporting.

3.4.1 Governance Characteristics

Under Option 4, TXHES establishes statewide expectations for data reporting, transparency, and coordination without operating a centralized application platform. Institutions continue to manage their own application environments while submitting required information to a state-managed data warehouse.

TXHES defines data standards, reporting formats, submission timelines, and compliance expectations. Institutions retain authority over admissions standards, evaluation practices, application workflows, and final selection decisions.

Governance activity in this model focuses on ensuring that reporting requirements are met, maintaining data quality, and updating statewide definitions as policy priorities evolve.

3.4.2 Stakeholder Characteristics

Option 4 preserves institutional control over application operations. Programs continue to determine how applicants apply, what materials are required, and how review processes are structured.

Applicants experience no change to the existing application experience and continue to encounter differences in terminology, sequencing, deadlines, and presentation of requirements. Access to standardized program quality information would require development of a separate solution.

Stakeholder engagement occurs through advisory processes that inform TXHES regarding data definitions, reporting priorities, and opportunities to improve comparability and transparency across institutions.

3.4.3 Technical Characteristics

Option 4 requires TXHES to design, implement, and maintain a statewide data warehouse capable of receiving information from multiple institutional systems. The State establishes submission mechanisms, validation procedures, and tools necessary to aggregate and report data.

Because application processing remains local, technical effort is concentrated on integration, standardization of definitions, and ensuring consistent interpretation of reported information. Institutions may need to adapt local systems to meet submission requirements.

Technical governance therefore centers on interoperability, data integrity, and alignment between institutional practices and statewide reporting expectations.

3.4.4 Operational Characteristics

From an operational perspective, institutions continue to run their own admissions processes while TXHES coordinates data collection and publication activities. Operational interaction between the State and programs is primarily related to reporting compliance, clarification of definitions, and resolution of discrepancies.

TXHES establishes calendars, submission cycles, and review procedures for validating statewide information. Institutions maintain responsibility for day-to-day applicant engagement and admissions management.

Operational variation across programs remains a feature of the model.

3.4.5 Financial Characteristics

Option 4 requires TXHES to fund development and operation of the data warehouse, reporting tools, and associated oversight functions. Expenditures relate to infrastructure, staffing, system maintenance, and support for institutional data submission.

Because application platforms remain local, institutions continue to bear costs associated with their existing systems in addition to any effort required to meet state reporting requirements.

Financial governance under this model focuses on sustaining the reporting environment, monitoring compliance, and evaluating how resources align with statewide transparency objectives.

4 Feasibility Framework

For this study, an analytic framework was developed to evaluate the feasibility of four options for meeting the directive and goals of HB 2851 and Task Force Recommendation 8. The framework organizes feasibility into five domains, each representing a distinct condition that must be satisfied for an option to succeed in practice.

The domains reflect the major areas of analysis identified by the Governor's Healthcare Workforce Task Force and reinforced by the statutory charge. They include:

- **Governance:** Statutory authority, decision rights, oversight, and data stewardship.
- **Stakeholder:** Benefits, challenges, and adoption considerations for institutions and applicants.
- **Technical:** System compatibility, architecture, scalability, and change implications.
- **Operational:** Workflow alignment, staffing and training requirements, and administrative burden.
- **Financial:** Implementation and operating costs, affordability, and long-term sustainability.

Within each domain, specific criteria were developed to test whether an option can be implemented in alignment with HB 2851 objectives. Criteria draw on interviews, document review, and materials provided by TXHES, as well as engagement with the Nursing Advisory Committee, nursing programs across institution types, and student stakeholders.

Draft criteria were presented to the Advisory Committee on January 20, 2026. Participants provided implementation-focused input during the meeting, and no written comments specific to the criteria were submitted afterward. To further ensure alignment with legislative intent, the framework was also reviewed with individuals involved in the Task Force recommendations and the passage of HB 2851, including staff for bill sponsors and the Governor's Office. Feedback from that review resulted in refinement of existing criteria and the addition of several new ones.

The sections that follow describe the methodology used to conduct the feasibility analysis and each domain and its associated criteria used to evaluate feasibility of the identified options.

4.1 Rating and Scoring Approach

Each option was assessed against every criterion using a common three-level qualitative scale: High, Medium, or Low feasibility.

- A rating of **High** indicates that implementation would be achievable within existing authority and operating conditions with manageable risk.
- **Medium** indicates that implementation is possible but would require mitigation, additional coordination, or policy clarification.
- **Low** indicates significant barriers, uncertainty, or dependency on changes that could materially affect practicality or timing.

To support consistent comparison, ratings were assigned point values (High = 3, Medium = 2, Low = 1). Points were totaled within each domain to identify relative performance of the options for that area of feasibility. Results were then compared across domains to identify overall patterns, tradeoffs, and comparative strengths. Numeric scoring was used as a tool to promote transparency and comparability. Because the purpose of this feasibility study is to inform decision-making, not to predict outcomes with precision, differences in totals were interpreted in context, and the final analysis considered not only which option scored highest, but also where risks clustered and whether those risks were manageable through implementation planning.

This analysis did not apply differential weighting across criteria or domains. While some stakeholders may reasonably view certain factors as more important than others, determining relative priority among policy objectives, institutional impacts, financial considerations, and operational risks is inherently a matter for state leadership rather than the study team. Presenting results on an unweighted basis provides a transparent starting point while preserving flexibility for TXHES or other decision makers to apply alternative weighting assumptions if desired. Because all underlying ratings are provided, such adjustments can be made without re-performing the analysis.

4.2 Governance Domain

The governance domain evaluates whether an option can be authorized, overseen, and sustained within existing legal and institutional frameworks while addressing stakeholder expectations regarding data stewardship, transparency, and representation. Feasibility in this domain depends on the ability to

establish governance arrangements that are legally sound, operationally durable, and credible across Texas's diverse nursing education environment.

4.2.1 Context

HB 2851 directs TXHES to include nursing programs in a centralized application service but does not alter institutional authority over admissions decisions or student eligibility determinations. Texas nursing programs operate within multiple governance environments, including statute and regulation, accreditation standards, and institutional policies. Any statewide approach must function within these boundaries.

For example, provisions of the Texas Education Code and rules administered by the Texas Board of Nursing assign responsibility for admissions criteria, background checks, and program compliance to individual institutions. Accreditation bodies such as CCNE and ACEN similarly require programs to retain authority over admissions policies, student evaluation processes, and program outcomes. Institutions are further governed by system and local policies that define responsibility for contracting, data stewardship, and technology operations.

Taken together, these requirements mean a feasible solution must preserve institutional control of admissions decisions as well as compliance with accreditation and regulatory expectations. It must also clearly define the roles of TXHES, institutions, and vendors. Governance feasibility therefore depends on whether an option can operate within existing authority structures rather than requiring statutory or accreditation change.

4.2.2 Stakeholder Perspectives on Governance

Input gathered through Advisory Committee engagement, roundtables, surveys, and institutional discussions highlighted several themes that shaped development of the governance criteria.

Stakeholders consistently asked for clarity regarding who controls applicant data, who may access it, and how it may be used. Transparency in decision-making and oversight was viewed as essential, particularly in an environment where institutions may compete for applicants. They emphasized that governance must extend beyond policy leadership to include operational voices such as admissions and registrar staff whose daily work is directly affected by system decisions. Representation across institution types and regions was also seen as critical to building trust and ensuring that policies reflect the breadth of Texas nursing education. Finally, stakeholders underscored the importance of governance structures capable of supporting pilots, phasing adoption, and resolving issues before broader expansion.

4.2.3 Governance Feasibility Criteria

Based on statutory, accreditation, institutional, and stakeholder considerations, the following criteria were developed to assess whether governance arrangements meeting these expectations can realistically be established for each option. The table below presents the criteria and the rationale for their inclusion.

Table 4.2.3. Governance Feasibility Criteria and Rationale

G.1 TXHES has clear and sufficient authority under existing statutes and regulations to implement and govern the option without requiring legislative or regulatory changes A centralized system must be executable within TXHES's current statutory and regulatory authority. If additional legislative or rulemaking action is required, timelines extend, uncertainty increases, and implementation risk rises significantly. This criterion therefore tests whether TXHES can establish participation expectations, define policies, and exercise oversight using existing powers, allowing the state to move from feasibility to action without dependency on future legal changes.
G.2 Participating institutions can implement and participate in governance of the option within existing legal, accreditation, and institutional governance constraints Institutions operate within layered approval environments that include state regulations, accreditation standards, system policies, procurement rules, and internal governance procedures. An option that requires institutions to bypass or substantially modify these structures would face delay or resistance regardless of technical capability. This criterion ensures the model is compatible with how institutions are authorized to adopt external systems and participate in shared decision-making.
G.3 Clear, enforceable data ownership, access, privacy, and confidentiality frameworks can be established that meet legal, institutional, and stakeholder expectations Because a CAS aggregates sensitive applicant and institutional data, clarity regarding who owns information, who may access it, and how it may be used is foundational to trust and participation. Without enforceable frameworks aligned with legal requirements and campus expectations, institutions may hesitate to contribute data or rely on system outputs. This criterion therefore evaluates whether governance structures can sustain lawful, consistent, and transparent stewardship.
G.4 The option can be governed through a shared or advisory model that is viable across institution types, systems, and regions Texas nursing education includes community colleges, universities, private institutions, and varied regional contexts. Governance must therefore be credible across this diversity. If a structure appears dominated by one segment or fails to recognize differences in scale and mission, participation legitimacy erodes. This criterion assesses whether representative input can be organized in a way that supports statewide consistency while maintaining institutional confidence.
G.5 Governance structures can meaningfully incorporate operational expertise (e.g., admissions and registrar perspectives) in decision-making Policy decisions in a CAS environment impact day-to-day workload for admissions, advising, and records staff. Governance that excludes operational expertise risks adopting changes that appear sound at a policy level but prove impractical in execution. This criterion ensures mechanisms exist to bring real-world implementation knowledge into deliberations before decisions are finalized.
G.6 Governance processes can clearly define decision rights, change control mechanisms, and dispute resolution approaches to manage system evolution and conflicting institutional priorities Over time, institutions will request modifications reflecting local priorities or emerging needs. Without predefined authority boundaries and escalation pathways, disagreements can stall progress or produce inconsistent outcomes. This criterion evaluates whether the option provides durable structures that allow change while preventing fragmentation of the statewide system.
G.7 Governance processes can support transparent decision-making, accountability, and clear communication regarding system selection configuration, data use, and future enhancements Stakeholders are more likely to accept decisions when processes are visible and rationale is communicated. Transparency strengthens legitimacy, reduces misinformation, and supports sustained participation. This criterion therefore focuses on whether governance arrangements can provide predictable communication and traceable accountability as the system matures.

4.2.4 Application of Governance Criteria to Options

Ratings reflect the degree to which each option can meet governance requirements within existing legal and institutional constraints. Options that maintain institutional authority while enabling coordinated

statewide oversight generally present lower governance risk. Options that centralize control over admissions logic or data use raise more complex questions related to statutory interpretation, accreditation compatibility, and institutional trust. Ratings also consider the effort required to establish oversight structures, agreements, and change management processes across a large and varied institutional landscape. Approaches requiring extensive new arrangements or unclear lines of authority introduce higher feasibility risk.

4.3 Stakeholder Domain

The stakeholder domain evaluates whether each option is acceptable, credible, and workable for the institutions, staff, and applicants who would be required to use it. Feasibility in this domain depends on whether participation is realistic given institutional practices, workforce capacity, and applicant needs.

4.3.1 Context

The success of a centralized application approach depends on sustained institutional participation and applicant use. The Governor's Task Force emphasized that reforms intended to improve workforce data and program capacity must be grounded in operational reality and equitable access for applicants. Feedback gathered through Advisory Committee discussions, roundtables, and surveys revealed wide variation in readiness, experience with external systems, staffing capacity, and perceptions of risk.

Without confidence among users, even otherwise viable models may experience uneven uptake, fragmented participation, or erosion of trust. Stakeholder feasibility therefore examines whether proposed approaches can be implemented in ways that institutions and applicants view as practical and beneficial. Stakeholder input informing this domain was drawn from:

- Three advisory committee meetings
- Six roundtables with nursing programs, including deans and admissions personnel
- A survey of students who applied to Texas nursing programs
- Discussions with individuals involved in the Governor's Task Force and development of HB 2851

These sources provided insight into operational pressures, adoption barriers, and expectations regarding value, autonomy, affordability, and applicant experience.

4.3.2 Stakeholder Feasibility Criteria

The criteria in this domain are derived directly from themes raised through structured engagement with institutions and students. They translate expressed concerns into specific tests of whether implementation is likely to succeed in practice. The table below presents the criteria and the rationale for their inclusion.

Table 4.3.2. Stakeholder Feasibility Criteria and Rationale

S.1 Delivers clear value to community colleges, universities, private institutions, and programs with varying demand

Stakeholders across institution types consistently indicated that adoption would depend on whether participation produces tangible operational or applicant-facing benefit relative to the effort required to change existing processes. A statewide CAS will only succeed if diverse programs see tangible benefit that justifies adoption effort and change. This criterion is essential to avoid fragmented participation, where only certain institution types opt in, because partial uptake undermines statewide visibility and limits the system's ability to improve applicant outcomes and seat utilization.
S.2 Preserves institutional autonomy over admissions criteria and decision-making Stakeholders consistently emphasized that institutions must retain authority over admissions standards, selection decisions, and program-specific requirements. This criterion protects against the core adoption risk that a centralized system is perceived as imposing "one-size-fits-all" decision logic, which would trigger resistance from institutions and raise concerns about compliance with Board of Nursing regulations and accreditation requirements.
S.3 Delivers transparency to applicants on seat availability, costs (total cost of attendance, not just tuition), graduation and NCLEX pass rates A central purpose of TexNCAS is to reduce information barriers that prevent applicants from making informed, timely choices, especially when programs vary widely in cost, outcomes, and capacity. This criterion aligns stakeholder and policy priorities around improving applicant decision-making and helping the state better understand and respond to unmet demand, while also supporting public trust through clearer, comparable program information.
S.4 Minimizes process burden on applicants through redundant data entry, navigation of multiple portals, or complex workflows. A CAS that reduces institutional burden but increases applicant burden will not achieve consistent applicant participation or equitable access. This criterion responds directly to common applicant pain points (manual re-entry of information, repeated uploads, confusion created by multi-system or duplicative steps).
S.5 Minimizes application fees and related costs to applicants Stakeholder feedback repeatedly identifies cost (broadly defined, including application and re-application fees across systems) as a dominant factor influencing application and enrollment decisions. This criterion ensures the system does not create new affordability barriers that undercut HB 2851 access objectives, particularly for community college students and other financially constrained applicants.
S.6 Maintains access to individualized navigation and advising support Centralization should not replace the hands-on guidance many applicants rely on to navigate prerequisites, timelines, and school-specific requirements. This criterion reflects stakeholder concern that applicants (especially first-generation and non-traditional students) need accessible, human support structures to prevent confusion, incomplete applications, and attrition from the pipeline.
S.7 Engages stakeholders in all implementation and operational phases through small groups, pilots, ongoing feedback loops Because stakeholder feasibility is grounded in lived operational experience, sustained engagement is necessary to surface real-world barriers early and to maintain trust as the system evolves. This criterion protects against prior statewide implementation failures cited by stakeholders by requiring structured opportunities for programs and applicants to shape configuration, support models, and improvements over time.

4.3.3 Application of Stakeholder Criteria to Options

Ratings indicate the degree to which each option aligns with expressed stakeholder expectations and minimizes barriers to participation.

- A **High** rating reflects strong alignment with institutional and applicant needs, limited additional burden, and clear perceived benefit.
  A **Medium** rating reflects tradeoffs or concerns that would require mitigation.
  A **Low** rating reflects substantial resistance, elevated burden, or risks to adoption and trust.

Assessment relies primarily on thematic evidence from engagement activities, supplemented where appropriate by technical findings regarding system configuration and integration. The objective is to determine whether each option is likely to function effectively in real operating environments across Texas.

4.4 Technical Domain

The technical domain evaluates whether each option's architecture, integrations, data design, and security posture can reliably support statewide application and reporting functions across the diverse systems used by Texas nursing programs.

Feasibility in this domain turns on practical implementability within existing resource, time, and compliance constraints. Technical feasibility focuses on whether a solution can:

- Integrate with heterogeneous institutional environments
- Maintain data integrity and privacy
- Scale to statewide demand
- Support required analytics
- Adapt to variation without excessive custom development

This analysis relies on system documentation, known integration patterns, security requirements, and implementation experience, with stakeholder feedback informing where design choices may create operational friction.

4.4.1 Context

A Fragmented Systems Environment. Texas nursing programs operate across universities, health-related institutions, community colleges, and private institutions that rely on many different application and student information platforms. Some use third-party intake systems; others maintain institution-specific tools or combinations of platforms for recruiting, supplemental materials, and matriculation. Any feasible statewide approach must therefore either integrate across this landscape or provide a migration path institutions can execute without major disruption.

From Applications to Applicants. HB 2851 emphasizes improved visibility into the nursing education pipeline. Today, most systems count applications rather than unique individuals applying. A single applicant submitting materials to multiple programs is recorded multiple times. Producing accurate statewide counts requires a consistent data model and an identity resolution strategy capable of linking applicants across institutions and, depending on the option, across systems. Because the data involved is sensitive and intersects with admissions processes, the technical design must also align with governance requirements for stewardship and access.

Seat Visibility as a Dynamic Data Problem. Programs know their own capacity but that information is not visible statewide in a manner that helps qualified applicants find alternatives. Addressing this requires timely synchronization of seat data and mechanisms for surfacing opportunities while

protecting sensitive information. Because seat availability changes as offers are made and declined, any approach must handle frequent updates while preserving reliability.

UTHealth Transition Considerations. The movement of core TXHES IT functions to UTHealth Houston introduces additional architectural and security factors. Hosting preferences, integration standards, cybersecurity expectations, and resourcing models may influence timelines and sequencing. Accordingly, UTHealth perspectives, coordinated with TXHES IT, inform assessments of complexity, risk, and practicality.

4.4.2 Stakeholder Perspectives on Technical Feasibility

Engagement surfaced several recurring themes that are reflected in this domain.

Data Verification and Transparency. Institutions reported cases where centralized services marked items complete while program requirements were not actually satisfied. Technical feasibility therefore includes whether systems support clear status communication, prerequisite logic, and review workflows.

Configuration Flexibility. Participants expressed concern about rigid platforms that require programs to adapt processes to the system. Options vary in how much control TXHES and institutions have over fields, instructions, and workflow design.

Integration as a Baseline Expectation. Manual uploads and disconnected tools create workload and error risk. The analysis therefore distinguishes between integrations necessary for launch and those that can be phased.

4.4.3 Technical Feasibility Criteria

The table below lists the criteria used to assess whether each option can meet these requirements in practice.

Table 4.4.3. Technical Feasibility Criteria and Rationale

T.1 Ability to identify unique applicants and capture capacity-constrained denials Texas currently lacks a reliable method to count unique applicants statewide because existing systems track applications rather than individuals. A unique identifier approach enables identity resolution across institutions and systems, supporting both accurate workforce pipeline analytics and longitudinal tracking of applicants through their nursing education journey. This criterion also addresses the nursing seats supply problem described in stakeholder and policy discussions: qualified applicants may be denied admission not because they fail to meet a program's criteria, but because the program has already extended offers for all available seats. Capturing this distinction is essential for understanding unmet demand and enabling applicants to be redirected to programs with available capacity.
T.2 Ability to identify applicants via unique identifiers that can also be transmitted to nursing programs to follow the applicant through matriculation, and follow-on education history A statewide CAS must do more than assign a unique identifier for application intake; it must generate an identifier that can be carried forward into program and state data environments so that applicant outcomes can be tracked beyond the point of application. This criterion is essential for translating HB 2851's "unique applicant" objective into longitudinal pipeline visibility, linking an individual's CAS activity to matriculation, progression, and subsequent education history in ways that support workforce planning and program-level analysis without relying on manual matching. In addition, transmittable identifiers support governance-aligned

data stewardship by enabling authorized users to exchange and reconcile records across systems while maintaining consistent identity resolution across institutions and time.
T.3 Ability to capture, update, and synchronize open seat status across institutions in a timely and reliable manner The seat availability challenge highlights that seat status is a point-in-time measure that changes as programs extend and rescind offers. Without near-real-time synchronization, applicants and stakeholders cannot reliably identify where capacity exists, undermining efforts to match qualified applicants to available seats across the state.
T.4 Ability to support analytics related to applicant numbers, duplication rates (ratio of applications to applicants), systemwide capacity, and related metrics that the State, nursing programs, and TXHES need. HB 2851 and the Governor's Task Force emphasize improved visibility into the nursing pipeline for workforce planning purposes. This criterion ensures that any option can produce the metrics stakeholders need, including the ability to distinguish between application counts and unique applicant counts, to inform policy decisions and resource allocation.
T.5 Supports ability of State, nursing programs, and TXHES to access aggregated national data for benchmarking local applicant and application trends for comparative measures (e.g., demographics, applicant profiles, age mix, gender mix) Effective workforce planning requires not only internal Texas data but also the ability to compare local trends against national benchmarks. This criterion assesses whether an option provides access to aggregated data that enables stakeholders to contextualize Texas-specific patterns within broader national trends.
T.6 Enables bi-directional data exchange with institutions' application platforms and related systems Stakeholder feedback highlighted integration and interoperability challenges as a significant pain point, with non-integrated processes creating inefficiencies and manual workarounds. This criterion reflects the baseline requirement that any feasible option must exchange data with the diverse institutional systems (CRMs, interview platforms, testing systems, and student information systems) that Texas nursing programs already use.
T.7 Provides role-based access to functions, data, and reporting (applicant, nursing program, evaluator, etc.) A governance-aligned technical design must ensure that different users (applicants, program staff, evaluators, and state stakeholders) access only the functions and data appropriate to their roles.
T.8 Supports efficient operations and application volumes via scalable architecture Texas's nursing school landscape spans universities, health-related institutions, community colleges, and private institutions, generating substantial application volume. This criterion ensures that any option can handle current and projected demand without performance degradation or operational bottlenecks.
T.9 Ability to support configurable workflows, data fields, and rules without requiring institution-specific custom development Stakeholders expressed concerns about rigidity in centralized platforms, including the inability to tailor application sections or align system configuration with program-specific practices. This criterion assesses whether an option can adapt to the diversity of Texas nursing programs without forcing institutions into costly parallel workflows or requiring extensive custom development.
T.10 Has auditable change management capabilities Auditable change management ensures accountability and supports compliance for any enterprise IT standards, especially with a centralized application service that will eventually support hundreds of Nursing Programs, tens of thousands of applicants, TXHES, the State, and other stakeholders. With such a broad and large user base, changes will be frequent and will need to be carefully yet efficiently managed to ensure data accuracy and reporting integrity.
T.11 Can be implemented within realistic timeframes using identified available resources and technologies This criterion assesses whether an option can be deployed within practical constraints, accounting for available staff, technology, development effort, and the time required to develop, configure, and deliver a solution that meets HB 2851 and Task Force Recommendation 8 requirements, as well as nursing program and applicant needs.
T.12 Maximizes TXHES control over system architecture, data models, and future enhancements

Stakeholder concerns about customization flexibility as well as the changing IT governance landscape highlight the importance of long-term control. This criterion evaluates the degree to which an option positions TXHES—rather than a third-party vendor—to shape system evolution, modify data structures, and respond to emerging policy or operational needs.
T.13 Ability to incorporate varied admissions criteria, prerequisites, and verification requirements Stakeholders noted that verification within a centralized service does not always indicate that program-specific eligibility criteria are met. This criterion assesses how an option can accommodate the diverse admissions standards, prerequisite structures, and verification workflows that vary across Texas nursing programs.
T.14 Ability to meet all applicable federal and state data privacy, security, and compliance requirements. This criterion assesses whether an option can satisfy all relevant privacy, security, and regulatory requirements as a condition of implementation, including protection of personally identifiable information per the Family Educational Rights and Privacy Act (FERPA).

4.4.4 Application of Technical Criteria to Identified Options

Each option is rated using a High–Medium–Low rubric.

- **High** indicates that core requirements can be met through proven approaches with manageable risk and a credible path to statewide use.
- **Medium** indicates that the solution is viable but requires mitigation, sequencing, or additional coordination.
- **Low** indicates significant barriers or uncertainties that threaten practicality or sustainability.

Ratings are applied in the context of phased implementation, recognizing that some capabilities may mature over time while early launches must still meet baseline requirements.

4.5 Operational Domain

The operational domain evaluates whether each option can be incorporated into the day-to-day admissions and enrollment workflows of Texas nursing programs in a way that is sustainable, coordinated, and aligned with institutional practice. Feasibility in this domain depends on whether institutions, TXHES, and partners can implement and manage required processes while minimizing disruption to admissions cycles and applicant support.

Even well-designed systems can fail if they cannot function within real operating constraints. Operational feasibility examines whether a solution can:

- Align with existing admissions calendars
- Support institutional staffing realities
- Accommodate program variation
- Be introduced in manageable phases
- Reduce rather than increase administrative complexity.

4.5.1 Context

Institutional Diversity and Established Processes. Texas nursing programs span universities, health-related institutions, community colleges, and private schools, each operating distinct admissions timelines, prerequisite structures, and review practices. Many institutions have refined workflows over years and coordinate across admissions, registrar, and academic units using combinations of centralized and local tools. A feasible approach must therefore work with these structures rather than require wholesale redesign.

Translating Policy Goals into Executable Processes. HB 2851 calls for improved statewide visibility into applicants and enrollment outcomes but does not prescribe how institutions must organize their operations to achieve this. Operational feasibility therefore focuses on whether options can deliver policy objectives through processes institutions can realistically adopt.

Timing and Sequencing Matter. Institutions plan application cycles well in advance. Abrupt changes risk confusion for applicants and staff, particularly where committees, prerequisite reviews, and system integrations are involved. Feasible options must allow sufficient preparation time and support phased participation.

4.5.2 Stakeholder Perspectives on Operational Feasibility

Engagement consistently surfaced three themes that are critical to this domain.

Balancing Efficiency with Flexibility. Participants recognized potential for centralized services to reduce manual work such as document handling and routine communications. At the same time, they cautioned against models that force uniform workflows misaligned with program needs.

Dual-system Burden. Many expressed concern that institutions might need to maintain both a CAS and separate internal tools for prerequisites or supplemental materials, increasing workload and applicant confusion.

Preserving Personalized Guidance. Stakeholders emphasized that applicants (particularly first-generation and non-traditional students) often rely on direct assistance from institutional staff. Operational models must therefore support centralized processing without displacing local advising responsibilities.

4.5.3 Operational Feasibility Criteria

The criteria below translate these operational considerations into specific tests of feasibility.

Table 4.5.3. Operational Feasibility Criteria and Rationale

O.1 Ability to operate across varied admissions models, timelines, and program pathways (BSN, ABSN, RN-to-BSN, and graduate level programs) while minimizing impact on institutional cycles Texas nursing programs vary in application cycles, prerequisites, and program pathways across universities, community colleges, health-related institutions, and private institutions. This criterion assesses whether an option can accommodate this diversity without forcing programs to restructure their admissions calendars or abandon established operational models.

O.2 Ability to support program-specific admissions requirements and workflows with minimal need for workarounds Stakeholders expressed concern that centralized systems may reduce institutional flexibility and force programs to adopt workflows that do not reflect their specific admissions models. This criterion evaluates whether an option allows programs to maintain their tailored approaches to applicant review, transcript processing, and committee decision-making without resorting to informal workarounds that undermine efficiency gains.
O.3 Delivers a common applicant-facing process that also accommodates individual program variation and branding The operational domain must balance the need for statewide standardization essential for workforce pipeline visibility, with the preservation of program-level variation that institutions have developed to serve their applicant. This criterion assesses whether an option can present a coherent experience to applicants while still allowing programs to reflect their distinct identity and requirements.
O.4 Minimizes workflow complexity and the need for manual workload for admissions staff, registrars, and committees Stakeholders emphasized the potential for a centralized service to reduce administrative burden by shifting manual tasks such as document collection, applicant tracking, and routine communications. This criterion helps ensure that any option can deliver on this promise of operational efficiency rather than introducing new sources of complexity that increase staff workload.
O.5 Offers support for training, onboarding, and user assistance Strong stakeholder support does not guarantee operational success if training and support resources are insufficient. This criterion assesses whether an option includes adequate mechanisms to prepare institutional staff for effective system use and to provide ongoing assistance as workflows evolve.
O.6 Can be implemented within a reasonable timeframe and in phases based on institutional readiness and program type Stakeholders repeatedly noted that application portals and review processes are often planned years in advance, and that abrupt changes can create confusion for applicants and staff alike. This criterion evaluates whether an option allows sufficient time for planning, training, and internal coordination, and whether it can be phased to align with admissions cycles and varying levels of institutional readiness.
O.7 Minimizes complexity in workflows requiring supplemental student application systems or parallel systems Stakeholders raised concerns that a uniform CAS could require programs to maintain both a centralized platform and a separate institutional system for supplemental materials or prerequisite evaluation. This criterion assesses whether an option can reduce or eliminate the need for parallel systems that duplicate staff work and create confusion for applicants.
O.8 Minimizes the effort required to reconcile CAS-verified data with institutional prerequisite, eligibility, and admissions requirements Programs have developed tailored workflows to evaluate whether applicants meet institution-specific prerequisites and eligibility criteria, and centralized verification does not always address these requirements. This criterion evaluates whether an option streamlines the process of aligning externally verified data with each program's admissions standards, reducing the manual effort required to confirm applicant qualifications.

4.5.4 Application of Operational Criteria to Options

Each option is rated using a High–Medium–Low rubric:

- **High** indicates strong alignment with existing workflows and manageable implementation demands.
- **Medium** indicates viability with mitigation, added coordination, or phased adjustment.
- **Low** indicates substantial disruption, sustained parallel processes, or elevated risk to institutions and applicants.

Ratings assume phased implementation and consider both immediate launch practicality and longer-term sustainability.

4.6 Financial Domain

The financial domain evaluates whether each option can be implemented and sustained as a fiscally responsible approach that supports HB 2851 objectives and long-term nursing workforce needs. Feasibility in this domain depends on affordability, predictability, equitable distribution of costs, and alignment between expenditures and anticipated statewide benefit.

Financial feasibility examines whether a solution can operate within realistic funding expectations for TXHES, institutions, and applicants. The analysis considers initial development and launch costs, ongoing operating expenses, scalability, and how financial responsibility is allocated among participants. The objective is not to identify the lowest-cost option in isolation, but to determine whether investment requirements are sustainable and justified by policy value.

4.6.1 Context

Legislative and Policy Environment. HB 2851 directs TXHES to evaluate and plan for inclusion of nursing programs within a centralized application service but does not specify a financing structure. Any recommended approach must therefore function within existing budget realities while supporting statewide goals related to transparency, access, and workforce planning.

Institutional Capacity Varies. Texas nursing programs operate under very different financial conditions. Community colleges, universities, health-related institutions, and private programs vary widely in their ability to absorb new fees, staffing demands, and system costs. A financially feasible option must be adoptable across this spectrum without disproportionately burdening institutions with fewer resources.

The IT Environment Affects Cost. Planned transition of TXHES technology functions to UTHealth Houston introduces additional considerations related to hosting, security, and long-term support. These factors influence both startup and recurring expenditures and must be incorporated into feasibility judgments.

4.6.2 Stakeholder Perspectives on Financial Feasibility

Engagement consistently identified cost as a central factor in adoption decisions.

Applicant Affordability. Participants emphasized that application and re-application fees accumulate quickly, particularly for first-generation, Pell-eligible, or geographically constrained students. Stakeholders cautioned that layered fees across systems could discourage otherwise qualified applicants.

Institutional Return on Investment. Programs with established admissions platforms questioned whether gains in statewide visibility outweigh their expense of migration, training, and participation. Concerns extended beyond direct charges to include staff time required to reconcile discrepancies or support applicants navigating multiple processes.

Exposure to Uncertainty. Stakeholders expressed apprehension about pricing models that could escalate over time or limit flexibility.

4.6.3 Financial Feasibility Criteria

The criteria below translate these considerations into specific tests of fiscal practicality.

Table 4.6.3. Financial Feasibility Criteria and Rationale

F.1 Maximizes affordability of initial development, integration, and launch costs Institutions differ significantly in their ability to absorb new technology costs. This criterion assesses whether an option's initial costs are realistic given available resources and the varied financial capacity of participating institutions
F.2 Minimizes extent to which costs change as the system scales (ie, from pilot to all BSN programs to broader program inclusion) The operational domain emphasizes the importance of phased implementation aligned with institutional readiness, but scaling a solution introduces financial uncertainty if costs increase unpredictably with each phase. This criterion evaluates whether an option's cost structure remains stable and manageable as participation expands from pilot programs to statewide adoption across program types.
F.3 Has predictable, sustainable cost structure for ongoing operating, maintenance, support, and enhancements Financial feasibility requires costs to be predictable over time with clearly defined funding responsibilities. This criterion assesses whether an option offers a transparent and sustainable financial model for long-term operations, rather than introducing uncertainty that could undermine fiscal planning or stakeholder confidence.
F.4 Minimizes the impact of fees and related costs on applicants Stakeholders indicated that financial barriers can affect student application decisions and reduce the number of applications. They also emphasized that financial barriers disproportionately affect first-generation students, Pell-eligible students, and those with geographic or family constraints, and that fees layered across multiple systems could compound inequities and discourage qualified candidates from applying. This criterion ensures that applicant-facing costs are evaluated not just in aggregate but in terms of their impact on the most financially vulnerable populations.
F.5 Extent to which costs are equitably distributed and aligned with ability to pay and commensurate with anticipated benefits (e.g., small vs. large institutions) Public universities, health-related institutions, community colleges, and private institutions operate under different financial models and resource constraints. This criterion assesses whether an option distributes costs fairly across institutions of varying size and capacity, ensuring that smaller or less-resourced programs are not disproportionately burdened relative to the benefits they receive.
F.6 Minimizes direct financial costs to institutions and nursing programs, including system fees, subscription charges, per-application costs, and implementation expenses, particularly for small programs and financially-constrained institutions. Stakeholders expressed concern about the financial burden of centralized services, including application fees, subscription charges, and implementation expenses, particularly for programs with limited budgets. This criterion evaluates whether an option keeps direct institutional costs at a level that does not create barriers to participation or force programs to choose between data visibility and financial sustainability.

F.7 Minimizes net change in institutional administrative costs, accounting for both efficiencies and new workload Stakeholders raised concerns about indirect costs such as additional staff time needed to reconcile data, address applicant confusion, and manage incomplete applications. This criterion recognizes that financial feasibility must account for the net effect on institutional budgets, including both the efficiency gains promised by centralization and the new workload it may introduce.
F.8 Minimizes exposure to pricing escalation, transaction-based fees, and long-term vendor lock-in Stakeholder feedback highlighted concerns about unpredictable costs associated with third-party vendors. This criterion assesses whether an option exposes TXHES and participating institutions to financial risks such as fee increases, per-transaction pricing models, or contractual arrangements that limit future flexibility.
F.9 Extent to which the cost structure reasonably supports HB 2851 goals (e.g., identifying unmet demand, improving seat utilization) House Bill 2851 directs TXHES to improve statewide visibility into the nursing workforce pipeline, but the statute does not appropriate specific funding or prescribe a financing model. This criterion evaluates whether an option's cost structure is justified by its ability to deliver the policy outcomes HB 2851 seeks—ensuring that expenditures are aligned with the goal of improving data quality, identifying unmet demand, and maximizing seat utilization across Texas nursing programs.

4.6.4 Application of Financial Criteria to Options

Each option is rated using a High–Medium–Low rubric.

- **High** indicates that costs are predictable, manageable, and reasonably aligned with expected benefits.
- **Medium** indicates viability with identifiable risks requiring mitigation or policy action.
- **Low** indicates unstable or disproportionate costs that threaten adoption or long-term sustainability.

Ratings are considered within a phased implementation pathway, recognizing that early investments must remain supportable as participation expands.

5 Domain-Level Findings

This section summarizes feasibility findings within each analytic domain: governance, stakeholder, technical, operational, and financial. Each summary provides a table showing domain scores and criteria for each option, followed by a brief discussion of how the options perform relative to one another and where key strengths and limitations appear. Together, they highlight the relative advantages, tradeoffs, and risk considerations that informed the overall evaluation.

Colors in the feasibility results tables should be interpreted as follows:

- **Domain Scores**: The highest score is indicated in dark green, the second highest score in light green, the next highest in orange, and the lowest in red
- **Criteria Rankings**. High feasibility is depicted in green, medium feasibility in orange, and low feasibility in red.

Full feasibility findings, including justifications for each criteria rating, are presented in *Appendix A. Detailed Feasibility Ratings by Domain*.

5.1 Governance Feasibility Results

Option 2 received the highest governance score because authority, ownership, and accountability reside entirely within TXHES. The model allows the agency to establish decision rights, transparency practices, participation expectations, and change control processes without reliance on an external entity. This structure provides maximum clarity regarding who governs the system and how determinations are made.

Table 5.1. Governance Feasibility Results

Option	1 TexNCAS	2 TXHES CAS	3 Hybrid	4 Data
Domain Score	**19**	**21**	**11**	**14**
Criteria Ratings				
G.1 TXHES has clear and sufficient authority under existing statutes and regulations to implement and govern the option without requiring legislative or regulatory changes.				
G.2 Participating institutions can implement and participate in governance of the option within existing legal, accreditation, and institutional governance constraints.				
G.3 Clear, enforceable data ownership, access, privacy, and confidentiality frameworks can be established that meet legal, institutional, and stakeholder expectations.				
G.4 The option can be governed through a shared or advisory model that is viable across institution types, systems, and regions.				
G.5 Governance structures can meaningfully incorporate operational expertise (e.g., admissions and registrar perspectives) in decision-making.				
G.6 Governance processes can clearly define decision rights, change control mechanisms, and dispute resolution approaches to manage system evolution and conflicting institutional priorities.				
G.7 Governance processes can support transparent decision-making, accountability, and clear communication regarding system selection configuration, data use, and future enhancements.				

5.1.1 Strengths and Tradeoffs Across Options

Option 1 (Vendor-supported TexNCAS). Option 1 rates almost as highly as Option 2 but certain system changes must move through a vendor-managed development environment. Governance feasibility remains high but require contractual mechanisms to ensure TXHES retains clear authority over CAS participation, policy, and configuration decisions and to provide enforceable standards for vendor performance. Existing use of NursingCAS within Texas demonstrates that centralized intake can operate alongside institutional autonomy when governance boundaries are explicit.

Option 2 (THXES-Built CAS). Option 2 concentrates governance authority within TXHES. Roles, policies, and dispute resolution mechanisms can be defined directly by the state, and institutions interact with a single accountable public entity. From a governance perspective, this creates straightforward lines of responsibility and minimizes ambiguity regarding control of data, rulemaking, and oversight.

Option 3 (Hybrid). Option 3 fragments the governance environment. Participating and non-participating institutions would operate under different rules, data structures, and incentives. TXHES could govern the CAS but not the broader admissions ecosystem, resulting in inconsistent policy, data practices, and oversight. Additionally, this model does not fully align with legislative and state policy objectives for streamlining the applicant experience and improving transparency.

Option 4 (Data Warehouse). Option 4 minimizes institutional disruption because it leaves admissions operations in place. Yet it provides limited alignment with the legislative emphasis on simplifying the applicant journey. Governance would focus on reporting standards rather than operational experience, which reduces both impact and engagement. TXHES oversight would focus primarily on reporting standards and data definitions rather than on shaping applicant experience or coordinated policy execution across programs.

5.1.2 Governance Domain Conclusion

All options are legally viable under TXHES authority.

- **Option 2** offers the most centralized governance posture.
- **Option 1** follows closely, with TXHES authority operating through a contractual partnership model.
- **Options 3 and 4** introduce increasing fragmentation in how governance can be applied statewide and do not completely align with legislative and state policy intent.

What differentiates Option 2 is the degree to which it enables TXHES to exercise direct control over rules, priorities, and accountability structures for the nursing school application ecosystem.

5.2 Stakeholder Feasibility Results

Options 1 and 2 received the highest and equivalent stakeholder feasibility scores. Both preserve institutional authority, improve transparency for applicants, and support effective engagement with stakeholders over time. Where they differ is not in overall acceptability, but in how stakeholders believe confidence would be established: Option 1 offers a model that institutions can already observe in operation while Option 2 offers opportunity for a CAS directed and managed fully within Texas public authority.

Table 5.5. Stakeholder Feasibility Results

Option	1 TexNCAS	2 TXHES CAS	3 Hybrid	4 Data
Domain Score	18	18	15	15
Criteria Ratings				

Option	1 TexNCAS	2 TXHES CAS	3 Hybrid	4 Data
S.1 Delivers clear value to community colleges, universities, private institutions, and programs with varying demand				
S.2 Preserves institutional autonomy over admissions criteria and decision-making				
S.3 Delivers transparency to applicants on seat availability, costs (total cost of attendance, not just tuition), graduation and NCLEX pass rates				
S.4 Minimizes process burden on applicants through redundant data entry, navigation of multiple portals, or complex workflows.				
S.5 Minimizes application fees and related costs to applicants.				
S.6 Maintains access to individualized navigation and advising support				
S.7 Engages stakeholders in all implementation and operational phases through small groups, pilots, ongoing feedback loops				

5.2.1 Strengths and Tradeoffs Across Options

Option 1 (Vendor-supported TexNCAS). Option 1 benefits from existing adoption within Texas, giving institutions tangible evidence that centralized intake can coexist with local admissions authority. Stakeholders recognize advantages in near-term expanded reach, standardized information for applicants, and opportunities to reduce repetitive clarification work. Concerns remain around applicant effort and cost, but many participants view these as design and policy questions rather than structural barriers. Because institutions would retain admissions decision-making and access to direct advising relationships, confidence in the model is relatively strong. Stakeholders also view this option as compatible with sustained advisory participation throughout implementation and operations.

Option 2 (TXHES-Built CAS). Option 2 generates interest because it places control within the state and could be tailored to Texas-specific needs from the outset. Stakeholders believe such a system could preserve autonomy, deliver transparency, and incorporate robust engagement opportunities. At the same time, the absence of operating history creates uncertainty. Institutions would be relying on a platform that has not yet demonstrated reliability, usability, or applicant acceptance. While many are willing to participate in development, they recognize that confidence would build over time rather than be present at launch.

Option 3 (Hybrid). Option 3 appeals to institutions that value choice. Programs comfortable with centralized application systems can participate while others maintain current practice. However, stakeholders acknowledge that optional participation weakens many of the benefits centralization is intended to create. Applicants still face multiple application pathways and transparency of information needed to support informed enrollment choices would remain uneven. Institutions inside the system may see diminished network effects if participation is uneven. Engagement structures may also skew

toward participating institutions, resulting in an increasing divergence over time between CAS and non-CAS ecosystems that further complicates the applicant experience.

Option 4 (Data Warehouse). Option 4 produces the least immediate disruption and preserves existing processes. Autonomy, advising relationships, and applicant burden remain unchanged, which many institutions find reassuring. However, stakeholders noted that this approach does not improve discoverability or simplify the student journey. Transparency exists at the reporting level but does not fundamentally reshape how applicants experience the system. As a result, perceived value may be lower.

5.2.2 Stakeholder Domain Conclusion

- **Option 1** benefits from real-world operating history that makes outcomes easy to visualize.
- **Option 2** benefits from clear state ownership that many stakeholders find reassuring.
- **Option 3** provides flexibility to institutions but only partial benefits to applicants and may increase confusion.
- **Option 4** is the least disruptive to institutions but offers no improvement of the applicant experience or transparency to support enrollment decisions.

Options 1 and 2 rank highest in the stakeholder domain because both can safeguard program control while making the system easier for applicants to understand and use.

5.3 Technical Feasibility Results

Option 1 and Option 2 are rated similarly and both are rated substantially better than Options 3 and 4 across the technical criteria. Both provide viable pathways to meet Texas's needs for applicant identification, reporting, security, and scalability. Where they differ is in how control is achieved: Option 1 achieves functionality through a mature existing platform operated under vendor partnership, while Option 2 achieves it through direct state ownership and design authority.

Table 5.3. Technical Feasibility Results

Option	1 TexNCAS	2 TXHES CAS	3 Hybrid	4 Data
Domain Score	38	36	23	23
Criteria Ratings				
T.1 Ability to identify unique applicants and capture capacity-constrained denials				
T.2 Identify applicants via unique identifiers that can also be transmitted to NPs to follow the applicant through matriculation, and follow-on education history				
T.3 Ability to capture, update, and synchronize open seat status across institutions in a timely and reliable manner.				

Option	1 TexNCAS	2 TXHES CAS	3 Hybrid	4 Data
T.4 Ability to support analytics related to applicant numbers, duplication rates (ratio of applications to applicants), system wide capacity, and related metrics that State, Nursing Program, and TXHES stakeholders need.				
T.5 Enables state, nursing programs, TXHES to access aggregated national data for benchmarking local applicant and application trends for comparative measures (e.g., demographics, applicant profiles, age mix, gender mix)				
T.6 Enables bi-directional data exchange with institutions' application platforms and related systems				
T.7 Provides role-based access to functions, data, and reporting (applicant, nursing program, evaluator, etc.)				
T.8 Supports efficient operations and application volumes via scalable architecture				
T.9 Ability to support configurable workflows, data fields, and rules without requiring institution-specific custom development.				
T.10 Has auditable change management capabilities				
T.11 Can be implemented within realistic timeframes using identified available resources and technologies				
T.12 Maximizes TXHES control over system architecture, data models, and future enhancements				
T.13 Ability to incorporate varied admissions criteria, prerequisites, and verification requirements				
T.14 Ability to meet all applicable federal and state data privacy, security, compliance requirements.				

5.3.1 Technical Strengths and Tradeoffs by Option

Option 1 (Vendor-Supported TexNCAS). Option 1 scores highest overall because the core technical capabilities already exist and are operating at scale today. Identity management, role-based access, reporting structures, integrations, and national benchmarking pathways are inherent to the platform. The system has proven performance under real admissions cycles, which lowers uncertainty about reliability and scalability. The tradeoff is structural: TXHES configures and governs use of the system but does not fully control the underlying architecture or enhancement roadmap. Certain Texas-specific changes may require vendor prioritization rather than unilateral action.

Option 2 (TXHES-Built CAS). Option 2 performs almost as strongly as Option 1 and leads in areas involving state authority over architecture, data models, and future enhancements. Because Texas would design the system, it could embed statewide definitions, workflows, and reporting constructs directly into the product. However, every capability must be built, integrated, tested, secured, and maintained. Unlike Option 1, the feasibility of these functions depends on development capacity and sustained operational maturity rather than inheritance from an already deployed national platform.

Option 3 (Hybrid). Option 3 preserves institutional flexibility but scores lower on technical feasibility where statewide consistency, synchronization, and auditability are required. Fragmentation across platforms introduces identity reconciliation challenges, inconsistent data definitions, and heavier integration demands. While individual systems may function well locally, achieving dependable statewide analytics or coordinated seat visibility becomes difficult without a single authoritative transaction environment.

Option 4 (Data Warehouse). Option 4 can succeed for retrospective reporting if institutions reliably submit standardized data. TXHES would control the warehouse environment and could manage privacy, access, and analytics within it. Its limitation is that it does not control upstream application workflows. As a result, many technical outcomes (e.g., unique identification, timely seat updates, longitudinal tracking) depend on institutional reporting behavior rather than system enforcement.

5.3.2 Technical Feasibility Conclusion

Technical feasibility is strongest where Texas can rely on either a single operating platform or a single architectural authority.

- **Option 1** delivers capability immediately through an established environment but requires partnership for deeper system evolution.
- **Option 2** provides maximum long-term control but requires Texas to create and sustain those capabilities itself.
- **Option 3** maintains autonomy yet weakens standardization and synchronization.
- **Option 4** enables analytics but cannot ensure consistent real-time operational data.

Option 1 ranks highest because it combines broad functionality, existing scale, mature integrations, and immediate access to national comparative data, while still allowing TXHES to direct configuration, governance, and participation policy.

5.4 Operational Feasibility Results

Option 1 receives the highest operational feasibility score because it relies on an established platform with proven admissions workflows, existing training and onboarding infrastructure, and demonstrated ability to support varied program pathways. Institutions can visualize how operations would function because versions of the model are already in use.

Table 5.4. Operational Feasibility Results

Option	1 TexNCAS	2 TXHES CAS	3 Hybrid	4 Data
Domain Score	**20**	**14**	**11**	**11**
Criteria Ratings				
O.1 Ability to operate across varied admissions models, timelines, and program pathways (BSN, ABSN, RN-to-BSN, ADN, graduate programs) while minimizing impact on institutional cycles.				
O.2 Ability to support program-specific admissions requirements and workflows with minimal need for workarounds				
O.3 Delivers a common applicant-facing process that also accommodates individual program variation and branding				
O.4 Minimizes workflow complexity and the need for manual workload for admissions staff, registrars, and committees				
O.5 Offers support for training, onboarding, and user assistance				
O.6 Can be implemented within a reasonable timeframe and in phases based on institution readiness and program type				
O.7 Minimizes complexity in workflows requiring supplemental student application systems or parallel systems.				
O.8 Minimizes the effort required to reconcile CAS-verified data with institutional prerequisite, eligibility, and admissions requirements				

5.4.1 Operational Strengths and Tradeoffs Across Options

Option 1 (Vendor-Supported TexNCAS). Option 1 performs strongly across timeline, training, applicant process, and phased implementation readiness. Centralized document handling, standardized intake, and mature user support structures reduce uncertainty about how institutions and applicants would operate on day one.

Its Medium ratings reflect practical realities rather than structural failure. Some programs will still manage parallel processes, complex prerequisites will still require institutional judgment, and reconciliation work will not disappear. These are ongoing management issues rather than barriers to launch.

Option 2 (TXHES-Built CAS). Option 2 offers the promise of workflows purpose-built for Texas. Over time, it could align closely with institutional expectations and embed state-defined processes directly into system logic. Operational feasibility is lower in the near term because the training infrastructure, user support capacity, and mature workflows do not yet exist. Institutions would experience heavier

participation demands during design, testing, and early releases, and efficiencies materialize later rather than immediately.

Option 3 (Hybrid). Option 3 allows institutions to avoid changing their operations if they choose not to join the CAS. However, from a statewide perspective, this creates the most complicated operating environment. TXHES must support platform users while also managing data intake, reconciliation, and compliance for non-participants. Applicants encounter different processes depending on where they apply, and institutional staff must coordinate across systems that do not function the same way. These structural conditions drive the consistently low ratings.

Option 4 (Data Warehouse). Option 4 preserves institutional workflows and avoids CAS transition disruption. Programs keep doing what they do today. However, it delivers almost none of the operational improvements associated with centralized intake. Manual processing, applicant navigation challenges, and verification burdens remain, while institutions take on new reporting responsibilities to populate the warehouse.

5.4.2 Operational Feasibility Conclusion

Operational feasibility is strongest where implementation can align with existing admissions timelines, staffing capacity, and applicant support responsibilities.

- **Option 2** can deliver a strong operational framework over time but requires institutions to live through a more complex, time-consuming development and transition process.
- **Option 3** maintains institutional flexibility but creates fragmentation and complexity for applicants.
- **Option 4** protects current practice but produces little operational advancement.

Option 1 ranks highest because it offers observable workflows, established training structures, and a credible, near-term path to phased adoption while keeping program authority intact.

5.5 Financial Feasibility Results

Option 1 achieves the highest financial feasibility score because it combines the lowest initial investment with a revenue model that partially offsets ongoing operating costs while avoiding direct charges to institutions. Although the vendor structure introduces defined pricing mechanisms and revenue-sharing constraints, the overall cost profile remains more favorable than alternatives that require large development appropriations or distribute financial responsibility directly to institutions.

Table 5.5. Financial Feasibility Results

Option	1 TexNCAS	2 TXHES CAS	3 Hybrid	4 Data
Domain Score	22	18	11	16
Criteria Ratings				
F.1 Maximizes affordability of initial development, integration, and launch costs				

Option	1 TexNCAS	2 TXHES CAS	3 Hybrid	4 Data
F.2 Minimizes extent to which costs change as the system scales (ie, from pilot to all BSN programs to broader program inclusion)				
F.3 Has predictable, sustainable cost structure for ongoing operating, maintenance, support, and enhancements				
F.4 Minimizes the impact of fees and related costs on applicants				
F.5 Extent to which costs are equitably distributed and aligned with ability to pay and commensurate with anticipated benefits (e.g., small vs. large institutions)				
F.6 Minimizes direct financial costs to institutions and nursing programs, including system fees, subscription charges, per-application costs, and implementation expenses, particularly for small programs and financially-constrained institutions				
F.7 Minimizes net change in institutional administrative costs, accounting for both efficiencies and new workload				
F.8 Minimizes exposure to pricing escalation, transaction-based fees, and long-term vendor lock-in				
F.9 Extent to which the cost structure reasonably supports HB 2851 goals (e.g., identifying unmet demand, improving seat utilization)				

5.5.1 Financial Strengths and Tradeoffs Across Options

Option 1 (Vendor-Supported TexNCAS). Option 1 performs strongly on affordability of launch, scalability, and limiting direct institutional expense. Implementation leverages an existing production platform, avoiding the need to finance full software development or stand-up of independent infrastructure. The per-applicant revenue approach provides a partial self-funding mechanism that reduces pressure on state appropriations.

Medium ratings reflect the visibility of vendor-related constraints rather than uncontrolled growth. Fee escalation provisions, revenue-sharing terms, and future enhancement pricing are defined contractually and therefore create exposure that TXHES must manage through governance, negotiation, and pacing of enhancements.

Option 2 (TXHES-Built CAS). Option 2 provides the greatest level of state control over pricing decisions and avoids dependence on a single application vendor. TXHES determines fee policy, timing of enhancements, and investment priorities. However, this control comes with materially higher upfront development cost and a persistent operating deficit under current assumptions. Because the system

must be built and maintained using public funds, financial sustainability depends on continued appropriations or future fee actions rather than a built-in cost recovery model.

Option 3 (Hybrid). Option 3 introduces the highest total cost and the greatest financial unpredictability. TXHES must fund development of both a centralized platform and a parallel data-integration framework. The number and complexity of institutions choosing each path cannot be forecast with confidence, making future expenditures difficult to model. Institutions incur direct financial responsibility regardless of participation choice, either through CAS transition activities or through building and maintaining data feeds. This produces structural inequity and the largest projected deficit among all options.

Option 4 (Data Warehouse). Option 4 avoids centralized applicant fees and vendor application contracts. Ongoing operational expenses are lower than most alternatives, and pricing exposure is limited to normal technology and staffing growth. At the same time, the absence of applicant fee revenue means the model relies entirely on state funding. Institutions must independently finance data feed development and the investment yields only reporting capability rather than the broader efficiencies associated with a centralized application process.

5.5.2 Financial Feasibility Conclusion

Financial feasibility is strongest where required investment, ongoing obligations, and risk exposure remain proportional to the capabilities delivered.

- **Option 2** offers maximum control but requires sustained public investment and carries a continuing deficit profile.
- **Option 3** distributes cost broadly yet results in the highest total expenditure and greatest uncertainty.
- **Option 4** limits vendor dependency and applicant fees but produces limited functional return while remaining fully state-funded.

Option 1 ranks highest because it delivers statewide functionality with the lowest entry cost, predictable scaling mechanics, and partial revenue support while keeping direct institutional financial burden minimal.

6 Cross-Domain Comparison

Across the five domains, the scoring patterns demonstrate that the distribution of strengths and limitations is not even across options. While several options demonstrate strengths in various domains, only Option 1 maintains consistently high performance across every domain without producing critical feasibility gaps.

Table 6. Cross-Domain Feasibility Scores

Domain	Option 1 TexNCAS	Option 2 TXHES CAS	Option 3 Hybrid	Option 4 Data Warehouse
Governance	19	21	11	14
Stakeholder	18	18	15	15
Technical	38	36	23	23
Operational	20	14	11	11
Financial	22	18	11	16
TOTALS	**117**	**107**	**71**	**79**

Each of the four options could be made to work in some fashion, but not all can be delivered within the practical constraints facing TXHES and participating institutions and in alignment with legislative and state policy goals. Options 1 and 2 both consistently perform at or near the top across governance, stakeholder, technical, operational, and financial considerations. The central question to answer in distinguishing them is not which model is most conceptually attractive, but which is most feasible to implement at scale within existing authority, available resources, institutional tolerance for change, and the timeframe implied by House Bill 2851.

Option 1 emerges as the model that best satisfies this test.

6.1 What Distinguishes Option 1

Option 1 benefits from demonstrated operability. Texas nursing programs are already using centralized application systems and many already use a version of the platform that would be customized for Texas under Option 1. This converts uncertainty about functionality, user behavior, and institutional interaction into known transition work. Stakeholders can observe how autonomy is preserved, how workflows operate, and how advisory input translates into system configuration. In feasibility terms, precedent reduces speculation. Implementation therefore builds on existing market practice rather than creating a novel institutional capability, while still allowing Texas-specific governance and configuration.

From a governance perspective, vendor involvement introduces dependencies in roadmap timing and certain architectural decisions. Yet these are standard features of enterprise software environments and can be managed through contract terms, participation agreements, structured advisory input, and transparent prioritization processes. The feasibility analyses show that while TXHES will not possess unilateral technical authority in every domain, it retains sufficient leverage to guide system evolution in alignment with statewide objectives.

Stakeholder evidence indicates that concerns are primarily conditional and focused on implementation considerations rather than oppositional. This pattern is consistent across advisory committee

discussions, roundtables, and survey responses. Institutions want assurances regarding autonomy, affordability, and influence over implementation. Where those assurances are credible, willingness to participate increases substantially. Importantly, a critical mass of programs has already judged participation acceptable.

Operationally, Option 1 entails transition effort, but it is transition toward a known model. Training, communication, and phased onboarding are required, yet the underlying workflows are proven in real settings. This differs materially from building or inventing new systems.

Financially, Option 1 avoids the concentration of upfront capital risk associated with system development while providing predictable scaling tied to usage. Long-term affordability requires active governance, but no alternative removes the need for sustained funding; they simply shift exposure into different categories of risk.

6.2 Why the Other Options Do Not Meet the Same Threshold

Option 2 offers maximal state authority but transfers nearly all execution risk to TXHES. Stakeholders express theoretical support for Texas ownership, yet confidence depends on the agency's ability to design, build, secure, and continuously enhance a complex admissions platform while simultaneously conducting change management across a diverse institutional landscape. Delays or performance failures would be borne directly by applicants and institutions. In cross-domain review, this concentration of delivery risk moderates feasibility.

Option 3 reduces institutional anxiety by allowing choice of CAS participation, but it does so by sacrificing model coherence. Partial participation undermines network value, complicates data governance, weakens incentives for sustained engagement, and preserves many of the applicant-navigation challenges that HB 2851 and the Governor's Task Force sought to address. TXHES can govern the platform but not the ecosystem, limiting the reach of policy decisions.

Option 4 is the least disruptive administratively, yet it is also the least transformative. While it can improve statewide reporting, it does not meaningfully reorganize how applicants discover, compare, or apply to programs. The model generates insight for policymakers more than simplification for applicants, placing it in partial tension with HB 2851 and Task Force Recommendation 8.

Delaying action or selecting a model with lower integration potential would preserve familiar structures but defer the statewide coordination and transparency objectives that prompted Recommendation 8 and legislative direction.

6.3 Recommendation

Option 1 is recommended because it provides the strongest overall combination of legal authority, institutional viability, applicant benefit, manageable technical and operational demands, and sustainable financial structure to meet the objectives of HB 2851 and the Task Force.

Option 1 represents the highest-feasibility pathway for TXHES to move from analysis into execution while maximizing value to institutions and delivering meaningful improvement to applicants.

Implementation will require deliberate governance design, ongoing stakeholder engagement, and active financial oversight. These responsibilities, however, are inherent to any statewide shared service and can be managed through the governance, readiness, and accountability mechanisms described in the implementation plan, consistent with TXHES' existing authority and demonstrated capability.

7 Key Risks and Considerations for Implementation

Implementation of a statewide CAS will require sustained attention to governance discipline, institutional partnership, operational readiness, and financial oversight. The feasibility assessment identified a set of considerations that TXHES must actively manage to translate the strengths of Option 1 into successful execution. Taken together, these considerations clarify the areas where consistent management focus will be required as TXHES advances toward implementation. These are not barriers to proceeding. They are the predictable responsibilities associated with launching and operating any enterprise-scale shared service.

The discussion below organizes these considerations across the same domains used in the feasibility evaluation.

7.1 Governance Risks and Implementation Considerations

The most significant governance consideration is TXHES' responsibility to exercise clear, durable authority over policy direction, prioritization, and accountability while maintaining credibility with institutions. Statewide services inevitably generate competing requests for flexibility, enhancement, or exception. Without disciplined decision processes, these pressures can slow progress, create inconsistency, or erode confidence in fairness.

A related risk concerns decision speed. Institutions require timely guidance in order to align academic calendars, admissions cycles, and internal approvals. Delayed decisions can translate into operational friction at the campus level and uncertainty for applicants.

Vendor partnership also introduces governance responsibility. While the platform provides significant capability, not every desired modification can occur immediately. Managing expectations, sequencing enhancements, and communicating priorities are essential to maintaining trust in the system's direction.

These risks are characteristic of large shared services and are manageable when authority is clear, processes are transparent, and decision rationales are consistently communicated.

7.2 Stakeholder Risks and Implementation Considerations

Stakeholder acceptance of Option 1 is conditional. Institutions emphasized that support depends on preservation of admissions authority, clarity regarding cost implications, and meaningful opportunities to influence how the system evolves. Applicants report challenges using NursingCAS, indicating the need to work with the vendor prior to launch to ensure usability.

Texas nursing programs differ widely in size, mission, staffing capacity, and prior experience with centralized platforms. Some will be positioned to move quickly, while others may require additional

time and support to align internal processes or obtain necessary approvals. If variation in readiness is not acknowledged, institutions may perceive implementation as disruptive rather than supportive.

Trust also represents an ongoing consideration. Participants will look for evidence that feedback is heard, that prioritization is equitable, and that system changes reflect real operating conditions across different program types.

These dynamics are typical in multi-institution initiatives and underscore the importance of sustained engagement, consistent communication, and visible responsiveness.

7.3 Technical Risks and Implementation Considerations

Technical feasibility depends less on basic platform capability than on disciplined management of standards, data definitions, and integration expectations. Institutions operate within a wide range of student information systems, local processes, and reporting environments. Differences in infrastructure maturity mean that some campuses will require more adaptation than others. Configuration flexibility, while valuable, can create complexity if not paired with clear rules about what must remain common statewide. Without that balance, the system risks drifting toward fragmentation, undermining comparability and efficiency. In addition, reliance on a shared vendor environment requires realistic assumptions about timelines for enhancements, testing, and deployment. Technical change in enterprise systems follows structured cycles rather than immediate response.

These considerations are normal for large platforms and can be managed through planning discipline and transparent prioritization.

7.4 Operational Risks and Implementation Considerations

Operational risk is most visible during transition. Admissions teams must learn new workflows, adapt to different sequencing of tasks, and integrate centralized processes into established campus routines. Early cycles often surface questions that are difficult to anticipate fully in advance.

Staffing capacity is uneven across institutions. Programs with limited administrative resources may feel pressure more acutely, particularly during initial adoption periods. If support is not well paced, institutions may experience fatigue or uncertainty about roles.

At the same time, shared services frequently produce efficiency gains after early learning curves are overcome. The challenge lies in navigating the period between familiar legacy processes and stable new operations.

These risks are temporary but real, and they require attention to communication, training, and expectation management.

7.5 Financial Risks and Implementation Considerations

Financial exposure is most sensitive during early adoption, when service capability must be available before participation reaches steady state. The pace at which institutions join and applicants utilize the system influences short-term budget performance.

Uncertainty regarding future enhancement demand, integration needs, or support intensity can also affect projections. Stakeholders may seek assurances about affordability before benefits are fully realized, creating pressure for clarity in advance of complete information.

Over time, predictability typically improves as participation stabilizes, operational patterns become clearer, and demand for new features can be evaluated against demonstrated value.

These are familiar dynamics for shared technology environments and highlight the importance of disciplined monitoring and prudent fiscal management.

Conclusion

This study was undertaken to determine a feasible path to implement a centralized application service for Texas nursing education programs in a manner consistent with legislative direction, institutional realities, and long-term workforce needs.

This analysis demonstrates that such a path exists. While each option considered presents advantages and limitations, the distribution of risk and capability is not equal. Option 1 provides the most balanced approach, offering proven technical infrastructure that will improve data quality and applicant experience while protecting institutional autonomy and ensuring fiscal responsibility and sustainability.

Importantly, this recommendation does not assume that implementation will be effortless. Statewide systems require clear governance, transparent decision making, continued partnership with stakeholders, and strong oversight mechanisms. This report identifies risks but they are characteristic of shared services and can be managed through clear lines of authority and accountability, thoughtful pacing, and ongoing engagement.

By identifying a feasible starting point, this study enables Texas to move from discussion toward action. With appropriate execution, the recommended approach can begin delivering benefits in the near term, strengthening visibility into the nursing education pipeline, supporting more efficient use of training capacity, and providing applicants with a clearer and more consistent pathway into the profession.