

TXHES Nursing Advisory Committee
Feedback on Feasibility Study and Implementation Plan

Prepared for the Texas Health Education Service

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Executive Summary

This report summarizes advisory committee feedback on the feasibility study and draft implementation plan for a centralized application service (CAS) for Texas nursing programs, as required by HB 2851. Four responses were received, all from representatives of public university systems who were highly engaged in the advisory process.

Feasibility Framework and Analysis. Respondents generally agreed that the five-domain feasibility framework (technical, operational, stakeholder, governance, financial) captures the major factors TXHES should consider and that the ratings reasonably reflect the strengths and tradeoffs of the options. Concerns raised did not critique the framework or analysis specifically, but focused on implementation plan weaknesses (discussed below). On whether the feasibility analysis provides a reasonable basis to proceed with Option 1, three respondents agreed and one did not, citing the absence of quantified impact analysis by program type.

Implementation Plan. Assessment of the implementation plan was positive but qualified. Respondents strongly endorsed the phased rollout and readiness-based approach and highlighted strengths including preservation of institutional admissions authority, recognition of vendor oversight needs, and a continuous improvement model.

At the same time, respondents identified several areas for strengthening:

- Lack of quantified operational impact and detailed staffing implications.
- Early identification of a funding gap without a defined solution.
- Deferral of affordability and fee mitigation safeguards.
- Governance asymmetry between TXHES authority and institutional operational risk.
- Need for clearer escalation mechanisms and stakeholder action triggers.
- Need for more analysis of alignment with accreditation and regulatory expectations.
- Need for stronger external communication to ensure applicant, family, and school counselor awareness and understanding of the CAS.

One respondent questioned whether a statewide CAS is necessary, expressing concern about implementing a large-scale system without clearly demonstrated need.

Risks and Confidence. Key risks identified include IT resource burden, operational workload and timing strain, affordability impacts, governance imbalance, potential process slowdowns, and the broader question of necessity. Proposed mitigation strategies include measurable readiness criteria, phased implementation, defined affordability safeguards, governance refinements, and proactive communication.

Confidence in implementation was cautious, with responses indicating conditional confidence dependent on resolving governance, affordability, and operational detail concerns.

Conclusion. Feedback indicates general acceptance of the analytic framework used in the study and agreement that the feasibility ratings reflect the relative strengths and tradeoffs of the four options. Most respondents believe the implementation plan is conceptually sound, but there are multiple areas respondents believe could be strengthened. Respondents provided recommendations to clarify governance protections for nursing programs; more specifically quantity and develop solutions to mitigate financial and operational risks prior to full implementation; and address applicant financial safeguards and CAS education.

Methodology

At the final advisory committee meeting (February 10, 2026), the committee was presented with feasibility study results and an overview of the draft implementation plan. Following the meeting, the full draft implementation plan was shared with the committee. Participants were provided with a week to review materials and provide feedback and recommendations using a structured survey that included multiple choice questions and free comment opportunities.

Responses and Respondent Characteristics

Four responses were received. All represent public university systems. Overall, respondents are highly engaged advisory committee participants who were involved in multiple phases of the feasibility study and implementation plan review process.

Institution Types Represented

Respondents were asked to identify whether they represented a public university system, community college, private institution, or other entity. All respondents indicated they represent public university systems.

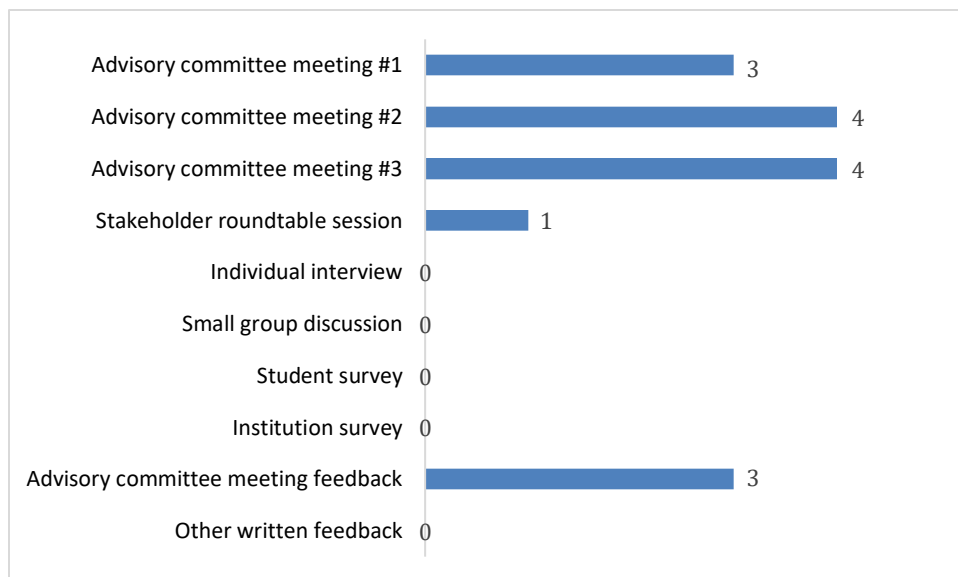
Participation in Engagement Opportunities

Respondents were asked to identify the stakeholder engagement opportunities in which they participated. Participation was strong across the three advisory committee meetings: all four respondents attended meetings #2 and #3, and three participated in meeting #1. Three provided feedback on advisory committee meetings. One participated in a stakeholder roundtable session.

Overall Results

Adequacy of the Feasibility Framework and Analysis

Questions related to the analytic framework and domain-specific ratings (Framework Adequacy, Technical, Operational, Governance, Financial) provided a 4-scale multiple choice response



option along with a free comment option. These questions asked whether the feasibility domains capture the major factors TXHES should consider in selecting an approach and whether the ratings for each domain reasonably reflect the strengths and tradeoffs of the four options considered. Three of four respondents (75%) selected “Yes” for most domains, with the remaining respondent typically selecting “Mostly” or “Somewhat.” These responses indicate general acceptance of the analytic framework and agreement that the feasibility ratings reflect the relative strengths and tradeoffs of the four options.

Respondents who provided narrative comments did not critique the five-domain structure (technical, operational, stakeholder, governance, financial) or ratings. Instead, concerns that were communicated centered on the representativeness of the stakeholder feedback received during the process and the need for greater specificity, quantification, and procedural clarity in implementation plan details.

For Question 7 (whether the feasibility analysis provides a reasonable basis for TXHES to proceed with Option 1), 3 of four respondents (75%) indicated “Yes” and one (25%) indicated “No”. The respondent indicating “No” commented that the study lacked quantified impact analysis for different program types.

Implementation Plan Strengths and Weaknesses

Assessment of the implementation plan was generally positive but more qualified than the feasibility framework and ratings responses. For alignment with legislative and state policy priorities that prompted the study, 50% selected “Yes” and 50% selected “Mostly”. For applicant impact, 75% selected “Yes” and 25% selected “Somewhat”. Phasing and readiness received unanimous “Yes” responses (100%)

Narrative comments suggest respondents view the plan as directionally sound but in need of greater operational precision and clearer safeguards. One respondent questioned the necessity of a statewide CAS.

Strengths Identified. Respondents highlighted several strengths:

- Phased rollout and readiness-based implementation.
- Continuous quality improvement approach.
- Explicit preservation of institutional admissions authority.
- Recognition of vendor dependency and need for oversight.
- Conceptual clarity and structured planning.

There was acknowledgment that the plan demonstrates intent to respect institutional autonomy, even if governance concerns remain.

Weaknesses Identified. Overall, the implementation plan was seen as conceptually strong, but respondents identified the need for more procedural clarity, earlier financial safeguards, and clearer governance protections.

1. Operational Detail and Quantification

- Lack of quantified impact analysis by program type (e.g., workload, configuration complexity, applicant volume differences).
- Insufficient specificity regarding staffing and resource implications.
- Lack of defined readiness criteria, measurable implementation gates, and clear institutional exit and reentry protections.

2. **Affordability and Equity Safeguards**

- Early funding gap identified but no clear solution.
- Applicant affordability and fee mitigation strategies deferred.
- Lack of equity-based intervention triggers.

3. **Governance Asymmetry**

- Concern that TXHES holds all authority while institutions hold operational and reputational risk.
- Advisory structure lacks clear veto, pause, appeal, or escalation mechanisms.
- Desire for clearer definition of when stakeholder input triggers formal review or action.

4. **External Communication and Education**

- Need to educate students, parents, and counselors about seat availability and program quality.
- Need to ensure alignment with accreditation bodies (ACEN, CCNE) and Texas Board of Nursing expectations.

Key Risks and Mitigation Strategies. Respondents identified the following primary risks:

- **IT Resource Burden.** Significant internal resources required for data capture and continuity.
- **Operational Workload and Timing.** Staffing and transition strain.
- **Governance Asymmetry.** Authority-risk imbalance between TXHES and nursing programs.
- **Affordability Risk.** Applicant fee burden and equity concerns.
- **Process Slowdown Risk.** Concern that CAS implementation process could slow acceptance and enrollment.
- **Question of Necessity.** Risk of implementing a major statewide system without demonstrated need.

Respondents proposed concrete mitigation strategies:

- Clearly published and measurable readiness criteria.
- Adequate time and phased implementation.
- Defined affordability safeguards and fee mitigation frameworks.
- Governance refinements (clear triggers for stakeholder action, escalation mechanisms).
- Early and broad communication to students and families.
- Alignment review with accrediting and regulatory bodies.
- Documentation and dissemination of lessons learned from Phase 1 to later cohorts.

Confidence in Implementation. Confidence levels were cautious rather than unequivocal. No respondent selected “Yes” to overall confidence. Two selected “Mostly” (50%) and one selected “Somewhat” (25%). Respondents generally believe TXHES is capable of implementing TexNCAS, but confidence is moderated by unresolved concerns about need, governance balance, affordability safeguards, and quantified operational impact.

Overall Interpretation of Results

The responses to this survey indicate:

- The feasibility framework itself is generally accepted
- The feasibility ratings are seen as reasonable for comparing the strengths and tradeoffs of each option.
- The implementation plan is viewed as directionally sound and thoughtfully structured.
- The strongest themes of concern for implementation are:
 - Governance asymmetry between TXHES and nursing programs
 - Applicant affordability and funding clarity
 - Lack of quantified operational impacts and specific solutions to address them
- Not all stakeholders see the need for a statewide CAS.

Results By Question

Results by question are shown below, including the response distribution for multiple choice questions and a summary of the narrative comments provided to expand on the multiple choice selections.

Questions Related to Feasibility Study

1. Framework Adequacy	Do the domains used in the feasibility framework (technical, operational, stakeholder, governance, financial) capture the major factors TXHES should consider in selecting an approach?
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Response Distribution

- Yes: 3 (75%)
- Mostly: 1 (25%)
- Somewhat: 0 (0%)
- No: 0 (0%)

Respondent Comments

One comment was received. The commenter critiqued the implementation plan as strong conceptually but weak on procedural details, specifically calling out defined readiness gates such as minimum training completion, defect thresholds, and integration validation.

2. Technical Domain	Do you believe the technical ratings and supporting rationale reasonably reflect the strengths and tradeoffs of the 4 options considered?
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Response Distribution

- Yes: 3 (75%)
- Mostly: 1 (25%)
- Somewhat: 0 (0%)
- No: 0 (0%)

Respondent Comments

One comment was received. The commenter stated that leveraging a proven vendor platform is appropriate but that the level of implementation detail is inadequate.

3. Operational Domain	Do you believe the operational ratings and supporting rationale reasonably reflect the strengths and tradeoffs of the 4 options considered?
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Response Distribution

- Yes: 3 (75%)
- Mostly: 1 (25%)
- Somewhat: 0 (0%)
- No: 0 (0%)

Respondent Comments

One comment was received. The commenter critiqued the level and type of detail provided. For example, the commenter noted that the plan identifies but does not quantify operational burdens (e.g., staffing and workload concerns) and provides no specific solutions to address them.

4. Stakeholder Domain	Do you believe the stakeholder ratings and supporting rationale reasonably reflect the strengths and tradeoffs of the 4 options considered?
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Response Distribution

- Yes: 2 (50%)
- Mostly: 0 (0%)
- Somewhat: 2 (50%)
- No: 0 (0%)

Respondent Comments

Two comments were received. The first comment noted that the number of stakeholders involved in the feasibility study and implementation plan development process was low compared to the total number of Texas nursing programs, pointing out this may affect how representative the collected stakeholder feedback is. The second comment highlighted the advisory nature of the stakeholder role and expressing concern that nursing programs do not share decision rights despite assuming operational, reputational, and accreditation risk. This commenter expressed a desire for greater clarity on how stakeholder feedback will trigger action.

5. Governance Domain	Do you believe the governance ratings and supporting rationale reasonably reflect the strengths and tradeoffs of the 4 options considered?
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Response Distribution

- Yes: 3 (75%)
- Mostly: 0 (0%)
- Somewhat: 1 (25%)
- No: 0 (0%)

Respondent Comments

One comment was received. The commenter stated that TXHES holds authority while nursing programs hold risk and that since the advisory group lacks veto, appeal, or pause mechanisms, there should be some limits on TXHES authority. The commenter stated that because faculty, not deans, control admissions criteria and processes at most Texas nursing programs, program faculty should be involved in governance.

6. Financial Domain	Do you believe the financial ratings and supporting rationale reasonably reflect the strengths and tradeoffs of the 4 options considered?
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Response Distribution

- Yes: 3 (75%)
- Mostly: 0 (0%)
- Somewhat: 1 (25%)
- No: 0 (0%)

Respondent Comments

One comment was received. The commenter noted that an early funding gap is identified but a solution is not provided, stating that applicant affordability should be an implementation prerequisite and suggesting that clarity on funding commitments and safeguards would reduce risk.

7. Sufficiency of Analysis	Do you believe the feasibility analysis provides a reasonable basis for TXHES to proceed with Option 1, recognizing that implementation details will continue to be refined?
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Response Distribution

- Yes: 3 (75%)
- Mostly: 0 (0%)
- Somewhat: 0 (0%)
- No: 1 (25%)

Respondent Comments

One comment was received. The commenter noted that while the implementation plan discusses diversity of program types and varied calendars, there is no quantified impact analysis for different program types that examines different workload, configuration complexity, or applicant volume effects by program type.

8. Other Observations	Do you have other observations regarding the feasibility study you would like to share?
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Response Distribution

- Yes: 2 (50%)
- Mostly: 2 (50%)
- Somewhat: 0 (0%)
- No: 0 (0%)

Respondent Comments

Two comments were received. One commenter expressed that the study was well thought out and accurate to assess feasibility. The other commenter expressed that the implementation framework is directionally sound and demonstrates strong intent to respect institutional autonomy but that the proposed governance model has a power asymmetry.

Questions Related to Implementation Plan

9. Alignment with Legislative and State Policy Objectives	Does the implementation plan align with the legislative and state policy objectives that prompted the feasibility study and development of the plan?
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Response Distribution

- Yes: 2 (50%)
- Mostly: 2 (50%)
- Somewhat: 0 (0%)
- No: 0 (0%)

Respondent Comments

Three comments were received. One commenter stated they felt the legislation was unclear. One commenter stated that the plan is directionally aligned with HB 2851 and the Governor’s workforce priorities through it focus on centralized intake, improved data visibility, and long-term sustainability. The third commenter indicated that the implementation phase must ensure that students and parents are educated on how to search for vacant seats and quality across all programs to ensure they understand all the available options rather than just going to schools they already know.

10. Risk Identification	What aspects of the plan present the greatest operational or organizational risk for your program?
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Respondent Comments

Three comments were received. One commenter identified the volume of IT resources required to capture data and ensure continuity. Another identified operational workload, timing, and governance asymmetry. The third expressed that their program does not need a statewide CAS since they have more applicants on a waitlist than available seats. This commenter explained that their program works to meet workforce needs through: 1) efforts to increase number of available seats each semester, noting the program’s success in growing enrollment in recent years; and 2) providing information about other nursing programs to applicants who are not accepted, noting most prefer to stay at their current school and re-apply to the nursing program for a later semester or work toward another degree.

11. Risk Mitigation	What additional supports, adjustments or safeguards would reduce that risk for your program?
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Respondent Comments

Three comments were received. One indicated the need for a phased approach and adequate time to implement changes. Another asked for published readiness criteria. The third noted they do not want the new process to slow the process of accepting and enrolling students.

12. Governance and Stakeholder Voice	To what extent does the proposed advisory and workgroup structure provide meaningful opportunity for institutions and students to raise issues and inform system improvements? What would strengthen it?
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Respondent Comments

Three comments were received. One stated the proposed structure is a good way to ensure voices are heard. Another suggested that higher survey response rates and focused groups across all feasibility domains would strengthen the proposed structure. The third comment stated the proposed structure represents a meaningful opportunity for institutional and student input but critiqued the advisory nature of the proposed structure and suggested more detail on how stakeholder input will translate to decisions or prioritized action, such as defining circumstances under which advisory input triggers formal review, adjustment, or veto.

13. Phasing and Readiness	Does the phased, readiness-based approach adequately account for differences among programs?
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Response Distribution

- Yes: 4 (100%)
- Mostly: 0 (0%)
- Somewhat: 0 (0%)
- No: 0 (0%)

Respondent Comments

Two comments were received. One stated this is a strong aspect of the plan. The other expressed that this will ensure each program phases in when they are able to do so without impacting their stakeholders.

14. Applicant Impact	Does the implementation plan adequately anticipate and address the potential administrative and financial impacts of TexNCAS to applicants?
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Response Distribution

- Yes: 3 (75%)
- Mostly: 0 (0%)
- Somewhat: 1 (25%)
- No: 0 (0%)

Respondent Comments

Two comments were received. One commenter stated they think it does but that the impact on applicants remains to be seen. The other noted that the plan acknowledges potential administrative and financial impacts on applicants and commits to monitoring equity outcomes but that fee mitigation and affordability strategies are deferred to future policy decisions. The commenter recommended earlier definition of safeguards (e.g., fee-waiver frameworks, clear applicant guidance, equity-based triggers for intervention) to protect applicants during initial rollout.

15. Implementation Plan Strengths	What aspects of the implementation plan give you confidence that TexNCAS can be successfully implemented
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Respondent Comments

Three comments were received. One stated the plan offers well-detailed concepts to ensure implementation without major stakeholder impact. Another highlighted the phased rollout and the continuous quality improvement approach. The third highlighted the phased rollout, explicit preservation of institutional admissions authority, and recognition of vendor dependency and the need for active oversight.

16. Implementation Plan Weaknesses	What aspects of the implementation plan should be strengthened to ensure successful implementation?
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Respondent Comments

Four comments were received. One commenter stated that state funding to support the plan would be helpful. One suggested educating students, parents, and high school counselors about the capability of the TexNCAS to showcase seat availability and program quality. The third commented highlighted the need for more concrete operational detail and quantified impact analysis; earlier resolution of affordability and equity safeguards; and clearer articulation of shared governance and escalation mechanisms. The fourth commenter raised the question of whether a statewide CAS is really needed, noting that inability to track unique number of applicants may inaccurately create the impression of a large number of denials due to capacity constraints.

17. Overall Confidence	How confident are you that TXHES can successfully implement TexNCAS?
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Response Distribution

- Yes: 0 (0%)
- Mostly: 2 (50%)
- Somewhat: 1 (25%)
- No: 0 (0%)

Respondent Comments

Three comments were received. One commenter said they believe it is a good plan that positions programs for success. Another stated they are confident that TexNCAS can be implemented successfully but questions if it is truly needed. The third commenter referred to their other responses (primarily related to educating students around options and concerns about stakeholder representativeness in the feasibility study process) without providing additional detail.

18. Feedback on Proposed Direction	Is there anything else you would like TXHES to consider in implementing TexNCAS?
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Respondent Comments

Two comments were received. One recommended asking state residency questions in the first three CAS platform quadrants, indicating a belief that this would ensure applicants only need to answer these once and make it easier to quickly turn around acceptances with tuition structure

already determined. The other recommended an alignment analysis with ACEN, CCNE, and Texas Board of Nursing expectations, development of clear institutional exit and re-entry protections, and early communication of written lessons learned from Phase 1 to later-onboarding programs.