

**OFFICE OF CHIEF ACCOUNTABILITY OFFICER**  
**Summary of State Board of Education Agenda Items**  
**Consent Agenda**  
**June 21, 2018**

**OFFICE OF DISTRICT AND SCHOOL PERFORMANCE**

- O. Deny approval to revise State Board Policy Chapter 36, Rule 36.4: Assessments Required for Graduation  
(Has cleared the Administrative Procedures Act process with public comments)

Background Information: In accordance with Mississippi Code Annotated § 37-16-7 and State Board Policy Chapter 36, Rule 36.4: Assessments Required for Graduation, each student must meet the minimum requirements established by the State Board of Education and its local board of education and in order to receive a high school diploma.

Process Standard 14.2, of the *Mississippi Public School Accountability Standards, 2018* states that each student receiving a standard diploma must achieve a passing score on each of the required end-of-course Subject Area Tests or meet one (1) of the options in lieu of a passing score in accordance with Miss. Code Ann. § 37-16-7 and State Board Policies, Chapter 36, Rules 36.2: Policies for Subject Area Testing and 36.4: Assessments Required for Graduation.

On June 16, 2016, the State Board of Education approved revisions to State Board Policy Chapter 36, Rule 36.4: Assessments Required for Graduation to remove passing an end-of-course Subject Area Tests as a requirement for graduation and incorporate the score on the applicable assessment into the final grade in the course effective the 2018-2019 school year.

Based on new standards and assessments for Biology I and U.S. History, a recommendation was made to revise Rule 36.4: Assessments Required for Graduation, to include phasing in four (4) end-of-course Subject Area Tests as follows:

- School Year 2018-2019: Algebra I and English II
- School Year 2020-2021: Biology I
- School Year 2021-2022: U.S. History

The proposed revisions were intended to provide guidance to the Local Educational Agencies (LEAs) regarding the assessments required for graduation and reestablishing the implementation of the assessment score constituting 25% of the student's final grade in the course.

On April 19, 2018, the State Board Education granted approval to begin the Administrative Procedures Act process to revise State Board Policy Chapter 36,

Rule 36.4: Assessments Required for Graduation. The public comment period was open through May 25, 2018, and 14 comments were received.

Based on the comments received, the Executive Leadership Team is recommending the revisions be denied and the proposed rule be withdrawn from the Secretary of State's Office.

Recommendation: Denial

Back-up material attached

## Chapter 36: Graduation Requirements

### Rule 36.4 Assessments Required for Graduation

1. All students enrolled in one of the four (4) end-of-course Subject Area Test courses **must** pass the course and participate in the applicable end-of-course Subject Area Test in order to earn the Carnegie Unit.
2. Beginning with school year 2014-2015, students shall graduate by passing the course and meeting **one** (1) of the following options:
  - Passing the applicable end-of-course Subject Area Test, or
  - Using options outlined in Chapter 36, Rule 36.5, or
  - Using the end-of-course Subject Area Test score with the overall course grade based on the Concordance Table for each of the four (4) end-of-course Subject Area Tests as provided to school districts by the Mississippi Department of Education. (Students must be enrolled in order to utilize this option.)
3. Beginning with school year 2015-2016, in addition to number two (2) above, all students enrolled may achieve a combined minimum score from the end-of-course Subject Area Tests to meet the requirement for graduation in lieu of passing the applicable end-of-course Subject Area Test.
4. Beginning with school year 2018-2019, all students who are enrolled in an end-of-course Subject Area Test course for the first time must participate in the assessment in order to earn the Carnegie Unit. The assessment score will constitute 25% of the student's final grade in the course.
5. Any Mississippi public school student who fails to pass a required end-of-course Subject Area Test, prior to school year 2016-2017, will be offered opportunities to retake the test.

### **Archived Information Regarding Chapter 36, Rule 36.4 for Students Graduating Prior to School Year 2014-2015:**

Academic end-of-course tests were phased in during the 2001-2002 school year to replace the Functional Literacy Examination (FLE) as a requirement for graduation.

1. Students who began 9th grade PRIOR to 1999-2000 must pass the Functional Literacy Examination (FLE).
2. Students who began 9th grade in school year 1999-2000 must pass the Functional Literacy Examination (FLE) plus the Subject Area Test in U.S. History.
3. Students who began 9th grade in school year 2000-2001 must pass the mathematics section of the FLE plus the Subject Area Tests in U.S. History and English II.
4. Students who began 9th grade in 2001-2002 must pass the mathematics section of the FLE plus the Subject Area Tests in U.S. History, English II, and Biology I.
5. Students who began 9<sup>th</sup> grade in 2002-2003 must pass the end-of-course Subject Area Tests in U. S. History, English II, Biology I, and Algebra I. Students who began 9<sup>th</sup> grade in 2003-2004 and each year thereafter must pass all required end-of-course Subject Area Tests in U.S. History, English II, Biology I, and Algebra I.

Source Code: MS Code 37-17-6, 37-16-7 (Revised 4/2016)



**Summary of Administrative Procedures Act (APA) Comments**  
**Revisions to State Board Policy Chapter 36, Rule 36.4: Assessments Required for Graduation**

The Office of Accountability received the following APA comments regarding revisions to State Board Policy Part 3, Chapter 36, Rule 36.4: Assessment Required for Graduation. Comments are summarized; complete submissions follow this table.

<b>Summary of Comment</b>
<p>“Some students are strong test takers, while others are not.” The proposed 25% grading policy “forces teachers and students to go back to learning how to beat a test rather than truly learn the skills needed to pass the assessment individually.”</p>
<p>“The most pressing concern that we have right now is the ability to have the state assessment scores returned in a timely manner in order to calculate final grades. Our high school is on a 4x4 block schedule, and testing lasts until the day students dismiss for Christmas. Spring schedules are determined by a student’s success in core courses during the Fall semester. We are concerned that there will either be an issue with scores not received in time, or assessments not truly scored (writing).” “Also, not all districts utilize the same grading scale.” Finally, students will not try their best on the state assessments and instead calculate the minimum required score needed to pass a course, resulting in a negative impact on the school and district accountability grade.</p>
<p>Adding the 25% policy would “have no accountability to monitor teachers inflating grades to compensate for struggling students. The overall integrity of our state assessment system would be compromised and would not truly provide meaningful feedback about students’ academic performance or assist districts/schools in refining their practices based on valid results.”</p>
<p>“Replacing the teacher-made final exam with the state assessment will remove the opportunity for the teacher to personalize instruction based on the students’ needs. It will also eliminate the opportunity for the teacher to provide meaningful feedback on student results.”</p>
<p>“Schools and districts have not been given the scale that will be used to convert the scores into grades. Carnegie units will be awarded in December for those courses completed during first semester which leaves school and districts at a disadvantage in communicating to students and parents the expectations for the course(s). We also have not been provided with guidance as to whether or not students would have to re-take both the test and the course if the average was not considered passing according to the district’s grading scale.”</p>
<p>“The logistics, timing, and relevance to how a student performed day to day in the classroom would be significant challenges to overcome. Teachers may experience confusion over the work that they do with students to help them master a sufficient portion of the content to pass only to have that work negated by a test they have little to no control over. Please consider NOT instituting this method of impacting the autonomy of a school and teacher by overreaching into the classroom beyond what is already done with the assessments required by the state of Mississippi.”</p>

**Summary of Administrative Procedures Act (APA) Comments**  
**Revisions to State Board Policy Chapter 36, Rule 36.4: Assessments Required for Graduation**

**Summary of Comment**

“PR disaster with parents. For example, our questions will be why is it 25% and this was not administered by the district? The timing of the return of the test grades. There is no way this can be done in a timely manner. Valedictorian and Salutatorian could be a real problem based of this. We need to keep it the same as it is now with the cut score. It keeps more pressure on the students they are more likely to perform at a higher level.”

“Please do not move testing windows to earlier dates in the school year. Teachers and students need as much time as possible to cover the curriculum content and prepare for high stakes assessments. Student interest after state assessments wanes, and it is important that educators be allowed to maximize instructional time.” Also, a timely return on state assessment results should be required.

“A student could suffer scholarship/rank-wise from a couple of bad questions on a state test. Should a state test really have an impact on a student’s GPA? How is making the state test part of a student’s grade BENEFITING the students in our state? No college or employer is ever going to ask my daughter how she did on her state tests. Where is our focus? I thought we were preparing our students for COLLEGE and CAREER? What does a state test have to do with college or a career?”

Instead of using the state assessment as 25% of their final average, the requirements for graduation should consist of the ACT and a passing grade in the course.

“I would recommend we have a practiced protocol of turning around state testing grades in a timely manner before we even think to issue an implementation schedule. 2018-19 needs to demonstrate that state tests can be "graded and scored" in a time frame to accommodate end of year exams in conjunction with report card distribution. Easy to say the state test counts 25% of a course grade but it is imperative that the score/grade is back to enter in teacher gradebooks to run report cards and for some seniors...it is their last gasp to graduate. If the time frames work for Algebra I and English II them proceed with implementation in 2019-20. Follow the same for Biology I and US History - just better to work out the kinks before setting policy in stone.”

“I wanted to voice a concern on the proposal for the subject area tests counting as 25% of the final grade for students. I do understand this logic and understand that other states probably have this process down. My concern is twofold. First, the concern is the ability of our testing vendors to get the scores back in time for schools to have them count as a final exam. Our limited feedback from parents in our district feel like it doesn’t make sense for someone besides the teacher to create a final exam. However, my bigger concern is the unintended consequence of grade inflation. I worry that there will be pressure on teachers across the state to keep grades artificially high so kids that do not score well on the state assessment will still be able to pass. I know we all would expect as professionals for this to never happen, but I worry in the name of graduation rates that this could become an unintended consequence.”

Fri 4/27/2018 10:19 AM

Janice McCullough [janicemccullough16@yahoo.com](mailto:janicemccullough16@yahoo.com)

APA Comment

To Whom It May Concern:

As a high school Mathematics teacher of 22 years, I would like to see requirements for graduation consist of the ACT and a passing grade in the course.

The math contained on the ACT is strenuous enough to test all the required mathematics of the high school curriculum.

At most, I would require a 70/C in the course and a 16-18 in Mathematics portion of the ACT to count as the graduation requirement.

These scores would set the average student at the edge of the College Algebra curriculum upon graduation from high school.

Each course should have a set grade and ACT sub-score requirement for graduation.

Sincerely,

Janice McCullough, M.Ed, NBCT  
Germantown High School  
Mathematics

**From:** Tom Duncan <[tduncan@simpson.k12.ms.us](mailto:tduncan@simpson.k12.ms.us)>

**Sent:** Friday, April 27, 2018 12:28:20 PM

**To:** Walt Drane

**Subject:** Re: [ms\_principals] APA Notices - Public Comment Through May 25, 2018

I would recommend we have a practiced protocol of turning around state testing grades in a timely manner before we even think to issue an implementation schedule. 2018-19 needs to demonstrate that state tests can be "graded and scored" in a time frame to accommodate end of year exams in conjunction with report card distribution. Easy to say the state test counts 25% of a course grade but it is imperative that the score/grade is back to enter in teacher gradebooks to run report cards and for some seniors...it is their last gasp to graduate. If the time frames work for Algebra I and English II then proceed with implementation in 2019-20. Follow the same for Biology I and US History - just better to work out the kinks before setting policy in stone.

Dr. Tom M. Duncan, Principal  
Magee High School  
501 East Choctaw Street  
Magee, MS 39111  
phone (601) 849-2263  
fax (601) 849-6201  
[tduncan@simpson.k12.ms.us](mailto:tduncan@simpson.k12.ms.us)

**GO TROJANS Respectful...Responsible...Ready**



From: Leslie Salter  
Sent: Thursday, April 26, 10:36  
Subject: Public Comment on the 25% rule  
To: Walt Drane

I need to speak to all of you as an EDUCATOR and a PARENT.

I am VERY concerned about 25% of a student's grade in a course being derived from our current state tests.

I reviewed the items teachers wrote for the biology state test. You asked teachers to come for 5 days straight, during the middle of the year, to write these items. Most GOOD teachers would not be comfortable leaving their students for 5 days in the middle of the year. I couldn't do it, and I don't even teach students! As a result, there were many content issues (questions not written to the standards, inappropriate difficulty levels, incorrect content assumptions, bias). I have no idea what the questions ended up looking like because we don't publish our tests like Texas and New York. Who is to say that the questions on the MAAP test are actually good questions? Who is evaluating this? For example, looking at the data from the December biology test, it is apparent to me that there was an issue with one of the water questions....2 questions on the test related to water, our district and the state average on water was 50%? I will never see that question to know for sure. And I know that on the math MAAP, some questions are statistically showing bad results (<15% in the state get the question right), and yet those questions are still counted? There are practice prompts for the English II test that are not even possible to answer.....and those are the examples we are given to use as a basis for what we do?

If less than 15 percent of the students in our state got a question right, is it the question or the teachers at fault? How would anyone know? If this was a teacher made exam, and less than 15 percent of the students got a question right, a good teacher would throw the question out. Either the material wasn't taught or it was a bad question.

If we are not willing to publish our tests to prove their validity, what are we saying?

We must get better at writing items for tests if we want to make them weighted to THIS extent, and as a state, we must be more TRANSPARENT with students and teachers. If we believe in our tests, we should publish them. Then, people would believe in the process....right now, as it is, I don't even believe in our tests, and I have helped to evaluate them for years.

Potentially, a student could suffer scholarship/rank-wise from a couple of bad questions on a state test. Should a state test really have an impact on a student's GPA?

How is making the state test part of a student's grade BENEFITING the students in our state?

No college or employer is ever going to ask my daughter how she did on her state tests. Where is our focus? I thought we were preparing our students for COLLEGE and CAREER? What does a state test have to do with college or a career?

Thank you,  
Leslie Salter, M.Ed., NBCT  
Science Curriculum Coordinator

228-219-0213

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Mon 5/7/2018 3:37 PM

Lundy Brantley <lbrantley@neshobacentral.com>

APA Comment

I have great concerns about the 25% rule:

- PR disaster with parents. For example, our questions will be why is it 25% and this was not administered by the district?
- The timing of the return of the test grades. There is no way this can be done in a timely manner.
- Valedictorian and Salutatorian could be a real problem based on this.
- We need to keep it the same as it is now with the cut score. It keeps more pressure on the students they are more likely to perform at a higher level.

Dr. Lundy Brantley  
Superintendent  
Neshoba County Schools  
#OneNeshoba  
228-219-0213

**Confidentiality Notice:** This communication may contain material protected by the Family Educational Rights and Privacy Act (FERPA.) This communication and any documents or files transmitted with it are confidential and are intended solely for the use of the Pascagoula-Gautier School District and the individual or entity to which it is addressed. Any use, dissemination, forwarding, printing or copying of this communication is strictly prohibited.

Tue 5/8/2018 10:41 AM

Teresa Loper [teresa.loper@petalschools.com](mailto:teresa.loper@petalschools.com)

APA Comment

To Whom It May Concern:

While counting state tests as 25% of student averages in Algebra 1, Biology, English 10, and US History helps ensure students' accountability, I firmly believe that the State School Board should still consider setting a low-threshold minimum cut score for passing each assessment in order to ensure that these four core classes are taught with rigor and integrity in each school district throughout the state.

If the School Board chooses to adopt this policy as is, please consider the following items when scheduling MAAP assessments:

1. Please do not move testing windows to earlier dates in the school year. Teachers and students need as much time as possible to cover curriculum content and prepare for high stakes assessments. Student interest after state assessments wanes, and it is important that educators be allowed to maximize instructional time.
2. Students deserve to know whether or not they have received credit for a course when the school year ends. If Questar can not offer a quick turn around on test score data for students (3-5 days), then the School Board should review its proposal or insist on this feature in the assessment contract with Questar.

Thank you for considering these opinions. I appreciate the opportunity to voice my viewpoint.

Sincerely,

Teresa Loper

—  
Teresa Loper  
Petal High School  
Mathematics Department  
601-583-3538

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**From:** Linda Smith <[lsmith@lumberton.k12.ms.us](mailto:lsmith@lumberton.k12.ms.us)>  
**Sent:** Monday, May 21, 2018 12:18 PM  
**To:** Walt Drane <[WDrane@mdek12.org](mailto:WDrane@mdek12.org)>  
**Subject:** APA for HS Exit tests

Walt,

I am writing to express concern over the proposal that would require the state assessments to count 25% of a student's grade. The logistics, timing, and relevance to how a student performed day to day in the classroom would be significant challenges to overcome. Teachers may experience confusion over the work that they do with students to help them master a sufficient portion of the content to pass only to have that work negated by a test they have little to no control over. Please consider NOT instituting this method of impacting the autonomy of a school and teacher by overreaching into the classroom beyond what is already done with the assessments required by the state of Mississippi. Please encourage the State Board to reconsider this idea and eliminate it all together. Thank you for your consideration of this request.

Linda L. Smith, Ph.D.  
Superintendent  
Lumberton Public School District  
601-796-2441



# *Forrest County Agricultural High School*

215 Old Highway 49 East, Brooklyn, MS 39425

Phone: (601) 582-4102

Fax: (601) 545-9483

**Donna H. Boone, Ph.D.**  
**Superintendent**

**Charles B. Johnson**  
**Principal**

May 24, 2018

Dr. Paula Vanderford, Chief Accountability Officer  
Mississippi Department of Education  
P.O. Box 771  
Jackson, MS 39205

Dear Dr. Vanderford:

As we plan for the opening of school in August for the 2018-19 school year, I would like to present to you justification as to the reasons why the State Board of Education and the Mississippi Department of Education need to reconsider the timeline to factor End of Course assessment scores into grades for high school students beginning in the 2018-2019 school year.

For schools that are on block schedule, this change will be implemented with the November/December testing cycle. Schools and school districts have not been given the scale that will be used to convert the scores into grades. Carnegie units will be awarded in December for those courses completed during first semester which leaves schools and districts at a disadvantage in communicating to students and parents the expectations for the course(s). We also have not been provided with guidance as to whether or not students would have to re-take both the test and the course if the average was not considered passing according to the district's grading scale. This would be another piece of communication that parents would need to know.

Currently, schools and school districts know what score constitutes passing for a student. But once an arbitrary grade has been assigned to a scale score, the game changes. Each school district sets its own grading scale so what was once a passing score on the test may constitute passing in one district while not passing in another once it is calculated in the grade for the course. I am not sure the equity of this policy has thoroughly been considered.

While I am not suggesting that we shouldn't factor the score into the grade for the course, what I am suggesting is that more information needs to be collected and considered. Once that has occurred, there needs to be time for the change to be communicated to parents and students far in advance of its impact. I respectfully request that the State Board of Education and the Mississippi Department of Education reconsider the current timeline for implementation.

Thank you for your consideration.

Respectfully,

A handwritten signature in blue ink that reads "Donna H. Boone". The signature is written in a cursive style with a large, prominent initial "D".

Donna H. Boone, Ph.D.  
Superintendent

# **Ocean Springs High School** **An International Baccalaureate World School**

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Vickie J. Tiblier, Ph.D., Principal  
6701 Old Spanish Trail • Ocean Springs, MS 39564  
Phone: (228) 875-0333 • Fax: (228) 875-7404

May 23, 2018

Walt Drane  
Office of Assessment and Performance  
359 N. West Street  
Post Office Box 771  
Jackson, MS 39205-0771

Dear Mr. Drane:

Please accept this letter as a note of concern regarding the changing of State Board Policy Chapter 36, Rule 36.4 to include the phasing in of the four end of course assessments to count as 25% of the course grade. As a current English II teacher with a Master's Degree in Instructional Design and Development, it is with utmost respect that I ask you to reconsider the course assessments to count as 25% of the course grade to prohibit a storm cloud from forming over your respectable teachers.

Over the years of teaching, I have had to adapt my teaching methods to every type of learner—from an ELL learner struggling to learn English as a second language to the most superior student who scores advanced on every assessment. By putting the course assessment to count as 25% of a student's grade, we are hindering both the teachers and the students in the classroom. Yes, the state test assessment is important. Yes, students DO need to illustrate what they have learned in a formal assessment similar to what they will be asked to do in their careers. However, not all students are great test takers. If we put this change into motion, we are forcing teachers and students to go back to learning how to beat a test rather than truly learning the skills needed to pass the assessment individually.

Some students are strong test takers with limited classroom skills while other students have strong classroom skills but struggle with test taking in a timed setting. Yes, we are preparing students for the English II test; however, we are also preparing them for the world. We must keep the state assessment and the classroom grade separated. Teachers struggle consistently to keep students engaged and motivated about learning. By high school, many students have lost their motivation because instead of enjoying their learning and expressing their intelligence of creativity in various ways, we limit them to testing, testing, testing. Tests are important to an extent; however, students have to enjoy learning. When students enjoy learning, they are more apt to take learning into their own hands because they will see the relevance their learning has on their future. The fact is that when students are given state test practice, assessments, and lessons all of the time, they lose their motivation in seeing learning as a tool for their future selves; they see learning as a storm cloud they can never find shelter from. Teachers are faced with the obstacle every day to make learning fun while also teaching the state test material with limited time in the classroom. So, the question is, Why should we take more and more away from our teachers and students by making learning ALL about testing? Is this what we are preparing them for in the real world? Or, are we preparing them to be self-motivated learners in their chosen field of study and have the mentality that learning is the key to being innovative and progressive in their lives?

In a career, students will be held accountable to yearly assessments (evaluations) or maintaining their credentials or validating certifications in their field of study. So, why I DO agree with holding them accountable for their learning, I also believe in helping students prepare themselves for the real world by figuring out who they are individually while they are in school. We have to have the ability to allow students to express themselves and to show their teacher what they can do. The only way we can accurately guide students down the right path in life is to not take time and teaching away from the teacher's themselves. Teachers must be given the freedom to teach and put their trained skills to use without the 25% rain cloud storming on top of them each and every day. The state test is proof enough that students have learned the skills they need.

Thank you for your time and attention in this policy review. I respectfully request that the State Board of Education forego this change in the assessment and accountability system.

Sincerely,  
Mrs. Shonda Bourn, MS. in IDD/PI  
English Department  
*Ocean Springs High School*  
District Google Trainer/Model Technology Coordinator





# Ocean Springs School District

2300 Government Street (39564)  
Post Office Box 7002 (39566-7002)  
Ocean Springs, Mississippi  
Phone (228) 875-7706

*Christopher J. Williams, Sr. Ph.D*  
Assistant Superintendent

May 24, 2018

Walt Drane  
Office of Assessment and Performance  
359 N. West Street  
Post Office Box 771  
Jackson, MS 39205-0771

Dear Mr. Drane,

Please accept this letter in response to the changing of State Board Policy Chapter 36, Rule 36.4 to include the phasing in of the four end of course assessments to count as 25% of the course grade. It is with great concern that we respond.

The most pressing concern that we have right now is the ability to have the state assessment scores returned in a timely manner in order to calculate final grades. Our high school is on a 4x4 block schedule, and testing lasts until the day students dismiss for Christmas. Spring semester schedules are determined by a student's success in core courses during the Fall semester. The grades must be finalized prior to dismissal in order to ensure students are placed in the needed courses. For Spring semester, course grades must be finalized before teachers are dismissed for the summer, which is usually only days after the end of state assessments. We know it takes some time to not only score the assessments (especially English II--Writing) but to also calculate the scaled scores. We are concerned that there will either be an issue with scores not received in time or assessments not truly scored (writing).

In addition, not all school districts have the same grading scale. Utilizing the state assessment as 25% of a course final grade will not have the same effect in every district. With the change, a student must no longer "pass" the state assessment; he must pass the course. In districts with a 10 point grading scale, the final average of 60 is considered passing. However, in districts with a different scale, a final average of 69 is considered passing. Equity will not exist. High school students are focused on the final goal--graduation. With the change, as long as they pass a course, they will graduate. However, what is to stop a student from calculating the minimum required score to pass a course--effectively negatively impacting accountability since the model focuses on proficiency? Teachers see this behavior daily in their classrooms where students calculate their required score to maintain their course grade. With this change, the accountability model becomes invalid because we can no longer depend on students to perform at their best ability.

Thank you for considering our concerns and we respectfully request that the State Board of Education abandon the proposed change in the assessment and accountability system.

Sincerely,

A handwritten signature in blue ink, reading "Christopher J. Williams, Sr." with a stylized flourish.

Christopher J. Williams, Sr., Ph.D.  
Assistant Superintendent of Curriculum & Instruction



## Ocean Springs School District

2300 Government Street (39564)  
Post Office Box 7002 (39566-7002)  
Ocean Springs, Mississippi  
Phone (228) 875-7706

Lori Brennan  
Literacy Curriculum  
Coordinator & Assistant  
District Test Coordinator

May 24, 2018

Walt Drane  
Office of Assessment and Performance  
359 N. West Street  
Post Office Box 771  
Jackson, MS 39205-0771

Dear Mr. Drane,

Please accept this letter in response to the changing of State Board Policy Chapter 36, Rule 36.4 to include the phasing in of the four end of course assessments to count as 25% of the course grade. It is with great concern that we respond.

The most pressing concern that we have right now is the ability to have the state assessment scores returned in a timely manner in order to calculate final grades. Our high school is on a 4x4 block schedule, and testing lasts until the day students dismiss for Christmas. Spring semester schedules are determined by a student's success in core courses during the Fall semester. The grades must be finalized prior to dismissal in order to ensure students are placed in the needed courses. For Spring semester, course grades must be finalized before teachers are dismissed for the summer, which is usually only days after the end of state assessments. We know it takes some time to not only score the assessments (especially English II--Writing) but to also calculate the scaled scores. We are concerned that there will either be an issue with scores not received in time or assessments not truly scored (writing).

In addition, not all school districts have the same grading scale. Utilizing the state assessment as 25% of a course final grade will not have the same effect in every district. With the change, a student must no longer "pass" the state assessment; he must pass the course. In districts with a 10 point grading scale, the final average of 60 is considered passing. However, in districts with a different scale, a final average of 69 is considered passing. Equity will not exist. High school students are focused on the final goal--graduation. With the change, as long as they pass a course, they will graduate. However, what is to stop a student from calculating the minimum required score to pass a course--effectively negatively impacting accountability since the model focuses on proficiency? Teachers see this behavior daily in their classrooms where students calculate their required score to maintain their course grade. With this change, the accountability model becomes invalid because we can no longer depend on students to perform at their best ability.

Thank you for considering our concerns and we respectfully request that the State Board of Education abandon the proposed change in the assessment and accountability system.

Sincerely,

A handwritten signature in blue ink that reads "Lori Brennan".

Mrs. Lori Brennan  
Literacy Curriculum Coordinator & Assistant District Testing Coordinator

 **Ocean Springs High School**   
**An International Baccalaureate World School**

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Vickie J. Tiblier, Ph.D., Principal  
6701 Old Spanish Trail • Ocean Springs, MS 39564  
Phone: (228) 875-0333 • Fax: (228) 875-7404

May 25, 2018

Walt Drane  
Office of Assessment and Performance  
359 N. West Street  
Post Office Box 771  
Jackson, MS 39205-0771

Dear Mr. Drane:

Please accept this letter as a note of concern regarding the changing of State Board Policy Chapter 36, Rule 36.4 to include the phasing in of the four end of course assessments to count as 25% of the course grade. It is with utmost respect that I ask you to reconsider the course assessments to count as 25% of the course grade to prohibit a storm cloud from forming over our hard working teachers.

Over the years, teachers have had to adapt their teaching methods to every type of learner—from an ELL learner struggling to learn English as a second language to the most superior student who scores advanced on every assessment. By putting the end of course assessment to count as 25% of a student's grade, we are hindering both the teachers and the students in the classroom. Yes, the state test assessment is important. Yes, students DO need to illustrate what they have learned in a formal assessment similar to what they will be asked to do in the future. However, not all students are great test takers. If we put this change into motion, we are forcing teachers and students to go back to focusing on a test rather than truly learning the skills needed to show competency for everyone in the course. Moreover, it would have no accountability to monitor teachers inflating grades to compensate for struggling students. The overall integrity of our state assessment system would be compromised and would not truly provide meaningful feedback about students' academic performance or assist districts/schools in refining their practices based on valid results.

In addition, given the fact that district grading scales vary widely and that in some districts, students cannot receive a grade lower than a 50 or a 60, how will MDE mitigate the variance of the scores assigned and the impact on the final grades? Teachers must be given the freedom to teach and put their trained skills to use without the 25% of their course resting on a test. When the final exam is the same for every student in the state, it will invariably impede our highly skilled instructors from bringing forth the very creativity that we embrace. The risks are simply too great and will create additional challenges to the state's accountability model which diminish the hard work of MS teachers and students.

Thank you for your time and attention in this review. I respectfully request that the State Board of Education forego this change in the assessment and accountability system.

Sincerely,

Vickie J. Tiblier, Ph.D  
Ocean Springs High School, Principal



## Ocean Springs School District

2300 Government Street (39564)  
Post Office Box 7002 (39566-7002)  
Ocean Springs, Mississippi  
Phone (228) 875-7706

Susan Jarvis  
Math/Science Curriculum  
Coordinator

May 24, 2018

Walt Drane  
Office of Assessment and Performance  
359 N. West Street  
Post Office Box 771  
Jackson, MS 39205-0771

Dear Mr. Drane,

Please accept this letter in response to the changing of State Board Policy Chapter 36, Rule 36.4 to include the phasing in of the four end of course assessments to count as 25% of the course grade. It is with great concern that we respond.

The most pressing concern that we have right now is the ability to have the state assessment scores returned in a timely manner in order to calculate final grades. Our high school is on a 4x4 block schedule, and testing lasts until the day students dismiss for Christmas. Spring semester schedules are determined by a student's success in core courses during the Fall semester. The grades must be finalized prior to dismissal in order to ensure students are placed in the needed courses. For Spring semester, course grades must be finalized before teachers are dismissed for the summer, which is usually only days after the end of state assessments. We know it takes some time to not only score the assessments (especially English II--Writing) but to also calculate the scaled scores. We are concerned that there will either be an issue with scores not received in time or assessments not truly scored (writing).

In addition, not all school districts have the same grading scale. Utilizing the state assessment as 25% of a course final grade will not have the same effect in every district. With the change, a student must no longer "pass" the state assessment; he must pass the course. In districts with a 10 point grading scale, the final average of 60 is considered passing. However, in districts with a different scale, a final average of 69 is considered passing. Equity will not exist. High school students are focused on the final goal--graduation. With the change, as long as they pass a course, they will graduate. However, what is to stop a student from calculating the minimum required score to pass a course--effectively negatively impacting accountability since the model focuses on proficiency? Teachers see this behavior daily in their classrooms where students calculate their required score to maintain their course grade. With this change, the accountability model becomes invalid because we can no longer depend on students to perform at their best ability.

Thank you for considering our concerns and we respectfully request that the State Board of Education abandon the proposed change in the assessment and accountability system.

Sincerely,

A handwritten signature in cursive script that reads "Susan Jarvis".

Mrs. Susan Jarvis

Math/Science Curriculum Coordinator

# Ocean Springs Middle School

3600 Hanshaw Road

P.O. Box 7002

Ocean Springs, MS

39566-7002



Adelle Register, Principal  
Gina Alford, Asst. Principal  
Aldo Moran, Asst. Principal

May 25, 2018

Mr. Walt Drane  
Office of District and School Performance  
359 N. West Street  
Post Office Box 771  
Jackson, MS 39205-0771

Re: State Board Policy Chapter 36, Rule 36.4: Assessment Required for Graduation

Dear Mr. Drane,

As we implement the new graduation requirements for 2018-2019 school year, I would like to present for your consideration to reconsider the revision in State Board Policy Chapter 36, Rule 36.4: Assessments Required for Graduation. It is with great concern that several components need to be taken into consideration with this revision.

In order to calculate final grades and determine appropriate courses for 4x4 block schedules for both Fall and Spring courses state assessment scores need to be returned in a timely manner. There is great concern that adequate time for the return of the state assessment will not be provided. This will hinder school districts and compromise final grade calculations. In addition, many districts follow different grading scales that will impact the equity of grade distribution when including the state assessment score into course grade. Lastly, replacing the teacher-made final exam with state assessment will remove the opportunity for the teacher to personalize instruction based on the students' needs. It will also eliminate the opportunity for the teacher to provide meaningful feedback on student results. While students will receive minimal explanation via a score report on the state assessment, they are not tailored to the individual student.

I respectfully ask for your consideration to forego this change in State Board Policy Chapter 36, Rule 36.4. I appreciate you listening to our concerns.

Sincerely,

Adelle Register  
Principal  
Ocean Springs Middle School

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**From:** Morgigno, Ray <rmorgigno@pearl.k12.ms.us>  
**Sent:** Tuesday, May 29, 2018 2:25 PM  
**To:** Accountability  
**Subject:** APA Comments on Subject Area Tests 25%

Hey Walt,

I wanted to voice a concern on the proposal for the subject area tests counting as 25% of the final grade for students. I do understand this logic and understand that other states probably have this process down. My concern is twofold. First, the concern is the ability of our testing vendors to get the scores back in time for schools to have them count as a final exam. Our limited feedback from parents in our district feel like it doesn't make sense for someone besides the teacher to create a final exam. However, my bigger concern is the unintended consequence of grade inflation. I worry that there will be pressure on teachers across the state to keep grades artificially high so kids that do not score well on the state assessment will still be able to pass. I know we all would expect as professionals for this to never happen, but I worry in the name of graduation rates that this could become an unintended consequence. Hopefully I will be wrong on this concern.

Thanks,

Raymond C. Morgigno, Ph.D.  
Superintendent, Pearl Public School District  
(601) 932-7916