

OFFICE OF CHIEF ACCOUNTABILITY OFFICER
Summary of State Board of Education Agenda Items
Consent Agenda
April 19, 2018

OFFICE OF ACCREDITATION
OFFICE OF SPECIAL EDUCATION

- O. Approval to revise Standard 14.3 and establish Appendix A-11 of the *Mississippi Public School Accountability Standards, 2017: Requirements for a Certificate of Completion for students with Individualized Education Programs (IEPs) effective school year 2018-2019*
(Has cleared the Administrative Procedures Act process with public comments)

Background Information: The Offices of Accreditation, Secondary Education, and Special Education began the process of examining Mississippi diploma requirements in the fall of 2015, with the convening of a Graduation Task Force. Based on feedback from stakeholders and surveys, the State Board of Education adopted changes to the graduation requirements on September 14, 2017 following the Administrative Procedures Act (APA) comment period. The requirements for issuing a certificate of completion were removed from the approval process after the APA comment period to allow for further review. A separate stakeholder group was convened to make new recommendations for the Certificate of Completion for students with an Individualized Education Program. Stakeholders who provided feedback included special education teachers, principals, special education directors, high school counselors, an assistant superintendent, and members of the Superintendent's Teacher Advisory Council. Recommendations focus on which students are eligible to receive a Certificate of Completion, the time frame in which they could be placed on this track for their exit option, and the requirements for completion.

These recommendations were presented to and approved by the Commission on School Accreditation on February 1, 2018. On February 15, 2018, the State Board of Education granted approval to begin the APA process to revise Standard 14.3 and to establish Appendix A-11 of the *Mississippi Public School Accountability Standards, 2017: Requirements for a Certificate of Completion for students with Individualized Education Programs (IEPs)*. The public comment period was open through March 23, 2018 with one (1) non-substantive change made to Appendix A-11 replacing "and/or" with "or".

Recommendation: Approval

Back-up material attached

APA Comments on Certificate of Completion Requirements

The Offices of Accreditation and Special Education received the following APA comments regarding Appendix A-11, the requirements for students with an Individualized Education Program (IEP) to earn a Certificate of Completion.

Comment	MDE Response
The Certificate of Completion does not give students a career certification that an employer will recognize. Need to have another option besides a traditional diploma and a certificate.	No Change Needed- An option other than a traditional diploma would create another special education diploma like the MS Occupational Diploma (MOD).
Believes that the MOD should not have been discontinued. The commenter is appalled that students who don't exhibit qualities for a traditional diploma or an alternate diploma should be placed in general education classes and expected to pass four state mandated tests.	No Change Needed- The MOD should have been discontinued because it did not prepare students for any post-secondary option.
The requirements of the Certificate of Completion (16 years old and 3 years below grade level) takes away the spectrum of services of least restrictive environment because students must be in general education classrooms rather than be educated in a special education self-contained setting.	No Change Needed- The requirements of a student being 16 years old and 3 years below grade level only apply to students whose IEP teams want to place them on a certificate track before they enter high school. A full continuum of services can be delivered based on the IEP team's determination.
Requests clarity regarding whether modifications are allowed and if a student may still earn a Carnegie unit.	No Change Needed- IDEA allows for both accommodations and modifications. Reasonable modifications would not prohibit a student from receiving a Carnegie unit for a course.
Because this applies to students for 2018-2019 school year, more time is needed to digest.	No Change Needed- This is the second round of APA for the Certificate of Completion. The field is well aware that the changes have been planned and are coming.
<i>"Students earning the certificate of completion must have completed at least four years of high school and/or be at least 19 years of age at the time of graduation."</i> Found the "and/or" to be confusing. Recommends it only be "or"	Change Needed- MDE agrees with the respondent. Change language from "and/or" to "or".
Mississippi needs to create a type of diploma between a certificate of completion and a regular diploma. Many of the students caught in between these two options have the ability to learn a skill and to be successful in high school classes. In order for the students to understand the material, their classes need to be slower, in small groups, curriculum modified at times,	No Change Needed- An option other than a traditional diploma would create another special education diploma like the MS Occupational Diploma (MOD). Training will be offered on how to appropriately modify the general education curriculum for students,

APA Comments on Certificate of Completion Requirements

Comment	MDE Response
<p>and lots of supports. Mississippi needs to offer more vocational skills classes to these students. I know my district does not have a large number of spots in the career tech program and most of the program areas are geared towards students going onto a two or four year program. Our state needs a trained work force. Many students are not college material, but we need to teach them the skills needed to be actively employed, live independently, and be a benefit to their community.</p>	<p>including career and technical education programs.</p>
<p>For those students who are moved to a Certificate of Completion at the end of their junior year, will these students also be required to be included in the CTE accreditation model under Perkins? Students who move to "work" training only during their senior year who are placed in a CTE program for one year will hit the Perkins accountability standards in at least 6-8 categories after they have already been used in accountability under MAAP.</p>	<p><u>No Change Needed-</u> Students may begin CTE programs before their senior year and could be completers.</p>
<p>I am comfortable with the standards outlined in Appendix A-11. As a special educator with over 30 years of experience I believe the standards as written allow for schools to assign the Certificate of Completion option to qualified students and I cannot envision a circumstance where a student who needs that option cannot have it available to them. Thank you for your work in this area!</p>	<p><u>No Change Needed-</u> Statement of Support</p>

Standard 14.3 of the *Mississippi Public Schools Accountability Standards, 2017*

Ending with incoming ninth graders of 2016-2017 each student who has completed the secondary curriculum for special education may be issued a certificate of completion, which states: "This student has successfully completed an Individualized Education Program." (Appendix A-6) {Miss. Code Ann. § 37-16-11(1)}

APPENDIX A-11

GRADUATION REQUIREMENTS STANDARD 14

Certificate of Completion

Note: This option may be offered by districts for incoming freshmen beginning in school year 2018-2019.

A Certificate of Completion is not a high school diploma or an Alternate Diploma, but rather an acknowledgement of the student's participation in and completion of his/her Individualized Education Program (IEP). Students eligible to receive a Certificate of Completion must fall into one (1) the following categories:

1. Students without a Significant Cognitive Disability at the end of 8th grade who:
 - Are 16 years old or older; AND
 - At least 3 or more grade levels below their peers in reading and math; AND
 - Have a signed statement from the parent that they understand that the Certificate of Completion is not a standard diploma and will not meet the requirements for entry into any career or post-secondary opportunity that requires a diploma.
2. Students with a Significant Cognitive Disability at the end of 8th grade who:
 - Have extremely limited or no receptive and expressive communication skills AND
 - Have a signed statement from the parent that they understand that the Certificate of Completion is not a standard diploma and will not meet the requirements for entry into any career or post-secondary opportunity that requires a diploma.
3. Students with or without a Significant Cognitive Disability at the end of their third school year of high school (6 semesters) who:
 - Have not earned at minimum of 3 English credits, 3 math credits, 2 science credits, 2 social studies credits, and 5 electives; AND
 - Have a signed statement from the parent and student that they do not wish for the student to be given services through age 20 and understand that the Certificate of Completion is not a standard diploma and will not meet the requirements for entry into any career or post-secondary opportunity that requires a diploma; AND
 - Have evidence of 3 or more years of intensive intervention to earn Carnegie Unit bearing courses (Or Alternate Diploma Course Credits for students with a Significant Cognitive Disability). Evidence could include, but is not limited to:
 - Progress monitoring data from reading intervention programs or math intervention programs
 - Documentation of accommodations and modifications provided in the general education courses and assessments
 - Course schedules outlining dedicated time for intervention.

The student's IEP committee determines the course of study for the Certificate of Completion. Areas of instruction should be developed based on the needs of the individual student. Course work could include, as appropriate for the student:

- Intensive remediation in deficit area skills
- Career preparation courses
- Life skills courses

Students earning the certificate of completion must have completed at least four years of high school ~~and~~ or be at least 19 years of age at the time of graduation.

All students are required to participate in the Mississippi Academic Assessment Program.

Dr. Jo Ann Malone,

I write to voice concerns about a need for a high school diploma option for students who do not exhibit qualities for either a regular high school diploma nor a Certificate of Completion. Before the Mississippi Department of Education decided to remove the Mississippi Occupational Diploma, there were a group of students who qualified for this track due to their Individualized Educational Plan. According to the Senate Bill 2432 that was passed by the legislature to remove the MOD track, this group of students were forced to be placed on a regular high school diploma track.

There are numerous factors that contributed to this decision as outlined on the updated "Guidance for the Discontinuation of the Mississippi Occupational Diploma" power point located on MDE's website for public view. After viewing the such factors, there is a constant concern for the students who do not qualify for a high school diploma nor a COC. I am appalled at the idea that this group of students are being forced to pass four state-mandated tests that require a high comprehension level in reading, which is shown as a deficiency in these students. The four state-mandated tests are written on a grade level exceeding their competency levels. This questions the students' opportunities for post-secondary success.

So, all in all, how do we explain and teach these students how to survive independently when we are pushing them into daily academic set-backs?

Thank you for considering these comments.

Sincerely,

Amber Bradley

From: [Tom Duncan](#)
To: [Accreditation](#)
Subject: Certificate of Completion comments
Date: Tuesday, February 27, 2018 10:13:33 AM

I am comfortable with the standards outlined in Appendix A-11. As a special educator with over 30 years of experience I believe the standards as written allow for schools to assign the Certificate of Completion option to qualified students and I cannot envision a circumstance where a student who needs that option cannot have it available to them. Thank you for your work in this area!

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Simpson County School District, 111 Education Lane, Mendenhall, MS 39114 <http://www.simpson.k12.ms.us>

From: [Biggs, Robert](#)
To: [Accreditation](#)
Subject: APA Certificate of Completion
Date: Tuesday, February 27, 2018 9:55:22 AM

For those students who are moved to a Certificate of Completion at the end of their junior year, will these students also be required to be included in the CTE accreditation model under Perkins?

My concern:

Students who move to "work" training only during their senior year who are placed in a CTE program for one year will hit the Perkins accountability standards in at least 6-8 categories after they have already been used in accountability under MAAP.

—
Robert Biggs
CTE Director
Business & Technology Complex
McComb Public Schools

601-684-5288 (office)

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From: [Jess Thomas](#)
To: [Accreditation](#)
Subject: certificate of completion
Date: Tuesday, March 06, 2018 7:30:35 PM

Dr. Malone,

This is my 8th year to teach special education. I have always been in a high school but have taught self-contained, inclusion, occupational diploma (o.d.), learning strategies, etc. Currently, I teach learning strategies. I am very concerned about the criteria for Non-SCD to obtain a certificate of completion.

I work daily with students who would have been o.d., but are now having to meet the criteria for a regular diploma. While I think it is good to push students and have high expectations, what I am seeing will not have positive effects on the students. These students struggle to remember formulas, write papers with complete sentences, read books, keep up or even do homework, and follow basic math and grammar rules. Most were previously in resource rooms and now they are in a big class, some have inclusion teachers while others do not. Most of these students are failing English and/or math. The students will have to repeat classes and fall behind their peers. They try but do not have the academic skills to be successful. Educators need to be concerned about these students. Due to low grades and achievement their self-esteem will be lowered, which will lead to more drop-outs and discipline problems among other issues.

Mississippi needs to create a type of diploma between a certificate of completion and a regular diploma. Many of the students caught in between these two options have the ability to learn a skill and to be successful in high school classes. In order for the students to understand the material, their classes need to be slower, in small groups, curriculum modified at times, and lots of supports. Mississippi needs to offer more vocational skills classes to these students. I know my district does not have a large number of spots in the career tech program and most of the program areas are geared towards students going onto a two or four year program. Our state needs a trained work force. Many students are not college material, but we need to teach them the skills needed to be actively employed, live independently, and be a benefit to their community.

According to criteria 3, it would be the third school year of high school before students could be moved to certificate. It also states that teachers should have evidence of interventions, accommodations/modifications, and progress monitoring data from reading and/or math intervention programs. If these students were previously resourced, the data should be there. They have struggled most, if not all, of their educational careers. Previous IEPs, re-evaluations, testings, progress monitoring, and tier information should indicate they should not be pursuing a traditional diploma. Special education teachers are required to do an enormous amount of paperwork and to require more, that should already be in the student's file, is unnecessary. My district has had a difficult time finding qualified special education teachers and I know the overwhelming paperwork is a huge factor.

Public Comment for Certificate of Completion

1. While I understand that graduation rates for students with disabilities need to improve in our state, placing students with disabilities who are significantly behind their same age peers both academically and socially, yet not SCD, into general education classrooms for their high school career is setting them up for great frustration and for failure. Especially when these students have been educated primarily in special education settings for the majority of their educational experiences. The proposed requirements for the certificate of completion takes away the purpose of the IEP which is to provide students with educational services in their least restrictive environment. With the requirement of 16 years of age or older and at least 3 grade levels behind, this removes certificate of completion as an option for many students and thus eliminates a spectrum of services. It essentially leaves the alternate diploma and the traditional diploma as options for students.
2. Clarification is needed in the area of modifications to the general education courses/grading for students who are significantly below grade level and on the traditional diploma track. Will students who have modified grading and curriculum be awarded Carnegie units?
3. It has been our understanding that this goes into effect for the 2018-2019 school year and thus affects this year's 8th grade students. IEP committees and families need more time to digest and prepare for these proposed changes.

Brenda Shelby

From: Kitty Love
Sent: Friday, March 23, 2018 3:44 PM
To: Accreditation
Subject: My concerns about the Certificate of Completion of IEP

By its nature, an IEP creates standards that a student can meet. Those standards are based on the student's current skills and reasonable expectations for adequate growth; therefore, the standards may or may not be on grade level. A Certificate of Completion, then means the student is making adequate progress at his/her present level of performance: K-12.

A Certificate of Completion does not qualify a student for further instruction at the post-secondary level. The only occupations for those students are jobs that provide on-the-job training and earn minimum wage which is inadequate for supporting a comfortable lifestyle.

Appendix A-11MDE COC mentions Life Skills Courses and Career Preparation Courses, but there is no mention of a certificate of skill area for career. These students need some certification of marketable job skills. IEP course work will not convince the public sector to hire them.

We must find a way to ensure that those students who display good thinking and reasoning skills and the ability to learn and complete complicated tasks even though there are limited reading and math skills. They must have an option to continue their career training without a diploma.

As the Certificate of Completion exists now, it in no way prepares a student for life after high school even if they are capable of learning work skills.

Katherine B. Love, Teacher
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