

OFFICE OF EDUCATIONAL ACCOUNTABILITY
Summary of State Board of Education Agenda Items
January 16-17, 2014

OFFICE OF ACCREDITATION

28. Approval of the proposed recommendations for the Statewide Accountability System beginning school year 2013-2014 (Has cleared the Administrative Procedures Act Process with public comment)

On September 10, 2013, the Commission on School Accreditation approved the recommendations of the Accountability Task Force and Technical Review Team for the Statewide Accountability System beginning school year 2013-2014.

On September 12, 2013, the State Board of Education granted approval to begin the Administrative Procedures Act (APA) process for the Statewide Accountability System effective school year 2013-2014. Following the approval on September 12, 2013, the MDE staff identified the need for the approval of additional business rules and clarification of some of the existing proposed rules.

On November 7, 2013, the Accountability Task Force and Technical Review Team proposed additional business rules and made amendments to the current proposed rules. On November 15, 2013, the State Board approved those amendments and extended the APA process through January 8, 2014.

Recommendation: Approval

Back-up material attached



Mississippi Department of Education
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MEMORANDUM

To: School District Superintendents
School District Principals
Other Interested Parties

From: Paula A. Vanderford, Ph.D.
Education Bureau Manager

Date: November 15, 2013

Subject: **Statewide Accountability System Effective School Year 2013-2014**

On September 13, 2013, the State Board of Education (SBE) granted approval to begin the Administrative Procedures Act (APA) process to approve the proposed recommendations for the Statewide Accountability System beginning school year 2013-2014. While developing the processes to perform the calculations, Mississippi Department of Education (MDE) staff determined that additional rules or clarification of existing rules was needed to provide districts with the most accurate impact data possible. Therefore, the Accountability Task Force and Technical Review Team met on November 7, 2013, to address those issues and concerns.

Today, November 15, 2013, the SBE granted approval to amend the proposed recommendations for the Statewide Accountability System. The SBE also extended the APA process through January 8, 2014. Initially, only state level impact data was going to be released during the APA process; however, there have been numerous requests by districts to have the district and school level impact data also available. As a result, both state and district level impact data will be provided to districts on December 2, 2013.

The proposed recommendations for the Statewide Accountability System will be effective upon the completion of the APA process for school years 2013-2014 and thereafter. The amended recommendations for the Statewide Accountability System are attached for your review. The additional rules are highlighted in yellow and the clarification of existing rules is in red.

You may submit comments in writing by mail or e-mail (accountability@mde.k12.ms.us), or they may be faxed to 601-359-1979 and received in the Office of Accreditation and Accountability no later than 5:00 p.m. on Wednesday, January 8, 2014. All written comments will be compiled and submitted to the SBE Thursday, January 16, 2014. Please submit written comments to Paula A. Vanderford, Education Bureau Manager, Office of Accreditation and Accountability, Post Office Box 771, Jackson, Mississippi 39205-0771.

If you have any questions, please do not hesitate to contact the Office of Accreditation and Accountability at 601-359-3764, or e-mail p.vanderford@mde.k12.ms.us.

Enclosures

c: Carey M. Wright, Ed.D.
Todd Ivey

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Beginning with the 2013-2014 school year, accountability labels will be assigned based on the following school grading assignments:

Schools with no 12th grade will have seven (7) components, each worth 100 points, totaling 700 possible points:

1. Reading Proficiency
2. Reading Growth – All Students
3. Reading Growth – Low 25% of Students
4. Math Proficiency
5. Math Growth – All Students
6. Math Growth – Low 25% of Students
7. Science Proficiency

Prior to the 2015-2016 school year, High Schools (schools with a grade 12) will have 10 components, each worth 100 points, totaling 1000 possible points:

1. Reading Proficiency
2. Reading Growth – All Students
3. Reading Growth – Low 25% of Students
4. Math Proficiency
5. Math Growth – All Students
6. Math Growth – Low 25% of Students
7. Science Proficiency
8. U.S. History Proficiency
9. Graduation Rate – All Students
10. College & Career Readiness (Math 50% and English/Reading 50%) (Contingent upon legislative funding)

Beginning with the 2015-2016 school year, High Schools (schools with a grade 12) will have 11 components, each worth 100 points, totaling 1100 possible points:

1. Reading Proficiency
2. Reading Growth – All Students
3. Reading Growth – Low 25% of Students
4. Math Proficiency
5. Math Growth – All Students
6. Math Growth – Low 25% of Students
7. Science Proficiency
8. U.S. History Proficiency
9. Graduation Rate – All Students
10. College & Career Readiness (Math 50% and English/Reading 50%) (Contingent upon legislative funding)
11. Acceleration (Participation and Performance Combined) on the following sliding scale:
 - a. Year 1 (2015-2016): Participation - 70%/Performance - 30%
 - b. Year 2 (2016-2017): Participation - 60%/Performance - 40%
 - c. Year 3 (2017-2018) and beyond: Participation - 50%/Performance - 50%

The following business rules will apply:

1. Assignment of Grade Classifications

1.1 Standards for student, school, and school district performance will be increased when student proficiency is at a seventy-five percent (75%) and/or when sixty-five percent (65%) of schools and/or districts are earning a grade of "B" or higher, in order to raise the standard on performance after targets are met. (SECTION 37-17-6, MS CODE OF 1972)

1.2 Grades for elementary/middle schools will be determined based on the following cut-points:

$$\begin{aligned} A &\geq 518 \\ 455 &\leq B < 518 \\ 400 &\leq C < 455 \\ 325 &\leq D < 400 \\ F &< 325 \end{aligned}$$

1.3 Grades for schools with a 12th grade will be determined based on the following cut-points (without the College & Career Readiness component):

$$\begin{aligned} A &\geq 695 \\ 623 &\leq B < 695 \\ 540 &\leq C < 623 \\ 422 &\leq D < 540 \\ F &< 422 \end{aligned}$$

(These cut-points were derived from an equating process using the same data and cut-points that were recommended by the Accountability Task Force to be used with the College & Career Readiness Component in Section 1.4)

1.4 Grades for schools with a 12th grade will be determined based on the following cut-points (with the College & Career Readiness component):

$$\begin{aligned} A &\geq 762 \\ 687 &\leq B < 762 \\ 595 &\leq C < 687 \\ 461 &\leq D < 595 \\ F &< 461 \end{aligned}$$

1.5 Assignment of district grades will be calculated by treating the district as one large school based on the same grading assignments used for schools.

2. Full Academic Year (FAY)

2.1 In order for a student to meet Full Academic Year (FAY) and be included in the proficiency and growth calculations he/she must have been enrolled (regardless of attendance) for at least 75% ($\geq 75\%$) of the days from September 1 (of school year) to the first day of testing. This date will be published yearly by the MDE and will be the same for all schools, students, and assessments. For schools on a traditional school calendar, the date will be in the Spring. Note: 74.5% will not be rounded up to 75%.

2.1.1 Enrollment is defined as enrollment at the school/district level except for students in 4x4 block scheduled courses.

2.2 For students in 4x4 block scheduled courses, FAY for the Fall semester will be calculated from September 1 of the school year to the first day of Fall primary test administration. The specific date will be published yearly by MDE. FAY for the Spring semester will be calculated from February 1 to the first day of Spring testing, the same day as schools using a traditional school calendar. These dates will be published yearly by MDE.

2.3 The beginning and ending dates will be included in the calculations. Calculations will be based on calendar days, not instructional days. Weekends and holidays will be included in the calculations.

2.4 If a student meets FAY at a school other than the school where he/she is enrolled at the time of testing his/her scores will count at the school where he/she met FAY.

2.5 This definition of FAY will not be applied to students for previous years where a previous definition of FAY was applied. In the event that no FAY was calculated for a student in a previous year, this method will be applied.

2.6 FAY will be calculated at the school level as well as at the district level. Therefore, it is possible for a student who transfers within a district to meet FAY for a district and be included in the calculations for the grade assignment for the district but not be included in the calculations for a school. Scores of all students will be included in the state level calculations regardless of FAY status.

2.7 If a student enrolls and withdraws on the same day, the student will be considered as having been enrolled for one (1) day.

2.8 (Deleted) Rule 2.9 supersedes.

2.9 If FAY cannot be calculated or discerned because of incorrect MSIS coding, the student will be forced to FAY at the school/district if the movement of the student appears to be within the same school/district.

3. N-Count Minimums

3.1 School Totals

3.1.1 In order for a school to earn a grade, the school must have a minimum of 10 valid test scores in each of the required components. . Schools that do not have the minimum of 10 valid test scores for each of the components but meet the 95% minimum participation requirements, the available data will be reported but the school will not receive a grade. If a school does not meet the minimum of 10 valid test scores requirement because they do not meet the 95% minimum participation requirement, the school will receive a grade based on the available data for each component. See Sections 22 and 24 for exceptions to this rule.

3.2 Low 25% N-Count Minimums

3.2.1 This subgroup must have a minimum of 10 valid test scores. If there are less than 10 (<10) students in the Low 25% subgroup, the subgroup will consist of All students except for the students

scoring at the highest achievement level. If this calculation still results in a number less than 10, then ALL students will be included in the calculation of the Low 25% subgroup.

3.2.2 At the grade-level, a minimum of 4 students with valid scale scores are required to identify the Low 25%. If a grade has less than 4 students with valid scale scores for the subject, there will be no students identified as being in the Low 25% for that grade level for that subject.

4. Participation Rates

4.1 If a school/district does not meet the 95% minimum participation rate, the school/district will automatically be dropped a letter grade. Although subgroup participation rates will be reported, this penalty will apply to the overall participation rate only. (A 94.5% participation rate will not be rounded to 95%.)

4.2 Elementary schools with no assessments (K, 1, and 2) will not be assigned a participation rate. Therefore, these schools will not be impacted by the participation rate minimum requirements.

4.3 Students may be removed from the denominator of testing participation calculations if he/she meets the criteria set forth by the Office of Student Assessment as having a Significant Medical Emergency which made participation in the state testing impossible. For details regarding the definition of Significant Medical Emergency and the process of requesting a student be removed from the calculations, please contact the Office of Student Assessment.

4.4 High School participation rates will be calculated based on the Senior Snapshot. Data from all statewide high-school level end-of-course assessments required for graduation will be used in the participation calculations.

4.5 Students with significant cognitive disabilities (SCD) with no U.S. History assessment scores will be removed from the denominator for the participation rate calculation for U.S. History.

4.6 If and when the ACT assessment becomes a state required assessment, it will be included in the participation rate calculations. (See Section 25.)

4.7 If a student is expelled but is still enrolled in MSIS for the school/district during the testing window, he/she will be included in the denominator. If the student does not test, the student will count as "not tested".

5. Proficiency

5.1 Proficiency will be determined by the percentage of students who achieve a performance/proficiency of Proficient and above. No additional credit will be given for students scoring in a performance/proficiency level above proficient (e.g. "Advanced"). No partial credit will be given for students scoring in any performance level below proficient.

5.2 Assessments included in the proficiency calculations will consist of all federally-required statewide assessments in Reading/Language Arts/English, Mathematics and Science, and any additional high-school level end-of-course assessments required for graduation. This includes all Alternate Assessments

based on Alternate Achievement Standards (AA-AAS) for SCD students. (This rule will need to be reviewed with the implementation of any new statewide assessments.)

6. Growth

6.1 Growth is determined by whether or not a student increases in performance/proficiency levels from one (1) year to the next based on the following criteria:

- An increase of ANY performance/proficiency level
- Staying at the same performance/proficiency that is at or above Proficient from one (1) year to the next
- An increase within the lowest two (2) performance/proficiency levels that crosses over the mid-point of the level. (Example: Bottom half of Basic to top half of Basic)

6.2 Additional weight in the numerator is given for the following increases:

- Any increase of two (2) or more performance/proficiency levels will be given a weight = 1.2.
- Any increase to the highest performance/proficiency level will be given a weight = 1.25.
- An increase within the highest performance/proficiency level and any other increase is given a weight = 1.

(Note: Because additional weight is given, it is mathematically possible for a school or district's growth value to be greater than 100 points for any/all of the four (4) growth components.)

6.3 Any decrease in performance/proficiency levels = 0.

6.4 The lowest two (2) performance/proficiency levels will be split into half at the mid-point of the range. In the event that the range is an odd number and cannot be split into two (2) equal halves, the lower half of the performance/proficiency level will be one (1) point larger than the upper half. (Example: If the range of the performance/proficiency level is 13 scale score points, the bottom half of the range will be seven (7) scale score points and the upper half of the range will be six (6) scale score points.)

The splitting of the lowest two (2) performance/proficiency levels into half at the mid-point range is not intended to create two (2) new separate performance/proficiency levels. Therefore, students who move from the bottom half of the lowest performance/proficiency level to the bottom half of the second lowest performance/proficiency level will not be given additional weight for increasing two (2) performance/proficiency levels. That student will be considered to have increased one (1) performance/proficiency level.

(Rules regarding the splitting of the lowest two (2) performance/proficiency levels are subject to review and change with the implementation of any new assessments.)

6.5 Assessments used for calculation of growth will include:

- Grade-level (3-8) assessments in Reading/Language Arts;
- Grade-level (3-8) assessments in Mathematics;
- High School-level assessment in Reading/Language Arts;
- High School-level assessments in Mathematics;
- Alternate Assessment (3-8 and High School) in Reading; and

- Alternate Assessment (3-8 and High School) in Mathematics.

Growth will not be calculated for Science or U.S. History.

6.6 Students taking Algebra I in 7th or 8th grade are required by No Child Left Behind (NCLB) to also take the grade-level assessment in mathematics. Therefore, these students will have two (2) growth calculations: grade-level to grade-level and grade-level to Algebra I. The grade-level to grade-level growth calculation will be applied to the current school. The grade-level to Algebra I growth calculation will be banked until the student's 10th grade year.

6.7 To calculate growth for the High Schools for Math-All Students, Math-Low 25%, Reading-All Students and Reading-Low 25%, the 8th grade grade-level assessments will be used as the baseline. The exceptions to this are as follows:

- If a student takes Algebra I during his/her 8th grade year, his/her 7th grade grade-level assessments will be used as the baseline and banked until the student is in the 10th grade.
- If a student takes Algebra I in the 7th grade, his/her 6th grade grade-level math assessment will be used as the baseline and banked until the student is in the 10th grade.

6.8 If a student does not have the previous year's grade-level assessment, the student will be excluded from the growth calculation(s) except in the cases of the high school level assessments.

6.9 For students taking high school level assessments in grades lower than 10th grade, growth will be banked until the student's 10th grade year and then applied.

6.10 If a student does not take the required High School level assessments until 11th or 12th grade year, growth will be calculated and applied in the first year he/she has a valid score. The exception to this will be for students taking the alternate assessment. For students taking the alternate assessment, a cap of two (2) years will be applied to the growth calculations. Therefore, if a student takes the alternate assessment in 8th grade and does not take the high school level alternate assessment until 11th or 12th grade, he/she will not be included in the growth calculations.

6.11 Students who are retained in grades 3-8 will have a growth calculation based on the retained grade from the previous year. (Example: A 4th grade student who was retained will have growth calculated based on his/her previous year's 4th grade assessment scores.)

6.12 For K-3 schools, growth of 4th grade students in the district will be used for the growth calculations of the K-3 school in which they met FAY. Growth of the 3rd grade students who are retained will be included with the 4th grade student growth calculations.

6.13 The student must meet FAY for the current year in order to be included in the growth calculations but is not required to meet FAY for the previous year.

6.14 Growth will not be calculated for students who take the Alternate Assessment in the current year but took the grade-level general education assessment the previous year or vice versa.

6.15 The denominator for the growth calculation includes any FAY student with two (2) valid assessment scores (as defined above). The numerator will include any student included in the denominator who has demonstrated growth as defined above, and weighted accordingly.

6.16 After the implementation of the Common Core assessments, if a student comes to Mississippi from another state and has taken the same Common Core assessment as given in Mississippi, his/her score will be used to calculate growth for the student and the student's growth will be included in the calculations (provided that he/she meets FAY). If the student took a Common Core assessment (in another state) that is different from the assessments given in Mississippi, he/she will not have a growth calculation.

7. Lowest 25% of Students

7.1 Calculation methodology for students whose baseline assessment score is 3rd – 7th grade:

7.1.1 The Lowest 25% in reading and the Lowest 25% in mathematics are determined using the same method but applied separately to reading data and to mathematics data. The procedure used to identify the Lowest 25% of the students in a school is applied separately by grade, and the identified students are combined across all grades to comprise the Lowest 25% and to determine learning gains.

The process:

1. Rank the scores of all FAY students in the grade from highest to lowest based on their prior year scale scores. Students without a score from the prior year, or students in high school without an 8th grade test score, are not included. (See Rules 7.1.2 and 7.1.3 for additional clarification). Do not include scale scores from the alternate assessment. (See Rule 7.4)
2. Divide the number of students in the list by four (4). If the result is not a whole number then automatically round up to meet the 25% minimum.
3. Count, from the lowest score up, the number of students identified in step 2. Then identify the scale score that corresponds to that student. This scale score becomes the boundary score.
4. Identify all students with the boundary score determined in step 3. All students with the same boundary score or lower scale score will be included in the Lowest 25% group for that subject/grade.
5. Repeat the process for each grade for the subject then combine students to form the Lowest 25% for the school for the subject.

Note: The number of students in the Lowest 25% group must meet the minimum n-count as defined in Section 3.2. If the minimum n-count is not met, the rules outlined in Section 3.2 will be applied. (See Section 3 for more details on N-Count minimums.)

It is possible for the Lowest 25% to be more than 25% when steps 4 and 5 are applied.

7.1.2 The Lowest 25% for high schools will be identified based on their 8th grade cohort and their 8th grade grade-level assessment score. The exception will be for those students who take a high-school level course before the 10th grade, in which case, those students will be excluded from the Lowest 25% group.

7.1.3 The Lowest 25% for schools whose highest grade is lower than fourth grade will be identified based on the students who attended the school, not based on their fourth grade school's Lowest 25% group. Therefore, a student may be identified in the Lowest 25% in one school, but not the other.

7.2 The Lowest 25% for a district will be identified using the same method described above (i.e., the district will be calculated as if it were one school). Therefore, it is possible that some students may be identified as the Lowest 25% for their school but not for their district, or for their district but not their school.

7.3 The Lowest 25% for the state will be identified using the same method (i.e., the state will be calculated as if it were one school).

7.4 Scores from the alternate assessment for SCD students will not be included in the identification of the Lowest 25%.

8. Graduation Rate

8.1 The federally-approved 4-year graduation rate will be used. (SECTION 37-17-6, MS CODE OF 1972)

Definition: The number of students who graduate in four (4) years from a school and LEA with a **regular high-school diploma** divided by the number of students who entered four years earlier as first-time 9th graders, with adjustments for deaths, emigration, and transfers in and out. Ninth-grade students who repeat 9th grade will stay in their original cohort.

Definition: A "regular high school diploma" is the standard high-school diploma that is fully aligned with the state's academic content standards. No exceptions are made for students with disabilities (SCD students or non-SCD students) or students receiving an occupational diploma, GED, certificate of attendance, etc.

8.2 For schools with a 12th grade that have been in existence for less than four (4) years, the district's graduation rate will be applied to the school's graduation component calculation.

9. Acceleration

9.1 Beginning in school year 2015-2016, high schools will have an Acceleration component in their calculations.

9.2 The Acceleration component refers to the percentage of students taking and passing the assessment associated with the accelerated courses such as Advanced Placement (AP), International Baccalaureate (IB), Advanced International Certificate of Education (AICE), or SBE-approved industry certification courses. For students taking dual credit and dual enrollment courses, passing refers to students who are passing the course with a "C" or above. For AP courses, the student must score at least 3 on the AP exam. For IB courses, the student must score at least 4 on the IB exam. For AICE courses, the student must obtain a passing score on the exam. (Passing scores of "A", "B", "C", "D", and "E" on the AICE exams are not based on the American "A-F" grading scale.) For industry certification courses, the student must pass the exam.

9.2.1 College courses must be credit-bearing courses with a minimum of 3 semester hours credit and may be in any subject/content area.

9.3 The Acceleration component will consist of a Participation and a Performance component. These two components will be combined for one score worth 100 points and phased in on the following sliding scale:

- a. Year 1 (2015-2016): Participation - 70%/Performance - 30%
- b. Year 2 (2016-2017): Participation - 60%/Performance - 40%
- c. Year 3 (2017-2018) and beyond: Participation - 50%/Performance - 50%

9.4 Calculation of Participation

9.4.1 The numerator for the Participation component calculation will be the number of students taking accelerated courses such as AP, IB, AICE, dual credit, dual enrollment or industry certification courses based on the definition above.

9.4.2 The denominator for the Participation component calculation shall include all students not identified as Significant Cognitive Disabilities (SCD) students whose Mississippi Student Information System (MSIS) grade or peer-grade equivalent is 11th or 12th grade plus any 9th or 10th grade students who are taking and passing these assessments/courses plus any 11th or 12th grade SCD students who are taking and passing these assessments/courses. (9th and 10th grade students and SCD students will not be included in the denominator unless they are also included in the numerator.)

9.4.3 Students participating in multiple accelerated courses during the same school year will be given additional weighting in the numerator as follows:

- 2 courses: 1.1
- 3 courses: 1.2
- 4 courses: 1.3
- 5 courses: 1.4

9.5 Calculation of Performance

9.5.1 The numerator for the Performance component calculation will be the number of students taking and passing accelerated assessments/courses such as AP, IB, AICE, dual credit, dual enrollment, or industry certification courses based on the definition above.

9.5.2 The denominator for the Performance component calculation will consist of all students participating in the courses identified in the participation calculations but with no additional weight applied for students taking multiple courses.

9.5.3 Students who are enrolled in accelerated courses but do not take the required assessment will be considered as "not proficient" in the performance calculations.

9.6 For students taking and passing multiple courses, the additional weighting used in the participation calculations will be applied. Example: A student taking and passing two (2) courses would count as one (1) student in the denominator and 1.1 in the numerator. A student taking two (2) courses but only passing one (1) will count as 1 in both the numerator and the denominator.

9.7 Students who take an accelerated course during their 11th grade year but do not take an accelerated course during their 12th grade year will be counted in the denominator both years, but in the numerator during their 11th grade year only.

9.8 FAY requirements will not be applied to the participation or proficiency calculations in the Acceleration component.

10. Banking Scores: High school end-of-course assessments taken before 10th grade

10.1 Scores of students taking Algebra I, Biology I, English II, or US History end-of-course assessments in a grade below 10th grade will be “banked” for proficiency/achievement and growth calculations until the student is in the 10th grade and then applied to a) the student’s school of origin where he/she took the assessment and b) the student’s 10th grade school (if the student met FAY requirements the year he/she was assessed and during his/her 10th grade year). (See Section 6 for additional clarification on Growth).

10.2 If a student transfers out of district before or during their 10th grade year, his/her scores (achievement and growth) will be applied to the school of origin (if FAY was met) but not to the receiving school in the new district.

Refer to Section 4 (Participation) and 6 (Growth) for additional information.

11. Focus Schools (Pending USDE approval)

11.1 Schools identified as “D” or “F” schools for two (2) consecutive years and not identified as “Priority” will be identified as “Focus” schools. (SECTION 37-17-6, MS CODE OF 1972)

11.2 If at least 10% of the schools in the state are not graded as “D” schools, the lowest 10% of schools, which are not already identified as Priority Schools, will be identified as Focus Schools. (SECTION 37-17-6, MS CODE OF 1972)

11.3 Beginning with the 2013-2014 grade assignments, any school designated as “Focus” will implement Focus School interventions for a minimum of two (2) years. If the school’s grade level improves the school will take the higher grade level but continue to be considered as a “Focus School” for federal reporting and will continue to implement the Focus school interventions for the two-year minimum

12. Priority Schools (Pending USDE approval)

12.1 Schools identified as “F” schools for two consecutive years will also be identified as “Priority” schools. (SECTION 37-17-6, MS CODE OF 1972)

12.2 If at least 5% of the schools in the state are not graded as “F” schools, the lowest 5% of school grade point designees will be identified as Priority Schools. (SECTION 37-17-6, MS CODE OF 1972)

12.3 Beginning with the 2013-2014 grade assignments, any school designated as “Priority” will implement Priority School interventions for a minimum of three (3) years. If the school’s grade level

improves the school will take the higher grade level but continue to be considered as a "Priority School" for federal reporting and will continue to implement the Priority school interventions for the three-year minimum.

13. Reward Schools (Pending USDE approval)

13.1 Schools identified as "A" schools will also be identified as "Reward" schools. (SECTION 37-17-6, MS CODE OF 1972)

13.1.1 Any school also meeting the federal criteria for "Reward-High Progress" or "Reward-High Performing" will be recognized.

14. Annual Measurable Objectives (AMOs) (Pending USDE approval)

14.1 AMOs will be reported for federal requirements but will not be factored into the calculations for the assigning of A-F accountability labels.

14.1.1 All "C," "D," and "F" schools not identified as Priority or Focus will develop an action plan regarding subgroups not meeting AMOs.

15. English Learners (EL)

15.1 Scores of English Learners (EL) will be included in the calculations UNLESS the district requests that the scores of an EL student who is first year in the country be excluded from their proficiency (not participation) calculations.

15.1.1 A student whose HLS (Home Language Survey) indicates the presence of a language other than English must be assessed for English-language proficiency within thirty (30) days of enrollment at the beginning of the school year. Students who register after the beginning of the school year must be assessed within two (2) weeks of enrollment. LEAs have the option to exclude the test scores for recently arrived EL students. "Recently Arrived" applies to the amount of time the student has been served in any school within the United States, NOT to the length of time the student has lived in the United States. LEAs must identify first year EL students designated for exclusion on or before February 1, annually. (For more information, contact the Office of Federal Programs.)

15.1.2 "Recently arrived" ELs may also be excluded from the Acceleration component and College and Career Readiness component. These students will automatically be included (if FAY is met) unless the district requests these students be excluded. The process for requesting the exclusion will be communicated by the MDE.

15.1.3 Any EL student whose scores are excluded based on rule 15.1 will have their score invalidated in the accountability calculations. Therefore, the score will NOT be used the following year as a baseline for any growth calculations.

16. Students with Disabilities

16.1 United States Department of Education (ED) regulations limit the number of scores of children taking alternate assessments for students with significant cognitive disabilities (SCD) scoring proficient or above to 1% of the students at the state and district level. This rule does not apply at the school level because these regulations recognize that some schools offer specialized services or are near specialized medical facilities that attract higher numbers of students with significant special needs. Therefore, if a district has >1% of their total population scoring proficient or above on an alternate assessment the percent above 1% will be adjusted ~~to reflect a score of non-proficient~~.

16.2 All eligible SCD students who are enrolled before or during the January MSIS data submission will be expected to participate in statewide assessments. If an SCD student, who would otherwise be eligible to participate in the alternate assessment, is enrolled after the January MSIS data submission, he/she may be removed from the denominator of participation calculations if the IEP committee determines that there is insufficient time for the teacher to gather both baseline and final assessment data that would yield a valid assessment for that student. The district will need to notify the Office of Student Assessment of any such student that may need to be removed from the participation calculations. If the student transfers from another school within the state after this deadline, and it is verified by the Office of Student Assessment that no baseline data from the school of origin is available, the district must notify the Office of Student Assessment and request that this student be removed from the participation calculations. (This rule will need to be updated and revised with the implementation of any new alternate assessment.)

16.3 Non-SCD students are not allowed to participate in alternate assessments. If any such students have alternate assessment data, the test data will be considered not valid.

16.4 Students with disabilities will be those students whose SPED indicator in MSIS is "Y" (Yes) at the end of month 8 (closest approximation to the test administration dates).

16.4.1 In order for a student to be counted as SCD, his/her SCD indicator and SPED indicator must be set to "Y" (Yes) in MSIS.

16.5 Students with disabilities who are coded as "ungraded" (56 or 58) in MSIS will be assigned a peer-grade calculation based on his/her age on September 1 of the current school year.

17. Duplicate Test Scores

17.1 If a student takes the general education (grade-level) assessment AND the alternate assessment, the scores from the general education assessment will be used in the school/district accountability calculations.

17.2 If MSIS records indicate two (2) valid assessment scores for the same assessment in the same year, the score from the first administration date will be used. In the event that MSIS records indicate two valid assessment scores for the same assessment on the same date, the higher of the two scores will be used in the school/district accountability calculations.

18. Invalid Test Scores

18.1 Students with invalid test scores will be counted as “not tested” for participation calculations. The first VALID test score will be used in the proficiency, growth, and participation calculations.

18.2 If an invalid score is validated after the accountability calculations are performed and final school/district grade classifications have been assigned, the school/district’s grade classifications will not be recalculated and adjusted to reflect the validated score. If during the next year, the student tests again and has a valid test score, that test score, although it was not the student’s first test score, will be used during the next year’s calculations. Please refer to the Office of Student Assessment regarding deadlines for appealing invalid test scores.

18.3 If a student’s MSIS grade level (or peer grade level for ungraded students) does not match his/her assessment grade level, the student’s scores will not be included in the numerator for participation, growth, or proficiency calculations. (The student will count as not proficient, not meeting growth, and not tested.) Likewise, the student’s scores will not be used the following year in growth calculations.

(Note: This rule does not apply to high school end-of-course assessments or high school alternate assessments.)

19. Rounding

19.1 In the calculation of each of the components in the accountability system that are reported to schools, the final value of each component will be rounded to one (1) decimal place (tenths place). After the components are summed, the total value will be rounded to a whole number and reported for the final grade value calculation.

Example:

Reading Proficiency	80.5
Reading Growth – All Students	80.5
Reading Growth – Low 25% of Students	80.5
Math Proficiency	80.5
Math Growth – All Students	80.5
Math Growth – Low 25% of Students	80.5
Science Proficiency	80.5
Total Score	564

Note: Other rounding rules are embedded in the explanations of the specific components.

20. School Reconfigurations or Redrawing of District Lines

20.1 A school’s accountability calculations will be based on the grade configuration of the school (and the students in that school) on the date that corresponds with the Full Academic Year rules at the time of testing (see Section 2 for details on Full Academic Year). The calculations are applied to the school the following year, regardless of any reconfigurations or redistricting that takes place during the summer after testing or during the school year before testing.

21. Alternative, Career, Technical, & Vocational Schools

21.1 No school grades or differentiated accountability labels will be assigned to alternative, career, technical, and/or vocational schools. Scores of students attending these schools will be included in the school grade of the student's official MSIS home school of enrollment.

22. Schools Without Tested Subjects or Grades

22.1 Elementary/Middle Schools

22.1.1 Any elementary/middle school that does not have reading or math scores because the school does not have the required grade level, the scores from the students in the next higher grade in the tested subject within the same district will be applied back to the student's lower elementary school of origin. In order for the scores to be applied, the student must meet FAY at the lower grade school, the current school and if there is a gap in years, anywhere in the district for the years in between.

Example 1, K-2 School:

- Reading and Math Proficiency- The reading and math scores from students in grade 3 who attended the K-2 school and are still in the same district will be used to calculate the math and reading proficiency for that K-2 school.
- Science Proficiency – An equating process will be used to adjust the scores for this component.
- Growth - The reading and math scores from students in grade 4 who attended the K-2 school and are still in the same district will be used to calculate the growth for Reading-All Students, Math-All Students, Reading-Low 25%, and Math-Low 25% for that K-2 school. The students would have to have met FAY
 - in the K-2 school during 2nd grade
 - the 4th grade school in the same district; and
 - any school within the same district during 3rd grade.

Example 2, K-3 School:

- Reading and Math Proficiency- The reading and math scores from students in grade 3 at the school will be used to calculate the math and reading proficiency for that K-3 school.
- Science Proficiency – An equating process will be used to adjust the scores for this component.
- Growth - The reading and math scores from students in grade 4 who attended the K-3 school and are still in the same district will be used to calculate the growth for Reading-All Students, Math-All Students, Reading-Low 25%, and Math-Low 25% for that K-3 school.
- All applicable FAY rules will apply.

Example 3, K-4 School:

- Reading and Math Proficiency- The reading and math scores from students in grades 3 and 4 at the school will be used to calculate the math and reading proficiency for that K-4 school.
- Science Proficiency – An equating process will be used to adjust the scores for this component.
- Growth - The reading and math scores from students in grades 3 and 4 at the school will be used to calculate the growth for Reading-All Students, Math-All Students, Reading-low 25%, and Math-Low 25% for that K-3 school.
- All applicable FAY rules will apply.

Example 4, 6-7 School:

- **Reading and Math Proficiency**- The reading and math scores from students in grades 6 and 7 at the school will be used to calculate the math and reading proficiency for that 6-7 school.
- **Science Proficiency** – An equating process will be used to adjust the scores for this component.
- **Growth** - The reading and math scores from students in grades 6 and 7 at the school will be used to calculate the growth for Reading-All Students, Math-All Students, Reading-Low 25%, and Math-Low 25% for that 6-7 school.
- All applicable FAY rules will apply.

22.1.2 An equating process to adjust the points required will be used for elementary/middle schools that do not have science scores because the school does not have a 5th or 8th grade.

22.2 High Schools

22.2.1 Schools with missing data for components specific to high schools (U.S. History, graduation rates, etc.) will have proxy data (i.e., district average, historical average, etc.) applied if available. If no proxy data is available, an equating process will be used to adjust for the missing components.

22.3 Schools with only Pre-Kindergarten and/or Kindergarten will not be assigned a school grade label. (Pending legislative amendment)

23. State and other Special Schools**23.1 Mississippi School of the Arts (MSA) and Mississippi School for Math and Science (MSMS)**

23.1.1 The Mississippi School of the Arts and Mississippi School for Math and Science will not earn grades. (Pending technical amendment to SB2396)

23.1.2 If a student takes a high-school end-of course assessment for the first time while at MSA or MSMS, his/her scores will be sent back to their school/district of origin and rolled into the state totals.

23.1.3 (Pending the implementation of the College Readiness component) Students enrolled at MSA and/or MSMS during the time of the Senior Snapshot will have their ACT scores sent to their high school of origin.

23.2 Mississippi School for the Blind (MSB) and the Mississippi School for the Deaf (MSD)

23.2.1 The Mississippi School for the Blind and the Mississippi School for the Deaf will not earn grades but will have results reported to meet federal regulations. (Minimum N-counts and FAY rules will apply.) (Pending technical amendment to SB2396)

23.3 Other State/Special Schools

23.3.1 State agencies (i.e. Hudspeth, Ellisville State School, etc.,) will not earn grades.

23.3.2 Students placed in non-public (special private schools) (i.e., Millcreek, CARES, etc.,) but are enrolled in regular Mississippi public school will have his/her scores included in the calculations of the school/district in which he/she is enrolled in MSIS.

23.3.3 Students enrolled in schools 200 and 500 have no enrollment and are not used for any of the usual statistical and reporting purposes. If a student is enrolled in a public school during the testing window, he/she would have to be tested (and counted in the testing participation rates) and his/her score (if FAY) would be used for accountability purposes.

23.4 Students in Correctional Facilities/Juvenile Justice System

23.4.1 According to the USDE, these facilities are considered “programs” not schools and would not be assigned accountability labels.

23.4.2 If a student, who is still enrolled in MSIS, is in such a program and is not tested, the student will count as “not tested” in the participation rate calculations of the school/district. If the student is tested, his/her scores will count at his/her MSIS resident school.

23.5 Virtual Public Schools

23.5.1 Only schools classified under the U.S. Department of Education’s EDEN (Education Data Exchange Network) reporting requirements as a separate school entity will receive a grade.

24. 9th Grade Only Schools

24.1 Scores of a 9th grade only school will be combined with the high school to which that school feeds and calculated as one (1) school but reported as two (2) separate schools. In other words, both schools will earn the same school grade because it will be based on the same data calculations.

25. College & Career Readiness Indicator

The College & Career Readiness component will be dependent on legislative action. The following rules will apply only if the state legislature mandates state-wide ACT testing and appropriates funding for such testing.

25.1 The ACT will be used as the College & Career Readiness Indicator.

25.2 Mathematics will comprise 50% of the College & Career Readiness component. English/Reading will comprise 50% of the College & Career Readiness component.

25.3 A student will be included in the numerator for Mathematics if he/she is considered College & Career Ready in Mathematics by having a score on the Mathematics component of the ACT at or above the ACT College Readiness Benchmark for the Mathematics component at the time of the student’s assessment.

25.4 A student will be included in the numerator for English/Reading if he/she is considered College & Career Ready in English/Reading by having a score on the English component of the ACT at or above the ACT College Readiness Benchmark OR if his/her score on the Reading component of the ACT is at or above the ACT College Readiness Benchmark at the time of the student’s assessment.

NOTE: As of September 1, 2013 the ACT College Readiness Benchmarks are as follows:
English - 18; Reading - 22; Mathematics - 22

25.5 Science ACT sub-scores will not be included in the College & Career Readiness component.

25.6 ACT Composite scores will not be included in the College & Career Readiness component. (Rationale: ACT does not designate a composite score to indicate college readiness.)

25.7 The highest sub-score for each student (at the time of the Senior Snapshot) in Mathematics and Reading/English, as described above, will be used in the College & Career Readiness Indicator accountability calculations.

25.8 Contingent upon legislative funding, the state will pay for one state-wide ACT administration to be held in the Spring for students classified in MSIS as juniors. Ungraded students whose birthdates link them to the cohort of students identified as juniors will also be included. Students may take the ACT as many additional times as they choose, at their own expense.

25.9 Students identified in MSIS as SCD will not be required to participate but may participate if the IEP committee deems it appropriate.

25.10 The ACT scores of all students identified in the Senior Snapshot will be included in the calculation except students identified in MSIS as SCD. However, if a student identified in MSIS as SCD takes the ACT, his/her score will be included in the calculations.

25.11 A student's score will be applied to the school in which the student is enrolled in MSIS at the time of the Senior Snapshot.

25.12 No other assessments will be allowed as a substitution for the ACT in the College & Career Readiness component.

26: Senior Snapshot

The Senior Snapshot (SS) is a method of identifying high school students for the high school assessment participation rate calculation required by the ED. Because students may take the high school level assessment at any time during high school to meet federal regulations, MDE uses this method to capture the status of students before the end of their fourth year in high school. The SS captures ALL students who have been enrolled in a MS public school for three (3) years (grades 10-12). If the student does not meet the 3-year enrollment criteria, he/she will not be included in the denominator for participation rate calculations.

27: Other

27.1 Deceased Students

27.1.1 Students indicated in MSIS as deceased will not be included in any accountability calculations.

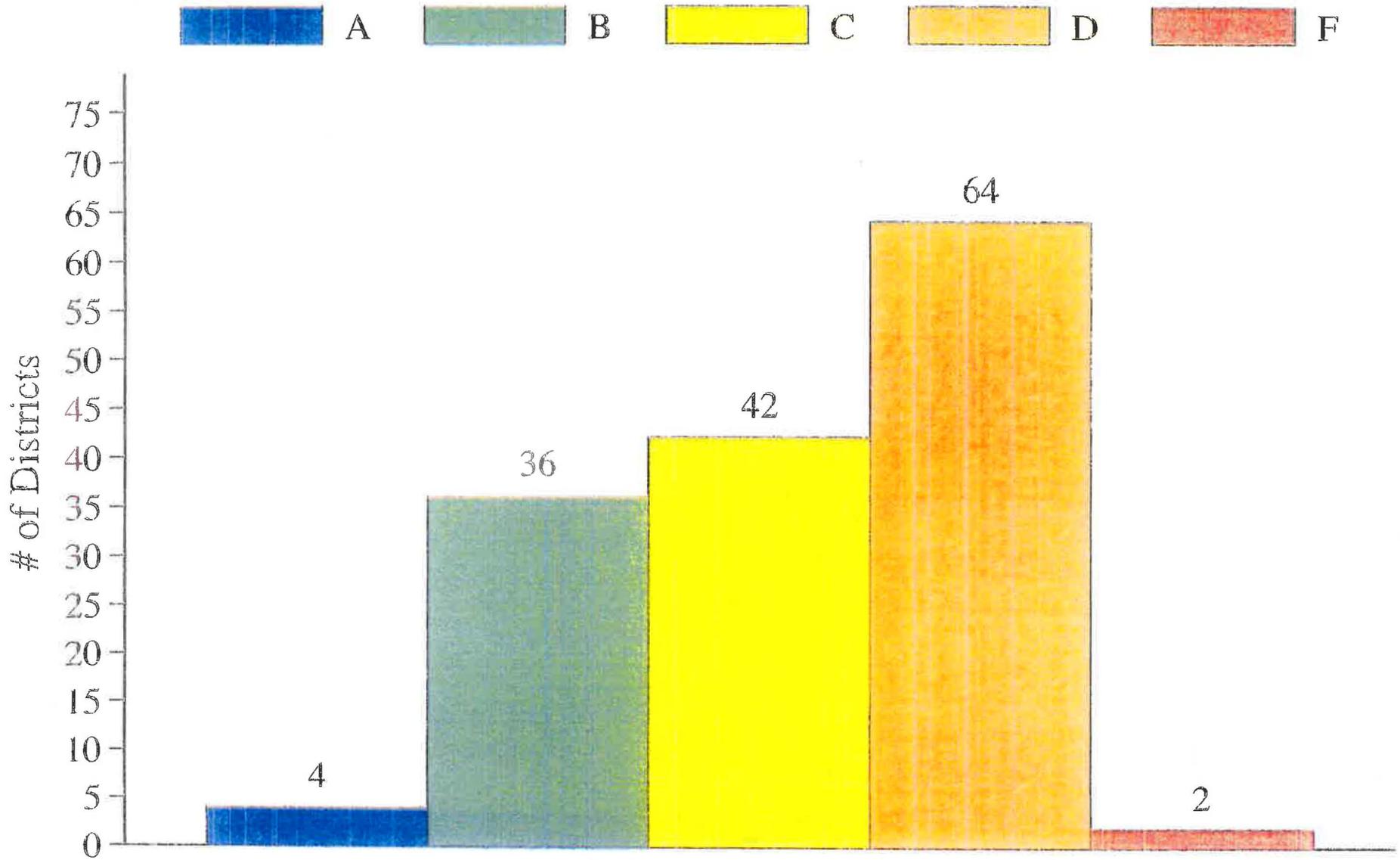
27.2 Foreign Exchange Students

27.2.1 For school year 2013-2014, foreign exchange students will automatically be included in accountability calculations just as any other students. However, if a school/district wishes to have a foreign exchange student excluded from the accountability calculations, the request should be made through the Internal Review Process.

27.2.2 Beginning in school year 2014-2015, MSIS will have a “Foreign Exchange Student Exemption” flag that schools/districts may use to identify and request exemption for these students. Schools/districts will be required to provide supporting documentation.

District Accountability Grades

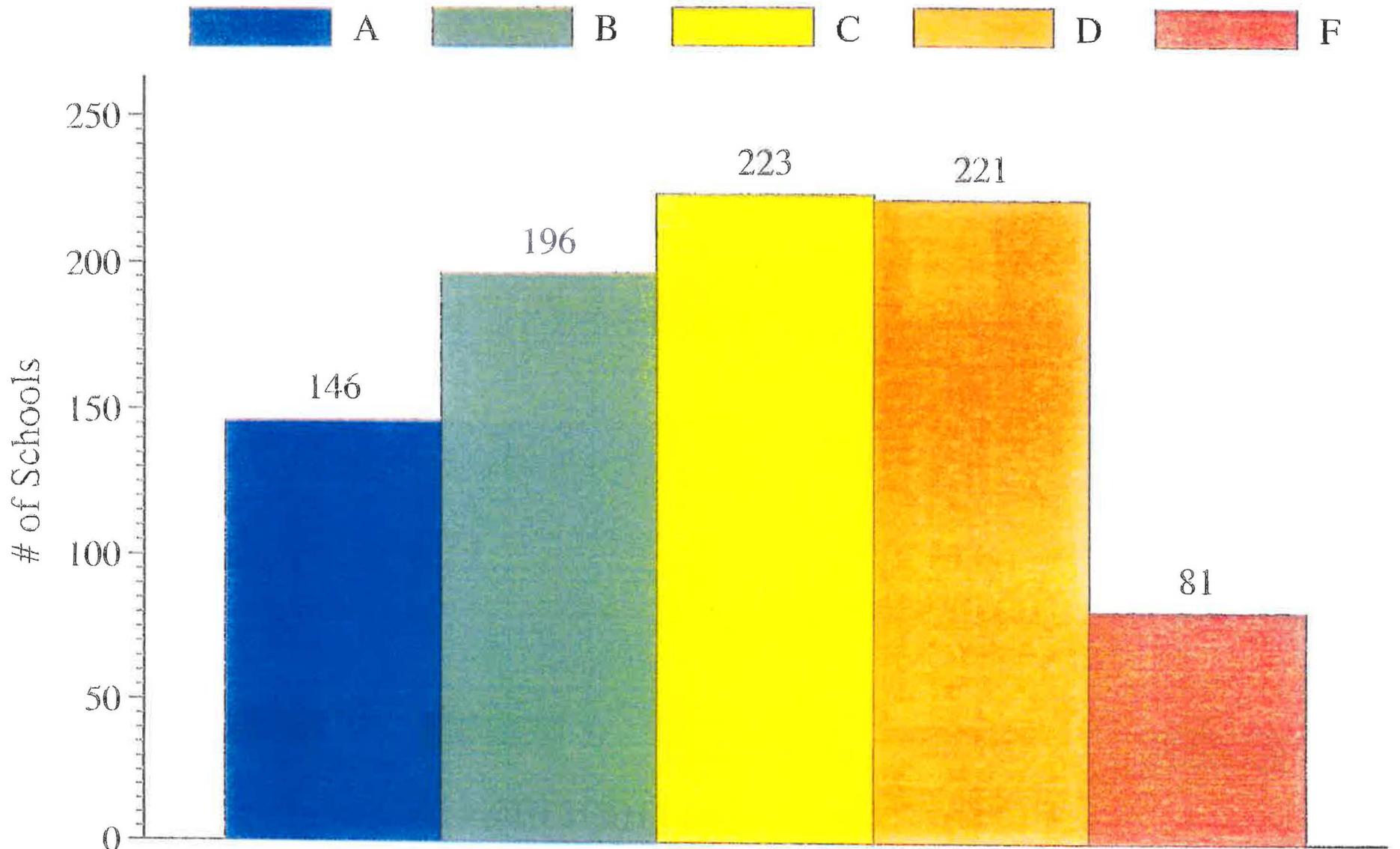
2012-2013 Impact Data



The *Excellence For All* participating districts are not represented in this graph.

School Accountability Grades

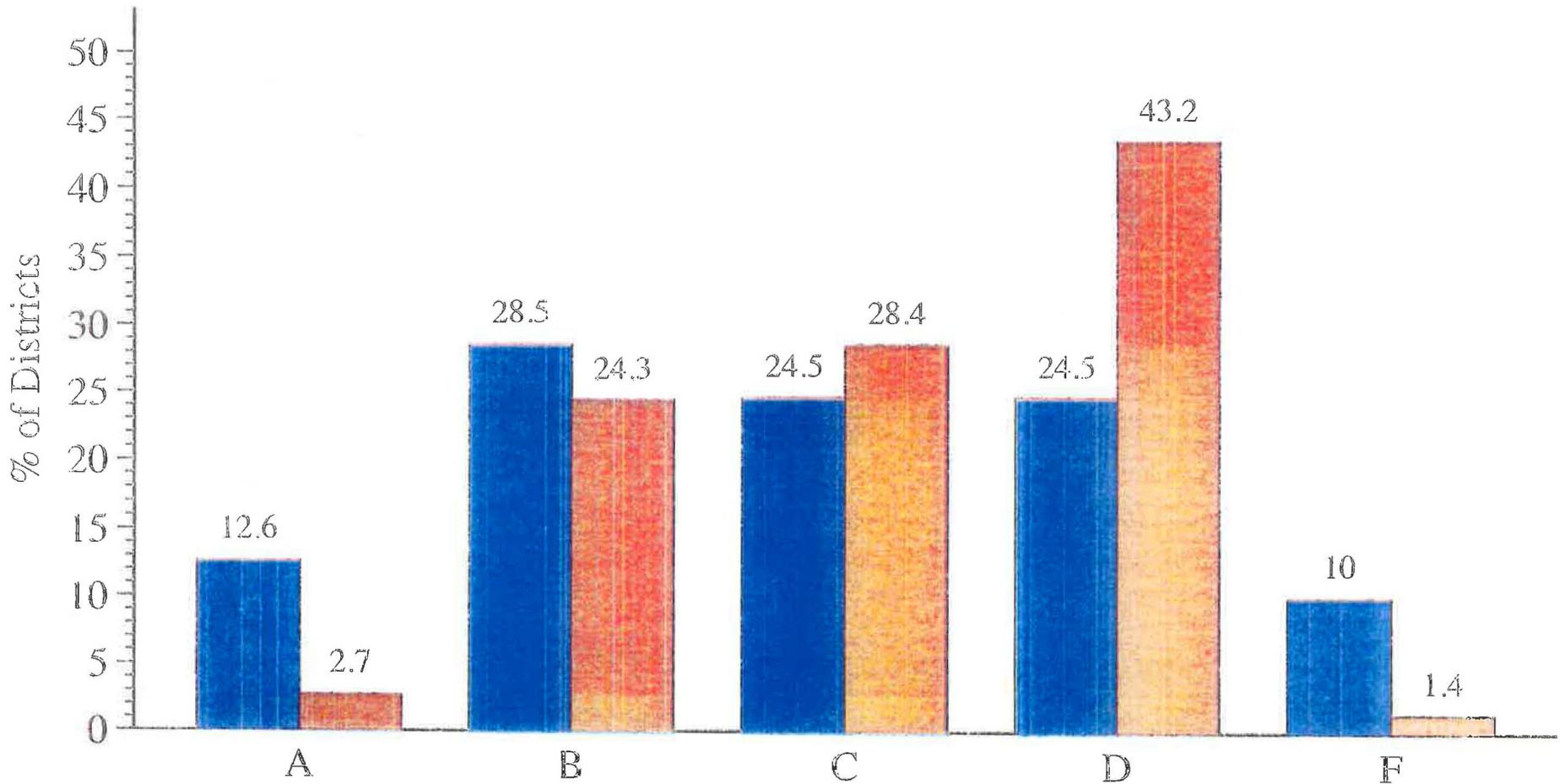
2012-2013 Impact Data



The *Excellence For All* participating districts are not represented in this graph.

Actual Accountability Results vs. Impact Data Results District Level Results

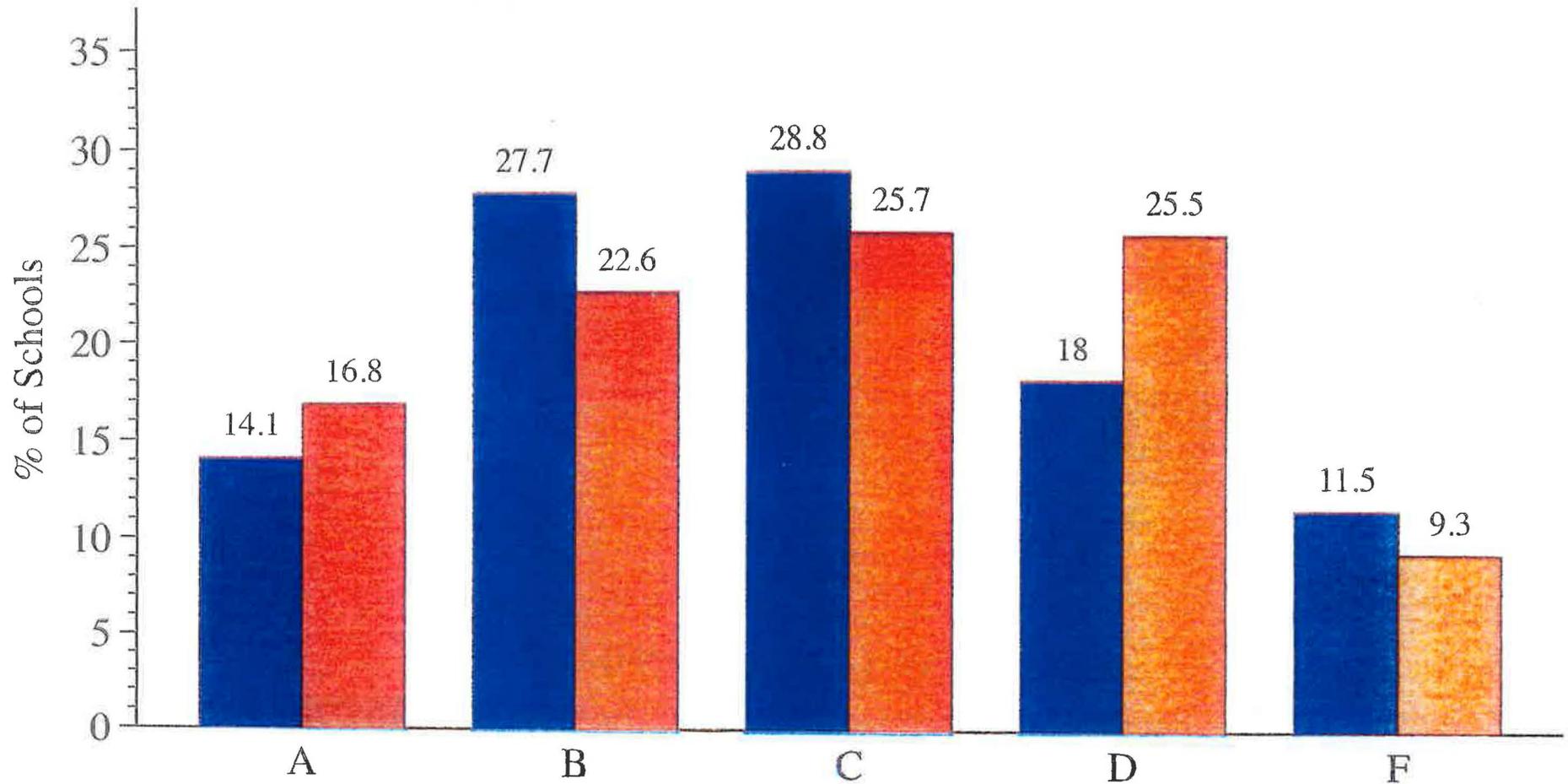
■ % from Actual 2013 Accountability Results
■ % from Impact Results Using 2013 Data



Calculations are based on percentages rather than numbers because more schools received accountability labels under the requirements of SB2396 and the proposed accountability system than in the 2012-2013 actual results and because the *Excellence For All* districts were removed from the impact data calculations.

Actual Accountability Results vs. Impact Data Results School Level Results

 % from Actual 2013 Accountability Results
 % from Impact Results Using 2013 Data



Calculations are based on percentages rather than numbers because more schools received accountability labels under the requirements of SB2396 and the proposed accountability system than in the 2012-2013 actual results and because the *Excellence For All* districts were removed from the impact data calculations.

**PROPOSED COMBINED
STATE AND FEDERAL
ACCOUNTABILITY MODEL**

APA COMMENTS

SEPTEMBER 13, 2013 – JANUARY 8, 2014

Proposed Combined State and Federal Accountability Model

APA Comments Summary Chart

Section	Topic	Comments		
		Supporting	Concerns	Total
1	Assignment of Grade Classifications	1	42	43
2	Full Academic Year	1	4	5
3	N-Count Minimums	0	1	1
4	Participation Rates	0	3	3
5	Proficiency	1	5	6
6	Growth	3	21	24
7	Lowest 25% of Students	4	49	53
8	Graduation Rate	0	24	24
9	Acceleration	0	43	43
10	Banking Scores	0	7	7
11	Focus Schools	0	1	1
12	Priority Schools	0	1	1
13	Reward Schools	0	0	0
14	Annual Measurable Objectives	0	0	0
15	English Learners	0	0	0
16	Students with Disabilities	0	3	3
17	Duplicate Test Scores	0	0	0
18	Invalid Test Scores	0	0	0
19	Rounding	0	0	0
20	School Reconfigurations or Redrawing District Lines	0	0	0
21	Alternative, Career, Technical, & Vocational Schools	0	0	0
22	Schools Without Tested Subjects or Grades	0	19	19
23	State and Other Special Schools	0	0	0
24	9 th Grade Only Schools	0	0	0
25	College & Career Readiness Indicator	3	29	32
26	Senior Snapshot	0	0	0
27	Other	0	0	0
-	Miscellaneous	10	49	59
TOTAL COMMENTS		23	301	324

Note: Sections highlighted in green are requirements of MS Code 37-17-6.

Proposed Combined State and Federal Accountability Model

APA Comments Summary Chart

Role	Number of Commenters
Superintendents/Conservators	19
Assistant Superintendents	10
District School Board Members	1
Federal Programs Directors	1
Curriculum Directors	2
Special Education Directors	1
Principals	10
Assistant Principals	3
Vocational School Directors	1
Other District Personnel	7
Instructional Specialist/Academic Coaches	3
Advocacy Groups	2
Unknown	8
TOTAL	68

Thirty-six (36) school districts were represented through the APA comments received.

Tollie Thigpen

From: Sherry Jackson <sjackson@gville.k12.ms.us>
Sent: Friday, September 20, 2013 10:11 AM
To: Accountability
Cc: Everett Chinn; Lesson Taylor
Subject: Statewide Accountability System Effective SchoolYear 2013-2014

Please stop changing the accountability standards and then implementing during the same schoolyear.

Thanks.

Sent from my iPhone

John Cartwright

m: Dianne Zanders <dzanders@gville.k12.ms.us>
Sent: Sunday, September 22, 2013 4:11 PM
To: Accountability
Cc: Lesson Taylor
Subject: Statewide Accountability System 2013-2014

My concerns with the accountability system is that we're constantly changing the rules and implementing new ones the same year. Being this is the 2nd month of school, we have outlined ways to improve . Yet, we have to go back and revise them based on the new Statewide Accountability System.

John Cartwright

From: Shannon Eubanks <aeubanks@lincoln.k12.ms.us>
Sent: Monday, September 23, 2013 3:53 PM
To: Accountability
Cc: Terry Brister; rratcliff@lincoln.k12.ms.us
Subject: APA Comments on Statewide Accountability System

To Whom It May Concern:

I do not expect this email to arrest the momentum of change with the Accountability System that is being implemented, but I feel I would be remiss if I did not voice my concerns. I do not believe this new system will improve education because the system is based on "reforms" that currently are running rampant in Mississippi and across the nation, with little or no true research to support. Also, the new Accountability System was not created due to a failing of the existing system, but in order to receive an ESEA flexibility request (<http://www2.ed.gov/policy/eseaflex/approved-requests/ms.pdf>). The issues I have with the new system are as follows:

1. Because the standards for performance are designed to increase once 75% of students are proficient and/or 65% of schools reach "B" status, these standards in this system are subjective and are not bound in any research or evidence of what "proficient" means.
2. Using Acceleration (i.e., AP, IB, dual credit) as part of the Accountability System will punish poor, small, and rural schools:
 - a. Many small schools do not have the staff members to offer these courses (which require advanced degrees or special curriculum), especially if students are expected to take two such courses;
 - b. Students will be resistant to sign up for these courses, especially if the students must bear the cost, because they are not required for graduation;
 - c. Not every student wants, or needs, to go to college and therefore to push them to take these courses will serve no purpose other than to try and get a "percentage".
3. Using ACT scores as a component (if eventually added) is not a good component:
 - a. The ACT's validity in determining college readiness has been questioned (http://www.insidehighered.com/news/2011/06/21/study_suggests_most_colleges_use_act_inappropriately);
 - b. The Mississippi School for Mathematics and Science has found that ACT scores do not accurately predict how well students will do and therefore requires no minimum score for admittance (<http://www.msms.k12.ms.us/admissions-faq/>);
 - c. Colleges and universities across the nation are de-emphasizing the ACT and SAT for student enrollment (<http://www.fairtest.org/university/optional>);
 - d. In Mississippi, students do not need the ACT to enroll in a public university if they have a qualifying GPA (<http://riseupms.com/apply/#1/>).
4. Using the federal, 4-year graduation rate, schools will be penalized for:
 - a. Students who may take 5 or 6 years to graduate;
 - b. Students who, through life circumstances, decide to go the GED route;
 - c. Students who, for whatever reason, pass all required classes but cannot pass the SATP;
 - d. Students who are Special Needs and cannot receive a standard diploma.
5. Using an "applied back" approach to schools that do not have required grade levels (e.g., K-2 school) or using an "equating" process for schools that have missing components (e.g., 5th grade science in a grade 3-4 school) not only has

no solid research or statistical justifications, it holds schools and teachers accountable for test score they have no control over.

In conclusion, if the intent was to create a system of "winners" and "losers", then the job was well-done. Schools with the financial resources, the parental and community involvement, or whose students who come from less challenging backgrounds will do well in this system. Schools without the finances, whose parents and communities are not involved, and whose students come from challenging backgrounds will struggle under this system. The state of Mississippi could have saved hundreds of thousands of dollars in developing this system by simply looking at the federal spending at each school, making an on-site visit, and awarding grades accordingly.

Sincerely,

Shannon Eubanks
Principal
Enterprise Attendance Center
1601 Highway 583 SE
Brookhaven, Mississippi 39601
Office: 601-833-7284
Fax: 601-835-1261

Tollie Thigpen

From: Paula Vanderford
Sent: Thursday, September 26, 2013 8:28 PM
To: Accountability
Cc: Jo Ann Malone; Patrick Ross; Tollie Thigpen
Subject: Fwd:
Attachments: image001.jpg; ATT00001.htm; Responses and Thoughts on Proposed Accountability System.doc; ATT00002.htm

Sent from my iPhone

Begin forwarded message:

From: Jimmy Weeks <jimmy.weeks@leecountyschools.us>
Date: September 26, 2013, 4:51:47 PM CDT
To: <pvanderford@mde.k12.ms.us>

Responses and Thoughts on Proposed Accountability System
Lee County School District

1. On the first page concerning College and Career Readiness – it states,
“...Contingent upon legislative funding.”

We are concerned that if legislature doesn't fund it, will that cost be passed on to districts when our budgets are already strained to the point of breaking. Can we be assured that costs will not be passed down to the district level? How soon will we know?

2. 5 – Proficiency

Why is no additional credit given for students scoring above proficient and no partial credit for those in a level below proficient? If students move up a level or move up within a level below proficient, districts should receive some credit for those kids. Teachers and students still had to work hard to make those gains. Why not give credit for those advanced students? If they moved from proficient to advanced, that is exactly what teachers and students have been working so hard to accomplish. Is there not concern that those students who teachers feel like won't count will be left out, or at the least not focused on as much. We ask that you really give this section a very close look.

3. 8 - Graduation – under the definition of “regular high school diploma”

The no exceptions clause for students with disabilities, GED, or certificate of attendance causes us great concern. Students with disabilities completing four years of high school, even if it is not a regular diploma, have still achieved a huge accomplishment, just as it is for many who receive a GED. Please reconsider this section, teachers and students work themselves to the bone to get these students to complete high school. I don't know about all the ins and outs and legalities, but I am concerned that this could become a legal issue with parents. Not only for the districts, but MDE as well.

4. 10 – Banking Scores

We would much rather back-mapping continue instead of banking scores. If a student moves before reaching 10th grade, does that banked score stay at the school they attended when the test was taken or does it move with the student?

Tollie Thigpen

From: Paula Vanderford
Sent: Monday, September 30, 2013 12:50 PM
To: Accountability
Cc: Patrick Ross; Jo Ann Malone; Tollie Thigpen
Subject: FW: APA Process for MS Statewide Accountability System

FYI

From: Morgigno, Ray [<mailto:rmorgigno@pearl.k12.ms.us>]
Sent: Friday, September 27, 2013 2:09 PM
To: Paula Vanderford
Subject: RE: APA Process for MS Statewide Accountability System

Hey Paula,

I think we have already sent in some things but just in case, I will plea a few more points.

1. The graduation part is concerning because kids that are finishing with an occupational diploma or certificate of attendance are doing what they are asked to do according to their abilities. This just does not pass the common sense test in my book when we now are going to say this is not worthy of anything and you do not count since you are Sped. This also punishes districts that have numerous sped students in Life Skills or MOD. This is not something that the district has control over.
2. The growth for 3rd grade schools. I still do not see how we can grade/judge a 3rd grade school based on what happens at the end of 4th grade. This is going to be a tough pill for 3rd grade teachers to swallow.
3. The bottom 25% growth. It just seems that if we already have to meet growth as a school, why double down on the 25%? You are already taking the hit if you didn't get growth accomplished for everyone.

I think that is all I have in me right now. Have a super weekend and I appreciate the great job that you do!

Ray Morgigno

From: Paula Vanderford [<mailto:PVanderford@mde.k12.ms.us>]
Sent: Thursday, September 19, 2013 5:57 PM
To: Morgigno, Ray
Cc: Accreditation
Subject: [ms_superintendents] APA Process for MS Statewide Accountability System

Please see the attached information regarding the APA process for the Mississippi Statewide Accountability System effective school year 2013-2014. Please do not hesitate to contact me if you have any questions. Thanks.

Attention:

This e-mail is privileged and confidential. If you are not the intended recipient please delete the message and notify the sender. Any views or opinions presented are solely those of the author.

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John Cartwright

From: Jerry Moore <jmoore@mcschools.us>
Sent: Friday, October 11, 2013 3:46 PM
To: Accountability
Subject: New Accountability Model - Concerns

The MCSD (4700) has the following concerns in reference to the New Accountability Model:

1. **Dual Enrollment:** The MCSD is a rural district and the students served come from, for the most part (over 90%), extreme poverty. We have dual enrollment in our school district, but accessing dual enrollment is a phenomenal task each school year. One option is to have your own instructors offer dual enrollment, but the problem is that we have so few employees with the specific Master's level degree required, that we rarely can utilize them. For example, to teach college math, they must have a master's level math degree. Most of our teachers have a degree in Curriculum and Instruction and/or Administration or Elementary Education. We have offered incentives for teachers to return to gain this degree, but the amount paid by the colleges and universities per class has been little enticement for them to do so. Another option is to do the courses on-line, which is what we do. Having said this, a plethora of problems ensues when you begin this process in a rural and poor school district.

The first problem is that there is no consistency in the pricing per course. Currently we utilize NWCC and they charge \$180 per course per student. Rust College, our local private college, offered to do this at a cost of \$1200 per student. Other local universities and colleges willing to serve our area fell in between the \$180 and \$1000. Based on this, please note that it is unfair to include, within the accountability model, a piece that forces a school district to rely on an outside source's mercy in the way of monies. If you are going to include this in the accountability model, you have to have some type consistency in the way of what a college/university can charge a school district and/or student. This creates an unfair advantage for districts with greater funding.

In conjunction with this, we have lots of students that would like to participate in dual enrollment, but simply can't afford it. I was able to get my school board to agree to pay half of the \$180 this school year, which did bring my numbers up, but still excluded a large number of students. Again, here is an unfair advantage for a high poverty school district. Districts consisting of middle to upper class would have no issue with the charge, but in my district, payment is something that has to be thought out by my students.

The bottom line is this, there should never be anything included in an accountability model that creates a disadvantage for those in high poverty, rural areas. Nor should we ever be at the mercy of outside sources (parent income, college/university fees, transportation [if done on a campus, which would be far away for all of our students]) to determine a portion of a school rating. Consistency and accessibility must be provided before this should be included as an "assessment piece" of any model. Please create the fair, equitable and consistent pricing method before making this inclusive to the model.

2. **The scales or cut scores for Proficient/Advanced:** As noted by the Florida Association of School Districts in their October 7th article in The Times (Tampa), "the purpose of the accountability system is to help improve student performance. Yet Florida's system, in which student scores rise, but school grades drop, has created a [confidence] crisis." I have looked at our model over and over and compared it to Florida's model. I've looked at their scales and their cuts. I've looked at their whole set up, and clearly, we have moved in their direction in almost mirror-like fashion. I'm not saying it's a horrific model by any stretch of the imagination, but it is clearly having significant problems. Still, why would we want to create a situation in which we could not

show our own communities the progress that we are making via the model in which we impose? Is it to ensure, as in Florida, that we have enough schools in the D or F range to incorporate charters? The public in my area certainly believes this, and I am beginning to lean that way myself. If you want charters in all districts, then just pass legislation that requires them. But, for the sake of the children, please allow them to see their progress by at least integrating the scales fairly. I am all about high expectations, but you must have benchmarks that can be reached. When you couple these new scales with common core assessments, there won't be a drop; they'll be a plummet. Let's do what's fair here and incorporate, at the very minimum, a step scale. Let's do what is best for Mississippi students and teachers.

3. ACT Readiness: The cuts for the ACT need to be looked at. I realize from the webinar that there are many variances amongst states with which cuts they utilize for this, but again, we need to look at the MS averages per sub-test and then set a realistic goal. As those rise each year, then we graduate them up. This would be a more fair way to initiate the higher expectations.

Jerry O. Moore, Superintendent
Marshall County School District (4700)
(662) 252-4271

"Lead, follow or get out of the way". ~ Thomas Paine

Tollie Thigpen

From: Paula Vanderford
Sent: Tuesday, October 15, 2013 11:02 AM
To: Accountability
Cc: Jo Ann Malone; Tollie Thigpen
Subject: Fwd: APA Business Rules
Attachments: image001.jpg; ATT00001.htm; APA Response for Business Rules.docx; ATT00002.htm

FYI

Sent from my iPhone

Begin forwarded message:

From: "Brantley, Lundy" <lbrantley@pearl.k12.ms.us>
Date: October 15, 2013, 10:27:02 AM CDT
To: "Paula Vanderford (PVanderford@mde.k12.ms.us)" <PVanderford@mde.k12.ms.us>, "pross@mde.k12.ms.us" <pross@mde.k12.ms.us>
Cc: "Morgigno, Ray" <rmorgigno@pearl.k12.ms.us>
Subject: APA Business Rules

Paula and Pat,

I have attached my APA response for the Business Rules. Will you place these with the other APA comments. Thank you for all you do!!

Lundy Brantley, Ph.D
Principal
Pearl High School

APA Response for Business Rules

10/15/13

8. Graduation Rate

- There should be credit given for special education students in the graduation rate. These are approved programs and there should be credit given to the students for completing their requirements.
- The actual drop-out rate would be a better indicator of school performance because the special education students are counted as well as graduates.
- Students that are SCD are placed in the certificate program out of necessity. A district cannot control the number of SCD students living in district lines therefore the school and district should not be punished for them not receiving a diploma.
- Use the 5 year rate because everyone is not going to graduate in 4 years.

9. Acceleration

- Why would we give only partial credit for students that take multiple courses of acceleration? I believe they should be given full credit for each class. That would be like saying, "take 18 hours of course credit as a freshmen in college but we will only give you 9 hours of credit."

10. Banking Scores

- Why would we bank scores? Example...Our 9th grade Algebra I students next year would never count because they would be banked and never count because you cannot determine growth without a previous CCSS test.
- How would the accountability model be changed to reflect this? For example, if my 9th grade algebra I students do not count next year, then our school gets zero points in the math portion of the model unless there are grades 10-12 students taking the test. According to the new proposed math requirement algebra I would be the only math course for 9th grade students.
- How do you explain your test scores to the public, good or bad, when the scores come out and the algebra I scores are from the previous year? It really does not make sense. It would be the equivalent of winning the state championship in a sport but not being able to count it until the next season when you may have lost every game. On the flip side of that, if your scores from the previous year were not good, but you had a great year during the current year, it is like you win but everyone thinks you have failed because the previous year's scores were not good.

25. College and Career Ready

- Why would we have 22 as a cut score for Math and Reading when you don't have to make a 22 to get into college? This cut score should be attainable. The proposed graduation option to have a 16 sub-score should be sufficient for the cut score if it is high enough to graduate.

- I do not agree with the notion that you get the senior snapshot ACT scores. I suggest a FAY type of calculation to see who owns the ACT score.

Tollie Thigpen

From: Paula Vanderford
Sent: Wednesday, October 16, 2013 10:21 AM
To: Accountability
Subject: Fwd: addition
Attachments: image002.jpg

Sent from my iPhone

Begin forwarded message:

From: "Brantley, Lundy" <lbrantley@pearl.k12.ms.us>
Date: October 15, 2013, 2:19:27 PM CDT
To: "Paula Vanderford (PVanderford@mde.k12.ms.us)" <PVanderford@mde.k12.ms.us>, "pross@mde.k12.ms.us" <pross@mde.k12.ms.us>
Cc: "Morgigno, Ray" <rmorgigno@pearl.k12.ms.us>
Subject: addition

Banked Scores

I put that next year's 9th grade would never actually count in the model if the scores are banked. With that being said, when that particular group takes English II they will not have points for growth, only proficiency because they would not have taken a previous English test to measure growth. The model would either need to be adjusted or held harmless for that year. There would only be U.S. History and Biology I in the model that would count fully. So the actual first year that the model could be fully implemented would be 16-17.

Lundy Brantley, Ph.D
Principal
Pearl High School



*The mission of Pearl High School
is to prepare each student to become a lifelong learner,
achieve individual goals, and positively impact a global society.*

Attention:

Delivered by **MailMarshal**



C

O

U

John Cartwright

From: walter moore <wmoore@benton.k12.ms.us>
Sent: Wednesday, October 16, 2013 2:23 PM
To: Accountability
Cc: Jack Gadd; Heather Linville
Subject: Comments / Questions Regarding the New Statewide Accountability Model

1. "Any school that does not have science scores because the school does not have the required grade level(s), an equating process to adjust the point requirements will be used to adjust for the missing component." What is the "equating process," and why would the science component not simply be removed from the accountability model for schools who do not test in science?
2. "Schools with missing data for components specific to high schools (U.S. History, graduation rates, etc.,) will have proxy data (i.e., district average, historical average, etc.,) applied if available. If no proxy data is available, an equating process will be used to adjust for the missing components." Could a specific example of "proxy data" being applied be provided?
3. "Any elementary school that does not have reading or math scores because the school does not have the required grade level, the scores from the students in the next higher grade in the tested subject within the same district will be applied back to the student's lower elementary school of origin." Assigning a performance label to a school based on scores over which they have no control is unfair. For example, teachers at a K-2 school cannot influence the instructional practices of teachers in 3rd grade at another school; therefore, the rating would be assigned to them based on a school year's worth of instruction they did not provide and could not affect.
4. "A student's [ACT] score will be applied to the school that 'owns' the student during the Senior Snapshot process." If the ACT is to be given to all juniors, why would the scores not be assigned to the school where the student met FAY as a junior? As currently written, it would seem a senior could move to a new district without having taken the ACT, and the previous district's failure to test him/her could adversely affect the new district's accountability - just like students who attend a school for two weeks of their educational career and count as dropouts on that last school of attendance.

Walter Moore, Assistant Superintendent
Benton County Schools
231 Court Street
Ashland, MS 38603
662-224-3602 Office
662-224-2607 Fax

John Cartwright

From: Jennifer Bradford <jbradford@jcsd.k12.ms.us>
nt: Wednesday, October 16, 2013 4:55 PM
To: Accountability
Cc: Briley Richmond; Christy Cumbest; Kirsten Ortego; Stephanie Gruich
Subject: The State Board welcomes your feedback as they evaluate the proposed accountability model.

Dear Dr. Vanderford,

My comments are directed at the change shown below:

Focus on growth among lowest scoring 25% - the new model will place additional emphasis on the academic growth of students scoring in the bottom 25% of the school and district. The growth of these students will, effectively, be counted twice for the purposes of accountability ratings.

I object to additional emphasis being placed on the growth in this category for the following reasons:

1. The majority of these students come from dysfunctional homes where education is neither supported nor respected; therefore, the parental involvement, *a widely accepted necessity for success*, is virtually nil.
2. The students in the lower 25% are usually not college material and should not be expected to perform as if they were. They are our future skilled laborers, a demographic that everyone knows is being outsourced to other countries due to a shortage of them in our country. We would better benefit our society by helping the students achieve their own personal goals, instead of the goals imposed upon them by strangers.
3. The additional emphasis will result in a neglect of the acceleration component.
4. If Common Core gets students ready for college and the workforce, why are we not putting equal emphasis on preparation for the workforce?

Please consider this question: Why are they "lower 25%"? Is it because they aren't the academic types? Maybe they shouldn't go to college and maybe we should not consider that as a failure? Why must we continue insisting that every student is either a square peg for our square standards or he is a failure, a second-class citizen, and destined for destitution?

Respectfully,

Jennifer Bradford

St. Martin Middle School

Jackson County School District

John Cartwright

From: Kim Carter <kimcarter38834@msn.com>
Sent: Wednesday, October 16, 2013 10:06 PM
To: Accountability
Subject: Updates!!!

Is there any updates affecting lep/504 special needs children?
I have lots of questions and am getting no answers from some of my school district personel.
I live in the alcorn county school district.

Thank you

John Cartwright

From: Tracy Robinson <tracy.robinson@hattiesburgpsd.com>
At: Thursday, October 17, 2013 8:24 AM
To: Accountability
Subject: Accountability System

To Whom It May Concern:

My concerns are escalated as I read information indicating the possibility that the growth of the bottom 25% of the student population would count more than the growth of any other student subgroup in our accountability system. When that happens, the remainder of the student populations will take a back seat to those in their classes/grades/schools who continue to score below the expectation. Current research tells us that the highest performing students are at risk of learning the least in a given academic year. In comparing students in the United States to students across the globe, students in our country continue to be placed under a glass ceiling where they are only allowed the opportunity to reach the base expectation for their grade level in their regular education coursework. Those students will never be able to compete from a global perspective as long as we continue to place a higher emphasis on one student subgroup over another. All students deserve the right to learn at their highest ability level and have the opportunity to grow beyond any limits our system places on them. The expectation of growth for all students should be equal in any accountability system.

Respectfully,

Tracy D. Robinson
Academic Coach - Thames Elementary School
HPSD Gifted Contact Person

*"People will forget what you said, People will forget what you did,
But people will never forget how you made them feel."*

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John Cartwright

From: Bernice Smith <Bernice.Smith@lowndes.k12.ms.us>
Sent: Thursday, October 17, 2013 4:46 PM
To: Accountability
Subject: Raising our student academic quality

I truly admire our state leaders for their persistence in trying to increase academic quality of all students in our schools.

Bernice Smith
Assistant Principal
New Hope High School
Office: (662) 244-4707



John Cartwright

From: Noal Cochran <ncochran@richton.k12.ms.us>
Sent: Friday, October 18, 2013 3:30 PM
To: Accountability
Subject: Public comment

I have two major concerns on which to comment. My first concern centers on the acceleration component. (a) I currently have two teachers who teach a partial AP load. All other AP courses are offered through virtual high school courses. Looking at my teacher placement for the next couple of years, it is probable that one or both teachers may be unable to teach AP courses. My stakeholders have shown a preference for a "live body" teacher on campus as opposed to a virtual instructor. I think it is unfair that my students are not afforded the same instructional opportunities as students in more well staffed districts.

(b) I have maintained since my first exposure to this model that the 70/30 percentage is reversed. If I have 100 eligible students, what would stop me from enrolling all 100 in AP courses. I would receive 70 points for 100 percent participation. If no one passes, I still have 70 points for the model. On the other hand, if I only enroll the 10/100 truly deserving students who all pass the test, I would get 7 points for participation and 30 points for passing for a total of 37 points. Not as impressive as 70. I hope I am interpreting this incorrectly.

My second concern is more benign in nature. I would suggest that we use a consistent ACT score across all incidents of use. I am not in favor of 16 being used as a proposed graduation rate while a higher score is used in the accountability model and yet another is used by IHL's. A little consistency goes a long way.

Thanks for your review of my comments.

Cochran

--
Dr. Noal B. Cochran
Superintendent
701 Elm Avenue
Richton, MS 39476
601-788-6581

John Cartwright

From: Jane Everly <jeverly@bellsouth.net>
Sent: Saturday, October 19, 2013 8:48 AM
To: Accountability
Cc: 'Everly, Jane'
Subject: comments regarding the new accountability system

Thank you for the opportunity to provide feedback.

As I reviewed the documents provided along with the September 18 memo regarding the APA process, I noted that the system outlined did not mention student growth percentiles, although MDE documents reference these as a basis for teacher and principal evaluation. It would make more sense if both the accountability system by which schools are labeled and the evaluation system for faculty measure the same thing the same way. This would provide a means for more focused work in the schools, rather than having multiple targets, as we do now (state accountability, federal AMO, teacher/principal evaluation).

I understand that addressing the bottom quartile is an effort to mirror the federal waiver's differentiated targets for schools. However, looking at growth of ALL students and then looking AGAIN at those in the bottom 25% counts those students twice. This added weight for the lowest students, along with exchanging the current model's scale score to scale score individual growth targets for the new model's "as long as you stay in the same proficiency range" growth expectation, does not encourage us to continue the forward momentum for the more advanced students. I worry that if one set of students counts more than another, we risk backsliding into the "level 5" days when it only mattered if students were proficient, not if they grew.

I have heard it said that the student growth percentiles are needed for personnel evaluation because the new rating model is not robust enough or statistically sound enough to use for personnel decisions. If that is the case, is it statistically sound enough to use for school ratings?

At least at the elementary level, I like the current scale score to scale score growth model and do not think it is complicated. I think it provides for equity in growth among students at all proficiency levels. I worry that a student who is at the top end of proficient can slide 10 points back to the bottom end of proficient and that is still considered growth, while a student who is at the bottom end of proficient can lose only one scale score point and become basic, and that will be considered no growth (10 point backslide is growth, but one point backslide is not). If a student slides back into a lower level, it will already count against the school rating score in a category other than growth.

Although it seems unlikely that the proposed model will change at this point, I still feel it is important to voice my misgivings about the way growth will be measured (why not student growth percentiles? Or scale score targets?) and about the bottom quartile counting twice.

John Cartwright

From: Tony Cook <tcook@amory.k12.ms.us>
At: Monday, October 21, 2013 9:50 AM
To: Accountability
Cc: Scott Cantrell; Karen Tutor
Subject: Response

We were told for months that we were going to have last Spring's testing data plugged into the new model so that we would know where we stood. Last week, we were told that we were not going to get that data because it might "skew" our thinking about the new model. I'm in favor of most of the components of the new model, and I want to see how we are doing. I don't expect the results to be great, but we will use them to help us understand the adjustments that we need to make as a district.

We really need this information so that we can make sure that we are doing our best to not only meet the new standards, but also to meet the needs of our students. Thank you for your help in this matter.

Tony Cook
Amory School District

John Cartwright

From: Scott Cantrell <scottcantrell@mcsd.us>
Sent: Monday, October 21, 2013 2:18 PM
To: Accountability
Cc: Scott Cantrell; Brian Jernigan; Amy Henley
Subject: Comments pertaining to new accountability model

Initially, let me ask that reconsideration be given to allowing each district to see our data from 2012-2013 plugged into the new model. It is my understanding that only the state's data as a whole will be plugged into the new model before the APA period is up, as there is some concern at MDE that districts will have their opinions of the model skewed by low individual district scores. We certainly have concerns as to what level our district might fall to, but we would like to have the information to begin the necessary adjustments on our part as quickly as possible.

Secondly, I admire and appreciate the hard work by the committee and all MDE employees in the development of this model. I realize that not all concerns can be addressed so that all districts will feel "this is absolutely the way we should be doing this", but I appreciate the efforts put forth on everyone's behalf. I'm the committee's worst nightmare in the fact that I don't even give them possible remedies to the concerns, but I did want to put the following concerns out there for review though. If they can be addressed, that's great. If they can't, then we'll get on board and do our part to make sure we do the best we can within this new system. Thanks again for your efforts.

1. Monroe County offers 8 AP courses, while Tupelo High School offers 19 AP courses. I have spoken with others who only have 4 offerings. In my eyes, since large districts can offer more AP offerings, due in large part to local funding, are small districts not put at a disadvantage in acquiring points in the acceleration portion of the model?
2. Unless 20 students from our school district enroll in dual credit American Govt. through our local community college, the price is \$350 per student. If 20 or more enroll, the price drops to \$100 per student. However, it is more difficult for smaller districts to gain an enrollment of 20, so most of our students would be forced to pay the \$350, while larger school districts would have little difficulty enrolling 20 to receive the \$250 discount. If all community colleges do not charge the same amount for dual credit courses, some districts will have more of an advantage in this portion of the model.
3. It is 45 - 50 miles from our southern most high school to our local community college. 100 miles of travel per day to dual enroll is difficult at best. My thought is that districts within the closest proximity to their community colleges will have an advantage in dual enrollment opportunities. Online is an option, but online courses aren't a good option for some students though.
4. Even if one ACT administration is paid for by the state during the student's 11th grade year, more affluent districts will possibly have active PTO's that will pay for other administrations that could serve to un-level this playing field with districts that cannot pay for multiple administrations.
5. I realize that not all of the scores on the ACT College Readiness Letter sent out in August were from students at least in the 11th grade. I also realize that some of these scores in English and Math are from students who possibly scored less than they had on a previous administration of the ACT, However, I believe the percentages show that we would only receive 37.5 points statewide of the possible 100 within the College and Career Readiness portion of the model. Our district would receive 38.5 pts. It will be tough for districts to leave 60+ points on the

table each year.

--

Scott Cantrell

Superintendent of Education

Carroll County School District

John Cartwright

From: Jimmy Weeks <jimmy.weeks@leecountyschools.us>
Sent: Wednesday, October 23, 2013 9:25 AM
To: Accountability
Subject: APA Comments

After viewing the webinar on 10/8 and discussion among our district level administrators, one major concern surfaced. The definition of "Regular High School Diploma" causes great concern. Not necessarily going to a 4 yr cohort, but leaving students who do not receive a traditional diploma out of the equation. Those students have worked as hard, or harder than a lot of students who are receiving a traditional diploma due simply to the nature of the learning disability. Schools have worked just as hard or harder to get those students to completion as well.

In our opinion, these students should count towards the graduation rate just like students receiving a traditional diploma.

Thank you.

Jimmy Weeks

Superintendent
Lee County Schools
Ph (662) 841-9144
Fax (662) 680-6012
email: jimmy.weeks@leecountyschools.us

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John Cartwright

From: Brian Jernigan <brianjernigan@mcsd.us>
Sent: Monday, October 28, 2013 2:55 PM
To: Accountability
Subject: APA Comment to Accountability Model

I have two major concerns that I believe need to be addressed.

1. Grades 3,4,6 and 7 will count Lowest 25% 6 different places. Grades lowest 25% in grades 5 and 8 will count 7 different places. This heavily weighted percentage could be tragic for a small district.

2. Large districts have an advantage over smaller districts when it comes to offering AP courses. Why should my district be penalized simply because we do not have the staff or students to justify offering 15 AP courses? We offer 4-5 while another district does offer 19.

--
Thank you!

Brian Jernigan
Assistant Superintendent
Monroe County School District
www.mcsd.us

662.257.2176

"What is now proven was once only imagined" William Blake

John Cartwright

From: Tim Dickerson <timdickerson@mcsd.us>
Sent: Monday, October 28, 2013 4:17 PM
To: Accountability
Subject: APA comments on accountability model

It looks like the lowest 25% is going to count in the model 7 times for grades 5 and 8. Also, the lowest 25% is going to count in the model 6 times for grades 3,4,6, and 7. The top 75% will only count 5 times.

A larger school district such as Tupelo will have a bigger advantage as far as being able to offer AP courses. They currently offer in the neighborhood of 19 AP courses whereas we offer in our district 8. Some only offer 4 AP courses.

Thank you,

--
Tim Dickerson
Principal
Hamilton School

John Cartwright

From: Steve Cantrell <stevecantrell@mcsd.us>
Sent: Tuesday, October 29, 2013 8:16 AM
To: Accountability
Subject: Comment on the new accountability model

Comment on the new accountability model: The new model should be revised to not count the lowest 25% of students 7 times in the formula, while other students are only counted 5 times within the formula. This allows the lower students to effect your scores more than any other group.

Small Districts are not given a fair opportunity to make as many points on the new model as large Districts because they can not offer as many AP courses. The enrichment goals will be much harder to meet because of the number of AP courses in those small Districts.

--
Steve Cantrell
Monroe County Vocational Director
50057 Airport Rd
Aberdeen, MS 38821
662 369 7845
662 369 9607 fax

John Cartwright

From: Chad OBrian <chadobrian@mcsd.us>
Sent: Tuesday, October 29, 2013 9:05 AM
To: Accountability
Subject: Concerns

Greetings:

I am writing to express to you my concern over the new proposed accountability model. My concern regards the lowest 25% of students. If my understanding of the model is correct students in the lowest 25% of 5th and 8th grade would count in 7 different categories. Students in the lowest 25% of grades 3,4,6, and 7 would count in 6 different categories. This is compared to the other students counting only in 5 categories (5 and 8 grade) and 4 categories (grades 3,4,6, and 7)

I feel this gives undue weight to the lowest 25% of students and will work to have a negative impact on student achievement. Please carefully reconsider this policy.

--
Chad O'Brian
Principal
Smithville High School
I Peter 2:15

Tollie Thigpen

From: Karen Norwood <karen.norwood@biloxischools.net>
Sent: Tuesday, October 29, 2013 3:20 PM
To: Accountability
Subject: Suggestions from Biloxi

In regards to recommendations:

- The proposed title changes, i.e. CCSS PLUS, Integrated Math II, etc. are not indicative of the rigor or the intent of the course. Because the Mississippi Gulf Coast is very transient, we have many students who transfer in and out of our schools and such vague titles will cause many problems when trying to transfer credits to graduate or attend other schools. Also, course titles needs to be university recognized.
- The assumption is that students that are 7th grade students currently earning a Pre-Algebra or Transition to Algebra Carnegie unit will be able to take CCSS Math Grade 8 next year and earn a Carnegie unit as well. Is that correct?
- Is Creative Writing being changed to a full year course?
- In the college readiness block, we believe that the ACT composite should be used rather than breaking the scores apart. Tracking the sub scores is going to be extremely cumbersome and is going to lead to errors. Also, IHL uses a composite score, why can't that be used on the accountability model? Also, why are the numbers for the ACT different for the assessment option. If a 16 is determined to be college and career ready, then why can't that number be used for accountability purposes as well.
- Because of the weight of industry certification classes, is MDE and IHL working collaboratively to ensure programs are seamless?
- If we are going to be waiting on Advanced Placement scores to come back in the summer, will the accountability timeline be moved back?

--
Dr. Karen Norwood
Assistant Superintendent
Biloxi Public Schools
(228)374-1810 x134

John Cartwright

From: Van Pearson <vanpearson@mcsd.us>
Sent: Wednesday, October 30, 2013 7:26 AM
To: Accountability
Subject: Concerns

I would like to make you aware of the following concerns with the accountability.

Lowest 25% count 7 times in grades 5 & 8 and only 3 times in grades 3-4-6-7.

Advanced placement offerings in larger districts have the advantage over small districts not be able to have equal offerings.

Tollie Thigpen

From: Brenda Shelby
Sent: Wednesday, October 30, 2013 10:42 AM
To: Accountability
Subject: Comments received
Attachments: Public comments from Holmes County 10.30.13.pdf

DR. ANGEL MEEKS
Assistant Superintendent
Federal/State Programs

DR. MARION A. MITCHELL
Assistant Superintendent
Curriculum and Instruction

SUSIE EVANS
Director of Special Education

SANDRA WINSTON
Director of Testing & Athletics

CLAUDETTE RICHARD
Director of Personnel, Nurse
& Home Liaison Programs



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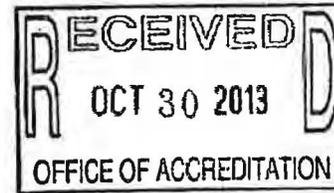
PEARL MABRY
Technology Specialist

BOBBY WILLIAMS
Technology Coordinator

HENRY L. DAVIS
Transportation Director

October 29, 2013

Dr. Paula Vanderford
Mississippi Department of Education
Office of Accreditation
P. O. Box 771
Jackson, MS 39205



RE: Statewide Accountability System Effective School Year 2013-2014

Dr. Vanderford:

First of all, allow me to commend you and the entire department for the work that you do. Please know that your tireless efforts to improve the educational process, especially as it relates to accountability, are not lost on those of us who are in local school districts. For many years, we, along with our stakeholders, have struggled to understand the workings of accountability.

I have studied the new proposed Statewide Accountability System and I have several concerns. As a superintendent born and reared in the Mississippi Delta, I have been continuously confronted with under funding, teacher shortages, and dire economic conditions. Therefore, I know full-well and firsthand the challenges of equity. Pardon my saying so, but in the proposed model, the high school and elementary accountability scales seem to be arbitrary and capricious. "F" and "D" cut points on the high school and elementary scales are the same when growth is not considered. The distribution of scores is simply not fair. One hundred eighteen points are required to move from "D" and "F" to "C" while only seventy-two points are required to move from "B" to "A".

It has been repeatedly stated that parent and community support are needed if schools and students are to be successful. The question then becomes how will we rally support when the odds for success are against us, and how will we rally support when a district is constantly noted a failure. We say to children that their efforts matter and we take an oath that is much like the one taken in the medical profession – do no harm. As a matter of fact, we pledge to treat children firmly, fairly, and respectfully. Yet, this new accountability model does just the opposite.

Dr. Vanderford

Page 2

10/29/13

I sincerely hope that you and those who work with you and share your genuine concern for education will reevaluate this model. If it is implemented as proposed, it will cause irreparable harm to poor, underfunded Districts. A scale that has an equal range of scores between graded categories would be one step in the right direction. Please see the model I have enclosed.

As always, thank you for all that you do to further the educational process. If you have any questions, comments, or concerns, please do not hesitate to contact me.

Sincerely,

Holmes County School District

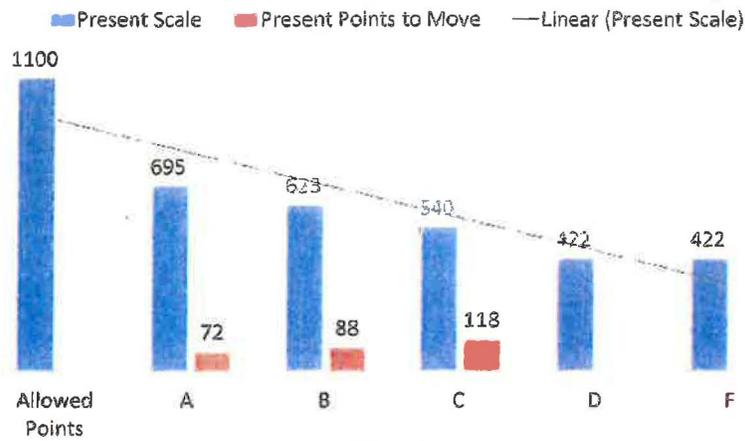


Powell Rucker
Superintendent of Education

PR/hhk

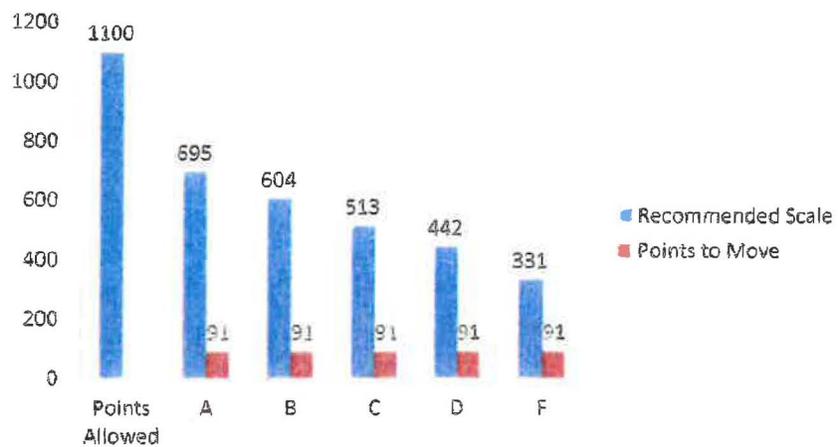
Enclosure

High School Accountability Scale

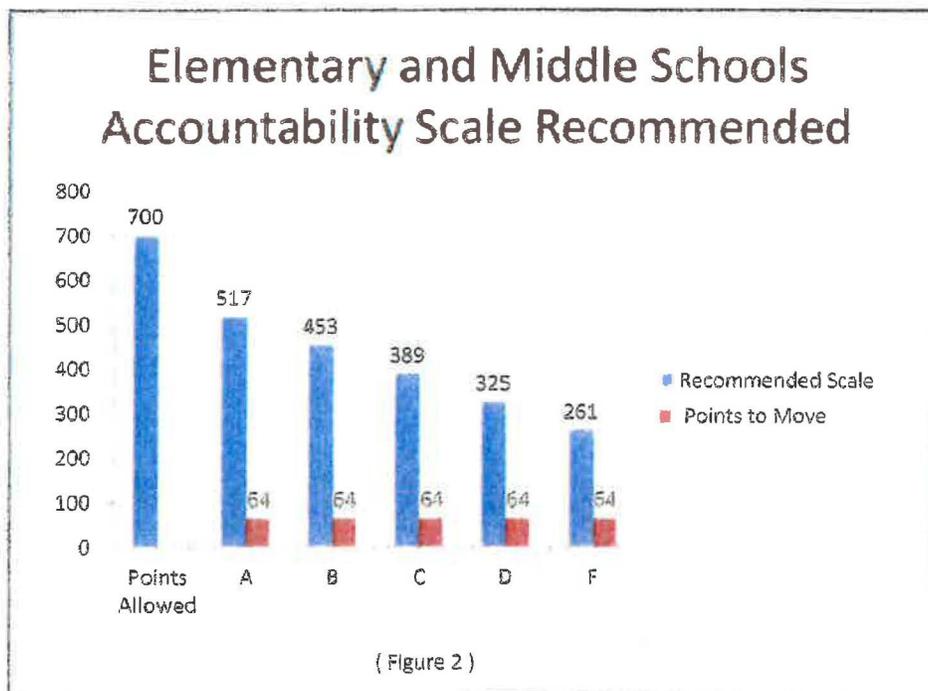
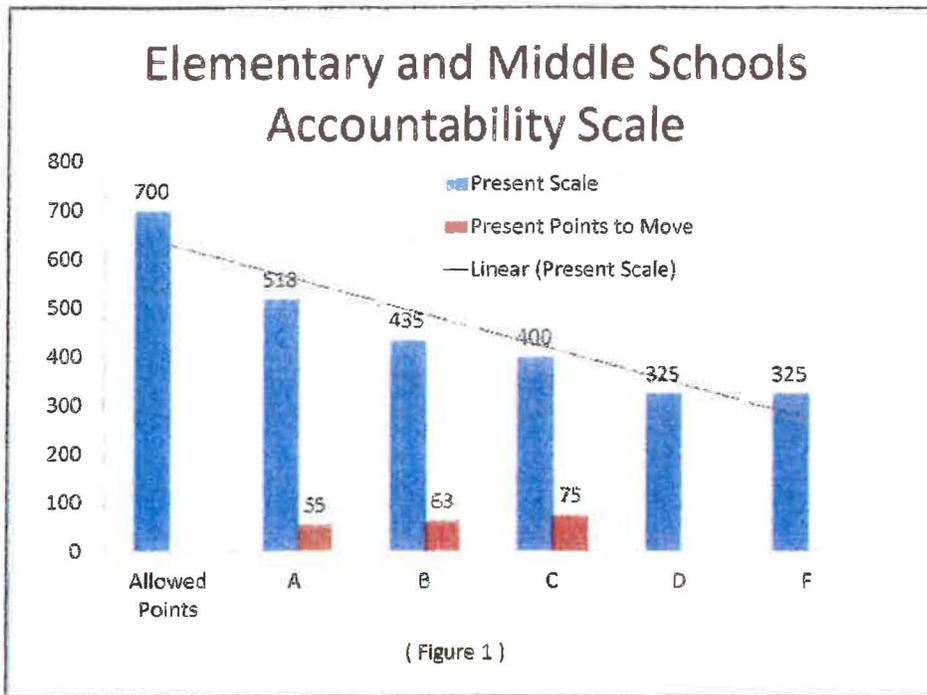


(Figure 3)

High School Accountability Scale Recommended



(Figure 4)



John Cartwright

From: Sam B. Williams <sam.williams@westpoint.k12.ms.us>
Sent: Wednesday, October 30, 2013 4:23 PM
To: Accountability
Subject: APA Process

My concern is that schools with struggling students may be punished even when they make gains with those students while schools with higher performing students may be rewarded for not making gains or even underserving those students.

Here is my example.

School A has Student A who scored at the bottom of the range for Low Minimal in Grade 4. In Grade 5 this student scores at the top of the Low Minimal range. Student A has grown and yet receives a growth score of 0.

School B has Student B who scored at the top of the range for Proficient in Grade 4. In Grade 5 this student scores at the bottom of the Proficient range. Student B has not grown and has actually regressed and yet receives a growth score of 1.

School A has Student C who scored at the bottom of the range for Low Basic in Grade 4. In Grade 5 this student scores at the top of the High Basic range. Student C has grown and receives a growth score of 1.

School B has Student D who scored at the top of the range for Proficient in Grade 4. In Grade 5 this student scores at the very bottom of the range for Advanced and grows only one point. This student's growth is not very big, but he receives a growth score of 1.25.

So School A which has grown 100% of its students receives a growth rate of 50 and School B which has regressed with one student and barely grown another receives a growth rate of 110.

Sam Williams
Associate Principal
West Point High School
(662) 495-2403 ext. 2026

John Cartwright

From: Sam B. Williams <sam.williams@westpoint.k12.ms.us>
Date: Wednesday, October 30, 2013 5:38 PM
To: Accountability
Subject: Re: APA Process

I submitted a question during today's webinar regarding why students who stayed in the proficient performance level received a growth score of 1 and those who stayed in High Basic received a growth score of 0. Jo Ann Malone addressed my question saying that we wanted all students to be proficient or advanced and so those schools were rewarded for keeping these students proficient and you did not want to reward schools for keeping students basic.

The problem I see is these schools are in effect rewarded twice - once in the proficiency component and once in the growth component. A student who is proficient from one grade to the next gets a proficiency score of 1 and a growth score of 1, even if the student's score drops within the proficient performance level. Meanwhile a student who gets is High Basic from one grade to the next gets a proficiency score of 0 and a growth score of 0 even if the student's score went up within the High Basic performance sub level.

Why does the school with the proficient student get rewarded twice?

Sam Williams
Associate Principal
West Point High School

On Oct 30, 2013, at 4:23 PM, "Sam B. Williams" <sam.williams@westpoint.k12.ms.us> wrote:

My concern is that schools with struggling students may be punished even when they make gains with those students while schools with higher performing students may be rewarded for not making gains or even under-serving those students.

Here is my example.

School A has Student A who scored at the bottom of the range for Low Minimal in Grade 4. In Grade 5 this student scores at the top of the Low Minimal range. Student A has grown and yet receives a growth score of 0.

School B has Student B who scored at the top of the range for Proficient in Grade 4. In Grade 5 this student scores at the bottom of the Proficient range. Student B has not grown and has actually regressed and yet receives a growth score of 1.

School A has Student C who scored at the bottom of the range for Low Basic in Grade 4. In Grade 5 this student scores at the top of the High Basic range. Student C has grown and receives a growth score of 1.

School B has Student D who scored at the top of the range for Proficient in Grade 4. In Grade 5 this student scores at the very bottom of the range for Advanced and grows only one point. This student's growth is not very big, but he receives a growth score of 1.25.

So School A which has grown 100% of its students receives a growth rate of 50 and School B which has regressed with one student and barely grown another receives a growth rate of 110.

Sam Williams
Associate Principal
West Point High School
(662) 495-2403 ext. 2026

Tollie Thigpen

From: Patrick Ross
Sent: Thursday, October 31, 2013 11:44 AM
To: Accountability
Subject: APA Comment
Attachments: APA Comment (Newton).pdf

Patrick Ross
Bureau Director, Accountability Services
MS Department of Education
601.359.1878

NEWTON MUNICIPAL SCHOOL DISTRICT
Office of Special Services
 P.O. Box 150 ♦ 203 West First Street
 Newton, MS 39345
 Office/Fax: 601.683.3275



FAX

TO: Office of Accreditation + Accountability

FROM: Dr. Geneva Jenkins

FAX #: 601.359.1979

DATE: 10.31.2013

OF PAGES (including cover sheet): 2

COMMENTS: _____

If you do not receive all pages, please contact us immediately at the telephone number listed above.

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Newton Municipal School District, 205 School Street, Newton, MS 39345

NEWTON MUNICIPAL SCHOOL DISTRICT
OFFICE OF SPECIAL SERVICES
P.O. Box 150—203 West First Street
Newton, Mississippi 39345
Phone: (601) 683-3275 * Fax (601)683-3275



Dr. Geneva Jenkins, Director

To: Dr. Paula Vanderford
Education Bureau Manager

From: Dr. Geneva Jenkins
Special Services Director

Date: October 30, 2013

Subject: Proposed Recommendations for Statewide Accountability System

As a Special Services Director and former special education teacher, I have grave concerns regarding the 4-year graduation rate. My concern is that only a "regular high school diploma" will be used in high school grading calculations. If the Certificate of Attendance and the Mississippi Occupational Diploma cannot be utilized in the high school grading calculations, those students become punitive and a liability to their districts. In addition, the message to the students is extremely negative: even though you have completed your prescribed courses within the required four years, your diploma is meaningless. Is this the message we want to send to our students?

These students live with the "special education stigma" every single day; now we are proposing yet another way to shine the spotlight on them in a negative manner. We continue to send them a plethora of contradictory messages. On the one hand, we want them to remain in school; on the other hand, we tell them that what they are doing does not matter. I am sure that you are well aware of the dropout statistics for this population. They comprise a large percent of the dropouts in the state. At this rate, that number will continue to grow.

Thank you for considering my comments. If you have questions, please do not hesitate to contact me at 601-683-3275.

Tollie Thigpen

From: MARTHA TRAXLER <martha.traxler@copiah.ms>
Sent: Thursday, October 31, 2013 12:24 PM
To: Accountability
Subject: Suggested Way of Equating Process for Elem. Grades without Science
Attachments: 201310311316.pdf

Paula,

Larry Williams, our statistician, spoke with Tollie Thigpen regarding ways to do the equating process, and he suggested that we send this way (attached) to you as a idea. Tollie stated that you all are considering other ways of doing this but thought it worth your looking at Mr. Williams's way.

It was good to see you at the MSBA meeting on Wed. You guys have a lot on your plate...in case you didn't know it. Ha.

Thanks for considering this suggestion.

Martha Traxler

----- Forwarded message -----

From: copierscan2012@gmail.com
Sent: Thu Oct 31 12:12:33 CDT 2013
To: martha <martha.traxler@copiah.ms>
Subject: Message from "RNP0026735B7E93"

This E-mail was sent from "RNP0026735B7E93" (Aficio MP C3502).

Scan Date: 10.31.2013 13:16:29 (-0400)
Queries to: Copierscan2012@gmail.com

*** This Email was sent by a staff member at District Office in Copiah County School District.

Elementary and Middle Schools

One way to adjust scale in the equating process with schools (K-3) that do not have science -
 Keep the percentages the same as shown below -

	A	B	C	D	F
* Points	≥ 518 ^{with science} ≥ 444 ^{without science}	≥ 455 ≥ 390 ^{without science}	≥ 400 ≥ 343 ^{without science}	≥ 325 ≥ 278 ^{without science}	< 325 < 278
Percent of Eligible Students Tested*	At least 95%	At least 95%	At least 95%	At least 95%	At least 95%

UPDATE: The SBE previously approved a requirement that schools/districts be dropped one letter grade for not meeting a specified target in either of the components for growth of the bottom 25%. The Accountability Task Force and Technical Review Team are recommending that requirement be removed.

*Although subgroup participation rates will be reported, this penalty will apply to the overall participation rate only. (A 94.5% participation rate will not be rounded to 95%.)



MISSISSIPPI
DEPARTMENT OF
EDUCATION

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$$F < \frac{325}{700} = 46.4\% = \frac{278}{600}$$

$$D \geq \frac{325}{700} = 46.4\% = \frac{279}{600}$$

$$C \geq \frac{400}{700} = 57.1\% = \frac{343}{600}$$

$$B \geq \frac{455}{700} = 65\% = \frac{390}{600}$$

$$A > \frac{518}{700} = 74\% = \frac{444}{600}$$

9/12/2013

John Cartwright

From: Angela Clark <Angela.Clark@lowndes.k12.ms.us>
Sent: Friday, November 01, 2013 3:50 PM
To: Accountability
Subject: FW: Major changes to accountability model proposed

To Whom It May Concern:

I received an email that was requesting public input on the new accountability model system that will be used to rate schools and school districts beginning this school year. I am going to provide my response in the same structure that I received in the email regarding the noteworthy changes to this model.

Noteworthy changes feedback: MY FEEDBACK WILL BE WRITTEN IN GREEN

Academic growth calculation – the new model will move away from the use of predictive scores and will measure academic growth based upon a student's movement within and among proficiency levels. Additional credit will be awarded to schools and districts when students improve more than one level or move to the highest proficiency level.

I believe moving towards this new way of calculating academic growth will be very beneficial and better than the old way.

Focus on growth among lowest scoring 25% - the new model will place additional emphasis on the academic growth of students scoring in the bottom 25% of the school and district. The growth of these students will, effectively, be counted twice for the purposes of accountability ratings.

I am not in support of ONLY focusing growth on the bottom 25%. While the bottom 25% percent is VERY important, so is the top 25%. I have a child who is in the top 25%. I believe educators will experience more behavioral issues within the classroom if their focus is on the bottom 25%. Can you imagine teaching a class where you don't focus on 75% of your students needs? What if when you went to college you were placed in remedial math classes because the university had to teach every one within those classes first because they are catering to the bottom 25%? In the past educators seemed to focus on the middle 50% while probably not accurately addressing the top 25% or the bottom 25%. It has been well documented that some gifted children become bored within the regular education classroom. Now, we will have 75% of our students "bored" instead of the top 10% of the bell curve. I believe if the current Tier process is **properly implemented** Tier 2 and Tier 3 remediation should properly address the bottom 25%. I think we need to focus on the proper implementation of Tier 2 and Tier 3 interventions first. Creating more "laws" does not create more law abiding citizens--especially when current laws may not be enforced or understood. Properly implementing Tier 2 and Tier 3 interventions in addition to increasing support staff and tutors on campuses would probably be a better solution.

Yes, focusing on the bottom 25% is wonderful, **but I am afraid some educators will TAKE this literally** and only focus on the bottom 25% and forget about the other 75%. A good educator will understand that this means giving that bottom 25% what they need while they give the other 75% what they need, too.

Acceleration component – the proposed model would, beginning in the 2015-2016 school year, grade high schools and districts in part on the percent of students enrolled in accelerated courses and the percent of those students passing the national exams. Accelerated courses include Advanced Placement (AP), International Baccalaureate (IB), industry certification courses, etc. It is important to note that state funding has a significant impact on districts' ability to hire additional teachers and to provide them the training required to teach these high

level courses, as well as the ability to cover the cost of the national exams. Currently, many districts are prevented from offering these courses due to chronic underfunding of schools by our Legislature.

I do not believe schools should be graded on the percentage of students in accelerated courses, etc. Accelerated courses and options should just be something that high schools offer to accommodate the advanced student's needs. Maybe, a good incentive would be to provide these districts with more funding instead. Although, I am in full support of accelerated courses, AP classes, and dual enrollment availability.

College and career readiness – the proposed model will include a “college and career readiness” component that will score high schools and districts in part based upon students’ performance on the ACT in math and English/reading. This component is contingent upon the Legislature mandating ACT testing for all high school students and providing the appropriate funding.

There are numerous other changes. The State Board welcomes your feedback as they evaluate the proposed accountability model.

Yes!, I believe the ACT and/or SAT should be the test we should be focusing on within education! Why can't we use the ACT as our exit exam for high school instead of the PARCC assessment and other State assessments? One exit exam and be done! At the least, our students will be focused on the one exam that a high score could provide financial rewards in the form of scholarships. Wouldn't it be great to have more students interested in their performance on the ACT and SAT?

Please submit your comments, no later than 5:00 p.m. on Tuesday, November 12, 2013, to the Office of Accreditation and Accountability at: accountability@mde.k12.ms.us

Thanks,
Angela Clark

John Cartwright

From: Marietta James <mjames@columbiaschools.org>
Sent: Friday, November 08, 2013 10:34 AM
To: Accountability
Subject: Comments - Statewide Accountability System

I would like to offer the following comments/suggestions regarding the statewide accountability system effective school year 2013-2014:

- In using growth of the all students and growth of the lowest 25%, students who are in the lowest 25% category will count against schools twice. I suggest that "Growth – Lowest 25%" category be removed, and a total of 500 points for elementary and middle schools and 900 points for high schools be given in determining accountability labels.
- In business rule 1. Assignment of Grade Classifications, points should be assigned based on standard distribution rather than varying numerical spans among letter grades.
- In business rule 6.12, growth calculations of 4th grade students should not be back-mapped to 3rd grade. K-3 school labels should be based on achievement, not growth. It is not fair to hold a K-3 school accountable for growth of 4th grade students when they may not be housed on same campus.
- In business rule 8. Graduation Rate, the graduation rate should include students who receive an occupational diploma, a GED, or a certificate of completion, or those students should be removed from the denominator.
- In business rule 10, Banking Scores: Algebra I and Biology I taken below 10th grade, scores should not be "banked". Scores should count only at the school where the student took the course.

Thank you for consideration of these comments/suggestions.

Marietta W. James, Ed.D.
Superintendent
Columbia School District
613 Bryan Avenue
Columbia, MS 39429
601 736-2366

John Cartwright

m:
t:
To: Lisa White <lwhite@columbiaschools.org>
Monday, November 11, 2013 11:48 AM
To: Accountability
Subject: APA comment

6.12

Concerning the growth of 4th grade students being used for the growth of k-3 schools: can the state provide a valid/reliable state-wide universal screener that may be used to calculate the growth of k-3 students? The growth component will be "high stakes" for individual teachers and should be correlated to a measure more closely aligned/accountable to individual teachers.

Lisa White

Federal Programs Director
Columbia School District
Office: 601-736-2366
Fax: 601-736-2653
613 Bryan Avenue
Columbia, MS 39429
lwhite@columbiaschools.org

John Cartwright

From: Lisa White <lwhite@columbiaschools.org>
Sent: Monday, November 11, 2013 12:06 PM
To: Accountability
Subject: APA comment 2

8.0

Concerning graduation rate: IEP students receiving a certificate will be included in the denominator – will not be included in the numerator: What is the logic here? It seems to be unfair and on the verge of discriminating. No matter how much progress has been made and no matter how many IEP goals have been met to receive a certificate, a “certificate” student will always count against a school’s graduation rate.

Lisa White

Federal Programs Director
Columbia School District
Office: 601-736-2366
Fax: 601-736-2653
613 Bryan Avenue
Columbia, MS 39429
lwhite@columbiaschools.org

John Cartwright

From: Cathy Creel <ccreel@columbiaschools.org>
Date: Monday, November 11, 2013 3:47 PM
To: Accountability; Paula Vanderford
Subject: APA comments on the NEW Combined Federal/State Accountability Model

Dr. Vanderford ,

I'm not sure if I need to submit these comments to you, JoAnn Malone, or someone else, so please share these with the appropriate person(s).

Listed below are a few concerns/comments I would like to share related to the New Proposed Combined State/Federal Accountability System.

I will start with the positive.

- Growth is actually easy to understand and explain with this model!!!! Thanks.
- Full Academic Year (75%) is much easier to explain and understand!!

Now, for concerns.

- Including a separate growth component for the "Low 25%" group
 - Growth of "ALL" students should give us information on the growth of all of our students. With that data, we should be able to determine the progress each group (high, middle, low, male, female, etc.) is making. Why do we need a separate growth component for our "low 25%" group? Having a separate component means that group will affect the school two times (once in the all group; again in the "low 25%" group). (One student who struggles with math and language arts would actually be included 4 times.) While I think it is **imperative** we track the progress of this group (and others), we can accomplish this without having a separate category for them and I don't think it is fair for any "one" group to count twice. Although this may actually help some schools, it still seems we could accomplish this without a separate component for the "low 25 %" group. We need to determine how we are doing with the "high 25%", with the students in the middle, and with our "low 25%" students.
 - Solution: Exclude the two components for the "low 25%" groups and have 500 instead of 700 points.
- Using NCEE recommended ACT scores used to determine "College and Career Readiness" (contingent upon legislative funding)
 - If colleges will allow students to take "non-remedial" courses with a 16 and our new state guidelines will accept a 16 in lieu of passing a SATP2 assessment, why are we using the NCEE recommended ACT scores for determining College and Career Readiness? The Reading score of 22 and the Mathematics score of 22 are higher than the **2013 National** ACT averages of 21.1 and 20.9 respectively. I understand these scores predict a student's probability of success (with a "C" or higher"), but if colleges don't require remedial classes with a 16, why do we have to use the NCEE recommended ACT scores?
 - Solution: Use 16 as the ACT score for determining College and Career Readiness.
- Using 4th grade "GROWTH" for assigning a label to a K-2 or K-3 school.

- The term “growth” implies we are measuring a student’s progress from one point in time to another (usually one academic year) for academic growth. In order for one school/teacher to have an impact on a student’s growth, that school/teacher must actually have the “possibility” to work with a student that year to make a difference. A K—2 or K-3 school/teacher has **NO** influence on 4th grade growth— achievement (yes); growth (no). At other schools, schools/teachers have students for the year in which growth is attributed, but K-3 teachers don’t teach 4th grade students and thus don’t have the opportunity to help them “grow.” At other schools, this is not the case. For example, our district has a K-3 school, a 4-5 school, a 6-8 school, and a 9-12 school. Sixth grade growth is assigned to 6th grade (where teachers have the opportunity to help students “grow” from 5th grade through 6th grade). Even if one doesn’t like the concept of high school growth being determined based on 8th grade MCT2 scores, high school teachers in Algebra I or English II have the opportunity to help students “grow” since 8th grade Math or Language Arts. Fourth grade teachers have the opportunity to help 4th grade students “grow” since 3rd grade, but the K-3 teachers have no opportunity to help 4th grade students “grow.” Of course, they (K-3 teachers) have an impact on a student’s overall achievement (cumulative prior knowledge), but not on growth (progress this year).
 - Solution: Assign labels for K-2 or K-3 schools for things they have the opportunity to influence (achievement). Use the proficiency components, but not the growth components.
- IEP students and Calculation of “graduation rate”
 - I understand the numerator must include “only standard high school diplomas” and not GEDs, certificates, etc. Federal and state regulations hold all of us accountable for helping IEP students reach their potential. IEP teams meet and determine each student’s plan. We are then required to follow that plan. If an IEP student’s “best” is to earn a certificate and become a productive citizen, then we celebrate the success of that student reaching his/her goals. If IEP students have met the federal and state Special Education requirements and have achieved their goals, how can a school be penalized for the student not receiving a “standard high school diploma”? By including these students in the denominator when calculating graduation rates, that is exactly what is happening.
 - Solution: Exclude IEP students meeting their IEP goals (i.e. certificate) from the denominator. That way we are NOT including them in the graduation rate (as having received a standard diploma), but we are not penalizing high schools for something they can’t be expected to do.
 - “Banking” students’ score until 10th grade
 - This is similar to using the 4th grade growth to determine 3rd grade students growth. High school math or English teachers have no impact on students’ scores in 7th or 8th grade (unlike the reverse where middle school teachers do have an impact on high school scores). Waiting until 10th grade to use scores earned in 7th or 8th grade could skew the scores for high schools (and teachers). With M-STAR including growth as part of a teacher’s evaluation, how can a 10th grade teacher be held accountable for scores students earned in middle school?
 - Solution: Include the scores where they are earned. Simple and fair.
 - Excellence for All High Schools
 - How will proficiency/growth/labels be determined for Excellence for All high schools?

Thank you for your careful consideration of these comments.

**Cathy Creel
Director of Curriculum/Instruction
Columbia School District
ccreel@columbiaschools.org
601-736-2366**

John Cartwright

From: Raymond Powell <rpowell@columbiaschools.org>
Sent: Tuesday, November 12, 2013 11:13 AM
To: Accountability
Subject: Statewide Accountability System Issues

I am a middle school principal in Columbia, and I am deeply concerned about the growth of the lowest 25% of our students counting twice in the new accountability system. I don't see the logic in counting them twice when we should be concerned about the growth of ALL OUR STUDENTS. The model should reflect proficiency in reading, math and science (300 points possible) and growth for all students in reading and math (200 possible points) for a total of 500 points possible instead of the current system of 700 points. We all want to see growth in our bottom 25% and conversely we want to see progress in our top 25% also! They are not included twice like the bottom 25%. I don't think parents of students who are in the upper quartile will be happy with this model.

Raymond Powell
Principal
Jefferson Middle School
Columbia, Mississippi

John Cartwright

From: Harvey, Brian <bharvey@oxfordsd.org>
Sent: Tuesday, November 12, 2013 11:31 AM
To: Accountability
Subject: APA Comments for the Mississippi Accountability System effective school year 2013-2014

Dr. Vanderford,

Please see comments below regarding the proposed Mississippi Accountability System.

5.1 The Accountability Model at both the elementary and secondary levels seems to be a proficiency based model with little to no consideration for advanced students. If the lowest 25% of students are effectively going to count twice in the model then there should be some consideration for those students on the upper end of the achievement scale. To not reward schools and districts for moving students into the highest levels of achievement will have the effect of bringing everyone to the middle. The ramifications of such will not be tolerated by our community.

9.2 The proposed standard of comparing a "C" in a dual enrollment course does not match the rigor of a "3" in an Advanced Placement class. There is simply no way to ensure that there is any consistency among coursework offered at two-year and four-year colleges.

9.3 The acceleration component of participation and performance should begin with the 50% participation, 50% performance. Year 1 is two years away. With more rigorous standards already being offered in the middle school, these students should be prepared. 70% on participation could lead to districts gaming the system to get points early on. Students should also have to meet the full academic year requirement (FAY) as well.

9.4.3 The proposed weighting does not give enough weight to students who take multiple AP courses.

9.5.1 The proposed rule states that the numerator for the Performance component calculation will be the number of students taking and passing accelerated assessments. The denominator should reflect those students who are taking AP or acceleration classes not the entire class.

11-12-13 Focus, Priority, and Reward Schools-Does the combined state/federal accountability include the achievement gap requirement?

16 Given that the U.S. History test is not a requirement for federal accountability, should it be included in the state accountability model? If so, will we have to have an alternate assessment for SCD students. If we have to have it, let's keep it as a graduation requirement, but take it out of the accountability model.

25.5 Why are the ACT science sub scores not included in the college and career readiness component? Our community would also fully support the ACT Aspire program for high school assessments.


Brian Harvey
Superintendent

John Cartwright

From: Nancy Loome <nloome@msparentscampaign.org>
Date: Tuesday, November 12, 2013 2:29 PM
To: Accountability
Subject: Public Comments on the Statewide Accountability System
Attachments: TPC Public Comments_Accountability System.pdf

Please see the attached public comments regarding the Statewide Accountability System.

Many thanks,

Nancy

Nancy Loome, Executive Director
The Parents' Campaign
222 N. President Street, Suite 102
Jackson, MS 39201
601.961.4551 office
601.672.0953 mobile
601.961.4552 fax
www.msparentscampaign.org

The goal of The Parents' Campaign is to engender a public education system that affords all children access to excellent schools so that children can become what they dream.

PARENTS' CAMPAIGN

Better Schools Brighter Future

November 11, 2013

Dr. Paula Vanderford
Education Bureau Manager
Office of Accreditation and Accountability
Mississippi Department of Education
PO Box 771
Jackson MS 39205-0771

Dear Dr. Vanderford,

Please accept these written comments regarding the proposed recommendations for the Statewide Accountability System submitted on behalf of The Parents Campaign. The Parents Campaign shares the Department's commitment to improving achievement among all Mississippi students, and we believe that a strong accountability system, a rigorous curriculum, and adequate resources are required to meet that goal.

We applaud the work of the Department and the Accountability Task Force to amend Mississippi's accountability model to provide a unified state/federal system that measures fairly and accurately the progress that schools and districts are making as they work to move all students toward college and career readiness.

The Parents' Campaign's concerns about the proposed recommendations are limited to two of the proposed components and stem from the precedent that has been set in the Mississippi Legislature for chronic underfunding of public schools. **We fear that, without equitable funding, two components of the proposed model will create serious inequities among school districts, with low-wealth districts being at a severe disadvantage.**

The two areas of primary concern are:

- the added weight of the growth component for the bottom 25% of students
- the acceleration component

While we agree that these components will cause districts to direct resources toward areas of critical importance, **we believe that the inclusion of these two components should be tied to the provision of adequate resources by the Mississippi Legislature, or full funding of its statutory obligation, and to the provision of state funding to cover the costs of students' exam fees for the acceleration component.**

Emphasis on Bottom 25% of Students

It can be assumed with reasonable confidence that, in low-wealth districts, the students falling into the bottom 25% in achievement will be students living in poverty. Research shows

conclusively that children in poverty require significantly more resources than do their more affluent peers in order to level the playing field and reach similar levels of achievement

When the state fails to meet its statutory obligation to ensure adequate and equitable funding for all districts, high-wealth districts have two distinct advantages in this regard:

1. The students in the bottom 25% in achievement in the high-wealth districts are likely relatively better off economically than are the students in the bottom 25% of low-wealth districts, and, thus, their challenges are fewer
2. High-wealth districts have additional resources to invest to bring these students to a higher achievement level.

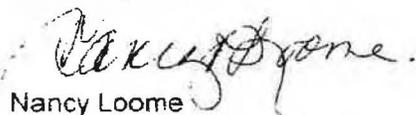
Acceleration Component

Because the acceleration component rewards high schools for high percentages of students taking and passing assessments associated with accelerated courses, schools and districts that offer multiple sections or a greater variety of these courses will have a distinct advantage. High-wealth districts will be better able to afford to recruit and provide the requisite training for teachers of accelerated courses than will low-wealth districts, and the absence of equitable state funding will exacerbate this advantage/disadvantage and set low-wealth districts up for failure

During Task Force deliberations, Florida's accountability model was held up as the model for these two components. It bears noting that Florida provides significant resources to Florida school districts to fund the acceleration component of its model. No such resources have been requested by the Mississippi Department of Education to address this proposed adjustment to Mississippi's accountability model.

Thank you for considering these comments and for the work you do daily to ensure that all Mississippi children get a shot at a bright future.

Warm regards,



Nancy Loomer
Executive Director

John Cartwright

From: Debbie Hood <dhood@columbiaschools.org>
Sent: Tuesday, November 12, 2013 3:12 PM
To: Accountability
Subject: New APA Accountability Recommendations

After reviewing the New APA Accountability Recommendations, I have several concerns:

- Growth of the lowest 25% is counted twice. Growth should be on all students and we should not single out the lowest 25%.
- Partial credit should be given for scores below proficient. Students with disabilities who are not SCD will not be given credit because they often score below proficient. Their IEP is not being taken into consideration.
- The distribution of scaled scores for the lowest 25% appears to be disproportionate. The distribution should follow a curve similar to the Bell Curve. It appears that the scaled scores are weighted toward failure.
- K-3 schools should only be held accountable for student achievement. Growth is based on influence during the current academic year not the past academic year.

Thank you in advance for taking the time to read my concerns. I hope you will take my concerns into consideration when finalizing our New APA Accountability Standards.

Debra Hood, Special Services Director
Columbia School District

John Cartwright

From: Mary Brown <marybrown@greenwood.k12.ms.us>
Sent: Tuesday, November 12, 2013 4:15 PM
To: Accountability
Cc: Mary Brown
Subject: New State Board of Education State/Federal Combined Accountability System goes out for APA Comments - due Nov. 12

Comments:

We are most proud of the fact that the model does not focus on QDI, but actual percents of students scoring at and above the proficiency level both at the school and district level. Additionally, it should be commended that the system requires not only that schools grow the lowest 25% of students, but districts must define the lowest 25% of students in Math and ELA and show growth as well. Lastly, given our mission in the Greenwood Public Schools to "Maximize Student Potential" we support the inclusion of the ACT being part of the new accountability model and that the new model invest in ensuring that all students are career and college ready.

Mrs. Mary Brown
Assistant Superintendent
Office of Academic Education
P.O. 1497
401 Howard Street
Greenwood, MS 38930
662-455-8974
662-299-7818

John Cartwright

From: Wendy Bracey <wbracey@columbiaschools.org>
Sent: Wednesday, November 13, 2013 2:37 AM
To: Accountability

Why does the bottom 25% have to count twice? Once in the all and once in a category of its own. Just curious.

--
Wendy Bracey
Principal

Columbia Elementary School
401 Mary Street
Columbia, MS 39429

Work: 601-736-2362
Cell: 601-731-4876

John Cartwright

From: Scott Cantrell <scottcantrell@mcsd.us>
Date: Thursday, November 21, 2013 8:02 AM
To: Accountability
Subject: Public comment on proposed accountability model

1. Pertaining to the performance portion of the acceleration component: The AP exam is approximately \$85-\$90. Many students in less affluent school districts cannot afford to take these AP exams. I believe more affluent districts will have an advantage on this portion of the model. I have read where the Legislature will ask for funds for an 11th grade administration of the ACT. Might it be a possibility for MDE to ask the Legislature for the funding of AP exams also.

2. Pertaining to the "lowest 25%" counting more times within the model than the remaining 75%:

As it stands now, if a 5th and/or 8th grade student is in the lowest 25% in both math and reading, this student will be counted 7 times in the model:

1. Math score
2. Math growth all
3. Math growth lowest 25%
4. Reading score
5. Reading growth all
6. Reading growth lowest 25%
7. 8th grade science

However, a 5th and/or 8th grade student who is not in the lowest 25% in both math and reading will only be counted 5 times in the model:

1. Math score
2. Math growth all
3. Reading score
4. Reading growth all
5. Science

I believe the model was set up to provide motivation for districts to identify and intervene more rigorously with the students who consistently fall into this lowest 25%. If identification of these students is the goal, would the following breakdown be possible for a 5th and/or 8th grade student?

1. Math score
2. Math growth lowest 25%
3. Reading score
4. Reading growth lowest 25%
5. Science

Therefore, students who do not fall into the lowest 25% category would fit into the model in the following manner.

1. Math score
2. Math growth remaining 75%

3. Reading score
4. Reading growth remaining 75%
5. Science

This methodology would not allow for the "lowest 25" to count more times in the model than the "remaining 75%", but it would ensure that districts are identifying and intervening with these students, as this group's growth will still make up a 100 pt. block in both math and reading. They just will not count twice by also counting in the "growth all" blocks of the model.

**** I used 5th and 8th grade as an example, but this would pertain to any grade that is tested.**

--
Scott Cantrell
Superintendent of Education
Monroe County School District

John Cartwright

From: Cherie Labat <clabat@bwsd.org>
Date: Thursday, November 21, 2013 11:51 AM
To: Accountability
Subject: Business Rules Comments

Office of Accreditation & Accountability,

I think that special education students should have a modification for the general growth component model for the business rules. IEP students need a criteria for growth that can be assessed using more than one form of assessment. A student with a math disability may never see growth on the math test but if they improve in ways that the assessment may not measure, credit should be given. The Council for Exceptional Children recommends multiple measures for SCD students. We may need to have the same mind set for other IEP children.

Cherie Labat
Bay-Waveland School District

Cherie Labat, Ph.D.
Principal
Bay Waveland Middle School
(228) 463-0315

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John Cartwright

From: Ferguson, Amanda C <acferguson@tupeloschools.com>
Sent: Friday, November 22, 2013 2:56 PM
To: Accountability
Cc: Mobley, Leigh
Attachments: APA Accountability Comment.docx

State Department of Education:

Attached are the APA comments on accountability from Tupelo Public School District.

Thanks,

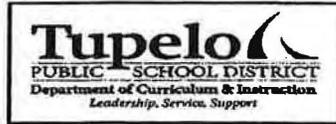
Amy Ferguson

RTI Administrator

Tupelo School District
Hancock Leadership Center
1920 Briar Ridge Road
Tupelo, MS 38804
662-840-1847 Work
662-840-1851 Fax
662-687-3720- Cell

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To the State Department of Education:

The newly proposed accountability model was developed with the success of Mississippi students in mind. This model clearly outlines the importance of student achievement in the state of Mississippi. Over the past decade, educators have seen the power of rigorous accountability standards to drive school improvement. However, after reviewing the business rules for this proposed model, these are areas of concern.

- Mississippi's prior accountability model was featured in *Education Week* as being one of the most rigorous school evaluation systems in the nation. Under this prior system, schools and districts across the state have shown marked improvement in the area of student achievement. The newly revised model should be one that continues to build upon Mississippi's progress. However, with current MCT2/SATP impact data, districts are finding the new model shows a dramatic grade drop for districts and schools. The two measures with different areas of focus show very different school outlooks. With higher standards, school grades are expected to show some decrease. However, a significant drop in performance on the same MCT2 assessments could be viewed to the public as a traumatic decrease in the performance of schools and districts. The cut points should reflect a slight change in status perhaps a difference of a high B to a low B, not a major discrepancy such as 1.3-1.4 grade levels. The new model needs to continue to move Mississippi forward by building upon the success of the prior model. **The cut points for defining A-F need to be reevaluated using current data in an effort to refocus Mississippi on continuing the improvement of schools.**
- Common Core will be fully implemented with live assessments in 2014-2015. This new model will be the tool used to define school success on preparing students for college and career. Cuts need to be set fairly with consideration of the upcoming transition to the Common Core Assessments. If the cut points, A-F, are inflated and causing severe discrepancies in school statuses for the same assessment, MCT2, there could be serious repercussions to school grades with next generation Common Core assessments. With higher academic standards, cut points at implementation will need to be recalibrated for Common Core assessment results. With cut points as they are currently set, there could be a misconception of lowering standards if adjustments must be made after the first round of Common Core testing. **Cut points being set at a practical level this year, with the onset of this model, could deter from this becoming an issue next school year.**
- Mississippi has been focused on every student, every year showing adequate growth. Schools have been incentivized through the current QDI model to move students to the advanced level on MCT2. Students under the current model can decrease in scale score and still make growth. However, with the new model, it



appears to be punitive for the advanced range students. Many bright students as they matriculate through the system will fluctuate scores over time. Educators are concerned that districts might be complacent with the proficient status and not push every student to reach his/her potential. In the long run, districts can actually gain more points not working the upper bubble students with the model as written. The model should be revised to outline growth for advanced students as follows:

- Students growing from low proficient to the advanced status receive a weighted credit of 1.25.
- Students decreasing from low advanced to low proficient are deducted the entire 1.0 growth credit.
- Students scoring low advanced and decreasing to high proficient are deducted only .25 growth credit.
- In addition, students growing from low advanced to high advanced status should receive a weighted 1.25 growth credit.
- Students scoring low proficient and growing to high proficient should also be given the weighted 1.25 credit.

Within the proficient and advanced achievement bands there should be weighted credit (1.25) for moving students across the mid-points of these bands. This amendment would ensure schools provide equal emphasis on the growth of all students in each proficiency band creating a balanced system on both sides of the achievement spectrum.

- College and Career readiness is the goal for all graduating students of Mississippi schools. This model places emphasis on the ACT as a benchmark indicator for students' college and career readiness. This component should also include allowances for high achieving high school students. Students scoring the college and career benchmark scores on ACT before enrolling in SATP classes should be exempt from state end of course assessments. These scores would be included in the proficiency status on the accountability model, while students scoring in the upper quartile should be counted as advanced. If college and career is the ultimate end point for measuring high school success, this measurement should be sufficient in proving student mastery of high school courses.

This proposed model places high emphasis on bridging the achievement gap of the bottom 25%, which is an area of great need. However, Mississippi should continue providing a well-rounded, nationally recognized accountability model. This model should build upon the current practices of growing all students to higher levels of proficiency.

Tupelo Public School District

John Cartwright

From: Cherie Labat <clabat@bwsd.org>
It: Saturday, November 23, 2013 8:54 AM
To: Accountability; Paula Vanderford
Subject: .Visit/business rules

The Bay Waveland School District leadership team visited the office of accountability on 11/22. We discussed the new accountability model at length. We left with a clearer understanding of the process. I think the business rules are clear, precise and give a better picture of a school. The accountability team at MDE was professional and well versed to answer questions. I have a clearer picture of growth, FAY and the lower 25 percent. Thank you for listening and taking time to meet with us.

Sincerely,

Cherie Labat, Ph.D.

Sent from my iPhone

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John Cartwright

From: Tollie Thigpen
Sent: Wednesday, December 04, 2013 2:29 PM
To: Accountability
Cc: Patrick Ross; Jo Ann Malone; Paula Vanderford
Subject: FW: Attached Image
Attachments: 1271_001.pdf

From: accredcopier@mde.k12.ms.us [mailto:accredcopier@mde.k12.ms.us]
Sent: Wednesday, December 04, 2013 1:27 PM
To: Tollie Thigpen
Subject: Attached Image

Quitman Lower Elementary
101 McArthur Street
Quitman, MS 39355
Phone: (601)776-6156
Fax: (601)776-1035

To: MDE

Total Pages: 2

Attention: Office of Accreditation + Accountability

* Accountability@mde.k12.ms.us

This email will not work!

From James Bounds, Principal

Date 12/4/13

*Quitman Lower Elementary**101 McArthur Street**Quitman, MS 39355**601-776-6156*

As a K-2 Principal, I have strong reservations about the assignment of a rating to a school that administers no standard assessment that would allow for a comparison to other students of the same age across the state. It appears to me that the current assignment has been given in an effort to track students that received instruction in the K-2 setting during their fourth grade year. The K-2 setting has no accountability for what takes place in the third or fourth grade instructional setting. This appears to be only partially valid as a measurement for accountability. The implications of a school rating are far reaching and should be on a more valid measurement process. It appears we should have no rating or we should have a state level assessment.

James Bounds, Principal

John Cartwright

From: Warren Woodrow <wwoodrow@westjasper.k12.ms.us>
Date: Tuesday, December 10, 2013 9:37 AM
To: Accountability
Subject: comments on accountability model

How can a valid indicator of academic growth be calculated when comparing the 2013-2014 MCT2 scores against growth attained on the 2014-2015 PAARC assessments ?

If ASVAB is used , who guarantees / ensures test security or validity since school officials to not administer the tests.

Note that impact data/new model creates an inordinate number of ' D ' school districts

Is there not a concern that some students or schools have greater access to accelerated classes than other schools.

John Cartwright

From: Hubbard Kaye <khubbard@grenadak12.com>
Sent: Thursday, December 19, 2013 10:04 AM
To: Accountability
Cc: Mike McInnis; David Daigneault
Subject: APA Comments Grenada School District
Attachments: DOC009.PDF

Dr. David Daigneault
Superintendent

Post Office Box 1940
Grenada, Mississippi 38902-1940

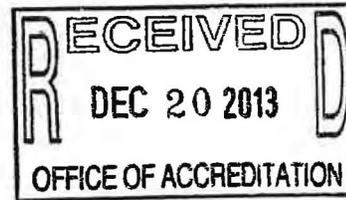


Telephone 662 226 1606

Fax 662 226 7994

December 19, 2013

Mississippi Department of Education
Office of Accreditation and Accountability
Attention: Paula A. Vanderford
Post Office Box 771
Jackson, Mississippi 39205-0771



Dear Dr. Vanderford:

On behalf of Grenada Public Schools, thank you for this opportunity to make comments regarding the new accountability model. We highly value the importance the Mississippi Department of Education places on seeking input from both school districts and the community in making decisions related to educating our students. The district has had numerous conversations with administrators, school board members, principals, teachers, parents and the citizenry of Grenada regarding the new accountability model. In lieu of writing individual letters from the constituents of Grenada, we have made an attempt to bundle our concerns collectively through this correspondence. Again, thank you for this opportunity to express our thoughts and concerns through this medium.

One concern specifically related to Grenada Public Schools is how we, as a district, are rated in the top 20 percent of districts in Mississippi, with all schools having QDI's in the high "B" category, but under the new accountability model, our district would be a 623, the lowest possible "B". We feel the cut scores have been set too high. We would like to recommend the accountability committee revisit the setting of cut scores, to bring the ranges more in line of being challenging for our students while also being more realistic and fair for our students to achieve.

This same concern regarding the setting of the cut scores is evidenced by the number of districts, as a state, that has been reduced from a "B" to a "C". Under the old accountability model, there were approximately sixty five districts rated as "B". Under the new model, the number of "B" districts drops to approximately thirty five. In addition, under the new accountability model, the percentage of "D" and "F" districts increases to forty five percent, leaving fifty five percent of districts rated as "A", "B" or "C". It is our hope that these ranges in scores will be reconsidered for the betterment of the new accountability system.

On a different note, we are concerned with the bottom 25 percent of students tested being counted twice in the new accountability model. While most school districts are excelling in providing interventions and other resources to help struggling students, it doesn't seem fair to place such a heavy weight on their achievement on the state test. Another thought regarding this...why not count the top academic students twice, both to reward and celebrate these students in their achievements while also getting the impact of counting the bottom 25 percent twice.

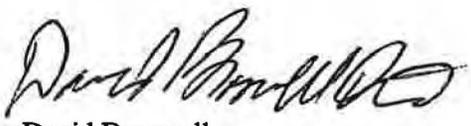
There is a consensus among all constituents in Grenada that, while admirable to improve our educational system, too much is being implemented at one time. There is a sense from all constituents of being overwhelmed when considering the implementation of the following:

- Implementation of Common Core
- Developing units for all subjects relevant to Common Core
- MStar teacher evaluations
- New Principal evaluations
- New PARCC assessments
- New Graduation options
- New courses at the high school level that have not been approved or released yet
- GED testing no longer counting in the dropout prevention plan
- GED, Occupational Diploma and Certificate routes not counting toward the graduation component of the new model

Finally, the constituents of Grenada have concerns regarding what measures the State has planned to accommodate the PARCC assessments anticipated drop in scores of at least 40 percent. One suggestion that has been offered is for the cut scores to be lowered by 40 percent in order to accommodate this drop in scores. The Grenada community is a champion of the dedicated job our public schools across the state are doing in Mississippi, while facing what oftentimes seems to be against unsurmountable odds, such as budget cuts, etc. We are fearful that the extraordinary efforts put forth by public educators will be undermined by the significant drops in student's test scores, without a well thought-out plan.

Again, the Grenada Public Schools applauds the Mississippi Department of Education for the opportunity to voice opinions the improvement of the new accountability system. We are both working for the same goal...providing top level instruction to our students to prepare them to become productive and successful citizens.

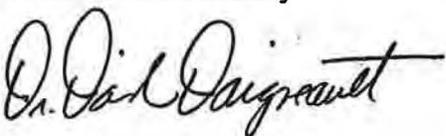
Sincerely,



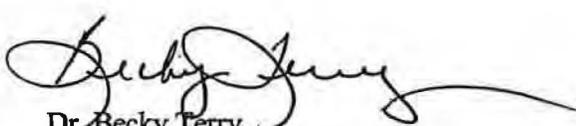
Dr. David Braswell
School Board Secretary



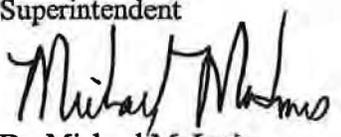
Dr. Bettye Neely
Assistant Superintendent



Dr. David Daigneault
Superintendent



Dr. Becky Terry
Director of School Improvement



Dr. Michael McInnis
Assistant Superintendent



Mrs. Bea Colbert
Special Education Director

John Cartwright

From: Paula Vanderford
It: Thursday, December 19, 2013 12:56 PM
To: Accountability
Subject: Fwd: NEW Statewide Accountability System

Sent from my iPhone

Begin forwarded message:

From: MASS <mass@superintendents.ms>
Date: December 19, 2013, 12:51:32 PM CST
To: <pvanderford@mde.k12.ms.us>
Subject: FW: NEW Statewide Accountability System

From: Miki Ginn [<mailto:mginn@mail.vwsd.k12.ms.us>]
Sent: Wednesday, December 18, 2013 2:06 PM
To: MASS
Subject: Re: NEW Statewide Accountability System

I do not agree with always having to have a "set" number of students in the bottom 25%. When schools and students get their scores to an acceptable/proficient level, they should not be forced to always "look" like they are not being successful because they have a "forced" bottom 25%.

I also do not agree with always having to have schools designated as "Focus" or "Priority" Schools just to say you have schools fall in that category.

"Forcing" these labels and calculations always makes schools/ kids feel like they are not doing a good job and that they are failures.

I agree there needs to be high expectations for student performance, but I do not agree with making it "appear" that there is always a problem.

Miki Ginn
Principal
Bovina Elementary School

GRENADA CAREER AND TECHNICAL CENTER

"Skills for a Lifetime"

2035 Jackson Avenue

Grenada, MS 38901

Phone 662-226-5969

Fax 662-226-5992

Cliff Craven, Ph.D.
Director

Mark Davis
Counselor

December 19, 2013

Mississippi Department of Education
Office of Accreditation and Accountability
Attention: Paula A. Vanderford
Post Office Box 771
Jackson, MS 39205-0771



To whom it may concern:

Listed below are some of the concerns that our school has with the new Accountability Model.

- If we are counting the bottom 25% twice, why are we not counting the top 25% twice?
- Why do GED, Occupational Diploma, and Certificate options not count toward the graduation component of the new model?
- Are we moving too quickly as related to Common Core, especially at the high school level?
 - New courses at the High School Level have not been approved or released yet. (Scheduling begins in January or February for the following year.)
 - Unit development for all subjects
 - New PARCC assessments
 - MStar teacher evaluations
 - New Graduation Options
 - Not enough teacher training
- If 9th grade students who repeat 9th grade stay in their original cohort, but graduate in 5 years, how do they count in the graduation rate?
- 70% Participation in accelerated courses is unreasonable

Sincerely,

A handwritten signature in cursive script that reads "Bonnie Brunt". The signature is written in black ink and is positioned above the printed name.

Bonnie Brunt

Tollie Thigpen

m: Chuck Benigno <cbenigno@laurelschools.org>
Sent: Saturday, December 21, 2013 9:39 PM
To: Accountability
Cc: James Mason
Subject: .APA Comment - New Accountability Model

Dr. Vanderford,

I want to commend the committee for all of their hard work on the new accountability model and would like to offer a suggestion for an area of concern. Please accept the comments below as part of the APA process.

Concern: US History and its overstated impact on district level ratings.

US History (district rating) - As you know, school districts will be judged in several areas with each area being worth 100 points. My concern is that US History is given way too much power in the district model for just a single test. Using the impact data for Laurel as an example, we had 120 students take the US History test last year and they had the potential to earn up to 100 points toward district rating. In contrast, our math test scores from grades 3-10 were based on over 1,500 students and the most they can earn is 100 points. It seems to me that 120 students on one test should not have the same potential impact on a school district as the reading and math scores with over 1,500 student performances per subject.

I totally agree with US History being worth 100 points for high schools because they only give four test and each one should be equally considered. However, allowing US History by itself to have this much impact on the district rating truly skews the reality of our proficiency performance. Please see the example below from Laurel School District.

Reading - 1,500 students - possible points = 100
Math - 1,500 students - possible points = 100
Science - 480 students - possible points = 100
US History - 120 students - possible points = 100

Suggestion: Please see the suggestion below.

I propose that we add the US History proficiency results to the Reading proficiency scores on the district model. This requires the district to still be held accountable for the US History performance. However, this combining of scores allows the US History results to have a more appropriate weight on the district model. This suggestion would not be difficult for the committee to implement since it only means that we would have one less category in the district model. We already have a similar situation with the difference between elementary ratings which use seven categories of 100 points and high schools that have a projected 10 categories of 100 points.

I propose that you could do the same thing with the district science results and group them with the

math scores to eliminate the inappropriate weight of the science category as well. However, I am scared to press my luck so I will leave that up to the committee.

Ex. Only district ratings would have a category called Reading/US History for a total of 100 points. Please see the Laurel example below.

Reading / US History - 1,620 students - possible points = 100

Math - 1,500 students - possible points = 100

Science - 480 students - possible points = 100

Please note that you could still compute student growth on just the reading and math portions of the score. Again, I am only advocating this for the district rating. The individual high school ratings do not have this issue of US History having inappropriate weight.

Thanks for considering this request!

Chuck Benigno, Ph.D.
Superintendent
Laurel School District

*** This Email was sent by an educator at District Office in Laurel School District MS.

*** This Email was sent by an educator at District Office in Laurel School District MS.

Tollie Thigpen

From: Angel Meeks <aldmeeks@holmes.k12.ms.us>
Sent: Friday, January 03, 2014 7:38 AM
To: Accountability
Subject: Accountability APA Comment

To Whom It May Concern:

The effort to combine the state and federal accountability models is to be commended. For many years school administrators, teachers, support staff, parents and the general public have struggled to make meaningful understanding of how a school could be praised for its accomplishments on one model and sanctioned for the lack of accomplishments on the other.

The focus on growth is another component of the combined accountability system which is to be acknowledged because it reinforces the ultimate mandate of educating every child.

I would, however, like to express my concern with the cut scores for school performance. It is unfathomable that the range between grade levels is not equal. In particular, the F category has the largest range of scores, and the D range has the second highest range of scores. In fact the range of cut scores for the D category is twice that of both the C and B categories. In essence, the new system creates a situation where it is easier for a school to be labeled as a D or F school than it is for the school to be labeled as an A, B, or C. This point range puts schools at a greater risk for low performance and failure. The distribution of scores is not equal, nor is it fair.

It has been stated over and over again in numerous educational publications that parent and community support is needed if schools are to thrive. Unfortunately it is very difficult to rally parent and community support for children when a district has been constantly deemed a failure. We tell children their efforts matter, and we vow to treat children firmly, fairly, and respectfully. Yet, this new accountability does just the opposite.

I sincerely hope that the State Board of Education will re-evaluate its stance on the proposed rating scale and implement a scale that has an equal range of scores between each of the graded categories. In essence, I hope that the State Board of Education will approve a rating scale that is fair to all districts, schools, and children.

--
Angel Meeks
Assistant Superintendent
Holmes County School District
Phone: (662) 834-2175
Fax: (662) 834-9060

Tollie Thigpen

From: Paula Vanderford
Sent: Monday, January 06, 2014 1:23 PM
To: Accountability
Cc: Billy Buchanan; Patrick Ross; Tollie Thigpen; Jo Ann Malone
Subject: FW: New Accountability Model: Proposed Cut Scores

From: Pam Briscoe [<mailto:pbriscoe@live.com>]
Sent: Sunday, January 05, 2014 6:27 PM
To: Paula Vanderford
Subject: New Accountability Model: Proposed Cut Scores

Dear Ms. Vanderford:

As a former teacher and now English Language Arts Instructional Specialist for Grenada School District, I am very proud of the work our district has done to improve student achievement. Through hard work and dedication, we have been rated a "B" school for the second year in a row. Since 2009, Grenada School District's students have ranked higher than Mississippi's state average. What an accomplishment to be celebrated!

While Grenada School District celebrates our academic achievements, we are very concerned about the direction the state is headed with the redesigning of our state's accountability model. For example, if our district's QDI places us in the high "B" category, why would the new model place us in the low "B" category? This new range has forced many districts to slip from a district rating of "B" to a "C." This drop is devastating to all who have worked so hard to improve student achievement. We could very well be the next victim of this shift.

Also, the state is facing at least a 40% drop in scores when the PARCC assessment is implemented. What does the state plan to do to protect our districts during this transition? Please take a closer look at the proposed cut scores. They should be lowered to protect our schools from being labeled as underperforming. We've worked too hard to suffer this setback.

Please prayerfully consider the redesigning of the cut scores for our school accountability model. You have the power to protect and preserve education in Mississippi. It is not too late to do the right thing for our schools and children.

Thank you,
Pam Briscoe
ELA Instructional Specialist, K-5
Grenada School District
Grenada, MS 38901
662-229-5070
pbriscoe@live.com

Tollie Thigpen

From: Paula Vanderford
Sent: Monday, January 06, 2014 1:24 PM
To: Accountability
Cc: Billy Buchanan; Patrick Ross; Tollie Thigpen; Jo Ann Malone
Subject: FW: Accountability Model
Attachments: Accountability letter from me.doc

From: Christa King [<mailto:mrskingspad@yahoo.com>]
Sent: Monday, January 06, 2014 8:25 AM
To: Paula Vanderford
Subject: Accountability Model

Good morning! Please review the attached letter.

Thank you,
Christa King
Instructional Specialist, K-5 Reading
Grenada School District



From the Desk of
Christa King
Instructional Specialist, K-5 Reading
Grenada School District

500 Pender Drive
Grenada, MS 38901

January 6, 2014

Mississippi Department of Education
Office of Accreditation and Accountability
Paula A. Vanderford
P.O. Box 771
Jackson, MS 39205-0771

Dear Ms. Vanderford:

I am an Instructional Specialist for grades K-5 in the Grenada School District with a focus on Reading in the early grades. As a district we strive for excellence in order to ensure that the children of Grenada County have an education to further them in their goals for education. With the effort from dedicated teachers and staff members, we are a "B" district for the second year. Again because of our dedicated teachers and staff members we have been pleased to rank higher than the average for the state of Mississippi. These are two accomplishments we celebrate proudly!

With this celebration and the review of the new state accountability model, we are discouraged that our district's QDI will now place us in the low "B" to "C" range. By studying the new accountability model, we realize other districts will also fall into the same guidelines and will also fall into lower levels. This is disturbing for not only our district but for our community and state.

With the PARCC assessments that are predicted to be taken next school year, it is predicted that the state will have at least a 40% drop in scores. I ask that the state consider these gaps and decide the best course of action to allow for successes to continue to be celebrated as we collectively aim to transition to this accountability model.

I realize the school accountability model will be discussed in the upcoming days and weeks. Please consider the statistics and information presented to defend and conserve the education of our children in Mississippi.

Thank you,
Christa King
Instructional Specialist, K-5 Reading
Grenada School District
mrskingspad@yahoo.com
662-688-5138

Tollie Thigpen

From: Brian Jernigan <brianjernigan@mcsd.us>
Sent: Monday, January 06, 2014 3:57 PM
To: Accountability
Subject: Accountability concerns

I have two major concerns that I believe need to be addressed.

1. Grades 3,4,6 and 7 will count Lowest 25% 6 different places. Grades lowest 25% in grades 5 and 8 will count 7 different places. This heavily weighted percentage could be tragic for a small district.
2. Large districts have an advantage over smaller districts when it comes to offering AP courses. Why should my district be penalized simply because we do not have the staff or students to justify offering 15 AP courses? We offer 4-5 while another district does offer 19.

--
Thank you!

Brian Jernigan
Assistant Superintendent
Monroe County School District

www.mcsd.us

662.257.2176

"What is now proven was once only imagined" William Blake

Tollie Thigpen

From: Cassandra Williams <cassandrawilliams@cantonschools.net>
Sent: Tuesday, January 07, 2014 1:53 PM
To: Accountability; Paula Vanderford
Cc: Dwight Lockett
Subject: APA response to new statewide acc. model
Attachments: State Accountability Model- APA responses -final submitted.docx

Please find comments and concerns about the proposed statewide accountability model attached.

Thanks!!

--
Cassandra Williams
Assistant Superintendent
Canton Public School District
Phone: 601-859-6720
Fax: 601-859-4023
Email: cassandrawilliams@cantonschools.net

Date: January 6, 2014

Subject: Statewide Accountability System APA Process

After reviewing the proposed Statewide Accountability System, concerns have been noted in the following sections of the model:

- Assignment of Grade Classification
- Growth
- Lowest 25% of Students
- Acceleration
- College and Career Readiness Indicator

Specific details have been noted by section.

1. Assignment of Grade Classifications

Issue #1: Inequity for schools and school districts with predominantly minority populations

The model has a wide range of opportunities for school districts to fall in the D and F categories. At the same time, the ranges on the upper end of the scale (A and B) are not as wide. We are recommending that the ranges of the cut points on the bottom end of the grade classifications be revised to reflect a system that is not so "bottom heavy." The current cut point ranges appear to be unfairly weighted so that predominantly minority districts stay at the bottom. The current arrangement of cut points in the high school component of the model fall within a 134 point range to move from D status to C status. However, to move from C status to B status, the range of cut points is 92 points. Then, to move from B status to an A status the range of cut points is 75 points. The same pattern of inconsistencies applies in the elementary and middle school model. In order for schools to move from D status to C status the range of cut points is 75 points. However, to move from C status to B status the range of cut points is 55 points. Then, to move from B status to an A status the range of cut points is 63 points. The model is very one-sided. Although we have been told that "experts" worked on the development of the cut point intervals, the range and derivation of the cut-points gives school districts that currently perform at higher levels an unfair advantage and opportunity to move up quicker in the classifications under this proposed model. Consequently, schools and school districts who have struggled with the current model are at an even greater disadvantage under the proposed model because the wider cut point ranges (134 points) at the bottom of the scale. The wider range at the bottom clearly makes it tougher for those schools to move out of the D and F categories. Ironically, most of the school districts that fall into the lower categories (D and F) have predominantly minority populations. By design, the model appears to keep districts with predominantly minority student populations at the bottom. We are questioning the lack of transparency of the standards setting process that was used to determine the cut points. What data was used? What specific standards setting process was used? How reliable are the data

Date: January 6, 2014

Subject: Statewide Accountability System APA Process

points that were used to set the standards? Were any parts of the process subjective? Who monitored the accuracy and quality of data used? How statistically sound is the model? The list of questions goes on and on because of the glaring inequities and inconsistencies. We are recommending that MDE revise the cut point ranges to represent a more equitable approach to the model for all schools and school districts regardless of demographics.

Issue #2: Unfair accountability practices for non-tested grades/schools

For K-2 schools that do not have tested grades (K-2), the impact data was based on grade 3 and 4 MCT2 language arts and math data. Is it fair to hold K-2 teachers accountable for grade 3 and 4 data on MCT2? Although K-2 is prerequisite to tested grades, MDE should consider measures that K-2 or K-1 schools can readily impact and control in order to be fair in an accountability system. Back-mapping data from feeder schools is not a fair and equitable approach to holding K-2 schools, teachers, and administrators accountable. There will be at least one full year of instruction the K-2 school had no direct impact upon, but yet will be held accountable for final outcomes. With the implementation of MSTAR and MPES, this approach to accountability will prove to be problematic for many teachers and administrators because of the unfair implications. Additionally, the cut-points used to determine the non-tested school's label was not published as part of the business rules. Again, the issue of inequity and lack of transparency is an immediate concern.

6. Growth

The process for determining growth within a performance classification is unclear (bottom half of basic to top half of basic, etc). Based on the information provided in the proposed business rules, MDE is proposing movement within a performance level that constitutes growth. School districts need a more definitive way to gauge growth and the impact this approach to calculating growth has on student achievement. Clearly defining the ranges for the "bottom half of basic" or "top half of basic", etc. with quantitative values will allow districts to have a system of check and balances for measuring and predicting growth internally. We understand that these values may change and vary by assessment. However, we need more transparency from MDE on this component.

The process for calculating the high school growth is absolutely not clear and does not give school districts a clear process for making sure that the correct students are being counted in the proposed model at the appropriate time (i.e. banking scores in section 10).

Date: January 6, 2014

Subject: Statewide Accountability System APA Process

7. Lowest 25% of students

Issue #1: Process for identifying students in the bottom 25% for elementary and middle schools

The process for identifying students scoring in the lowest 25% is a concern at the elementary and middle levels. Based on the guidance that MDE provided on identifying these students, school districts must have the ability to confirm the full academic year status of a student. Because the ultimate determination of FAY is determined by MDE, schools will struggle to get an accurate list of students who fall into the bottom 25%. MDE should consider providing school districts with snapshots of their bottom 25% to give school districts more concrete guidance on this. MDE should also provide districts with monthly or quarterly updated lists of the bottom 25% as the lists will change as enrollment changes.

Issue #2: Process for identifying students in the bottom 25% for high schools

The process for identifying students at the high school level ahead of time who count in the growth model in the bottom 25% is a concern. School districts should know who these students are ahead of time. How can we be assured that the students that the state will identify after the SATP is administered are the same students that the school district identified before the SATP is administered? If we use 8th grade MCT2 data, all of those students may not take Algebra I as 9th graders. The process that MDE will use to define the bottom 25% is not clear. Without an accurate way to plan for the appropriate students who will fall in the bottom 25% at the high school level, school districts will struggle to provide remediation to those targeted students. MDE should consider providing school districts with snapshots of their bottom 25% to take the subjectivity out of this part of the process. MDE should also provide districts with monthly or quarterly updated lists of the bottom 25% as the lists will change as enrollment changes.

9. Acceleration

As educators, we have high expectations for our students. However, requiring Advanced Placement, IB and/or other accelerated coursework participation and performance requirements in a statewide accountability model perpetuates inequity and a more pronounced achievement gap. Accessibility for all students and school funding issues arise as districts with high poverty levels attempt to comply with this component. This requirement will also impact teacher units at schools who currently have lower enrollment in accelerated courses. The number of teacher units will increase in order to accommodate the increased enrollment in accelerated courses. Since MAEP has not been fully funded in years, the need for additional

Date: January 6, 2014

Subject: Statewide Accountability System APA Process

funding from the state will be crucial. In addition, districts with a large percentage of students on free and reduced lunch encounter challenges because some parents cannot afford college tuition for dual enrollment/dual credit. The requirement to **offer** advanced coursework for students is great and should remain policy. However, the mandated participation and required performance targets should not be included in a statewide accountability model. Again, if PARCC assessments are going to be more rigorous and will promote college and career readiness, why is this requirement necessary? We are recommending that the MDE eliminate this component of the model.

25. College and Career Readiness Indicator

The ACT requirement is unrealistic not just because the cut score has been set above the state's average score but also because of the testing mandates that are already in place. Why add more? As educators, we have high expectations. However, unrealistic expectations and demands cripple the public school system. Requiring students to score 22 or even 18 on the ACT when we have students who are struggling to pass SATP2 assessments with lower cut points is extremely unrealistic. If PARCC assessments are going to be more rigorous, why is the state adding an ACT requirement that will burden students and school districts financially? Won't the PARCC assessment accomplish the same goal (serve as an indicator for college and career readiness)? We are recommending that the MDE eliminate this component of the model.

Tollie Thigpen

From: Tollie Thigpen
Sent: Wednesday, January 08, 2014 10:17 AM
To: Accountability
Cc: Patrick Ross; Jo Ann Malone; Billy Buchanan; Paula Vanderford
Subject: FW: accountability fax
Attachments: 1332_001.pdf

From: John Cartwright
Sent: Wednesday, January 08, 2014 10:02 AM
To: Tollie Thigpen
Subject: accountability fax

From: accredcopier@mde.k12.ms.us [mailto:accredcopier@mde.k12.ms.us]
Sent: Wednesday, January 08, 2014 9:00 AM
To: John Cartwright
Subject: Attached Image

GREENVILLE PUBLIC SCHOOL DISTRICT
Office of The Superintendent
P. O. Box 1619;
Greenville, MS 38702-1619

Fax

Date: 1/7/14

TO: <u>Princk Vanderford, Ph.D</u>	FROM: <u>Audrey L. Sanders</u>
COMPANY: <u>MDL</u>	PAGES: <u>5</u> including cover sheet
FAX: <u>601-359-1979</u>	FAX: <u>662-334-3646</u>
PHONE:	PHONE: <u>662-334-7004</u>

CC:

RE: Revision to the 2013-14 A.S. schedule of Accountability Systems

COMMENTS:

- Urgent
- Please review
- Please comment
- For your records



Leeson M. Taylor, II Ed. D.

Superintendent

412 South Main Street
 P. O. Box 1619
 Greenville, MS 38702-1619
 Office: (662) 334-7001
 Fax: (662) 334-3646
 Cell: (662) 820-8607
 ltaylor@yothe.k12.ms.us

Paula Vanderford, Ph.D.
Office of Accreditation and Accountability
Mississippi Department of Education
359 North West Street
PO Box 771
Jackson, MS 39205-0771

April 9, 2013

Re: Revision to the 2013-14 Mississippi Statewide Accountability System

Dear Dr. Vanderford:

As Mississippi moves toward improving the state's accountability system, I am concerned about the potential unintended negative impact of several suggested changes. Please note the following areas that provide us with an opportunity to improve on the existing revisions:

- Assignment of grade classification;
- Assignment of grades to school w/o tested grades;
- FAY
- Lowest 25% of Students;
- Acceleration;
- College Readiness;

In an attempt to put direct and make the most of your time, I have outlined each area and provided suggestions for improvement. If further information is needed, I would be more than happy to discuss the matter further at your convenience.

Assignment of Grade Classifications

Issue #1: Inequity for schools and school districts with predominantly minority populations

The model has a wide range of opportunities for school districts to fall in the D and F categories. At the same time, the ranges on the upper end of the scale (A and B) are not as wide. We are recommending that the ranges of the cut points on the bottom end of the grade classifications be revised to reflect a system that is not so "bottom heavy." The current cut point ranges appear to be unfairly weighted so that predominantly minority districts stay at the bottom. The current arrangement of cut points in the high school component of the model fall within a 134 point range to move from D status to C status. However, to move from C status to B status, the range of cut points is 92 points. Then, to move from B status to an A status the range of cut points is 75 points. The same pattern of inconsistencies applies in the elementary and middle school model. In order for schools to move from D status to C status the range of cut points is 75

points. However, to move from C status to B status the range of cut points is 55 points. Then, to move from B status to an A status the range of cut points is 63 points. The model is very one-sided. Although we have been told that "experts" worked on the development of the cut point intervals, the range and derivation of the cut-points gives school districts that currently perform at higher levels an unfair advantage and opportunity to move up quicker in the classifications under this proposed model. Consequently, schools and school districts who have struggled with the current model are at an even greater disadvantage under the proposed model because the wider cut point ranges (134 points) at the bottom of the scale. The wider range at the bottom clearly makes it tougher for those schools to move out of the D and F categories. Ironically, most of the school districts that fall into the lower categories (D and F) have predominantly minority populations. By design, the model appears to keep districts with predominantly minority student populations at the bottom. We are questioning the lack of transparency of the standards setting process that was used to determine the cut points. What data was used? What specific standards setting process was used? How reliable are the data points that were used to set the standards? Were any parts of the process subjective? Who monitored the accuracy and quality of data used? How statistically sound is the model? The list of questions goes on and on because of the glaring inequities and inconsistencies. We are recommending that MDE revise the cut point ranges to represent a more equitable approach to the model for all schools and school districts regardless of demographics.

Issue #2: Unfair accountability practices for non-tested grades/schools

For K-2 schools that do not have tested grades (K-2), the impact data was based on grade 3 and 4 MCT2 language arts and math data. Is it fair to hold K-2 teachers accountable for grade 3 and 4 data on MCT2? Although K-2 is prerequisite to tested grades, MDE should consider measures that K-2 or K-1 schools can readily impact and control in order to be fair in an accountability system. Back-mapping data from feeder schools is not a fair and equitable approach to holding K-2 schools, teachers, and administrators accountable. There will be at least one full year of instruction the K-2 school had no direct impact upon, but yet will be held accountable for final outcomes. As with Alternative Schools and Vocational Schools, these sites could simply not be assigned a label.

Growth

The process for determining growth within a performance classification is unclear (bottom half of basic to top half of basic, etc). Based on the information provided in the proposed business rules, MDE is proposing movement within a performance level that constitutes growth. School districts need a more definitive way to gauge growth and the impact this approach to calculating growth has on student achievement. Clearly defining the ranges for the "bottom half of basic" or "top half of basic", etc. with quantitative values will allow districts to have a system of check and balances for measuring and predicting growth internally. We understand that these values may change and vary by assessment. However, we need more transparency from MDE on this component. The process for calculating the high school growth is absolutely not clear and does not give school districts a clear process for making sure that the correct students are being counted in the proposed model at the appropriate time (i.e. banking scores in section 10). As MDE provides a Senior "Snapshot", it would be desirable that MDE follow the same process here with students in this category

Lowest 25% of students

Issue #1: Process for identifying students in the bottom 25% for elementary and middle schools

The process for identifying students scoring in the lowest 25% is a concern at the elementary and middle levels. Based on the guidance that MDE provided on identifying these students, school districts must have the ability to confirm the full academic year status of a student. Because the ultimate determination of FAY is determined by MDE, schools will struggle to get an accurate list of students who fall into the bottom 25%. MDE should consider providing school districts with snapshots of their bottom 25% to give school districts more concrete guidance on this. MDE should also provide districts with monthly or quarterly updated lists of the bottom 25% as the lists will change as enrollment changes.

Issue #2: Process for identifying students in the bottom 25% for high schools

The process for identifying students at the high school level ahead of time who count in the growth model in the bottom 25% is a concern. School districts should know who these students are ahead of time. How can we be assured that the students that the state will identify after the SATP is administered are the same students that the school district identified before the SATP is administered? If we use 8th grade MCT2 data, all of those students may not take Algebra I as 9th graders. The process that MDE will use to define the bottom 25% is not clear. Without an accurate way to plan for the appropriate students who will fall in the bottom 25% at the high school level, school districts will struggle to provide remediation to those targeted students. MDE should consider providing school districts with snapshots of their bottom 25% to take the subjectivity out of this part of the process. MDE should also provide districts with monthly or quarterly updated lists of the bottom 25% as the lists will change as enrollment changes.

Acceleration

As educators, we have high expectations for our students. However, requiring Advanced Placement, IB and/or other accelerated coursework participation and performance requirements in a statewide accountability model perpetuates inequity and a more pronounced achievement gap. The requirement to offer advanced coursework for students is great and should remain policy. However, the mandated participation and required performance targets should not be included in a statewide accountability model. Again, if PARCC assessments are going to be more rigorous and will promote college and career readiness, why is this requirement necessary? Due to the fact that this will produce equity issues among districts, we are recommending that the MDE eliminate this component of the model or use these points as "bonus" points in order to encourage districts with the resources to strive for improvement.

FAY

In this area, the establishment of a discernable fixed date for district enrollments to be counted toward assessment is the fairest method of holding districts accountable for student achievement. For example if September 30th is the fixed date, then all students that enroll or leave after that date would still be measured for achievement but not count toward that impacted district's accountability scores.

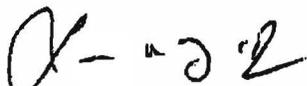
College Readiness

The ACT requirement is unrealistic not just because the cut score has been set above the state's average score but also because of the testing mandates that are already in place. There is a real danger of overtesting students and causing lower achievement as a result. As educators, we have high expectations. However, unrealistic expectations and demands cripple the public school system. Requiring students to score 22 or even 18 on the ACT when we have

students who are struggling to pass SATP2 assessments with lower cut points is extremely unrealistic. If PARCC assessments are going to be more rigorous, why is the state adding an ACT requirement that will burden students and school districts financially? Won't the PARCC assessment accomplish the same goal (serve as an indicator for college and career readiness)? We are recommending that the MDE eliminate this component of the model.

Let me close by pleading with the Mississippi Department of Education to act proactively on behalf of our schools and children. Politics cannot continue to control and dictate the path of education here in Mississippi. As educators, sound decisions must be reached by those put in place to protect the interests of our parents and children.

Sincerely,



Leeson M. Taylor II, Ed. D.
Superintendent

Tollie Thigpen

From: Paula Vanderford
Sent: Wednesday, January 08, 2014 11:38 AM
To: Accountability
Cc: Tollie Thigpen; Billy Buchanan; Jo Ann Malone; Patrick Ross
Subject: FW: Concerns with New State Accountability Model
Attachments: Concerns-New State Accountability Model.pdf

From: Dianne Morris [<mailto:dmorris@southpike.org>]
Sent: Wednesday, January 08, 2014 9:15 AM
To: Paula Vanderford
Subject: Concerns with New State Accountability Model

Dr. Vanderford,

Please see the attached letter regarding the district's concerns with the new state accountability model.

Thank your,

Dianne Morris
250 West Bay Street
Magnolia, MS 39652
Phone- 601.783.0430 x 1041
Fax 601.783.4226
dmorris@southpike.org



South Pike School District

<http://www.southpike.org>
250 West Bay Street
Magnaolia, MS 39652
Telephone 601-783-0430
Fax 601-783-4226

Dr. Estes Taplin
Superintendent
etaplin@southpike.org

January 8, 2014

Dr. Paula Vanderford
MDE Office of Accountability
P O Box 771
Jackson, MS 39205

Dear Dr. Vanderford:

Please see our concerns regarding the new state accountability model below:

Issue of Concern:

For K-3 schools, growth of 4th grade students in the district will be used for the growth calculations of the K-3 school in which they met FAY.

Arguments against Issue of Concern:

- A K-3 school will have 57% of a possible 700 points based on growth of 4th grade students that have not been enrolled in the K-3 school for a calendar school year
- It is extremely difficult for administrators and teachers of the K-3 to monitor the instruction of 4th grade students that are attending another district school. Yet, 57% of the possible 700 points of the K-3 school is determined by the 4th graders.
- MSTAR scores for teachers in the K-3 school are dependent on the growth of 4th graders in reading and math. However, the teachers of the K-3 school have not been involved in the instruction of the 4th graders for a calendar year.

Points to Ponder:

- Use a new statewide assessment process for 2nd and 3rd graders that monitors student growth each 9 week term throughout the school year in reading and math.

- Summative results of the new statewide assessment process would be used to determine the growth of 2nd and 3rd grade students regardless of school configuration.
- The new statewide assessment process would provide needed student data each term so teachers can adjust instruction.
- The new statewide assessment process would make teachers responsible for improving student growth throughout the school year.

Thank you for your consideration,



Dr. Estes Taplin
Superintendent

Tollie Thigpen

From: Earl Watkins <ewatkins@indianolaschools.org>
Sent: Wednesday, January 08, 2014 11:51 AM
To: Accountability; Paula Vanderford
Cc: Larry Drawdy; Bill Welch
Subject: Comments Regarding Recommendations for the Proposed Accountability Model
Attachments: DOC010814.pdf

Dr. Vanderford - Attached, you will find my comments regarding the recommendations for the proposed accountability model. Thank you for the opportunity to provide input.

Sincerely,
Earl Watkins, Ph.D.



January 8, 2014

Paula Vanderford, Ph.D.
Mississippi Department of Education
359 North West Street - PO Box 771
Jackson, MS 39205-0771

Dr. Vanderford:

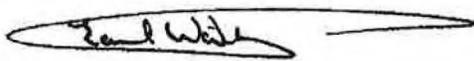
Below, you will find my comments regarding the recommendations for the proposed accountability model.

- **Assignment of Grade Classification**
 - ✓ **Concern:** The distribution of the cut point ranges is weighted more toward the lower end of the scale.
Suggestion: Revise the cut point ranges to reflect an equal distribution of the points.
 - ✓ **Concern:** K-2 schools will be penalized if the schools that receive their students do not provide effective instruction.
Suggestion: The state department should consider measures that K-2 schools can readily impact and control in order to be fair in an accountability system. Back-mapping data from feeder schools is not a fair and equitable approach to holding K-2 schools, teachers, and administrators accountable.
- **Full Academic Year**
 - ✓ **Concern:** 2.1 Indicates that a student must have been enrolled (regardless of attendance) for at least 75% (> or = 75%) of the days from September 1 (of school year) to the first day of testing in order for a student to meet "Full Academic Year (FAY)". This is more problematic for high schools with students that are chronically over-aged. We are diligently working with compulsory attendance and parents to improve attendance. However, we have a large number of students who are over-aged, and they refuse to attend school regularly. Their parents cannot force them to attend school, and the law cannot compel them to attend school. Also, there are students with chronic illnesses that cause excessive absence from school. What about students who are placed in facilities like Millcreek? If expelled students are still enrolled, are they considered in school for the FAY as well? If a district has expelled a student for carrying a weapon or for another applicable offense, why would the state department require that we now ask that student to come back for testing? Simply stated, there are issues that are beyond the control of the school and the district.
Suggestion: Exclude students from the model that have been expelled and that have chronic absences from school. If there is a concern about "pushing out" students with chronic absences from school, then only include these students at the district level, but not in the school model. However, expelled students should not be included at all.

- **Participation**
 - ✓ **Concern:** 4.1-A school or district should not be dropped a letter grade if it does not meet the 95% minimum participation rate. As stated under the "Full Academic Year" comments, there are problems beyond the control of the school and the district.
Suggestion: This consequence should be dropped from the accountability model.
 - ✓ **Concern:** 4.7-Including expelled students in the denominator is unfair to schools and districts. If students are expelled for weapons or other applicable offenses, by law we must remove them from the school environment.
Suggestion: Please do not include expelled students in the denominator for the school and the district.
- **Acceleration**
 - ✓ **Concern:** Accessibility for all students and school funding issues arise as districts with high poverty levels attempt to comply with this component. This requirement will also impact teacher units at schools who currently have lower enrollment in accelerated courses. The number of teacher units will increase in order to accommodate the increased enrollment in accelerated courses. Since MAEP has not been fully funded in years, the need for additional funding from the state will be crucial. In addition, districts with a large percentage of students on free and reduced lunch encounter challenges because some parents cannot afford college tuition for dual enrollment/dual credit.
Suggestion: This should be eliminated from the model.
- **College and Career Readiness Indicator**
 - ✓ **Concern:** The ACT requirement is unrealistic not just because the cut score has been set above the state's average score but also because of the testing mandates that are already in place. Why add more? How much more time will we spend on testing students and not teaching them? Also, requiring students to score 22 or even 18 on the ACT when we have students who are struggling to pass SAT assessments with lower cut points is extremely unrealistic. In every professional development, school leaders are asked and trained to set SMART goals. Is this SMART?
Suggestion: This should be eliminated from the model.

Thank you for the opportunity to provide feedback regarding the proposed accountability model. It is greatly appreciated.

Sincerely,



Earl Watkins, Ph.D.

Tollie Thigpen

From: Sargent, Jason <jasargent@jackson.k12.ms.us>
Sent: Wednesday, January 08, 2014 1:36 PM
To: Accountability
Subject: APA Comments from Jackson Public Schools
Attachments: JPS Comments for APA Process.pdf

A leader is powerful to the degree he empowers others.

Jason Sargent, Ph.D.

Jackson Public School District

Executive Director of Research, Evaluation and Assessment

Phone: 601-960-8850

Facsimile: 601-973-8680





Jackson Public Schools

Paula Vanderford, Ph.D.

Office of Accreditation and Accountability

Mississippi Department of Education

359 North West Street

PO Box 771

Jackson, MS 39205-0771

January 8, 2014

Re: 2013-14 Mississippi Statewide Accountability System

Dear Dr. Vanderford:

Having reviewed the proposed new accountability model and business rules, the Jackson Public School District embraces the opportunity to share its commendations, concerns and recommendations. Please note the following:

Commendations:

The Accountability Task Force and the Technical Review Team have done and have continued to do an excellent job in the development of our new accountability system while vetting the questions and concerns of our education community. We have found the webinars and task force meetings to be most informative, productive, and inclusive. Thank you for your hard work and dedication.

Concerns and Recommendations:

We find that the method for labeling elementary and middle schools to be a very good process; however, we are concerned with growth determination.

Growth for All Students

- Rule 6.3 states that any decrease in performance/proficiency levels = 0. Our concern focuses on those students who score advance in the previous year and score proficient the following year. In this instance, those students would not receive credit for growth because of the decrease in performance level; however, the students were able to achieve proficiency. We argue that the rule penalizes students for maintaining proficiency. Therefore, we recommend that the decrease equals 0.5 instead of 0.

Growth for the Lowest 25%

- Due to the fact that we have nearly 60 schools in our district, many of our students tend to have a high mobility rate. This causes us to struggle in maintaining an accurate list of students who fall into the bottom 25% as a result of frequent enrollment changes. Consequently, we recommend that MDE considers providing districts and schools with monthly snapshots of its bottom 25% following the monthly transmission of MSIS data. This will assist districts in monitoring the effectiveness of internal processes for tracking such students and will allow for making appropriate revisions.

Labeling High Schools

We **HIGHLY** recommend that you **STRONGLY** consider developing a different accountability model for high schools. We feel that the process used for labeling elementary and middle schools does not work well for high schools. The method used for calculating proficiency is fine; however, we have concerns with the method of tracking and calculating growth for all students as well as the bottom 25%.

1. Rule 6.7: To calculate growth for the High Schools for Math-All Students, Math-Low 25%, Reading-All Students and Reading-Low 25%, the 8th grade grade-level assessments will be used as the baseline. According to rule 6.1, Growth is determined by whether or not a student increases in performance/proficiency levels from one (1) year to the next.
 - We argue that this is not a true measure of growth for high school students for several reasons.
 - a. These two rules contradict each other. If rule 6.7 is applied, growth for high school students' performance WILL NOT be measured from one year to the next. The time between a high school student taking a SATP exam and his/her 8th grade MCT could be anywhere between 2 to 6 years depending on readiness and/or retention.

- b. MCT and SATP differ in the level of rigor and scoring; therefore, it is a comparison of apples to oranges.
- c. As it stands right now, students are able to pass SATP exams without scoring proficient. We praise them for passing and being on track for graduation, while on the other side of the coin, it is revealed them that they are not proficient in the subject area. Hence, it leaves us to wonder why many of our graduates do not score as well on the ACT as we think they should!!! We recommend that passing and proficiency become one in the same.
- d. Monitoring and tracking growth for all students and the lowest 25% will be very difficult and labor intensive for schools, districts, and MDE due to the high mobility rates of our children. Let's say a student takes his/her 8th grade MCT in Desoto County. He/she moves three different times in three years and ends up in Gulf Port. In order for Gulf Port High School to determine if the student is in its lowest 25%, the school would have to ensure that they have the child's 8th grade MCT score reports. They must also realize that they are now accountable for the child's growth. Please note that student has only been with Gulf Port for one year and did not have any prior influence over or impact on the child's educational development. They would then have to determine if the child is ready to take the exam, and if not, the child would end up not taking the exam until his/her 12th grade year. This then increases the growth gap!

2. **Acceleration:**

The requirement to offer advanced coursework for students is great and should remain policy. However, the mandated participation and required performance targets should not be included in a statewide accountability model. School districts are struggling to find certified and highly qualified teachers to teach general courses in addition to funding the positions. This requirement would only complicate matters. Without state funding and a plan to increase the pool of certified and qualified teachers, school districts will fail to meet this requirement. Therefore, we recommend that this component be removed from the model.

3. **College Readiness:**

One reason for utilizing state level assessments is to measure how well our students have learned and retained information from our state curricula. The ACT serves as a college readiness assessment that provides colleges and universities with an excellent informational platform for recruiting, advising, and retaining students. We do not believe that the ACT was designed to serve K-12 education in the manner in which it is proposed

in the new accountability model. It was designed to provide additional data to colleges and universities for evaluating prospective students.

To our knowledge, there have not been any studies conducted to evaluate the alignment of the ACT; therefore, using the results to label high schools and districts is unfair, and we recommend that this component be removed from the model.

Recommendations for Redesigning the High School Model

In Jackson Public Schools, we have always aligned our practices toward educating and graduating students who are college and career ready. With this approach in mind, we feel that the proposed model for high schools is requiring school districts to focus on too many components. We firmly believe that when you focus on too many components, nothing gets accomplished. For many years, our state has launched many initiatives to improve our graduation rates, which leads us to believe that out of all the variables, graduation ranks as the most important. Therefore, we would like to make the following suggestions for the high school model:

1. Remove the growth for all students, growth for the bottom 25%, acceleration, and college readiness components from the model due to the concerns previously mentioned. Considering that high school marks the end of a child's matriculation through public school, what is the need of monitoring growth? High Schools should be focusing on graduation instead.
2. Allow the proficiency components for tested subjects to remain and make passing equal to proficiency.
3. Allow the graduation component to remain as it is.

Due to the recommended changes, the high school model would have a total of 5 components instead of 9 or 11. We argue that these proposed changes for the high school model would align our focus on graduation with our work, and the way the work is measured.

The Jackson Public School District would like to echo the sentiments of our colleagues in urging the Mississippi Department of Education to act proactively on behalf of our schools and children. We would like to make any personnel on our staff available to the Accountability Task Force and/or the Technical Review Team if necessary.

We urge you to keep up the good work, and we thank you in advance for your time and consideration.

Tollie Thigpen

From: Paczak, Greg <gpaczak@madison-schools.com>
Sent: Wednesday, January 08, 2014 2:09 PM
To: Accountability
Cc: Ronnie McGehee
Subject: APA Process Response from Madison County Schools
Attachments: MDE - APA Process Response from Madison County Schools on January 8, 2014.docx

To whom it may concern:

Per Superintendent Dr. Ronnie McGehee, attached is Madison County School's response to the Administrative Procedures Act (APA) process. Please e-mail or call (601-259-9723) me with questions. The opportunity to provide input is much appreciated.

Thanks,

Greg

Greg Paczak, PHD, NCC, NCSC, COOL
Madison County Schools
gpaczak@madison-schools.com

MADISON COUNTY SCHOOLS

117 Fourth Street – P.O. Box 159
Flora, MS 39071

BOARD OF EDUCATION

Dr. Ronnie L. McGehee
Superintendent of Education
Phone (601) 879-3000
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Shirley Simmons, President
William Grissett, Secretary
Ken McCoy
Philip Huskey
Sam Kelly

TO: Mississippi Department of Education, Office of Accreditation and Accountability

FROM: Greg Paczak, Ph.D.
Assistant Director of Student Assessment

CC: Ronnie McGhee, Ph.D.
Superintendent

DATE: January 8, 2014

SUBJECT: Administrative Procedures Act (APA) Process Response

1) Statewide Accountability System

A) Proficiency & Growth Assessments

Rationale: parents and students have a vested interest in the ACT since it is utilized to determine college admissions, scholarship attainment and post-secondary course placement

Recommended Implementation Step(s): the ACT composite score become THE TEST required for Graduation, and the sub-scores of the ACT become the SATP requirements.

B) Graduation Rate

Rationale: the diploma type that a special education student works toward is often determined prior to high school

Recommended Implementation Step(s): special education students who enter the 9th grade with an I.E.P. that states they will receive a M.O.D. or Certificate of Attendance should not count in the denominator of the graduation rate calculation

C) Acceleration

Rationale: regardless of the participation/performance ratio, this component does not look favorable to schools when considering examples used in MDE Webinars

Recommended Implementation Step(s): every AP class that a student takes should be counted as a whole unit in the numerator, i.e., if one student is taking 3 AP courses, then 3 units rather than 1.2 should be credited to the numerator

D) Banking Scores

Rationale: middle schools have been under an accountability system for many years where high school-level, graduation-required assessments such as Algebra I are included in their rating during the current year

Recommended Implementation Step(s): middle schools would have applied to their current year school rating all high-school level, graduation-required assessment scores, i.e., there would not be a two or three year lag between actual test administration & credit toward accountability score

MADISON COUNTY SCHOOLS

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2) **SATP3 Assessment Transition** – if our recommendation concerning the ACT above is not implemented, then consider the following:

Rationale: Common Core State Standards are supposed to have been implemented over the course of the last three years when school & district accountability ratings have been determined by the MCT2 & SATP2 testing programs

Recommended Implementation Step(s): For all classes prior to & including 9th Graders of 2015-16 (current 7th Graders), do one of the following (keeping in mind that they are ordered by preference):

- 1) Allow the continuation of the Algebra I SATP2 as the Math Assessment Graduation Requirement
- 2) Waive the CCSS Algebra I SATP3 as the Math Assessment Graduation Requirement

3) **Graduation Assessment Options**

Rationale: the recommended score of 16 for ACT sub-scores represents IHL's minimum performance for admission

Recommended Implementation Step(s): approve the subsection score of 16

Tollie Thigpen

From: Pauline Rhodes <prhodes@coahoma.k12.ms.us>
Sent: Wednesday, January 08, 2014 2:41 PM
To: Accountability
Cc: Andrae Sims; Khristie Cousin
Subject: APA Public Comment for 2013 Accountability Model
Attachments: APA Public Comment for 2013 Accountability Model.pdf

Dr. Vanderford,

Coahoma County School District public comment concerning the new accountability model is attached.

Please feel free to contact me with any questions or concerns regarding the attached letter.

Thank you.

--
Pauline J.Rhodes, Superintendent
Coahoma County School District
662-624-5448 Office
662-902-5179 Cell

COAHOMA COUNTY
SCHOOL DISTRICT



"COMMITTED TO CARING
DEDICATED TO EXCELLENCE"

Pauline J. Rhodes, Superintendent

1555 Lee Drive
PO Box 820
Clarksdale, MS 38614

email: prhodes@coahoma.k12.ms.us
phone: (662) 624-5448
fax: (662) 624-5512

January 7, 2014

Paula Vanderford, Ph.D.

Office of Accreditation and Accountability

Mississippi Department of Education

359 North West Street

PO Box 771

Jackson, MS 39205-0771

Re: *Revision to the 2013-14 Mississippi Statewide Accountability System*

Dear Dr. Vanderford:

As Mississippi moves toward improving the state's accountability system, I am concerned about the potential unintended negative impact of several suggested changes. Please note the following areas that provide us with an opportunity to improve on the existing revisions:

- Assignment of grade classification;
- Assignment of grades to school w/o tested grades;
- FAY
- Lowest 25% of Students;
- Acceleration;
- College Readiness;

In an attempt to put direct and make the most of your time, I have outlined each area and provided suggestions for improvement. If further information is needed, I would be more than happy to discuss the matter further at your convenience.

Assignment of Grade Classifications

Issue #1: Inequity for schools and school districts with predominantly minority populations

The model has a wide range of opportunities for school districts to fall in the D and F categories. At the same time, the ranges on the upper end of the scale (A and B) are not as wide. We are recommending that the ranges of the cut points on the bottom end of the grade classifications be revised to reflect a system that is not so "bottom heavy." The current cut point ranges appear to be unfairly weighted so that predominantly minority districts stay at the bottom. The current arrangement of cut points in the high school component of the model fall within a 134 point range to move from D status to C status. However, to move from C status to B status, the range of cut points is 92 points. Then, to move from B status to an A status the range of cut points is 75 points. The same pattern of inconsistencies applies in the elementary and middle school model. In order for schools to move from D status to C status the range of cut points is 75 points. However, to move from C status to B status the range of cut points is 55 points. Then, to move from B status to an A status the range of cut points is 63 points. The model is very one-sided. Although we have been told that "experts" worked on the development of the cut point intervals, the range and derivation of the cut-points gives school districts that currently perform at higher levels an unfair advantage and opportunity to move up quicker in the classifications under this proposed model. Consequently, schools and school districts who have struggled with the current model are at an even greater disadvantage under the proposed model because the wider cut point ranges (134 points) at the bottom of the scale. The wider range at the bottom clearly makes it tougher for those schools to move out of the D and F categories. Ironically, most of the school districts that fall into the lower categories (D and F) have predominantly minority populations. By design, the model appears to keep districts with predominantly minority student populations at the bottom. We are questioning the lack of transparency of the standards setting process that was used to determine the cut points. What data was used? What specific standards setting process was used? How reliable are the data points that were used to set the standards? Were any parts of the process subjective? Who monitored the accuracy and quality of data used? How statistically sound is the model? The list of questions goes on and on because of the glaring inequities and inconsistencies. We are recommending that MDE revise the cut point ranges to represent a more equitable approach to the model for all schools and school districts regardless of demographics.

Growth

The process for determining growth within a performance classification is unclear (bottom half of basic to top half of basic, etc). Based on the information provided in the proposed business rules, MDE is proposing movement within a performance level that constitutes growth. School districts need a more definitive way to gauge growth and the impact this approach to calculating growth has on student achievement. Clearly defining the ranges for the "bottom half of basic" or "top half of basic", etc. with quantitative values will allow districts to have a system of check and balances for measuring and predicting growth internally. We understand that these values may change and vary by assessment. However, we need more transparency from MDE on this component. The process for calculating the high school growth is absolutely not clear and does not give school districts a clear process for making sure that the correct students are being counted in the proposed model at the appropriate time (i.e. banking scores in section 10). As MDE provides a Senior "Snapshot", it would be desirable that MDE follow the same process here with students in this category

Lowest 25% of students

Issue #1: Process for identifying students in the bottom 25% for elementary and middle schools

The process for identifying students scoring in the lowest 25% is a concern at the elementary and middle levels. Based on the guidance that MDE provided on identifying these students, school districts must have the ability to confirm the full academic year status of a student. Because the ultimate determination of FAY is determined by MDE, schools will struggle to get an accurate list of students who fall into the bottom 25%. MDE should consider providing school districts with snapshots of their bottom 25% to give school districts more concrete guidance on this. MDE should also provide districts with monthly or quarterly updated lists of the bottom 25% as the lists will change as enrollment changes.

Issue #2: Process for identifying students in the bottom 25% for high schools

The process for identifying students at the high school level ahead of time who count in the growth model in the bottom 25% is a concern. School districts should know who these students are ahead of time. How can we be assured that the students that the state will identify after the SATP is administered are the same students that the school district identified before the SATP is administered? If we use 8th grade MCT2 data, all of those students may not take Algebra I as 9th graders. The process that MDE will use to define the bottom 25% is not clear. Without an accurate way to plan for the appropriate students who will fall in the bottom 25% at the high school level, school districts will struggle to provide remediation to those targeted students. MDE should consider providing school districts with snapshots of their bottom 25% to take the subjectivity out of this part of the process. MDE should also provide districts with monthly or quarterly updated lists of the bottom 25% as the lists will change as enrollment changes.

Acceleration

As educators, we have high expectations for our students. However, requiring Advanced Placement, IB and/or other accelerated coursework participation and performance requirements in a statewide accountability model perpetuates inequity and a more pronounced achievement gap. The requirement to offer advanced coursework for students is great and should remain policy. However, the mandated participation and required performance targets should not be included in a statewide accountability model. Again, if PARCC assessments are going to be more rigorous and will promote college and career readiness, why is this requirement necessary? Due to the fact that this will produce equity issues among districts, we are recommending that the MDE eliminate this component of the model or use these points as "bonus" points in order to encourage districts with the resources to strive for improvement.

FAY

In this area, the establishment of a discernable fixed date for district enrollments to be counted toward assessment is the fairest method of holding districts accountable for student achievement. For example if September 30th is the fixed date, then all students that enroll or leave after that date would still be measured for achievement but not count toward that impacted district's accountability scores.

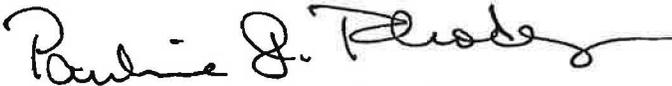
College Readiness

The ACT requirement is unrealistic not just because the cut score has been set above the state's average score but also because of the testing mandates that are already in place. There

is a real danger of overtesting students and causing lower achievement as a result. As educators, we have high expectations. However, unrealistic expectations and demands cripple the public school system. Requiring students to score 22 or even 18 on the ACT when we have students who are struggling to pass SATP2 assessments with lower cut points is extremely unrealistic. If PARCC assessments are going to be more rigorous, why is the state adding an ACT requirement that will burden students and school districts financially? Won't the PARCC assessment accomplish the same goal (serve as an indicator for college and career readiness)? We are recommending that the MDE eliminate this component of the model.

We respectfully request that you take the above concerns and recommendation into serious consideration before approving the final accountability model. High poverty schools and district need your assistance. As educators, sound decisions must be reached by those put in place to protect the interests of all of the parents and children regardless of their socio economic standing.

Sincerely,

A handwritten signature in black ink, appearing to read "Pauline J. Rhodes", with a long, sweeping horizontal line extending to the right.

Pauline J. Rhodes, Superintendent
Coahoma County School District

Tollie Thigpen

From: Karen Norwood <karen.norwood@biloxischools.net>
Sent: Wednesday, January 08, 2014 2:58 PM
To: Accountability
Subject: Considerations submitted through public comment

The following are points I ask you to consider:

- The proposed title changes, i.e. CCSS PLUS, Integrated Math II, etc. are not indicative of the rigor or the intent of the course. The course titles are also not going to be university recognized. Because the Mississippi Gulf Coast is very transient, we have many students who transfer in and out of our schools and such vague titles will cause many problems when trying to transfer credits to graduate or attend other schools.
- The assumption is that students that are 7th grade students currently earning a Pre-Algebra or Transition to Algebra Carnegie unit will be able to take CCSS Math Grade 8 next year and earn a Carnegie unit as well. Is that correct?
- In the college readiness block, we believe that the ACT composite should be used rather than breaking the scores apart. Tracking the sub scores is going to be extremely cumbersome and is going to lead to errors. Also, IHL uses a composite score, why can't that be used on the accountability model? Also, why are the numbers for the ACT different for the assessment option. If a 16 is determined to be college and career ready, then why can't that number be used for accountability purposes as well. Why does a student have to fail the SATP one time in order to use this option. If they make a 16, students should be allowed to meet the graduation assessment requirement rather than being required to take the SATP. Performance level descriptors using ACT data should be established using historical state-wide data to determine the cut points. Example- on the English II SATP, a score in the 77th percentile and above puts you in the Advanced PLD. A similar system of scoring should be established for ACT scores.
- Because of the weight of industry certification classes, is MDE and IHL working collaboratively to ensure programs are seamless?
- If we are going to be waiting on Advanced Placement scores to come back in the summer, will the accountability timeline be moved back?
- Why are we taking an English III PARCC assessment but not making English III a mandatory course? It is my belief that all students need English III or English IV or a comparable AP or Dual Credit class to prepare them for the ACT and for College and Career Readiness.
- Under the current accountability model, students can decrease in scale score and still make growth. With the new model, it appears to be punitive for the advanced scoring students. Students growing from low proficient to advanced should receive a weighted credit. Students growing from low advanced to high advanced should receive a weighted growth credit.



Dr. Karen Norwood
Assistant Superintendent
Biloxi Public Schools
(228)374-1810 x134

Tollie Thigpen

From: Paula Vanderford
Sent: Wednesday, January 08, 2014 3:47 PM
To: Accountability
Cc: Tollie Thigpen; John Cartwright; Jo Ann Malone; Patrick Ross
Subject: FW: Statewide Accountability System
Attachments: Statewide Accountability System Page 1.jpg; Statewide Accountability System Page 2.jpg

From: Chandra Miller [<mailto:cmiller@wbsd.k12.ms.us>]
Sent: Wednesday, January 08, 2014 3:46 PM
To: Paula Vanderford
Cc: Henry Phillips
Subject: Statewide Accountability System

Dr. Vanderford,

Please accept the attached letter as comments for APA process on the new statewide accountability system.



WEST BOLIVAR SCHOOL DISTRICT
OFFICE OF THE SUPERINTENDENT
P.O. BOX 189
ROSEDALE, MISSISSIPPI 38769

Dear Mr. Superintendent:

Phone: 662-736-5526
Fax: 662-736-0762
E-mail: super@wbolivar.k12.ms.us

January 8, 2013

Dr. Paula Vanderford
Education Bureau Manager
Office of Accreditation and Accountability
Post Office Box 771
Jackson, Mississippi 39205-0771

Dr. Vanderford:

The proposed statewide accountability system contains many unintended negative consequences that will make it more difficult for low performing schools/districts to rise from the bottom. The following paragraphs identify those areas of concern and attempt to offer suggestions to improve the proposed system:

#1. Grade Classification

The proposed assignment system is "bottom heavy" which continues the same pattern of inequity for schools/districts that are poor and have a predominantly minority population. The cut points to receive a grade of a "D" or "F" are wider than those for an "A" or "B". Therefore, it almost guarantees that if you are at the bottom you will remain there. This pattern is present throughout the process of assigning grades for classification. The "fix" is simple - go back and adjust the cut scores for a more equitable distribution.

#2. Non-tested Grades/Schools

It is my opinion that vocational centers and alternative schools should not receive a grade due to their student make-up. Further, I believe k-1 and k-2 schools should be graded on criteria that they have control over rather than back-mapping. If the Department decides to use back-mapping, then the non-tested school should receive the same grade as the feeder school. This grade should not be based on just the results of the third grade students.

#3. Lowest 25%

Identification of these students is critical if a school/district is to rise from the bottom or remain on the top. Therefore, I believe the Department should provide each district with a list of these students each quarter. The department should also revisit its definition of the lowest 25% and provide districts with a clear way to determine who those students are.

#4. Acceleration

Because of the inequity between schools/districts, I believe mandating and including Advanced Placement courses and other accelerated coursework into the accountability model is unfair. Further, it places less affluent schools/districts at a disadvantage. It gives the appearance that

the Department is more interested in maintaining the status quo when it comes to school/district rankings. Therefore, I recommend that this component be removed from the accountability model.

#5. Full Academic Year (FYA)

To ensure both clarity and fairness, the Department should set the date for all schools/districts. With the recent passage of legislation that will require all schools to start school at the same time, this should be an easy task to do.

#6. College Readiness

First, I do not see a need for this component in the model. According to the Department and everything that I have read, the PARCC assessments are more rigorous than the MCT2 and SATP2. If that is true then why do we need another test? Secondly, the ACT scores are not realistic, especially in a state with an average ACT score close to 18. This component should be eliminated from the proposed model or phased in over time.

#7. N Count (High School)

It is my understanding that the N count will be determined by the total number of juniors and seniors in a school. Because federal calculations do not include all Special need students, the N count should not include those students. We also need to be cautious not to include students that maybe expelled during the school year.

I want to thank the Department for the opportunity to express my opinion on this matter. It is my hope that as decisions are considered will be given to ALL parts of the state (the haves and the have nots). My suggestions, if implemented, will level the playing field for ALL schools and districts.

Respectfully submitted by,



Henry Phillips, Jr.
Superintendent

Tollie Thigpen

From: Lisa Bramuchi <lbramuchi@cleveland.k12.ms.us>
Sent: Wednesday, January 08, 2014 4:22 PM
To: Accountability
Subject: Comments
Attachments: AVG Certification.txt

1. There seems to be disparity in points for grade classifications.
2. The cut point range for the bottom 134-more difficult to move while the top is half of the 134.
3. Should revise the cut point ranges to represent a more equitable approach for all school in all districts.
4. Business Rule for K-2 schools-These schools have to wait one full year after students leave which seems unfair.

Tollie Thigpen

From: Smith, Nikki <nsmith@pearl.k12.ms.us>
Sent: Wednesday, January 08, 2014 4:32 PM
To: Accountability
Cc: Smith, Nikki
Subject: Growth Model

I am e-mailing in regards to the proposed grading assignments for accountability labels. I serve as the principal of a second and third grade school. As our third graders set the baseline in the testing module, our goal is to provide the strongest base of knowledge for our students. As a baseline level school, we refine our practices to ensure the strongest group of students possible for the next grade. In order to track our growth as a school, we focus on third grade scores from year to year. We examine student data to identify strengths and weaknesses as a school, as a grade, and as individual teachers. Areas of focus include instructional delivery, time on topic, and curriculum emphasis. It is a great concern that my school's growth will be based on how students perform in the fourth grade and in another building.

How can one justify determining the growth of a school based on how students perform in another school?

- I am not responsible for Tier I instruction, professional development, RTI both academic and behavioral, parental involvement, or any other facet that contributes to the success of students beyond third grade.
- My school growth should be based on how well we grow students from the beginning of the school year until the end of that school year. To do anything less than this is not fair to the teachers and administrators in K-3 buildings.
- The curriculum is different for each grade. How can growth of a first grade teacher be determined based on fourth grade test results?

We understand that we have a different cohort each year. However, our goal is to provide quality instruction that lends itself to higher student achievement every year. Our job is to grow each child every day they are present within an academic year.

[Nikki N. Smith, Ed. S.](#)
[Principal](#)
[Northside Elementary](#)
[3600 Harle Street](#)
[Pearl, MS 39208](#)
[601-932-7971 \(phone\)](#)
[601-932-7984 \(fax\)](#)

[The mission of Pearl Public School District is to prepare each student to become a lifelong learner, achieve individual goals, and positively impact a global society.](#)

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Tollie Thigpen

From: Farrar, Stacy <sfarrar@pearl.k12.ms.us>
Sent: Wednesday, January 08, 2014 4:38 PM
To: Accountability
Subject: Accountability

I am interested in real accountability. What I understand of our proposed model means that this state will yet again not have it. Please direct me to the webinar that will correct my understanding of this model.

I have several questions and concerns that will go beyond 5:00 p.m. today. To whom would I need to address those?

Stacy Farrar
Assistant Principal
Northside Elementary

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Tollie Thigpen

From: Wilkinson, Tammy <twilkinson@pearl.k12.ms.us>
Sent: Wednesday, January 08, 2014 4:40 PM
To: Accountability
Subject: Accountability Model Comments

Our concerns are with the proposed accountability model. First, the growth portion on the model is just not fair to all teachers/schools. For instance, a K-1 Teachers/Schools rating should not be dependent on how a kid did on a test in third grade and growth for 4th grade. It does not make sense for us to hold a K-1 school accountable for students' performance 3 years later. This honestly does not pass the common sense test. Next, if a district has a 2-3 school configuration, they run into the same problem. Again, this does not pass the common sense test. This model could encourage some schools/districts not to work as hard in the early grades and start off weak, and then grow more in 4th grade since this grade can basically make or break a K-1 school and a 2-3 school. One solution could be for K-3 Schools to pick a pre-approved assessment and use the pre-test and post-test results while those students are in their building. This would then make holding those teachers and principals accountable more fair.

Next, the 25% portion is focusing too much on this group of children. These students count in the all category for proficiency and growth, then in the bottom 25% for ELA and Math in all other grades. This one group can hit a district in 4 different components of the 7 possible components. Why then are we not focusing on the average and above average kids this much? If we put all of our focus on the lowest achieving students, we run the risk of failing our higher achieving students. This is just like when you teach: If you teach to the low, achievement gains are lower. We are held accountable for all students so I do not understand why we are now focusing so much on the bottom 25% when we are already working with them through the TST process, etc. It is not like schools want any kid to not meet growth. We already are held accountable for this with all students.

Next, the standards proposed for the ASVAB and ACT scores are unrealistic. If we are going to provide other options to graduation, let's do some that will actually help the kids that need it. For example, an AP student will most likely never fail the SATP so that area is pretty much mute. Next, the ASBAB score of 31 gets a kid into the military. That is career ready. A kid that scores a 50 on the ASVAB is not going to fail the SATP. The same can be said for the ACT recommended score. Again, why do we shoot ourselves in the foot when the majority of states in America do not even have graduation exams? We have got to get ourselves playing by the same rules as the other states or we are never going to get off of the bottom.

Thanks,

Raymond Morgigno, Ph.D.
Superintendent, Pearl Public Schools

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Tollie Thigpen

From: Karen L. Tutor <kltutor@pontotoc.k12.ms.us>
Sent: Wednesday, January 08, 2014 5:02 PM
To: Accountability
Subject: business rules concerns

Our concerns with the newly proposed accountability model:

Affluent schools will have an advantage in providing ACT prep classes and paid AP exams for students. Poorer schools will not have that advantage. Schools in affluent areas will also have parents who will pay for additional ACT tests for their children and those schools will have an advantage in increasing their scores in acceleration areas. Consideration needs to be given to these areas as long as the state continues to underfund education.

Lowest 25% students scores are weighted more than students who score proficient/advanced. For schools/districts who have students who already score very high, this model will not benefit them. The model should be revised to address growth for advanced and proficient students too.

Students who meet the ACT benchmark for college and career readiness before enrolling in SATP classes should be exempt from state end of course assessments. These students should count in the proficiency status on the accountability model while students scoring in the upper quartile should be counted as advanced.

Karen L. Tutor
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Tollie Thigpen

From: Derrick Johnson <derrickjohnson@hotmail.com>
Sent: Wednesday, January 08, 2014 5:03 PM
To: Accountability
Subject: NAACP comment
Attachments: MSNAACP APA Repsonse to Dr. Paula Vanderford_Correspondence.pdf

Please see attached



NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE
MISSISSIPPI STATE CONFERENCE

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The Mississippi State Conference NAACP actively monitors issues affecting our communities. As such, we are committed to ensuring that all students receive a quality public education regardless of their race or socio-economic status. We were made aware of the Administrative Procedures Act (APA) process for the Mississippi Statewide Accountability System and have some serious concerns about the impact on school districts. However, this letter will only address the assignment of grade classifications for schools and districts under the proposed model.

Virginia McDonald
6th Vice President

Jamere Bell
Secretary

The proposed model has a wide range of opportunities for schools and school districts to fall in the D category. This was confirmed when Dr. Lynn House and Mrs. Trecina Green presented an overview of the proposed accountability model during the December 17, 2013 meeting of the House Education Committee. Slide 8 of that presentation was a comparison of the percent of districts that rated A-F under the current accountability model and the percent of districts that would have rated A-F using the "impact" results based on the 2013 data. It was obvious that MORE districts will be driven into D status. This phenomenon occurs in the comparison for schools as well.

Terna Jones
Assistant Secretary

David Clarke
Treasurer

David Thomas
Assistant Treasurer

Debra Ann McDonald
President of the NAACP
College of Education

Debra Ann McDonald
President of the NAACP
College of Education

As you look at the proposed model more closely, the ranges on the upper end of the scale (A and B) are not as wide as the lower end. The current cut-point ranges appear to be unfairly weighted so that predominantly African American districts stay at the bottom. The current arrangement of cut-points in the high school component of the model fall within a 134-point range to move from D status to C status. However, to move from C status to B status, the range of cut points is 92 points. Then, to move from B status to an A status the range of cut-points is 75 points. The same pattern of inconsistencies applies in the elementary and middle school model. In order for schools to move from D status to C status the range of cut points is 75 points. However, to move from C status to B status the range of cut points is 55 points. Then, to move from B status to an A status the range of cut points is 63 points. The model is clearly negatively skewed to prevent certain districts from achieving a rating of C or higher.

It is our view that this model intentionally demoralizes teachers and students. The range of the cut-points gives school districts that currently perform at higher levels an unfair advantage and opportunity to move up quicker in the classifications under this proposed model. Consequently, schools and school districts that have struggled with the current model are at an even greater disadvantage under the proposed model because the wider cut-point ranges (134 points) at the bottom of the scale. The wider range at the bottom clearly makes it tougher for those schools and school districts to move out of the D and F categories. As you know, most of the school districts that fall into the lower categories (D and F) have predominantly African American populations. By design, the model appears to keep districts with predominantly African American student populations at the bottom.

The Mississippi Department of Education must be more transparent about the standards setting process that was used to determine the cut -points. What specific standards setting process was used? What data points were used? How reliable are the data points that were used to set the standards? Who monitored the accuracy and quality of data used? And, how statistically sound is the model?

I am recommending that the ranges of the cut-points on the bottom end of the grade classifications be revised to reflect a system that is not so "bottom heavy." The cut-point ranges must represent a more equitable approach for all schools and school districts regardless of demographics.

Sincerely,



Derrick Johnson
State President